

Answer of Garnishee
Bakkt Financial Solutions I, LLC

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,	
Plaintiff,	
v.	Case No. SA-26-CR-00038-FB
DEVIN WARD ELDER,	
Defendant,	
and	
BAKKT FINANCIAL SOLUTIONS I, LLC	
(f/k/a BAKKT CRYPTO SOLUTIONS, LLC),	
Garnishee.	

ANSWER OF THE GARNISHEE

Marc D'Annunzio, Affiant, being duly sworn, deposes and says:

That he is the General Counsel & Secretary of Bakkt Financial Solutions I, LLC f/k/a Bakkt Crypto Solutions, LLC, Garnishee, a limited liability company organized under the laws of the State of Delaware.

On or about June 29, 2026, Garnishee received the Writ of Garnishment as stated on the Certificate of Service.

- A. The Garnishee has custody, control, or possession of the following property in which Devin Ward Elder maintains or may maintain an interest, as described below. The information below is based on Bakkt's records as of July 20, 2026. As of July 20, 2026, all accounts listed below were suspended and trade restricted.**

No.	Description of Property	Approx. Value as of July 20, 2026	Description of Debtor's Interest
1.	Entity account for DJE Properties LLC ; custodial identifier b267c740-ee60-4834-a569-ba135cbcd93a ; account identified as not active, with documents not received for the entity, and migrated with Swan.	Crypto: approximately \$4,350 Cash: approximately \$76	Entity account associated with Devin Ward Elder.
2.	Entity account for DJE Texas Management Group LLC ; custodial identifier a0115116-479e-4edc-85e7-d01d8de30cf7 .	Crypto: approximately \$63,590 Cash: approximately \$560	Entity account identified as 100% owned by Devin Elder.

	Entity account for DJE Equity 01 LLC ; custodial identifier 70ae0a1b-1efe-40ae-beb5-0c9d4b38ccd2 ; account identified as not active, with documents not received for the entity, and migrated with Swan.		
3.		Crypto: \$0 Cash: \$0	Entity account associated with Devin Ward Elder.
4.	Entity account for The DJE Foundation Limited ; custodial identifier be346a4b-9a83-470b-a919-dc83acb7646e .	Crypto: \$0 Cash: approximately \$105	Entity account associated with Devin Ward Elder.

B. Garnishee anticipates owing to Defendant in the future the following amount:

No.	Amount	Estimated Date or Period Due
1.	\$0	Not applicable. The accounts identified above are suspended and trade restricted.
2.	\$0	Not applicable.

The Garnishee makes no claim of exemption on behalf of Defendant.

The Garnishee has no objections, defenses, or set-offs to Plaintiff's right to apply Garnishee's indebtedness to Defendant upon Plaintiff's claim.

C. State date, type, and amount of last transaction, including deposits, withdrawals, and account closings:

No.	Date	Type	Amount
1. b267c740-ee60-4834-a569-ba135cbcd93a	12/26/2024	Allocation - account migrated	\$76.00 USD and 0.06679972 Bitcoin
2. a0115116-479e-4edc-85e7-d01d8de30cf7	12/26/2024	Allocation - account migrated	\$560.00 USD and 1.05536111 Bitcoin
3. 70ae0a1b-1efe-40ae-beb5-0c9d4b38ccd2	03/06/2025	Coin withdrawal	0.06738301 Bitcoin
4. be346a4b-9a83-470b-a919-dc83acb7646e	05/16/2025	Coin withdrawal	0.13609609 Bitcoin

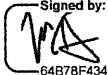
D. Has the individual closed any accounts with your institution in the last 12 months?

Not applicable. Defendant's accounts were migrated, and therefore none of Defendant's accounts at Bakkt were ever "closed."

The Garnishee mailed a copy of this Answer by first-class mail to Defendant Devin Ward Elder, c/o John Gilmore, Goldstein & Orr, 315 E. Commerce St., #301, San Antonio, Texas 78205, attorney for Devin Ward Elder, and to the Financial Litigation Unit, USAO-WDTX, Attn: AUSA Steven E. Seward, 601 N.W. Loop 410, Suite 600, San Antonio, Texas 78216, on this 2 day of September, 2026.

GARNISHEE:

BAKKT FINANCIAL SOLUTIONS I, LLC f/k/a BAKKT CRYPTO SOLUTIONS, LLC

By:  Signed by:
64B78F434FDD473

Marc D'Annunzio, General Counsel & Secretary

Garnishee Printed Name: Marc D'Annunzio

Title: General Counsel & Secretary

Address: 3280 Peachtree Road NE, Suites 07-128, 07-130, and 07-132 Atlanta, Georgia

Email: legal-notices@bakkt.com

NOTARY ACKNOWLEDGMENT

Subscribed and sworn to before me this 2 day of September, 2026.

Notary Public



My commission expires: 12/13/2027

