

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:26-24485-Civ-ALTMAN

ARON REYNOLDS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CITADEL SECURITIES LLC and VIRTU
AMERICAS LLC,

Defendants.

CLASS ACTION

**DECLARATION OF NATHAN C. ZIPPERIAN IN SUPPORT OF MOTION OF
MOVANT JORDAN DARIO PRIMO FOR APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF COUNSEL**

I, Nathan C. Zipperian, hereby declare as follows:

1. I am a partner at Miller Shah LLP (“Miller Shah”), counsel on behalf of Jordan Dario Primo (“Primo”), and have personal knowledge of the facts set forth herein. I make this Declaration in support of Primo’s motion for appointment as Lead Plaintiff for the Class in the above-captioned action (the “Action”) and approval of his selection of Pomerantz LLP (“Pomerantz”) as Lead Counsel and Miller Shah as Liaison Counsel for the Class.

2. Attached hereto as the exhibits indicated are true and correct copies of the following:

- Exhibit A: Chart setting forth Primo’s financial interest in this litigation;
- Exhibit B: Shareholder Certification executed by Primo;
- Exhibit C: Press release published via *Business Wire* on June 29, 2026, announcing the pendency of the Action;
- Exhibit D: Declaration executed by Primo;
- Exhibit E: Firm resume of Pomerantz; and
- Exhibit F: Firm resume of Miller Shah.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on August 28, 2026.

/s/ Nathan C. Zipperian
Nathan C. Zipperian

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2026, I electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via CM/ECF.

/s/ Nathan C. Zipperian

Nathan C. Zipperian