

# Exhibit 1

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA, *ex rel.*  
PAUL PIETSCHNER,

v.

KATHRYN PETRALIA, ROBERT  
FROHWEIN, and SPENCER ROBINSON.

Case No. 4:21-cv-110-SDJ

**DECLARATION OF ROBERT FROHWEIN  
IN SUPPORT OF HIS MOTION TO DISMISS**

I, Robert Frohwein, hereby declare as follows:

1. From August 1996 until February 2022, I lived and worked in Atlanta, Georgia. In February 2022, I relocated to California, where I presently live, work, and intend to remain. I have never lived, worked, or owned property in Texas.

2. I do not presently transact business in Texas, nor did I when the above-captioned complaint was filed.

3. To the best of my recollection, knowledge, and belief, while I was employed by Kabbage, I never had any communications with Paycheck Protection Program (“PPP”) borrowers in Texas, nor did I review or approve any loan applications for PPP borrowers in Texas.

I declare under penalty of perjury that the foregoing is true and correct to the best of my recollection, knowledge, and belief.

Executed on March 6, 2025, at Saratoga, CA.

A handwritten signature in black ink, appearing to read "Frohwein", written over a horizontal line.

Robert Frohwein