

EXHIBIT 3

Defendant's Declaration Under Penalty of Perjury

UNSWORN DECLARATION OF BRANDON MCGIVERN

STATE OF ILLINOIS, COUNTY OF COOK

I, BRANDON MCGIVERN, declare under penalty of perjury under the laws of the State of Illinois that the following is true and correct:

1. I am over eighteen (18) years of age, have personal knowledge of the facts stated herein, and am the record owner of 6122 N Winthrop Ave Unit C, Chicago, Illinois 60660.
2. I created the equity tracking document titled "6122 Winthrop - Tenant Equity" in Google Docs and shared it with Kyle Hadley (kylewhadley@gmail.com) on May 13, 2024, at 8:20:50 PM.
3. My last edit to this document while sharing with Mr. Hadley was August 19, 2024, at 2:44 PM.
4. I made NO EDITS to the document between August 19, 2024, and January 30, 2025, when I revoked Mr. Hadley's access at 12:45:29 PM.
5. My next edit was February 14, 2025, at 5:52 PM - after access revocation.
6. Plaintiff's Exhibit B contains fabricated entries dated September 2024 through May 2025 that I did not create and that did not exist when Mr. Hadley had access to the document.
7. Plaintiff's Exhibit B falsely shows the purchase price as \$300,000. The actual agreed price was \$320,000, as confirmed by my July 29, 2024 letter and Mr. Hadley's own February 14, 2025 email.
8. The Google Docs version history attached as Exhibits 1 and 2 proves these falsifications are technically impossible given the documented timeline of document access and edits.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 31 2025, in Chicago, Illinois

/s/ Brandon McGivern

BRANDON MCGIVERN

Defendant