

Exhibit 170

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

RIPPLE LABS, INC.,
BRADLEY GARLINGHOUSE,
and CHRISTIAN A. LARSEN,

Defendants.

Case No. 1:20-CV-10832 (AT)

**DECLARATION OF KRISTINA CAMPBELL SUPPORTING DEFENDANTS’
OPPOSITION TO THE SEC’S MOTION FOR SUMMARY JUDGMENT**

I, Kristina Campbell, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Chief Financial Officer (“CFO”) of Ripple Labs Inc. (“Ripple” or the “Company”) and have held this position since April 2021. I make this declaration based on my personal knowledge and on information made known to me in the course of my duties at Ripple. If called to testify, I would testify competently to them.

2. In my capacity as Ripple’s CFO, I am the Company’s most senior financial officer. I report to Ripple’s Chief Executive Officer (“CEO”) and I advise the CEO and Board of Directors on the Company’s financial condition and financing efforts. I oversee a team of finance and accounting professionals, who report to me. As CFO, I am primarily responsible for, among other things, preparing reports of the Company’s financial condition, including balance sheets and cash flow statements; generating financial forecasts and models of anticipated revenues and expenses; securing financing from equity and debt investors; investor relations; and

reporting information to Ripple's independent auditors to prepare the Company's annual audited financial statements.

3. At various times between 2013 and 2020, a variety of Ripple subsidiaries sold XRP. Examples include Ripple Markets DE LLC (formerly known as XRP II, LLC) and Ripple Markets Inc.

4. Each Ripple subsidiary that sold XRP at various times maintained a separate bank, digital asset exchange or XRP Ledger account to receive proceeds from its XRP sales. Each Ripple subsidiary that sold XRP deposited or received revenues from its sales of XRP into its own separate account.

Dated: October 16, 2022
Los Angeles, CA

By:



Kristina Campbell

RIPPLE LABS INC.