

INTERROGATORY NO. 1. Do you or have you had in the past two years, whether held by you or for your benefit, any of the following:

- A. Balances on any money transfer software applications including but not limited to Paypal, Dwolla, venmo, cashapp, held in your name or for your benefit.
- B. Virtual Currencies including but not limited to airline miles, mileage points or online game currency held in your name or for your benefit.
- C. Digital Currencies including but not limited to Bitcoin, Ethereum and Ripple, held in your name or for your benefit.

ANSWER NO. 1.

INTERROGATORY NO. 2. If you answered “yes” to any of the questions in the preceding interrogatory, please provide the following information for each of said balances or currencies:

- A. Type of Account/Software Currency
- B. Name and Address of Institution/Account Manager/Software
- C. Account Number/Wallet Address
- D. Present Balance
- E. Present Value in USD (\$)
- F. When Obtained
- G. Username, Password, Private Key

ANSWER NO. 2.

INTERROGATORY NO. 3. Identify any people or business with whom you have transacted in the past two (2) years to send or receive any money or monetary value through payment applications, virtual currencies or digital currencies, including but not limited to purchases, online exchanges, automated teller machines, online services or local businesses.

ANSWER NO. 3.

INTERROGATORY NO. 4. For each person or business listed in the preceding interrogatory, please provide the following information:

- A. When the transaction(s) took place.
- B. What was obtained by your in the transaction.
- C. What payment application or currency was used.
- D. What number of units of the currency were involved.

ANSWER NO. 4.

INTERROGATORY NO. 5. Do you or have you in the past two (2) years stored any virtual currencies, digital currencies, payment applications or any related information (including items such as Bitcoin, Wallet, or venmo software) on any computer, phone or portable storage devices you possess?

ANSWER NO. 5.

REQUEST NO. 1: Please provide all electronically stored information regarding any payment application, virtual currency or digital currency, in your possession or held by someone else for your benefit including, but not limited to, Bitcoin wallets, venmo software or frequent flyer miles.

RESPONSE NO. 1:

REQUEST NO. 2: Please provide all documents or electronically stored information with account transaction histories regarding any application, virtual currency or digital currency, including, but not limited to, any lists of transactions with any online exchanges or phone software.

RESPONSE NO. 2:

REQUEST NO. 3: Please provide any documents you provided to the IRS or any state tax authority regarding virtual currencies or digital currencies, including, but not limited to, reporting of foreign accounts and reporting of capital gains.

RESPONSE NO. 3: