

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

JEREMY SPENCE,

Defendant.

Case No. 21–CV–699

ECF Case

**COMPLAINT FOR INJUNCTIVE  
AND OTHER EQUITABLE RELIEF  
AND FOR CIVIL MONETARY  
PENALTIES UNDER THE  
COMMODITY EXCHANGE ACT  
AND COMMISSION REGULATIONS**

**JURY TRIAL DEMANDED**

**I. INTRODUCTION**

1. From at least in or around December 2017 through at least in or around April 2019 (the “Relevant Period”), Jeremy Spence (“Spence” or “Defendant”), doing business under the name “Coin Signals,” operated a virtual currency Ponzi scheme in which he fraudulently solicited individuals to invest funds in various pools that traded virtual currencies such as bitcoin and ether, each a commodity in interstate commerce. During the Relevant Period, Defendant obtained virtual currencies such as bitcoin and ether, worth more than \$5 million from individuals (“customers”) comprising approximately 175 user accounts through fraudulent solicitations involving misrepresentations of, among other things, his trading record, assets under management, and highly profitable returns. In fact, as Defendant himself has admitted, Defendant’s trading resulted in significant trading losses, and Defendant caused false performance reports to be provided to customers. As in all Ponzi schemes, Defendant’s payouts of supposed profits to customers in actuality consisted of other customers’ misappropriated funds.

2. Through this conduct, Defendant has engaged, is engaging, or is about to engage in fraudulent acts and practices in violation of the Commodity Exchange Act (“Act”),

7 U.S.C. §§ 1–26 (2018), and Commission Regulations (“Regulations”), 17 C.F.R. pts. 1–190 (2020), specifically Section 6(c)(1) of the Act, 7 U.S.C. § 9(1) (2018), and Regulation 180.1(a), 17 C.F.R. § 180.1(a) (2020).

3. Accordingly, pursuant to Section 6c of the Act, 7 U.S.C. § 13a-1 (2018), the Commission brings this action to enjoin such acts and practices and compel compliance with the Act. In addition, the Commission seeks civil monetary penalties and remedial ancillary relief, including, but not limited to, trading bans, restitution, disgorgement, rescission, pre- and post-judgment interest, and such other relief as the Court may deem necessary and appropriate.

4. Unless restrained and enjoined by this Court, Defendant is likely to continue to engage in the acts and practices alleged in this Complaint and similar acts and practices, as more fully described below.

## II. JURISDICTION AND VENUE

5. **Jurisdiction.** This Court has jurisdiction over this action under 28 U.S.C. § 1331 (2018) (federal question jurisdiction) and 28 U.S.C. § 1345 (2018) (district courts have original jurisdiction over civil actions commenced by the United States or by any agency expressly authorized to sue by Act of Congress). In addition, Section 6c(a) of the Act, 7 U.S.C. § 13a-1(a) (2018), authorizes the Commission to seek injunctive and other relief against any person whenever it appears to the Commission that such person has engaged, is engaging, or is about to engage in any act or practice constituting a violation of any provision of the Act or any rule, regulation, or order thereunder.

6. **Venue.** Venue properly lies with the Court pursuant to Section 6c(e) of the Act, 7 U.S.C. § 13a-1(e) (2018), because Defendant is found in, inhabits, or transacts business in this

District, and because acts and practices in violation of the Act occurred, are occurring, or are about to occur, within this District.

### **III. THE PARTIES**

7. Plaintiff **Commodity Futures Trading Commission** (“Commission” or “CFTC”) is an independent federal regulatory agency that is charged by Congress with the administration and enforcement of the Act and the Regulations. The Commission maintains its principal office at Three Lafayette Centre, 1155 21st Street, N.W. Washington, D.C. 20581.

8. Defendant **Jeremy Spence** is a natural person with a last known residence in New York, New York. Spence has never been registered with the Commission. During the Relevant Period, Spence did business under the name “Coin Signals.”

### **IV. FACTS**

9. A virtual currency is a type of digital asset defined here as a digital representation of value that functions as a medium of exchange, a unit of account, and/or a store of value, but does not have legal tender status in any jurisdiction. Bitcoin, ether, and other virtual currencies are distinct from “real” currencies, which are the coin and paper money of the United States or another country that are designated as legal tender, circulate, and are customarily used and accepted as a medium of exchange in the country of issuance.

10. During the Relevant Period, Defendant solicited and received virtual currency then equivalent to more than approximately \$5,000,000 from customers comprising approximately 175 user accounts, who invested amounts ranging from fractions of bitcoin to virtual currency amounts worth hundreds of thousands of dollars, for the purpose of entering into contracts of sale of virtual currency, including bitcoin and ether, through electronic web-based virtual currency trading platforms based in various states and countries.

**A. The Formation and Operation of Coin Signals**

11. In or around late 2017, Defendant began doing business as Coin Signals (“CS”) for the purpose of soliciting customers and others in several of the United States as well as a number of foreign countries to provide virtual currencies such as bitcoin and ether to Defendant, which Defendant would employ in various “funds” to engage in virtual currency trading on the customers’ behalf.

12. The CS funds included but were not limited to the Mex Fund (the “CS Mex Fund”), the Alt Fund (the “CS Alt Fund”), and the Long-Term Fund (the “CS Long-Term Fund”) (collectively, the “CS Funds”).

13. During the Relevant Period, Defendant solicited customers and managed the CS Funds from New York, New York.

14. Defendant’s trading strategies purportedly included seeking to trade virtual currency profitably based on market volatility by, among other things, trading conservatively.

15. Defendant arranged with persons (“CS admins”) he met through online social media sites such as Twitter, Telegram, and Discord internet chatrooms and otherwise to assist in creating and to serve as administrators of CS chatrooms, to handle non-trading administrative aspects of the CS Funds, and to act as conduits of information and solicitations to prospective and existing customers.

16. Defendant’s solicitations—which, as described below, were rife with fraud, lies, and deceit—were successful. During the Relevant Period, Defendant obtained virtual currencies such as bitcoin and ether worth more than approximately \$5 million from individual customers comprising approximately 175 user accounts.

17. These customers included retail customers, that is, customers who were not high net-worth individuals.

18. During the Relevant Period, Defendant's primary virtual currency trading accounts for the CS Mex Fund trading strategy were held at an international virtual currency trading platform (the "CS Mex accounts"). In the CS Mex accounts, Defendant engaged in trading of contracts of virtual currencies such as bitcoin and ether, each a commodity in interstate commerce, including on a futures contract basis (contracts in which the CS Mex account agreed to trade, e.g., a commodity such as bitcoin or ether, at a predetermined price and specified time in the future, e.g., in one week), swaps, and through the use of margin.

19. During the Relevant Period, Defendant engaged in trading of virtual currencies via accounts on another international virtual currency trading platform (the "CS Alt accounts").

20. Defendant also employed other virtual currency accounts in furtherance of his scheme.

21. Defendant communicated with customers regarding his trading strategy and results in CS chatrooms directly and through CS admins.

22. Defendant also provided customers with information such as reports of his trading results and customers' account balances by "rounds" that ranged from approximately a few days to a few weeks. Defendant's reports—which, as described below, were false and misleading—generally reflected successful and highly profitable virtual currency trading.

23. Defendant provided such trading and customer account information to customers through an automated computer program referred to as a "bot" (the "CS Bot"), which customers could query on demand. For a given round, Defendant reported the CS Funds' trading profit-

and-loss results to a CS admin, who entered that information into the CS Bot, which then calculated each customer's resulting balance and profits or losses.

24. The profit-and-loss information reported at the end of each "round" was purported to be realized profits or losses. This supposedly allowed customers to closely monitor their investments and promptly withdraw funds as they wished.

**B. Defendant's False and Misleading Solicitations**

25. During the Relevant Period, Defendant's solicitations involved exaggerations of his trading track record and ability to generate outsize returns.

26. In or around January 2018, in soliciting participation in CS, Defendant touted his ability to trade successfully over the course of 2018 the funds that customers gave him to trade "20x"—that is, to trade so successfully and lucratively as to return 2,000% of a customer's investment by year end.

27. In or around March 2018, in a CS chatroom, the CS Mex Fund was touted as having averaged more than 10% in weekly profits for at least two months.

28. Around the same time, Defendant solicited a customer by touting his consistent trading gains of approximately 10% per month.

29. Defendant claimed to another prospective customer that he achieved his gains through trading virtual currencies profitably based on market volatility.

30. These and other statements were false and misleading representations and omitted material facts.

31. In fact, for the period January through March 2018, Defendant's CS Mex accounts' trading records reflect unsuccessful virtual currency trading that resulted in significant losses well in excess of \$1,000,000 (the trading records reported these losses as more than 160

bitcoin, as the records' convention was to reflect all profit and losses from trading of bitcoin, ether, and other virtual currencies as denominated in Bitcoin).

32. During the Relevant Period, Defendant's solicitations also involved substantial overstatements of the amount of his assets under management.

33. These and other statements were false and misleading representations and omissions of material facts.

34. For example, in or around early 2018, Defendant told one prospective customer that Defendant had approximately \$8 million in assets under management.

35. In fact, during the Relevant Period, Defendant's net balances at his CS Mex accounts and his CS Alt accounts never exceeded approximately \$2 million. As of March 31, 2018, Defendant's assets under management in those accounts was less than \$1 million, and as of September 30, 2018, Defendant's assets under management in those accounts had dwindled to virtual currency worth less than approximately \$20,000 using the then-prevailing valuation.

36. Defendant's solicitations also failed to disclose to customers that Defendant was misappropriating customer funds.

37. For example, Defendant stated to customers that he requested a voluntary payment equal to 15% of customer profits, which Defendant referred to as a "Tip."

38. These and other of Defendant's statements concerning his compensation were false and misleading representations and omissions of material facts.

39. In fact, customers generally were automatically charged the 15% fee based on Defendant's purported profitable trading.

40. But because Defendant suffered trading losses, Defendant was not entitled to such fees. Any “Tips” Defendant paid himself based on fictitious profits were, in fact, paid from customer funds and therefore misappropriated.

41. For example, in or around September 2018, the CS Bot reported to one customer that as a result of Defendant’s purportedly successful trading during that “round,” the customer’s CS Mex Fund was charged approximately a .5 bitcoin “Tip” based on Defendant’s then “[c]urrent [r]ound [g]ain” of more than 5%.

42. In fact, as of that date, the CS Mex accounts records show Defendant’s unsuccessful virtual currency trading had resulted in losses equivalent to more than \$250,000 (the records reflect these losses, denominated by convention in Bitcoin, as more than forty bitcoin).

43. Similarly, like all Ponzi schemes, because Defendant suffered trading losses, customer withdrawals during the Relevant Period based on the purported profits in fact were funds misappropriated from other customers.

44. Defendant made these and other false and misleading representations and omissions of material facts to prospective customers directly and through agents during the Relevant Period in person, by telephone, and online.

45. Defendant made these and other false and misleading representations and omissions of material facts to prospective customers as well as existing customers directly and through agents knowingly or with reckless disregard for the truth.

**C. Defendant Misrepresented the Performance and Balance of the Funds**

46. During the Relevant Period, by the CS Bot and otherwise, Defendant caused numerous reports to be issued to customers claiming that their accounts or the overall balance of the funds had increased in value.

47. These reports were false and misleading.

48. For example, in or around September 2018, the CS Bot reported to one customer that as a result of Defendant's purportedly successful virtual currency trading during that "round," the customer's CS Mex Fund deposit of more than fifty-five bitcoin (equivalent to more than approximately \$325,000 using the then-prevailing valuation) had enjoyed profits of more than 5%, and that the value of the customer's deposit had increased by more than 12% in a matter of weeks.

49. In fact, for the month of September 2018, the CS Mex accounts records show Defendant's unsuccessful virtual currency trading had resulted in losses equivalent to more than \$250,000 (the records reflect these losses, denominated by convention in Bitcoin, as in excess of forty bitcoin).

50. Similarly, Defendant caused one customer to receive a report stating that the customer's initial investment had increased in value by more than 7% in a matter of weeks due to Defendant's purported successful virtual currency trading.

51. In fact, from that customer's initial investment to around the time of the additional investment, the CS Mex accounts records show that Defendant's virtual currency trading had resulted in losses equivalent to approximately \$600,000 to \$700,000 (the records reflect these losses, denominated by convention in Bitcoin, as approximately 100 bitcoin).

52. By indicating that customers' accounts virtually always increased in value each "round," the statements also served as fraudulent solicitations for customers to invest additional funds with Defendant.

53. For example, as a result of receiving a false and misleading report of 7% growth in a matter of weeks, a customer invested an additional more than sixty bitcoin (equivalent to more than approximately \$375,000 using the then-prevailing valuation) in Defendant's CS Mex Fund.

54. On or about October 1, 2018, Defendant claimed to customers in a CS chatroom that over the previous nine months the CS Mex Fund had grown "from just 10btcs to 1300btcs today."

55. As of on or about October 1, 2018, 1,300 bitcoin was approximately equivalent to more than \$8 million using the then-prevailing valuation.

56. In fact, on or about October 1, 2018, the total balance in the CS Mex accounts and the CS Alt accounts was approximately one bitcoin (equivalent to approximately \$6,500 using the then-prevailing valuation).

57. Defendant made these and other false and misleading representations and omissions of material facts to customers directly and through agents during the Relevant Period in person, by telephone, and online.

58. Defendant made these and other false and misleading representations and omissions of material facts to customers directly and through agents knowingly or with reckless disregard for the truth.

**D. Defendant's False and Misleading Claims of a Hack**

59. Beginning in or around August 2018, when customers requested withdrawals of the investments, Defendant offered a series of excuses for delays in repayment, falsely represented that there were sufficient balances in CS's bitcoin accounts, and failed to pay redemption requests from customers.

60. In or about Fall 2018, to explain delays in meeting customers' withdrawal demands, Defendant represented that CS had experienced a security issue—a "hack"—that caused approximately forty bitcoin in losses (approximately equivalent to more than \$250,000 using the then-prevailing valuation).

61. In or about November 2018, Defendant represented that the "hack" actually had resulted in approximately 150 bitcoin in losses (approximately equivalent to \$1,000,000 using the then-prevailing valuation).

62. These statements were false and misleading.

63. In fact, on and around the date of the purported hack, the total balance in the CS Mex accounts and the CS Alt accounts never reached 150 bitcoin (approximately equivalent to \$1,000,000 using the then-prevailing valuation).

64. Around the date of the purported hack, records of the CS Mex accounts and CS Alt accounts reflect no withdrawals of approximately 150 bitcoin, whether attributable to a "hack" or not.

65. In fact, the CS Mex accounts records for September 2018 reflect virtual currency trading losses—not a "hack"—in excess of \$250,000 (records reflect these losses, denominated by convention in Bitcoin, as more than forty bitcoin).

66. Defendant made these and other false and misleading representations and omissions of material facts to customers concerning the “hack” directly and through agents during the Relevant Period.

67. Defendant made these and other false and misleading representations and omissions of material facts to customers directly and through agents knowingly or with reckless disregard for the truth.

**E. Defendant’s False and Misleading “Proofs of Funds”**

68. On or about November 4, 2018, in an effort to reassure customers that they would receive their full balances soon, Defendant stated to customers that “since the beginning the [M]ex [F]und is up almost 500btcs (sic).”

69. This statement was false and misleading.

70. In fact, from the opening of the CS Mex accounts through on or about November 4, 2018, the CS Mex Fund trade records show virtual currency trading losses of more than approximately \$1,400,000 (the records reflect these losses, denominated by convention in Bitcoin, as more than 200 bitcoin).

71. In late 2018, to substantiate his claims of sufficient remaining assets to return customers’ balances, Defendant provided purported proofs of funds to his agents for them to convey to the customers.

72. Defendant’s agents then conveyed the sum and substance of these purported proofs to customers.

73. These purported proofs of funds were false and misleading.

74. For example, in or about November 2018, Defendant showed purported screenshots of the CS Mex accounts reflecting balances totaling in excess of several hundred

bitcoin (equivalent to more than approximately \$3,000,000 using the then-prevailing valuation). This information in sum and substance was conveyed to customers.

75. In fact, through November 2018, Defendant's bitcoin, ether, and other virtual currency trading had resulted in the equivalent of hundreds of bitcoin in losses.

76. In fact, at no point during November 2018 did the balance of the CS Mex accounts exceed ten bitcoin, much less the several hundred bitcoin that Defendant had represented.

77. Defendant made these and other false and misleading representations and omissions of material facts to customers concerning the "proofs of funds" directly and through agents during the Relevant Period.

78. Defendant made these and other false and misleading representations and omissions of material facts to customers directly and through agents knowingly or with reckless disregard for the truth.

**F. Defendant's Admissions of His Lies and Deceit**

79. In late 2018, after numerous efforts to conceal his misconduct and to forestall customers' withdrawal requests, Defendant admitted to deceiving and misleading his customers.

80. In or around that time, in a chat to CS customers, Defendant admitted, "I've spent the past two months trying to hide my drawdowns with lies and deceit."

81. Also in or around that time in a chat to CS customers, Defendant acknowledged that he had concealed and misrepresented losses to his customers, admitting, "I should have been more honest with my losses."

82. In or around that time, Defendant claimed that he had lied about the size of the purported hack and had downplayed it to deceive his customers.

83. In or around that time, Defendant also claimed that, contrary to the conservative strategy and prompt realization of profits he had represented to customers, he had opened and held a long bitcoin position that had suffered significant losses.

**V. VIOLATIONS OF THE COMMODITY EXCHANGE ACT AND REGULATIONS**

**Count I—Fraud by Deceptive Device or Contrivance**

**Violations of Section 6(c)(1) of the Act, 7 U.S.C. § 9(1) (2018), and Regulation 180.1(a), 17 C.F.R. § 180.1(a) (2020)**

84. Paragraphs 1 through 83 are re-alleged and incorporated herein by reference.

85. 7 U.S.C. § 9(1), makes it unlawful for any person, directly or indirectly, to:

use or employ, or attempt to use or employ, in connection with any swap, or a contract of sale of any commodity in interstate commerce, or for future delivery on or subject to the rules of any registered entity, any manipulative or deceptive device or contrivance, in contravention of such rules and regulations as the Commission shall promulgate by not later than 1 year after [July 21, 2010, the date of enactment of the Dodd-Frank Wall Street Reform and Consumer Protection Act] . . . .

86. 17 C.F.R. § 180.1(a), provides:

It shall be unlawful for any person, directly or indirectly, in connection with any swap, or contract of sale of any commodity in interstate commerce, or contract for future delivery on or subject to the rules of any registered entity, to intentionally or recklessly:

(1) Use or employ, or attempt to use or employ, any manipulative device, scheme, or artifice to defraud;

(2) Make, or attempt to make, any untrue or misleading statement of a material fact or to omit to state a material fact necessary in order to make the statements made not untrue or misleading;

(3) Engage, or attempt to engage, in any act, practice, or course of business, which operates or would operate as a fraud or deceit upon any person . . . .

87. During the Relevant Period, as described above, Defendant violated 7 U.S.C. § 9(1) and 17 C.F.R. § 180.1(a) by, among other things, in connection with swaps,

contracts of sale of commodities in interstate commerce, or for future delivery, making or attempting to make untrue or misleading statements of material fact or omitting to state or attempting to omit material facts necessary in order to make statements made not untrue or misleading, such as the following:

- A. Issuing performance statements and updates misrepresenting the supposed amount of bitcoins and profits in each customer's purported account(s);
- B. Misrepresenting the amount of assets under management to prospective and existing customers;
- C. Misrepresenting the profitability of Defendant's virtual currency trading to prospective and existing customers;
- D. Failing to disclose, and omitting, that Defendant's pools never achieved the advertised performance and returns for customers;
- E. Failing to disclose, and omitting, that Defendant was not investing customers' funds as promised but rather using their funds to pay other customers;
- F. Failing to disclose, and omitting, that Defendant was misappropriating customers' funds.

88. As described above, Defendant violated 7 U.S.C. § 9(1) and 17 C.F.R. § 180.1(a) by, among other things, in connection with swaps, contracts of sale of a commodity in interstate commerce, or for future delivery on or subject to the rules of any registered entity, soliciting customers with false and misleading performance statements and promises of future performance; misrepresenting and omitting material facts in communications with customers regarding the use of customers' funds; and misappropriating customers' funds.

89. Defendant engaged in the acts and practices described above willfully, intentionally, or recklessly.

90. By this conduct, Defendant violated 7 U.S.C. § 9(1) and 17 C.F.R. § 180.1(a).

91. Each act of: (1) using or employing, or attempting to use or employ, a manipulative device, scheme, or artifice to defraud; (2) making, or attempting to make, untrue or misleading statements of material fact, or omitting to state material facts necessary to make the statements not untrue or misleading; and (3) engaging, or attempting to engage, in any act, practice, or course of business, which operated or would operate as a fraud or deceit upon any person, including but not limited to those specifically alleged herein, is alleged as a separate and distinct violation of 7 U.S.C. § 9(1) and 17 C.F.R. § 180.1(a).

## **VI. RELIEF REQUESTED**

**WHEREFORE**, the Commission respectfully requests that the Court, as authorized by Section 6c of the Act, 7 U.S.C. § 13a-1 (2018), and pursuant to its own equitable powers, enter:

- A. An order finding that Defendant violated Section 6(c)(1) of the Act, 7 U.S.C. § 9(1) (2018), and Regulation 180.1(a), 17 C.F.R. § 180.1(a) (2020);
- B. An order of permanent injunction enjoining each Defendant and any other person or entity associated with them, including but not limited to affiliates, agents, servants, employees, assigns, attorneys, and all persons in active concert or participation with Defendant, including any successor thereof, from:
  - i. Engaging, directly or indirectly, in conduct in violation of 7 U.S.C. § 9(1) and 17 C.F.R. § 180.1(a);
  - ii. Trading on or subject to the rules of any registered entity (as that term is defined in Section 1a(40) of the Act, 7 U.S.C. § 1a(40) (2018));

- iii. Entering into any transactions involving “commodity interests” (as that term is defined in Regulation 1.3, 17 C.F.R. § 1.3 (2020)), for his own personal account(s) or for any account in which Defendant has a direct or indirect interest;
  - iv. Having any commodity interests traded on Defendant’s behalf;
  - v. Controlling or directing the trading for or on behalf of any other person or entity, whether by power of attorney or otherwise, in any account involving commodity interests;
  - vi. Soliciting, receiving, or accepting any funds from any person for the purpose of purchasing or selling any commodity interests;
  - vii. Applying for registration or claiming exemption from registration with the Commission in any capacity, and engaging in any activity requiring such registration or exemption from registration with the Commission, except as provided for in Regulation 4.14(a)(9), 17 C.F.R. § 4.14(a)(9) (2020); and/or
  - viii. Acting as a principal (as that term is defined in Regulation 3.1(a), 17 C.F.R. § 3.1(a) (2020)), agent, or any other officer or employee of any person (as that term is defined in 7 U.S.C. § 1a(38), registered, exempted from registration, or required to be registered with the Commission except as provided for in 17 C.F.R. § 4.14(a)(9));
- C. An order requiring Defendant to pay civil monetary penalties of not more than the civil monetary penalty prescribed by Section 6c(d)(1) of the Act, 7 U.S.C. § 13a-1(d)(1) (2018), as adjusted for inflation pursuant to the Federal Civil Penalties

Inflation Adjustment Act Improvements Act of 2015, Pub. L. 114–74, 129 Stat. 584, title VII, Section 701, *see* Commission Regulation 143.8, 17 C.F.R. § 143.8 (2020), for each violation of the Act or Regulations, plus post-judgment interest;

- D. An order directing Defendant, as well as any successors thereof, to disgorge, pursuant to such procedure as the Court may order, all benefits received including, but not limited to, trading profits, revenues, salaries, commissions, fees, or loans derived directly or indirectly from acts or practices which constitute violations of the Act and Regulations, as described herein, and pre- and post-judgment interest thereon from the date of such violations;
- E. An order directing Defendant, as well as any successors thereof, to make full restitution, pursuant to such procedure as the Court may order, to every customer and investor whose funds Defendant received, or caused another person or entity to receive, as a result of the acts and practices constituting violations of the Act and Regulations, as described herein, and pre- and post-judgment interest thereon from the date of such violations;
- F. An order directing Defendant, as well as any successors thereof, to rescind, pursuant to such procedure as the Court may order, all contracts and agreements, whether express or implied, entered into between, with, or among Defendant and any customer or investor whose funds were received by Defendant as a result of the acts and practices which constituted violations of the Act and the Regulations, as described herein;
- G. An order directing that Defendant, and any successors thereof, make an accounting to the Court of all of their assets and liabilities, together with all funds

they received from and paid to investors and other persons in connection with commodity transactions and all disbursements for any purpose whatsoever of funds received from commodity transactions, including salaries, commissions, interest, fees, loans, and other disbursement of money or property of any kind from at least the beginning of the Relevant Period to the date of such accounting;

- H. An order requiring Defendant and any successors thereof to pay costs and fees as permitted by 28 U.S.C. §§ 1920 and 2412(a)(2) (2018); and
- I. An order providing such other and further relief as the Court deems proper.

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**VII. DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury trial.

Dated: January 26, 2021

**COMMODITY FUTURES TRADING  
COMMISSION**

By: s/ Gates S. Hurand  
Gates S. Hurand  
Senior Trial Attorney  
ghurand@cftc.gov  
Phone: (646) 746-9700

Elizabeth C. Brennan  
Senior Trial Attorney  
ebrennan@cftc.gov  
Phone: (646) 746-9700

K. Brent Tomer  
Chief Trial Attorney  
ktomer@cftc.gov  
Phone: (646) 746-9700

Manal M. Sultan  
Deputy Director  
msultan@cftc.gov  
Phone: (646) 746-9700

Commodity Futures Trading Commission  
Division of Enforcement  
140 Broadway, 19th Floor  
New York, NY 10005  
Phone: (646) 746-9700  
Fax: (646) 746-9940

**ATTORNEYS FOR PLAINTIFF  
COMMODITY FUTURES TRADING  
COMMISSION**