

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-- against --

**TRENDON T. SHAVERS AND BITCOIN
SAVINGS AND TRUST,**

Defendants.

**CIVIL ACTION NO.
4:13-CV-416 (RC) (ALM)**

**REPLY DECLARATION OF PHILIP MOUSTAKIS
IN SUPPORT OF PLAINTIFF’S MOTION FOR AN ORDER TO SHOW CAUSE,
RULE 37 SANCTIONS, AND OTHER RELIEF**

I, Philip Moustakis, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over eighteen years of age and am employed by the Securities and Exchange Commission (“Commission”) as an attorney in the Division of Enforcement in the Commission’s New York Regional Office. I submit this declaration in support of the Commission’s Motion for an Order to Show Cause, Rule 37 Sanctions, and other Relief.

2. Attached hereto are true and correct copies of the following:

<u>Document</u>	<u>Ex.</u>
11/7/2013 letter from Commission counsel to Trendon T. Shavers (“Shavers”)	A
2/26/2014 letter from Commission counsel to Shavers	B
8/30/2013 email correspondence between Commission counsel and Shavers	C
10/9/2013 Rule 26 Initial Disclosures by Commission to Shavers and cover email	D
5/23/2014 email from Shavers to Commission counsel; 5/27/2014 letter from Commission counsel to Shavers	E
6/3/2014 Screenshots from <i>www.secvshavers.com</i>	F

Pursuant to 28 U.S.C. § 1746, I, Philip Moustakis, declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 12, 2014
New York, New York

Philip Moustakis
Philip Moustakis