

**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)**

**PLAINTIFF'S FIRST REQUEST TO DEFENDANTS
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, plaintiff Securities and Exchange Commission ("Commission") requests that defendants Trendon T. Shavers ("Shavers") and Bitcoin Savings and Trust ("BTCST" and, together with Shavers, "Defendants") produce to the undersigned Commission staff the documents and communications called for by this request for production ("Request") within 30 days of the date of service hereof.

DEFINITIONS AND INSTRUCTIONS

1. "BTCST" means Bitcoin Savings and Trust, First Pirate Savings & Trust, and any parent, subsidiary, or affiliate, or special purpose entity, variable interest entity, off-balance sheet entity, predecessor, successor, general partner, limited partner, or partnership of any of the foregoing, wherever located worldwide.

2. "GPUMAX" means GPUMAX technologies, LLC, and any parent, subsidiary, or affiliate, or special purpose entity, variable interest entity, off-balance sheet entity, predecessor,

successor, general partner, limited partner, or partnership of any of the foregoing, wherever located worldwide.

3. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise) stored in any medium from which information can be obtained either directly or, if necessary, after translation into a reasonably usable form.

4. The term “document” means all documents or electronically stored information including, without limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations, stored in any medium from which information can be obtained either directly or, if necessary, after translation into a reasonably usable form.

5. The term “concerning” means relating to, referring to, describing, evidencing, or constituting.

6. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Request all responses that might otherwise be construed to be outside of its scope.

7. The terms “all,” “any” and “each” shall be construed as encompassing any and all.

8. If any document or communication is withheld from production due to an assertion of the attorney-client privilege, or any other privilege or protection against production, identify each such document or communication in a manner sufficient to permit the Commission to evaluate the claimed privilege or protection. At a minimum identify the type of document or communication, its general subject matter, its date, its author(s), its addressee(s), its recipient(s), and the privilege or protection claimed.

9. If any document or communication sought by this Request once was, but no longer is, within your possession, custody, or control, identify each such document or communication and

its present or last known custodian, state the reason why it is not being produced, and the date of its loss, destruction, discard, theft or other disposal.

10. The time period covered by this Request is May 1, 2011 to the present.

DOCUMENTS TO BE PRODUCED

1. All documents and communications concerning BTCST, including, without limitation, all communications with investors or potential investors in BTCST.
2. All documents and communications concerning GPUMAX.
3. A full and complete digital copy of BTCST's website, btcst.com, as of the following dates: (a) April 30, 2012; (b) May 31, 2012; (c) June 30, 2012; (d) July 31, 2012; and (e) August 31, 2012.
4. All filed federal and state income tax returns, including all schedules and attachments for Shavers.
5. All filed federal and state income tax returns, including all schedules and attachments for BTCST.
6. For each position of employment, your two most recent paystubs.
7. Documents sufficient to identify all Bitcoins owned by you or for your benefit, or which you control or controlled, in whole or in part.
8. Documents sufficient to identify all bank or brokerage accounts, or accounts at other financial intermediaries (whether transacting business in Bitcoin, U.S. dollars, or other currencies), including without limitation payment processors or currency exchanges, held in your name or for your benefit, or which you control or controlled, in whole or in part.
9. All account opening documents, and monthly or quarterly statements, for all accounts identified in connection with item 8.

10. Documents sufficient to identify the name, address, the legal status, and tax identification number, if any, of all partnerships, joint ventures, funds, or other business enterprises entered into or invested in by you.

Dated: October 9, 2013
New York, NY

By: */s/ Philip Moustakis*
PHILIP MOUSTAKIS (PM-1748)
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MoustakisP@sec.gov
Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that, on this 9th day of October, 2013, I served the foregoing Request for Production of Documents, by UPS Overnight Delivery, and by email, on:

TRENDON T. SHAVERS
2305 South Custer Road, Apt. 1507
McKinney, TX 75070
tredon@buscog.com

BITCOIN SAVINGS AND TRUST
c/o Trendon T. Shavers
2305 South Custer Road, Apt. 1507
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/s/ Philip Moustakis

PHILIP MOUSTAKIS (PM-1748)

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