



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
FORT WORTH REGIONAL OFFICE  
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July 11, 2014

**By CM/ECF and E-mail**

The Honorable Ron Clark, United States District Judge  
The Jack Brooks Federal Building and United States Courthouse  
300 Willow Street, Suite 221  
Beaumont, TX 77701

The Honorable Amos L. Mazzant, United States Magistrate Judge  
U.S. Courthouse Annex Chase Bank Building  
200 N Travis Street  
Sherman, TX 75090

Re: Supplemental Authority in Support of Plaintiff's Opposition to Defendants'  
Renewed 12(b)(1) Motion, Set for Hearing July 14, 2014  
*Securities and Exchange Commission v. Trendon T. Shavers and Bitcoin Savings and Trust*  
Case No. 4:13-CV-416 In the United States District Court for the Eastern District of Texas

Your Honors,

In advance of the hearing scheduled for Monday, July 14 on Defendants' Renewed 12(b)(1) Motion [Doc. 46], enclosed for your consideration is the July 9, 2014 opinion in *United States v. Ulbricht*, 14-CR-68 KBF, 2014 WL 3362059 (S.D.N.Y. 2014) concluding that Bitcoin is money within the context of 18 U.S.C. § 1956, the federal anti-money laundering statute. *See id.* at pp. 47-50 (concluding that "the money laundering statute is broad enough to encompass use of Bitcoins in financial transactions. Any other reading would—in light of Bitcoins' sole raison d'être—be nonsensical.").

Plaintiff United States Securities and Exchange Commission submits this opinion as supplemental authority in support of its position that this Court has subject matter jurisdiction over the litigation because (1) Bitcoin is money; and (2) the instruments Defendants offered and sold were investment contracts and, therefore, securities. *See Plaintiff's Response in Opposition to Defendants' Renewed 12(b)(1) Motion* [Doc. 60].

I certify that on July 11, 2014 I electronically filed the foregoing letter and enclosure using the CM/ECF system and served it by the same means upon counsel for Defendants.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Magee".

Jessica B. Magee

Counsel for Plaintiff  
United States Securities and Exchange Commission

Encl. Opinion of July 9, 2014 in *United States v. Ulbricht*, 14-CR-68 KBF, 2014 WL 3362059 (S.D.N.Y. 2014)