



## Items for SEC

1 message

Wed, Jul 11, 2018 at 11:41 AM

To: Houlihan, Michael F <mhoulihan@cov.com>

Cc: Kornblau, David <dkornblau@cov.com>, Reggie Middleton <reggie@veritaseum.com>

Hi Michael,

I have provided below answers or actions in response to your request.

On Wed, Jul 11, 2018 at 11:01 AM, Houlihan, Michael F <mhoulihan@cov.com> wrote:

Thank you for your email. Based on the information you provided, we are still missing information responsive to a number of items sought by the SEC's June subpoena and Jorge's supplemental requests (both attached). As a reminder, our response is due by **Monday, July 16**. I've listed our immediate questions below:

1. The subpoena calls for identification not just of hardware items like those in your list, but also of SIM cards, removable media (like USB storage devices), and other similar items. This means we need to identify the SIM cards separate from mobile devices on the list. Please also let us know if Reggie can identify any memory storage devices he used during 2017. **Reggie does not have SIM cards separate from the mobile devices on the list. I will verify whether or not he has flash drives.**

2. The subpoena also calls for identification of the "chain of custody" of items on the list, including "the time and date, location, and purpose of the custody." As we previously noted, we need to state who is in possession of those devices now and, if they are not in Reggie's possession, when he gave the device away and under what circumstances. **I will work on getting dates for the transfer of items not in his possession. The list should show what is or is not in his possession and to whom he gave it.**

3. Also with respect to the devices Reggie used during 2017, please provide a general overview of how each device was used and to what extent it is likely to contain personal or privileged information. We don't need an itemized listing of the documents on the computers/phones; rather, we need a broad sense of how these items were used (for Veritaseum business, primarily for personal use, by Masiah, etc.) so that we can knowledgeably discuss proposed limitations on the subpoena response with the SEC. **I will get this information and add it to the sheet.**

4. The information you provided does not appear to respond to the following supplemental requests:

2. A list of all investors in Veritaseum Inc., the dates and amounts of the investment, and the status of the investment. If their investment was governed by a particular document

or agreement, please direct us to it in the production or produce it. **We will work on this list**

3. A list of all purchasers of the original "VERITAS" coin, the amounts of funds raised, and the status of the purchases. **We are working on this list**

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5. Please provide us the location of all emails referred to in the "Hack" report (VERI25-VERI51) in the production—we believe we have located at least some of them but it would be helpful to be in the same page about these. As I mentioned, I did not actually see the natives of any of the [yluces@protonmail.com](mailto:yluces@protonmail.com) email, so that would be particularly helpful—and I apologize if I missed them. **We will confirm one way or the other**

6. A list of which purchasers of VERITAS or investors in Veritaseum, Inc., have converted to VERI (if any). **We will work on this and combine with "3" above**

Please let us know what additional information you can provide in response to those requests.

5. Jorge's seventh supplemental request asked that we identify Reggie's "bank accounts and wallets" other than those we have already provided. He specifically said "we knew about Coinbase, Citi, and JP Morgan, but now heard about Gemini, BofA, Kraken, and perhaps others." I received the Schwab, Gemini and Kraken account information, but we have not received Bank of America account information (Reggie emailed about those accounts, but inadvertently failed to attach information regarding those accounts). Can you please provide the additional Bank of America information? **I believe the Bank of America account is the one recently opened this year. We can get that to you if it is a part of this request.**

6. Can you please verify that the list of "Bulk VERI sales Post-ICO" includes all sales of Veri by Veritaseum after the ICO? The use of "bulk" could suggest that smaller sales were excluded from this list. **Yes, I am working on filling in this list. Bulk just refers to our direct sales versus secondary sales.**

[Quoted text hidden]