**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THE JURATBTC BLOCKCHAIN, an unincorporated association, by and through MICHAEL KANOVITZ, one of its members,	))))
Plaintiff,	))
v.	))
ANTON ANDREYEV, BLENDER.IO, CHATEX, FARRUKH FURKATOVITCH FAYZIMATOV, TABAN DENG GAI, MATHEW GRIMM, YU JIN, JIADONG LI a/k/a "KHALEESI" a/k/a "BLACKJACK1987", HYDRA MARKET, HUSAYN AL-SHAMI, SECOND EYE SOLUTIONS a/k/a "FORWARDERZ" SOUTHFRONT, SUEX, YINYIN TIAN a/k/a 田寅寅" a/k/a "TIANYINYIN0404", a/k/a "SNOWSJOHN", XIAOBING YAN, and FUJING ZHENG,	))))))))))))))
Defendants.	))

VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELEIF

Now comes Plaintiff, the JURATBTC BLOCKCHAIN, by and through its undersigned

attorneys, and complaining of Defendants ANTON ANDREYEV, BLENDER.IO, CHATEX,

FARRUKH FURKATOVITCH FAYZIMATOV, TABAN DENG GAI, MATHEW GRIMM,

YU JIN, JIADONG LI a/k/a "KHALEESI" a/k/a "BLACKJACK1987", HYDRA MARKET,

HUSAYN AL-SHAMI, SECOND EYE SOLUTIONS a/k/a "FORWARDERZ",

SOUTHFRONT, SUEX, YINYIN TIAN a/k/a 田寅寅 a/k/a "TIANYINYIN0404", a/k/a

"SNOWSJOHN", XIAOBING YAN, and FUJING ZHENG, states as follows:

INTRODUCTION

1.   This action seeks to prevent the misuse of cryptocurrency to commit very serious crimes.

2.   Defendants are a group of sixteen "sanctioned individuals" – people who have been identified as international criminals by the President of the United States (and/or by the Secretary of the Treasury as the President's designee). Their crimes range from human rights violations, to running international drug rings, to proliferating weapons of mass destruction, among others. Having been designated by the President, Defendants are now subject to U.S. economic sanctions that prohibit them from engaging in transactions or otherwise accessing their assets in the U.S.

3.   Unfortunately, Defendants are using cryptocurrency and blockchain networks to evade these sanctions and it is essentially impossible to stop them absent court intervention. Some brief background is needed to explain.

4.   Unlike a traditional bank, which can task its employees to freeze a sanctioned account, there is no authority in control of a blockchain. Rather, blockchains are "decentralized" and software-based. The software vests control in an open group of independent, often anonymous, computer operators (called "miners") who may be located throughout the world.

5.   All the miners who join the open group process cryptocurrency transactions by networking their computers (called "nodes") together over the internet and then passing the transactions between themselves in a peer-to-peer fashion. It is thus futile to try to block a transaction on a blockchain manually because even if one could force some nodes to reject the transaction, a quorum of the remainder will still complete it automatically.

6.   Computer network decentralization offers unique and legitimate benefits such as making the networks resilient, protecting transactions from attack by malicious actors like hackers, and keeping data records secure. But decentralization simultaneously thwarts control by lawful outside authorities including members of law enforcement, governments, and courts. The resulting absence of effective law enforcement attracts criminals and criminal enterprises who can engage in their activities on the blockchain with little fear of accountability. They prey on legitimate cryptocurrency users (through scams, frauds and ransomware) and evade sanctions.

7.   For example, the Secretary of the Treasury officially sanctioned Defendant HYDRA MARKET on April 5, 2022, because it was laundering money for Russian ransomware extortionists among for other crimes. The sanctions were well-publicized. Nevertheless, over two months later, the Bitcoin blockchain miner permitted HYDRA MARKET to access its sanctioned account on the Bitcoin network and processed HYDRA MARKET's transactions for over $1.5 million worth of BTC cryptocurrency, all in direct violation of the sanctions and U.S. national interests.

8.   Plaintiff, the JuratBTC blockchain ("JuratBTC") is an independent association of civic-minded blockchain miners who provide their users the benefits of decentralization while at the same time working to prevent criminals from misusing decentralization as a tool to commit crimes.

9.   To accomplish this, Plaintiff created a unique solution. Plaintiff updated the Bitcoin core software so that the blockchain's nodes are able to access electronic dockets of state and federal courts. If a court has ruled that a given transaction is or is not lawful, the JuratBTC nodes will review the docketed order and follow it when processing the transaction. This method

allows the JuratBTC blockchain to remain decentralized (preserving the legitimate benefits of decentralization) while still enforcing the law and protecting users' legal rights.

10.   Defendants currently possess cryptocurrency accounts on the JuratBTC blockchain which contain JuratBTC's native cryptocurrency, JTC. As is explained in greater detail below, Defendants received these accounts as a necessary part of the process when JuratBTC updated the Bitcoin core software. Defendants have complete control over these accounts and could use them at will to attempt to evade sanctions. Doing so would harm the Plaintiff and risk dragging users and miners into illegal transactions as HYDRA MARKET already did with the Bitcoin miners.

11.   Plaintiff has attempted to protect the JurtBTC community from such misconduct, *inter alia*, by maintaining a public user agreement (the "Terms and Conditions" or "Terms") which prohibits misuse of the blockchain for criminal purposes. Important here, the Terms specifically state that any person who has been designated on the SDN is prohibited from using the JuratBTC blockchain or owning its native cryptocurrency, JTC. Similar prohibitions are commonly used to protect online communities from running afoul of sanctions requirements. The Terms also provide for issuance of injunctive relief to enforce its terms.

12.   Plaintiff brings this action to obtain declaratory and injunctive relief enforcing the Terms and Conditions and prohibiting Defendants from using the JuratBTC network. Entering the requested judgment will allow the nodes to freeze Defendants' accounts on the JuratBTC blockchain so that they cannot violate U.S. sanctions nor make the JuratBTC miners complicit in any violations.

BACKGROUND

13.   Among its many other responsibilities, the United States Treasury Department

("Treasury Department") is charged with enforcing economic and trade sanctions imposed

against nations, as well as individual criminals and criminal enterprises. Sanctioned individuals

can include money launderers, terrorists, international narcotics traffickers, those engaged in

activities related to the proliferation of weapons of mass destruction, and others threatening the

national security, foreign policy, or economy of the United States.

14.   The Treasury Department's Office of Foreign Asset Controls (OFAC) publishes a

list identifying the current group of sanctioned individuals, called the List of Specially

Designated Nationals and Blocked Persons ("SDN list"), which it updates as new sanctions are

imposed. Examples of those currently identified on the SDN list include Defendant ANTON

ANDREYEV (a Russian hacker who worked to interfere in U.S. elections), Defendant CHATEX

(a money laundering organization that assists ransomware extortionists), and Defendant HYDRA

MARKET (a dark web online marketplace for illegal drugs and other criminal activities).

15.   OFAC includes in the SDN a list of the blockchain accounts it has traced to the

sanctioned individuals. Plaintiff has reviewed the SDN list and determined that it includes

accounts on the JuratBTC blockchain.

16.   Blockchains are a method for keeping a ledger of account balances. That ledger is

distributed among the network's nodes such that there is ordinarily no single authority who can

alter the ledger. This protects the ledger from tampering and makes it inherently trustworthy, as

opposed to a centralized ledger which can be unilaterally altered, intentionally or by mistake, to

deprive an account holder of funds. The miner's nodes maintain the ledger by passing transaction

messages between themselves in a peer-to-peer fashion and then updating their copies of the ledger with the resulting changes to the account balances.

17.   Unlike a bank account, which can only be opened with approval of the bank and after the customer sufficiently identifies themselves, anyone can create a cryptocurrency account without permission and without revealing their identity simply by using a cryptographic formula. The formula generates a "key pair" which consists of a publicly displayed string of letters and numbers (the "public key") and an associated secret password (the "private key") known only to the person generating the public key. The public key is the blockchain account address while the private key portion controls the cryptocurrency in that account.

18.   OFAC imposes two requirements regarding sanctioned individuals and their blockchain accounts. First, U.S.-based persons and entities may not engage in any dealings with sanctioned individuals or their blockchain accounts. Accordingly, transactions involving sanctioned individuals must be "rejected." For example, an internet retailer like Amazon cannot accept cash from a sanctioned individual in person. Similarly, Amazon cannot accept a cryptocurrency payment from that individual's SDN-listed blockchain account.

19.   In addition to rejecting transactions, OFAC rules also require freezing sanctioned individuals' assets (called "blocking" their accounts). For example, dollars in the sanctioned individual's bank account are assets that must be frozen by the bank. Coins in a blockchain account listed on the SDN are also assets, and so those coins must be frozen just like any other sanctioned asset. The terms "blocking" and "freezing" are often used interchangeably.

PARTIES

A.   PLAINTIFF THE JURATBTC BLOCKCHAIN

20.   The JuratBTC blockchain is an unincorporated association of operators (called "miners") who use their computer servers (called "nodes") to maintain the blockchain. Each miner joins the blockchain by running a version of the Bitcoin core software that JuratBTC has updated to provide court access. The miner then networks his or her node to other miners' nodes over the internet.

21.   Like the miners on Bitcoin and other blockchains, JuratBTC miners operate the blockchain network for their mutual profit. They split the profits using a competitive process. The profits are paid out in the JuratBTC blockchain's native coin, JTC, just as Bitcoin pays out BTC for processing Bitcoin transactions and Ethereum pays out ETH for processing Ethereum transactions.

22.   As an unincorporated association, JuratBTC is capable of suing and being sued in its own name. 735 ILCS 5/2-209.1; Fed. R. Civ. P. 17(b)(2-3). MICHAEL KANOVITZ is a JuratBTC blockchain miner who brings this claim. Mr. Kanovitz resides in Cook County, Illinois. He has personal knowledge of the facts alleged herein and/or has obtained those facts from reliable sources. An unincorporated association is a citizen of any jurisdiction where one of its members is located.

Bitcoin "fork"

23.   The JuratBTC blockchain is one of multiple "forks" of the Bitcoin blockchain (other examples include Litecoin (LTC coin), Bitcoin Cash (BTC coin), and Bitcoin SV (BSV coin)). Bitcoin forks are adapted from the Bitcoin core software and many import Bitcoin's ledger of BTC accounts. Following a fork, different versions of the software are run by different nodes and so the blockchain breaks into two blockchains. The JuratBTC fork updates the Bitcoin

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core software so that the miners are capable of accessing electronic court dockets and reviewing docketed court orders. This new capability allows the JuratBTC blockchain to add unique functionality to Bitcoin's software, including the ability to freeze accounts and reverse transactions in response to court rulings about users' legal rights.

24.   The JuratBTC fork occurred at Bitcoin network block height 717808, which was on January 8, 2022. Bitcoin and JuratBTC contain the same transaction ledger history up to the moment of the fork, and then the ledgers diverge with different transactions taking place on each chain going forward. Public keys that held BTC as of block 717808 also hold JTC at a 1 to 1 ratio to BTC. The same private key controls both the BTC and the JTC in the wallet.

JuratBTC's Goodwill

23.   JuratBTC has developed valuable goodwill by differentiating itself from other blockchains and Bitcoin forks through its dedication to effective law enforcement and protecting its user's legal rights. Most blockchains do not have any such focus and, if anything, are anti-law enforcement. JuratBTC, by contrast, provides tools for enforcing the law and user's legal rights through the execution of lawful court orders on-chain. JuratBTC is unique among blockchains in providing these protections for users and for law enforcement.

24.   JuratBTC has invested approximately five-hundred thousand dollars ($500,000) developing the necessary technologies to support on-chain enforcement of court orders. It has also invested over one-hundred thousand ($100,000) by building apps and communities to popularize on-chain enforcement and draw customers to its blockchain.

25.   These efforts have been successful in building up valuable goodwill for JuratBTC. In the last six months alone, users attracted to JuratBTC have established almost 9,000 new accounts. The average customer acquisition cost in the software-as-a-service industry is $205 per customer, valuing the 9,000 customer acquisitions at over $1.8 million.

B.   THE DEFENDANT SANCTIONED-PERSONS

26.   Defendants are subjects of foreign states who have been sanctioned by the United States. The SDN list, published at www.treasury.gov/ofac/downloads/sdnlist.pdf (last checked February 1, 2023) is incorporated herein by reference. There is a total of 331.3274777 JTC held in the sanctioned Defendants' accounts listed in the SDN as of February 1, 2023.

27.   Defendant BLENDER.IO is a cryptocurrency mixer. Mixer services take cryptocurrency coins from multiple accounts and comingle them so as to conceal the origin of the coins. They are therefore useful for money laundering. BLENDER.IO has aided the notorious cybercrime organization called "Lazarus Group" to launder money on behalf of the Republic of North Korea. The public keys associated with BLENDER.IO include 15PggTG7YhJKiE6B16vkKzA1YDTZipXEX4 which contains 0.28175679 JTC.

28.   Defendant ANTON NIKOLAEYVICH ANDREYEV is a Russian hacker who worked to interfere in U.S. elections. The public keys associated with ANDREYEV on the SDN list include 1DbShx4r8i2XesthoDBf5EkYWz5dsKEusV which contains .00017542 JTC.

29.   Defendant CHATEX is a money laundering organization that services ransomware extortionists. The blockchain accounts associated with CHATEX on the SDN list include 3N9YcPBDky9UsMx1RTk33tL4jDkZfSnsPk, which contains 1 JTC, and 39KQvziHwUe2vddbpfC5WkQEV72qbQhxuh, which contains .00708714 JTC.

30.   Defendant TABAN DENG GAI (DENG) is a First Vice President of South Sudan who has committed human rights abuses including the disappearance and deaths of civilians. The blockchain accounts associated with DENG on the SDN list include 1DH2xDH7TngrDU6LXciprKCBKNcPA1xX8A, which contains .00012429 JTC. DENG is sued only in his individual capacity.

31.   Defendant FARRUKH FURKATOVITCH FAYZIMATOV is a recruiter and money lauder for the al-Qa'ida affiliated terrorist organization Hay'et Tahrir Al-Sham. Among the blockchain addresses associated with FAYZIMATOV on the SDN is 17a5bpKvEp1j1Trs4qTbcNZrby53JbaS9C, which contains .00216263 JTC.

32.   Defendant JIADONG LI (a.k.a. "blackjack1987"; a.k.a. "khaleesi") is a conspirator in a crime ring that laundered over $100 million worth of cryptocurrency stolen by North Korean hackers. The blockchain accounts associated with LI on the SDN list include 17UVSMegvrzfobKC82dHXpZLtLcqzW9stF, which contains .000101 JTC, and 1EfMVkxQQuZfBdocpJu6RUsCJvenQWbQyE, which contains .00001556 JTC.

33.   Defendant SECOND EYE SOLUTIONS (a/k/a FORWARDERZ) is an organization that specializes in creating and selling fraudulent identities and assisted the Russian troll farm "Internet Research Agency" to evade sanctions after interfering in the 2016 U.S. presidential election. The blockchain accounts associated with SECOND EYE SOLUTIONS on the SDN list include 1G9CKRHA3mx22DoT1QyNYrh85VSQ19Y1em which contains .1156258 JTC and 1DtGgdCi9VPKz2Bpq8GQhUQEPnQ5HwaT9n which contains .00510228 JTC.

34.   Defendant MATHEW SCOTT GRIMM is an international drug dealer who supplied illicit fentanyl, synthetic stimulants, cannabinoids, and opioids to U.S. markets through internet sales and a host of shell companies. The blockchain accounts associated with GRIMM on the SDN list include 15yqWQ4sqr7jzCwDtZ3U1KaCa8WMEy7Mm2 which contains 10.00067802 JTC, 19GrL5jnUkGmHXVcraB1Etv5rXCANeLWpq which contains 15.61 JTC, and 1LAh7PQwpd1uGiLHae5C5Xz9QXse3y2phq which contains 25.24648223 JTC.

35.   Defendant HYDRA MARKET is the world's largest and most prominent darknet market. Based in Russia, HYDRA MARKET supports ransomware extortion, international drug

crimes and other forms of cybercrime. The blockchain accounts associated with HYDRA

MARKET on the SDN list include bc1qqf8kcc9m57xjqcvsvuf989nnl48ve6d2s24cx3 which

contains 50 JTC, 148LKmyZT3FGE4x1GjsFN6RsAwcjzk5iuE which contains 0.00000547 JTC,

1CNbhgxGRZvsWnEHotfXge7k2E1UPzBDC7 which contains 0.00013233 JTC,

1FFS6pX1TCKTNy668Mbk2Lyoem1qB48kYXwhich contains 0.00023218 JTC,

bc1qvlzfn6kmezv44d8kw0p5jsmxe6wchv3zc7gsxs which contains 0.02409762 JTC,

1HH8eiuaTMucTNyvGCUmAvmCZCtdMi8SqK which contains 0.04308807,

1E9uUnLbyfToazo95vmM3ysYnzgkrL7GeC which contains 0.14997162 JTC,

1PWRKxkR5AU7Tc9zPqjdhtu1eGW1QZzs4y which contains 0.34044295 JTC,

1LKE3XA9bf5JFqtGtCHzWj5QGxKGwMfXZw which contains .6 JTC,

1H8sDTTgJPBKw83EBZDLhXvetCbxZUMMZM which contains 1.16750008,

1MtsQsw6n2jvJCWhpCw7jifTfD9Q3rBBVg which contains 1.40019298 JTC,

1MbtT2ZsTtLp7EKZUV9r74cTyqvsMtTP2M which contains 1.64468703 JTC,

3P6PzdfETr4275Gn3veLkCyDxA1jV8fHKm which contains 1.73852123,

3PDmRwotTkRAFRLGTUrucCERp2JdM1q4arwhich contains 2 JTC,

34WWXwFKAsXL9zYxbeNPaPV6vDamkjQLUo which contains 2.64188192   JTC,

3MP7yBGSW2gkXVRE8S84T2j4KVgPh3rEzv which contains 3.12050828 JTC,

3KvBX3jo69Qn8jHy44M33RYoeYcf8DdRBD which contains 3.7763 JTC,

3HRExd8GKFskZC5inmVcpiyy9UWG7FVa6o which contains 4.4 JTC,

35LScRJ8hzDvvWh9t9UA8bHGnGNVz3YEfa which contains 9.6718786 JTC.

     36.   Defendant YU JIN is an official of the Republic of North Korean who was

instrumental in the country's development of weapons of mass destruction. The blockchain

accounts associated with JIN on the SDN list include

1DH2xDH7TngrDU6LXciprKCBKNcPA1xX8Awhich contains .00012429 JTC.

37.   Defendant SOUTHFRONT is an online disinformation site controlled by Russian

intelligence services. The blockchain accounts associated with SOUTHFRONT on the SDN list

include bc1qv7k70u2zynvem59u88ctdlaw7hc735d8xep9rq which contains .00078931 JTC.

38.   Defendant SUEX is a virtual currency exchange assisting ransomware

extortionists to launder ransoms paid in cryptocurrency. The blockchain accounts associated with

SUEX on the SDN list include 1LrxsRd7zNuxPJcL5rttnoeJFy1y4AffYY which contains .0007

JTC, 1KUUJPkyDhamZXgpsyXqNGc3x1QPXtdhgz which contains 0.00760469 JTC,

1CF46Rfbp97absrs7zb7dFfZS6qBXUm9EP which contains .00824086 JTC, and

1B64QRxfaa35MVkf7sDjuGUYAP5izQt7Qi which contains 3.0977 JTC.

39.   Defendant FUJING ZHENG is an international trafficker of Fentanyl identified as

a significant narcotics trafficker under the U.S. Drug Kingpin Act. The blockchain accounts

associated with ZHENG on the SDN list include 18uKfaUjgG52rVeXEi3wxnveww7zZuECtE

which contains .00011337 JTC, and 1DH2xDH7TngrDU6LXciprKCBKNcPA1xX8A which

contains .00012429 JTC.

40.   Defendant XIAOBING YAN, (a.k.a. Steven Yan, a.k.a. William Zhou) is an

international trafficker of Fentanyl identified as a significant narcotics trafficker under the U.S.

Drug Kingpin Act. The blockchain accounts associated with YAN on the SDN list include

1Kuf2Rd8mDyAViwBozGTNYnvWL8uYFrkVo which contains .00011546 JTC,

1P3ZfGFLezzYGg9k5SVzQmnjyh7nrUmF2y which contains .00011883 JTC,

1EpMiZkQVekM5ij12nMiEwttFPcDK9XhX6 which contains .00011883 JTC,

1JREJdZupiFhE7ZzQPtASuMCvvpXC7wRsC which contains .00011883 JTC,

1P3ZfGFLezzYGg9k5SVzQmnjyh7nrUmF2y which contains .00011883,

1EpMiZkQVekM5ij12nMiEwttFPcDK9XhX6 which contains 0.00011883 JTC,

1JREJdZupiFhE7ZzQPtASuMCvvpXC7wRsC which contains .00011883,

12QtD5BFwRsdNsAZY76UVE1xyCGNTojH9h   which contains 2.19011546, and

13f59kUM5FU8MfTG7DCEugYarDhSD7XCoC which contains 5.56318387 JTC.

41.   Defendant YINYIN TIAN (a.k.a. "田寅寅 "; a.k.a. "snowsjohn"; a.k.a. "tianyinyin0404") is a conspirator in a money laundering ring that laundered over $100 million worth of cryptocurrency stolen by North Korean hackers. The blockchain accounts associated with TIAN on the SDN list include 1AXUTu9y3H8w4wYx4BjyFWgRhZKDhmcMrn which contains .00000546 JTC.

42.   Defendant HUSAYN AL-SHAMI is a money launderer for and Iran-funded terrorist organization. The blockchain account associated with AL-SHAMI on the SDN list include 17a5bpKvEp1j1Trs4qTbcNZrby53JbaS9C which contains .00216263 JTC.

JURISDICTION AND VENUE

43.   The court has subject matter jurisdiction over this action pursuant to 31 U.S.C. §§ 1331, 1332(a)(2), 1337 and 1367.

44.   Each of the Defendants are subjects of foreign states and Plaintiff is a citizen of the United States. The amount in controversy, which includes Plaintiff's threatened goodwill and other damages, exceeds $75,000. Plaintiff is also entitled to recover reasonable attorney's fees and costs under its user agreement Terms and Conditions.

45.   The claims herein also arise under federal statutes including International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.), the Foreign Narcotics Kingpin Designation Act (21 U.S.C. §1904) and others. The claims also arise under executive orders

entered pursuant and administrative orders by the Department of the Treasury and/or are supplemental to claims over which this court has jurisdiction.

46.   Personal jurisdiction and venue are proper in this judicial district. A substantial part of threatened events or omissions giving rise to the claims would occur here if not enjoined because transactions on a blockchain take place at least in part where one or more miners are located. Further, each blockchain's ledger of accounts is maintained at least in part where one or more of the miners are located. Finally, an unincorporated blockchain is a citizen of any jurisdiction where one or more of its miners is located.

47.   Personal jurisdiction and venue are also proper here because Defendants have consented to jurisdiction and venue by and through the JuratBTC Terms and Conditions (https://jurat.io/juratbtc-terms/). The terms expressly provide that JTC holders may not transact in JTC if they are placed on the SDN list, see §11, and that each JTC account owner consents to jurisdiction and venue to enforce this provision in any location where a miner may be found. At least one JuratBTC miner is located here.

48.   Pursuant to the JuratBTC Terms & Conditions, owners of JTC consent to service of summons and other notices via the notice list at www.jurat.io/notifications. See § 2.E.

DEFENDANTS ARE PROHIBITED BY LAW FROM TRANSACTING JTC

49.   Each of the Defendants have been designated as sanctioned persons by the Secretary of the Treasury pursuant to the following statute and Executive Orders (E.O.):

    a. Defendant HUSAYN AL-SHAMI (E.O. 13224);

    b. Defendant ANTON ANDREYEV (E.O.s 13694, 13757 and 13848);

    c. Defendant BLENDER.IO (E.O. 13694);

    d. Defendant CHATEX (E.O. 13694);

     e.   Defendant FARRUKH FURKATOVITCH FAYZIMATOV (E.O. 13224);

     f.   Defendant TABAN DENG GAI (E.O. 13818);

     g.   Defendant MATTHEW GRIMM (E.O. 14059);

     h.   Defendant HYDRA MARKET (E.O. 13694);

     i.   Defendant YU JIN (E.O. 13687);

     j.   Defendant JIADONG LI (E.O.s 13694, 13757, and 13722);

     k.   Defendant SECOND EYE SOLUTIONS (E.O. 13848);

     l.   Defendant SOUTHFRONT (E.O.s 13382, 13694, and 13848);

     m. Defendant SUEX (E.O. 13694);

     n.   Defendant YINYIN TIAN (E.O.s 13694, 13757, and 13722);

     o.   Defendant XIAOBING YAN (Foreign Narcotics Kingpin Designation Act, 21 U.S.C. §1904);

     p.   FUJING ZHENG (Foreign Narcotics Kingpin Designation Act, 21 U.S.C. §1904).

50.   Each of the E.O.s, in turn, are enacted pursuant to The International Emergency Economic Powers Act (IEEPA), 50 U.S.C. §§ 1701-08 and well as other federal statutes.

51.   The various provisions of law under which Defendants were designated all "block" Defendants' property in the United States or within the possession or control of any person (including any entity) in the United States. The JTC property is located in the United States. Moreover, there are JuratBTC miners located in the United States.

52.   Executive Order ("E.O.") 13224 § 1(a) provides in pertinent part: "[A]ll property and interests in property of the [sanctioned persons] that are in the United States or that hereafter

come within the United States, or that hereafter come within the possession or control of United

States persons are blocked. . . ”

53.   E.O. 13687 § 1(a) provides in pertinent part: "All property and interests in

property that are in the United States, that hereafter come within the United States, or that are or

hereafter come within the possession or control of any United States person of the [sanctioned

individual] are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt

in . . .”

54.   E.O. 13694 § 1(a) provides in pertinent part: "All property and interests in

property that are in the United States, that hereafter come within the United States, or that are or

hereafter come within the possession or control of any United States person of the [sanctioned

individual] are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt

in.. . .”

55.   E.O. 13757 § 1(a) provides in pertinent part: "All property and interests in

property that are in the United States, that hereafter come within the United States, or that are or

hereafter come within the possession or control of any United States person of the [sanctioned

individual] are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt

in. . .”

56.   E.O. 13722 § 1 (a) provides in pertinent part: "All property and interests in

property that are in the United States, that hereafter come within the United States, or that are or

hereafter come within the possession or control of any United States person of the Government

of North Korea or the Workers' Party of Korea are blocked and may not be transferred, paid,

exported, withdrawn, or otherwise dealt in.”

57.   E.O. 13818 1(a) provides in pertinent part: "All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person of the [sanctioned individual] are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in. . . "

58.   13382 1(a) provides in pertinent part: "[A]ll property and interests in property of the [sanctioned persons], that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of United States persons, are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in:

59.   E.O. 13848 § 2(a) provides in pertinent part: "All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person of the [sanctioned individual] are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in. . ."

60.   E.O. 14059 2(a)(i) provides in pertinent part: "all property and interests in property of the sanctioned person that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person, and [] such property and interests in property may not be transferred, paid, exported, withdrawn, or otherwise dealt in. . ."

61.   The Foreign Narcotics Kingpin Designation Act, 21 U.S.C. § 1904 (b) provides in pertinent part: "[T]here are blocked as of [the designation date], and any date thereafter, all such property and interests in property within the United States, or within the possession or control of any United States person, which are owned or controlled by [the sanctioned person]. . . "

31 CFR § 501.605 governs private litigation against or on behalf of sanctioned individuals. Private litigants must notice of the litigation and of each filing to Chief Counsel (Foreign Assets Control), Office of the General Counsel, Department of the Treasury. Plaintiff is complying and will continue to comply with this rule.

THE NEED FOR DECLARATORY AND INJUNCTIVE RELIEF

62.   Pursuant to the foregoing provisions of federal law, Defendants are prohibited from accessing the JTC in their sanctioned blockchain account. Despite this fact, there is nothing that actually prevents Defendants from accessing their accounts and transacting the JTC because Defendants currently possess the private keys which cryptographically control the sanctioned accounts. These private keys are known only to Defendants.

63.   Were Plaintiff like the Bitcoin blockchain, there would be nothing a court (or any lawful authority) could do to stop Defendants from accessing the blockchain accounts. However, JuratBTC includes protocols for its blockchain nodes to comply with court orders. In particular, the nodes can access electronic docket systems like this Court's PACER system, and retrieve valid court orders. The blockchain nodes are then able to understand and implement the court orders using the method explained below.

64.   So long as Defendants' private keys remain valid for signing transactions, Defendants can initiate a transaction message over the internet from anywhere in the world, sign it with the private key, and the blockchain will process it. Accordingly, Plaintiff needs a declaration regarding Defendants' rights and responsibilities so that the blockchain can follow the declaration and prevent Defendants from evading the sanctions.

65.   In particular, Defendants' rights in JTC are defined and limited by the JuratBTC Terms and Conditions. The Terms prohibit use of JTC by anyone on the OFAC SDN list. See §

11. The Terms further provide for entry by consent of a restraining order, preliminary injunction,

and final judgment for injunctive relief upon proof that a JuratBTC account is listed on the SDN:

> For any Account that is officially identified . . . on the U.S. Treasury
> Department's Specially Designated Nationals List . . . you understand and further
> agree that an enforcement action may be brought pursuant to subsection (C) to
> include the entry by consent of an immediate restraining order, preliminary
> injunction, and final judgment for declaratory and/or injunctive relief freezing the
> Account and any Digital Assets associated with it as well as voiding all associated
> private keys, without prior notice. You acknowledge that JuratBTC, its Users,
> Miners and the Company, would suffer irreparable harm should you violate any
> trade restriction or sanction regarding your Account.
>
> You consent to entry of the orders and judgments, without security, solely upon
> proof that the Account address is listed on the official website of a U.S.
> government agency and pursuant to Section 2, above. The consent order or
> judgment will note that the Account may be unfrozen by a court in a subsequent
> action upon proof that the Account is no longer subject to sanctions or
> restrictions.

Id. The Terms are available at https://jurat.io/juratbtc-terms and attached as Exhibit A

hereto.

66.   Accordingly, Plaintiff seeks a declaration that the Defendants' private keys are

invalid to spend the JTC in their JuratBTC accounts and that the JuratBTC miners are not

obligated to honor transactions signed with those keys. Entering this relief will allows the

JuratBTC miners to reject any transactions that Defendants attempt to sign with the key.

Inclusion of the Jurat ID

67.   Blockchain nodes, like any other computer, cannot reading and understand a court

order in the same manner as a human being. Rather, in order to enforce court orders, JuratBTC

nodes rely on the inclusion of a "Jurat ID".

68.   A Jurat ID is a string of letters and numbers (called a "hash") that identifies the

blockchain accounts and blockchain transactions subject of the court's order. The Jurat ID recites

the relevant facts stated in the plain English order but in a compressed, machine-readable form.

Including a Jurat ID in the court order allows the computer nodes to extract the same information from the order as a human reader would. The JuratBTC blockchain nodes will then follow the court's order.

69.   For example, a court order freezing property in a safe deposit box must specify the location and number of the safe deposit box (as provided to the court by the litigants) and the require action – not to accept the defendant's deposit box key if he attempts to access the box. Cryptocurrency litigation involves similar information, the relevant blockchain account addresses (as provided by the litigants) and the relevant transaction (freeze, unfreeze, or transfer a certain number of coins) as determined by the court. The Jurat ID is the same set of information in a compressed, machine-readable form.

70.   Litigants to a case concerning a blockchain account can provide a Jurat ID to the court along with the plain language statement of the same information (account numbers and requested relief). Opposing litigants can provide opposing IDs. For example, a Plaintiff's ID may state entitlement to 10 JTC, while the Defendant's ID may state that only 5 JTC is appropriate. Once the court decides the case, it includes the ID tendered by the prevailing party just as it includes the plain language version of the same information -- account address and relief.

71.   All holders of JTC consent to inclusion of the Jurat ID in the JuratBTC Terms & Conditions ("Terms"):

> When you send a transaction to the network that is not signed by a private key you must include information identifying a court order or judgment which you believe justifies the transaction: [including] court, case number, and docket entry. Nodes will then check the court's order or judgement for a Jurat ID corresponding to your transaction request. If the identified order or judgment contains a corresponding ID then the nodes will process the transaction. Inclusion of the Jurat ID is necessary to this core function of JTC. **Accordingly, by using JTC, you consent to the inclusion of the Jurat ID in any court order or judgment concerning JTC.** (Emphasis added.)

T&C § 2 (Unique Functions of the JuratBTC Network) (emphasis added).

72.   Plaintiff has generated Jurat IDs that encode the transaction needed for the miners to disable the Defendants' private keys from spending the JTC in the Defendants' accounts. Those IDs are attached hereto as Exhibit B.

73.   Assuming the court grants the requested relief, the docketed order should include the Jurat ID (by consent, pursuant to the JuratBTC T&C), either in the text of the order itself or as an attachment thereto. The inclusion of the specific Jurat ID requested herein in the court's order will cause the Jurat blockchain to carry out the Court's order.

74.   If OFAC removes the Defendants from the SDN list, the Defendants can generate Jurat IDs that restore control of the coins to their private key and bring their own declaratory judgment action to have the keys declared valid.

COUNT I – DECLARATORY RELIEF

75.   Plaintiff incorporates all paragraphs of this complaint as if fully set forth herein.

76.   Each Defendant possesses JTC coins on the JuratBTC blockchain and is a party to the JuratBTC Terms and Conditions.

77.   It is a breach of the JuratBTC Terms and Conditions for a person or entity on the U.S. Treasury Department's Specially Designated Nationals List to use JTC. T&C § 11.A.

78.   The SDN list identifying Defendants' blockchain accounts is published on the official website of the United States Department of the Treasury at https://www.treasury.gov/ofac/downloads/sdnlist.pdf.

79.   Pursuant to the Terms, Defendants may not use JTC so long as they are included in the SDN list.

80.   Pursuant to the Terms, Defendants have consented to entry of declaratory relief.

WHEREFORE, the Court should enter judgement against each of Defendants ANTON ANDREYEV, BLENDER.IO, CHATEX, FARRUKH FURKATOVITCH FAYZIMATOV, TABAN DENG GAI, MATHEW GRIMM, YU JIN, JIADONG LI a/k/a "KHALEESI" a/k/a "BLACKJACK1987", HYDRA MARKET, HUSAYN AL-SHAMI, SECOND EYE SOLUTIONS a/k/a "FORWARDERZ", SOUTHFRONT, SUEX, YINYIN TIAN a/k/a 田寅寅 a/k/a "TIANYINYIN0404", a/k/a "SNOWSJOHN", XIAOBING YAN, and FUJING ZHENG, declaring that:

(1) The Defendant has no right to transact the JTC in their above-identified accounts on JuratBTC;

(2) The Defendant's private key for the above-listed accounts are invalid to transact the JTC in their accounts;

(3) Awarding Plaintiff reasonable costs and attorney's fees.

COUNT II – INJUNCTIVE RELIEF

81.   Plaintiff incorporates all paragraphs of this complaint as if fully set forth herein.

82.   By all of the above, Defendants are in violation of the restrictions on their use of JTC in the Terms and Plaintiff is threatened with irreparable harm as a direct result.

83.   Defendants have consented in the Terms and Conditions to entry of an injunction prohibiting their access to JuratBTC blockchain accounts.

84.   Entry of an injunction would serve the interests of Plaintiff as well as the public interest.

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WHEREFORE, the Court should enter an injunction against each of Defendants ANTON ANDREYEV, BLENDER.IO, CHATEX, FARRUKH FURKATOVITCH FAYZIMATOV, TABAN DENG GAI, MATHEW GRIMM, YU JIN, JIADONG LI a/k/a "KHALEESI" a/k/a "BLACKJACK1987", HYDRA MARKET, HUSAYN AL-SHAMI, SECOND EYE SOLUTIONS a/k/a "FORWARDERZ", SOUTHFRONT, SUEX, YINYIN TIAN a/k/a 田寅寅 a/k/a "TIANYINYIN0404", a/k/a "SNOWSJOHN", XIAOBING YAN, and FUJING ZHENG, prohibit the Defendant form using their private key for their JuratBTC blockchain account or otherwise transacting in JTC. The Court should further award Plaintiff reasonable costs and attorney's fees.

VERIFICATION

I, Michael Kanovitz, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: February 8, 2023

Signed:_____

RESPECTFULLY SUBMITTED,

s/Jonathan Loevy

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