

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

<b>SECURITIES AND EXCHANGE</b>	)	
<b>COMMISSION,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 1:23-cv-01599</b>
	)	
<b>BINANCE HOLDINGS LIMITED,</b>	)	
<b>BAM TRADING SERVICES INC.,</b>	)	
<b>BAM MANAGEMENT US HOLDINGS</b>	)	
<b>INC., AND CHANGPENG ZHAO,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF U.S. SECURITIES AND EXCHANGE COMMISSION’S  
EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER  
FREEZING ASSETS, GRANTING OTHER RELIEF, AND  
ORDER TO SHOW CAUSE WHY RELIEF SHOULD NOT CONTINUE**

Pursuant to Section 21(d) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78u(d)] and Section 20(b) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. §§ 77t(b)], Plaintiff U.S. Securities and Exchange Commission (“SEC”) requests that this Court issue a temporary restraining order:

- (i) freezing assets (both known and unknown) of Defendant BAM Management US Holdings Inc. (“BAM Management”) and BAM Trading Services Inc. (“BAM Trading”) (collectively, “BAM”), as set forth in the supporting Memorandum of Law and proposed restraining order and specifically including those in Exhibit A to the Motion and Proposed Order;
- (ii) ordering the repatriation and other specified relief concerning the custody and control of fiat currency and crypto assets deposited, held, traded, and/or accrued by customers on the Binance.US crypto asset trading platform (“Binance.US

Platform”) or otherwise held for the benefit of customers of BAM and the Binance.US Platform (collectively, “Customer Assets”);

- (iii) directing Defendants Binance Holdings Limited (“Binance”), BAM Trading, BAM Management, and Changpeng Zhao (“Zhao”) to show cause why a preliminary injunction should not be entered;
- (iv) prohibiting Defendants from destroying, altering, or concealing relevant records;
- (v) requiring sworn accountings from Defendants;
- (vi) ordering expedited discovery;
- (vii) authorizing alternative means of service; and
- (viii) ordering any other equitable relief necessary to protect investors and effectuate the requested relief.

The SEC respectfully submits that this relief is necessary on an expedited basis to ensure the safety of customer assets and prevent the dissipation of available assets for any judgment, given the Defendants’ years of violative conduct, disregard of the laws of the United States, evasion of regulatory oversight, and open questions about various financial transfers and the custody and control of Customer Assets—including by Defendants who claim they are not subject to the Court’s jurisdiction—as described in the Complaint, Memorandum of Law, and supporting materials

In support of this Motion, the SEC relies upon and incorporates by reference the Complaint, the supporting Memorandum of Law, the Declarations of Sachin Verma and Colby Steele of the SEC and their respective attachments, and the Certification Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1 (“Certification”).

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1, undersigned counsel for the SEC has certified in the attached Certification that, contemporaneously with the filing of the Motion for a Temporary Restraining Order and accompanying materials, the SEC has provided copies of all pleadings and papers filed in this action to date or to be presented to the Court at the hearing, including the Motion for a Temporary Restraining Order.

For all the reasons set forth in the supporting Memorandum of Law, the Complaint, and the other documents referenced above, the SEC respectfully requests that the Court grant the SEC's Motion and issue an order providing all of the relief requested herein. For the Court's convenience, the SEC has also contemporaneously filed a proposed order.

Dated: June 6, 2023  
Washington, D.C.

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SECURITIES AND EXCHANGE  
COMMISSION

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<hr style="border: 0.5px solid black; margin-bottom: 5px;"/> <b>SECURITIES AND EXCHANGE COMMISSION,</b>	)	
	)	
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<b>Plaintiff,</b>	)	
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<b>v.</b>	)	<b>Civil Action No. 1:23-cv-01599</b>
	)	
<b>BINANCE HOLDINGS LIMITED, BAM TRADING SERVICES INC., BAM MANAGEMENT US HOLDINGS INC., AND CHANGPENG ZHAO,</b>	)	
	)	
	)	
	)	
<b>Defendants.</b>	)	
<hr style="border: 0.5px solid black; margin-top: 5px;"/>	)	

**TEMPORARY RESTRAINING ORDER  
FREEZING ASSETS, GRANTING OTHER RELIEF, AND  
ORDER TO SHOW CAUSE WHY RELIEF SHOULD NOT CONTINUE**

This matter comes before the Court upon the Emergency Motion by Plaintiff United States Securities and Exchange Commission (“SEC” or “Commission”) for the following orders with respect to Defendants Binance Holdings Limited (“Binance”), BAM Trading Services, Inc. (“BAM Trading”), BAM Management US Holdings, Inc. (“BAM Management”), and Changpeng Zhao (“Zhao”):

1. an Order to Show Cause Why a Preliminary Injunction Should Not be Granted as to Defendants;
2. an Order Freezing the Assets of Defendant BAM Management and BAM Trading (together, “BAM”) as set forth herein;
3. an Order Directing Defendants to Repatriate Assets Held for the Benefit of BAM Customers;

4. an Order for Other Relief Concerning the Custody and Control of BAM Customers' Assets;
5. an Order Prohibiting the Destruction of Records by the Defendants;
6. an Order Requiring Sworn Accountings of Certain Assets from the Defendants;
7. an Order Authorizing Expedited Discovery from the Defendants; and
8. an Order Authorizing Alternative Means of Service.

The Court has considered the Commission's Complaint; its Emergency Motion for a Temporary Restraining Order Freezing Assets, Granting Other Relief, and Order to Show Cause Why Relief Should Not Continue; supporting Memorandum of Law; and the declarations, exhibits, and other materials filed in support thereof. The Court now finds as follows:

1. This Court has jurisdiction over the subject matter of this action and over Defendants, and venue properly lies in this District as to all Defendants.
2. The Commission has made a sufficient and proper showing in support of the relief granted herein, as required by Section 20(b) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. § 77t(b)] and Section 21(d)(1) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78u(d)], by setting forth evidence from which an inference of a violation can be drawn and showing a likelihood that the Commission will prevail at trial on the merits and that the Defendants have engaged in and, unless temporarily restrained and enjoined by order of this Court, will continue to engage in acts, practices, and courses of business constituting violations of Section 5 and Section 17(a)(2) and (3) of the Securities Act [15 U.S.C. §§ 77e(a) and 77e(c)] [15 U.S.C. § 77q(a)(2) and 77q(a)(3)] as well as Sections 5, 15(a), and 17A(b) of the Exchange Act [15 U.S.C. §§ 78e, 78o(a), and 78q-1(b)] .

3. An order freezing BAM's assets is necessary to preserve the status quo, prevent dissipation or transfer of those assets from the jurisdiction of this Court, and protect this Court's ability to award relief in the form of disgorgement, prejudgment interest, and civil penalties.

4. It further appears that an order requiring Defendants to repatriate assets held for the benefit of customers of BAM and the Binance.US crypto asset trading platform ("Binance.US Platform") is necessary to preserve the status quo, ensure the safety and availability those assets held, and prevent dissipation or transfer of those assets from the jurisdiction of this Court.

5. It further appears that an order requiring Defendants to transfer to, and otherwise ensure that, Defendant BAM Trading and Defendant BAM Management, through their officers and employees, have sole possession, custody, and control of all BAM and Binance.US Platform customer assets as defined below, including, for the avoidance of doubt, assets deposited, held, traded, and/or accrued by the customers to transact on the Binance.US Platform and assets committed to BAM's "staking as a service" investment product, is necessary to preserve the status quo, ensure the safety and availability of BAM customer assets, and prevent dissipation or transfer of those assets from the jurisdiction of this Court.

6. It further appears that an order prohibiting Defendants from destroying, altering, or concealing records of any kind—including documents concerning the allegations in the Complaint or Defendants' assets, finances, business operations, or customer assets—is necessary to ensure compliance with the relief granted herein and to protect the integrity of this litigation.

7. There is good cause to grant the SEC's requests for a verified accounting of assets as set forth herein and alternative means of service.

8. Good and sufficient reasons have been shown why expedited discovery is necessary.

Accordingly, the Motion is **GRANTED**, and the Court hereby orders as follows:

**I.**

**SHOW CAUSE HEARING**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the** Defendants show cause, if any, before the Honorable \_\_\_\_\_ of this Court, at \_\_\_ o'clock \_\_.m., on the \_\_\_ day of \_\_\_\_, 2023, in Courtroom \_\_\_\_, United States Courthouse, in Washington, D.C., or as soon thereafter as the matter can be heard, why a Preliminary Injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure should not be granted against the Defendants, as requested by the Commission. Defendants shall serve any papers in opposition to such relief by hand delivery, overnight courier service, or electronic mail to the Commission's counsel, Matthew Scarlato, Senior Trial Counsel, Securities and Exchange Commission, 100 F Street, N.E., Washington, DC, 20549-5949, scarlatom@sec.gov, with a copy sent to all SEC counsel of record, no later than \_\_\_\_\_, 2023 at 5:00 p.m. The Commission may serve and file a reply no later than \_\_\_\_\_, 2023 at 5:00 p.m., and shall serve such reply brief, if any, on Defendants by the most expeditious means available.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that,** as provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this Final Judgment by personal service or otherwise: (a) each Defendant's officers, agents, servants, employees, and attorneys; and (b) other persons in active concert or participation with Defendant or with anyone described in (a).



**II.**

**ASSET FREEZE**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that, pending the determination of the Commission's Motion for a Preliminary Injunction or hearing on the merits:

A. Defendants BAM Management and BAM Trading and their agents, servants, employees, attorneys-in-fact, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise (including without limitation, all financial and brokerage institutions identified on Exhibit A to this Order), and each of them, shall hold and retain within their control, and otherwise prevent any disposition, transfer, pledge, encumbrance, assignment, dissipation, concealment, or other disposal whatsoever of any of their funds or other assets or things of value presently held by them, under their control, or over which they exercise actual or apparent investment or other authority, in whatever form such assets may presently exist and wherever located, including, but not limited to, all funds or assets in those accounts identified on Exhibit A to this Order except as expressly set forth in this Order;

B. That any financial or brokerage institution or other person or entity holding any funds or other assets in the name of, for the benefit of, or under the custody or control of Defendants BAM Management and BAM Trading, their agents, servants, employees, attorneys-in-fact, and those persons in active concert or participation with them, and each of them, shall hold and retain within their control and prohibit the withdrawal, removal, transfer or other disposal of any such funds or other assets except as expressly set forth in this Order.

C. To the extent that a brokerage firm holds a brokerage account for Defendant BAM Management or Defendant BAM Trading that contains options, the brokerage firm shall

exercise business judgment to close or sell the position and/or take other reasonable steps to preserve and maximize the value of Defendant BAM Management or Defendant BAM Trading's accounts and to prevent dissipation of the assets. The brokerage firm shall ensure that all net proceeds of any such activity remain in that account and subject to the asset freeze ordered in this case.

### **III.**

#### **REPATRIATION**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that** on or before **10 days** from the date the Court issues this Restraining Order, each Defendant shall repatriate to the United States all fiat currency and crypto assets that are deposited, held, traded, and/or accrued by investors (referred to herein as "customers") on the Binance.US Platform, including for BAM's staking-as-a-service program, or otherwise held for the benefit of BAM and Binance.US Platform customers, including, but not limited to, any hardware crypto asset wallets, all private keys in any form (or portions thereof), and any device, hardware, or software holding such private key or portion thereof (hereinafter referred to as "Customer Fiat Assets" or "Customer Crypto Assets" and, collectively, "Customer Assets").

### **IV.**

#### **CUSTODY AND CONTROL OF BINANCE.US CUSTOMER ASSETS**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that,** on or before **5 days** from the date the Court issues this Restraining Order, Defendants will transfer to, and otherwise ensure that, BAM Trading, through its officers and employees, will have sole possession, custody, and control of all Customer Assets, and all transfers and withdrawals of Customer

Assets will solely be under the direction and control of Defendant BAM Trading, through officers and employees located in the United States;

**1. IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that within **5 days** of this Restraining Order, Defendants will:

- a. coordinate the transfer to Defendant BAM Trading of any Customer Assets currently in the possession, custody, or control of Defendant Binance, Defendant Zhao, and any individual or entity with any affiliation, agreement, or other relationship with Defendant Binance, Defendant Zhao, or any Zhao-owned or -controlled entity (collectively, “Binance Entities”);
- b. remove Defendant Binance, Defendant Zhao, and any of the Binance Entities as a signatory or authorized person to transfer or withdraw assets from all accounts and/or wallets containing Customer Assets; and
- c. ensure that neither Defendant Binance, nor Defendant Zhao, nor any of the Binance Entities obtains possession, custody, or control over Customer Assets, including by being designated as an account holder or signatory of any account or wallet holding Customer Assets, without first obtaining leave of the Court.

**2. IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that within **30 days** of entry of the Restraining Order, Defendants will transfer all Customer Crypto Assets to new wallets with new private keys, including new administrative keys. These private keys, and any portion or copy thereof, and any device, hardware, or software holding such private keys or any portion or copy thereof, will be in the sole possession, custody, and control of Defendant BAM Trading officers and employees who are located in the United States, and will not be

provided to or in any way shared with Defendant Binance, Defendant Zhao, or any of the Binance Entities. Defendant BAM Trading will provide counsel of record for the SEC with the addresses for all new wallets holding Customer Assets, both hot and cold, and will identify the specific crypto asset(s) held within each wallet.

3. **IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that Defendant BAM Trading may continue to transfer Customer Assets to support redemptions of Customer Crypto Assets, with the exception of and specifically excluding Customer Crypto Assets of any of the Binance Entities and otherwise subject to the prohibition that it not transfer Customer Assets for the benefit of any of the Binance Entities.

4. **IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that any transfer of Customer Assets over \$100,000 must be approved in writing by the CEO and CFO of Defendant BAM Trading and certified by them to counsel of record for the SEC as being compliant with this Order.

5. **IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that Defendant BAM Trading may transfer custody of Customer Crypto Assets deposited, held, traded, staked, and/or accrued through BAM Trading's staking-as-a-service program "Staking Assets" to the third-party custodians BitGO and Aegis, provided the following criteria are met:

- a. the wallets are located within the United States and directed solely by BAM Trading officers and employees located in the United States;
- b. the private keys for these wallets, or any portion or copy thereof, and any device, hardware, or software holding such private keys or any portion or copy thereof, are held in the United States by officers and employees of

BAM Trading, BitGO, and/or Aegis, respectively, located in the United States;

- c. all transfers require the approval of both Defendant BAM Trading and, if held by BitGO or Aegis, as necessary, BitGO or Aegis; and
- d. The Binance Entities shall not have possession, custody, or control of these Staking Assets, including, but not limited to, any authority, formally or informally, directly or indirectly, to control, transfer, or withdraw, these Staking Assets.

**V.**

**PRESERVATION OF DOCUMENTS AND INFORMATION**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Defendants, their directors, officers, agents, servants, employees, attorneys, depositories, banks, and those persons in active concert or participation with anyone or more of them, and each of them, be and they hereby are restrained and enjoined from, directly or indirectly, destroying, mutilating, concealing, altering, disposing of, or otherwise rendering illegible in any manner, any of the books, records, documents, correspondence, brochures, manuals, papers, ledgers, accounts, statements, obligations, files and other property of or pertaining to Defendants, wherever located and in whatever form, electronic or otherwise, until further Order of this Court.

**VI.**

**ACCOUNTING**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that, on or before **5 days** from the date the Court enters this Restraining Order, each Defendant, to the best of their knowledge and ability, provide counsel for the SEC with a preliminary list of:

1. accounts and wallets holding Customer Fiat Assets, Customer Crypto Assets, and funds or assets of either BAM entity and the value of assets held;
2. customers of the Binance.US Platform and related services, and the balance of Customer Assets associated with each customer's Binance.US account and/or wallet; and
3. United States customers of the Binance.com crypto asset trading platform and related services, and the balance of Customer Assets associated with each United States customer's Binance.com account.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that, on or before **30 days** from the date the Court issues this Restraining Order, each Defendant shall serve upon the Commission a verified written accounting, which each Defendant must sign under penalty of perjury, providing the following information;

1. Each account or wallet holding Customer Assets or assets of either BAM entity or maintained in any Defendant's name, held by any Defendant or for any Defendant's direct or indirect beneficial interest, or over which any Defendant exercised any direct or indirect control from January 1, 2023 through the date of the accounting, including the name of the financial institution, exchange, or other entity holding such account or wallet, name and last four digits of the account number, and the wallet address;
2. All assets, funds, crypto assets, securities, or other property, real or personal, within each Defendant's possession, custody, or control, that is valued greater than \$1,000, that was transferred to or for the benefit of any Defendant or other person or entity from January 1, 2023 to the date of the accounting, including a description of each transferred asset, the name of the recipient, the date of the transfer, and the reason for the transfer; and

**VII.**

**EXPEDITED DISCOVERY**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that commencing with the time and date of this Order, in lieu of the time periods, notice provisions, and other requirements of Rules 26, 30, 33, 34, 36 and 45 of the Federal Rules of Civil Procedure, discovery shall proceed as follows:

1. For the next **60 days**, the SEC may conduct expedited discovery of Defendants and third parties concerning the Customer Assets and their security, segregation, availability, and any encumbrances or limitations that would make them unavailable for transfer or withdrawal by customers, including, but not limited to type, identity, location, value, custody, control, restrictions, and whether there are sufficient assets to satisfy customer liabilities or meet customer claims for Customer Assets held on their behalf. This limited expedited discovery pertaining to the Customer Assets shall not be counted against any discovery limits imposed under the Federal Rules of Civil Procedure;

2. Pursuant to Rule 30(a) of the Federal Rules of Civil Procedure, the SEC may take depositions upon oral examination on **7 calendar days'** notice of any such deposition. As to Defendants and their agents, servants, employees, and associates, the SEC may depose such witnesses after serving a deposition notice by email, hand, or overnight courier upon such individuals, and without serving a subpoena on such witness. If the Parties agree to conduct any depositions virtually, such depositions shall be conducted pursuant to the SEC's procedures, and the oath of the deponent may be administered remotely by the court reporter, through audio-video means, and this oath shall have the same effect as if given in the physical presence of the

deponent. Depositions that have not been signed by the witness may be used for purposes of any hearing relating to this preliminary injunction;

3. Pursuant to Rule 33(a) of the Federal Rules of Civil Procedure, Defendants shall answer any interrogatories served by the SEC within **10 calendar days** of service of such interrogatories;

4. Pursuant to Rule 34(b) of the Federal Rules of Civil Procedure, Defendants shall produce all documents requested by the SEC within **10 calendar days** of service of such request, with production of the documents made to counsel of record for the SEC or such other person or place as counsel for the SEC may direct in writing; and

5. All written responses to the SEC's requests for discovery under the Federal Rules of Civil Procedure shall be delivered electronically, or such other place and person as counsel for the SEC may direct in writing.

## **VIII.**

### **ALTERNATIVE SERVICE**

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** in addition to any means allowed by Federal Rules of Civil Procedure 4 and 5, the SEC may serve the summons and Complaint, any orders entered pursuant to this Motion (and all related papers), and any future filings, notices, subpoenas, or other process in the above-captioned case upon Defendants Changpeng Zhao and Binance Holdings Limited by sending copies by email to the attorneys who represented them during the investigation that led to this proceeding.



**IX.**

**RETENTION OF JURISDICTION**

**IT IS HEREBY FURTHER ORDERED** that this Court shall retain jurisdiction over this matter and the Defendants in order to implement and carry out the terms of all Orders and Decrees that may be entered and/or to entertain any suitable application or motion for additional relief within the jurisdiction of this Court, and will order other relief that this Court deems appropriate under the circumstances.

**SO ORDERED.**

Dated this \_\_\_ day of June, 2023:

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UNITED STATES DISTRICT JUDGE

SERVE:

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Washington, D.C. 20036-5306

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# EXHIBIT A

**Exhibit A****BAM Trading Services Inc.  
Bank Account Summary**

Bank/Processor	Entity	Account Number	
Axos Bank	BAM TRADING SERVICES INC	██████████6672	
Axos Bank	BAM MANAGEMENT US HOLDINGS INC	██████████7639	
Axos Bank	BAM MANAGEMENT US HOLDINGS INC	██████████3153	
Axos Bank	BAM MANAGEMENT US HOLDINGS INC	██████████3161	
Axos Bank	BAM MANAGEMENT US HOLDINGS INC	██████████3179	
Axos Bank	BAM TRADING SERVICES INC	██████████3088	
Axos Bank	B.US SECURITIES INC	██████████8827	
Axos Bank	BAM TRADING SERVICES INC	██████████3963	
Axos Bank	BAM TRADING SERVICES INC	██████████3971	
Axos Bank	BAM TRADING SERVICES INC	██████████3989	
Silvergate (SG)	BAM Trading Services Inc.	██████████377	
Prime Trust	BAM TRADING SERVICES INC	PT holds bank account @ Cross River Bank	
Prime Trust	BAM TRADING SERVICES INC	PT holds bank account @ Cross River Bank	
Prime Trust	BAM TRADING SERVICES INC	PT holds bank account @ Cross River Bank	
Prime Trust	BAM TRADING SERVICES INC	PT holds bank account @ Cross River Bank	
Prime Trust	BAM TRADING SERVICES INC	PT holds bank account @ Cross River Bank	
BitGo	BAM TRADING SERVICES INC	BitGo holds bank account at Customers Bank	
Nuvei	BAM TRADING SERVICES INC	Nuvei holds bank account @ Fresno First Bank	
Orum	BAM TRADING SERVICES INC	Orum holds bank account @ Silicon Valley Bank	
Orum	BAM TRADING SERVICES INC	Orum holds bank account @ Silicon Valley Bank	

Network	
ADA	s0yst0c
ALGO	PRXSZU
APT	9e63d5
ARBITRUM	d8e7
ASTR	Yvap8
ATOM	jj06rn2
AVAXC	ac46b
BAND	qsgl48
BCH	MCvdH
BNB	m7cesl
BSC	a807f
BTC	t67zlu
CELO	36edc
DASH	UqV8s
DGB	ysegv
DOGE	22EUz
DOT	1 84tFnd
EGLD	rkqgdh
EOS	inan
ETC	9490a5
ETH	30019c
FET	g7gs6
FIL	oyaq7i
FLOW	86da0
FTM	0eb3c
HBAR	4258
ICP	7ea2814c

ICX	[REDACTED]2c4cc
IOTA	[REDACTED]szfyyI
KAVA	[REDACTED]53x5x
KDA	[REDACTED]4f0f96c
KSM	[REDACTED]J2LZUF
LSK	[REDACTED]ank5
LTC	[REDACTED]eEP5Wvz
MATIC	[REDACTED]0d821
NANO	[REDACTED]68cbg
NEAR	[REDACTED]e046c00
NEO	[REDACTED]6s5sH
ONE	[REDACTED]t2vpzas
ONT	[REDACTED]vxhsQT
OPTIMISM	[REDACTED]7b97ed
POLYX	2[REDACTED]HiFXRGPg
QTUM	[REDACTED]THW9h
ROSE	[REDACTED]cdzkjge
RVN	[REDACTED]D9f2R
SGB	[REDACTED]8612ef
SOL	[REDACTED]GGLyr
SYS	[REDACTED]l6hg5m
THETA	[REDACTED]d06de8
TRX	[REDACTED]KcneH5
VET	[REDACTED]a6c29c6c
WAVES	[REDACTED]6VYoknT1
WAX	[REDACTED]swdr
XLM	[REDACTED]MGINUL4

XRP	[REDACTED] ZiZECV
XTZ	[REDACTED] x82CD
ZEC	[REDACTED] qCA2
ZEN	[REDACTED] NYBRG
ZIL	[REDACTED] qan7hc
IOST	[REDACTED] tw

Network	
BNB	x5mqr
VET	f1938c1
ETH	1938c1
XRP	uZK
RVN	5nNXs
LTC	Lxb5ha
DOGE	zYiTfdz
DASH	wuhW6
ATOM	hzthpd
XTZ	pUvKvL
NEO	3kZ6
ONT	UK3kZ6
XLM	XVQNIF
ETC	f1938c1
BTC	puZK
BSC	1938c1
SOL	a2am5h
AVAXC	938c1
ADA	qcul0a2
DOT	YdVMRA
BAND	wdt4e9
NEAR	c42f58
TRX	po9
FTM	938c1
QTUM	QLrEW
FLOW	9f6
ONE	gj7kfw
ALGO	COVFKE
ROSE	z2sut9k827
FET	lznr6
KSM	ajc48sv



Network	[REDACTED]	
ICP	[REDACTED]2d6380c	
HBAR	[REDACTED]79	
KAVA	[REDACTED]thl2h2	
EGLD	[REDACTED]xdg24e	
ATOM	[REDACTED]qlpyqt	
ATOM	[REDACTED]me2jz	
AVAXC	[REDACTED]63d	
AVAXC	[REDACTED]7	
BNB	[REDACTED]zm7gp9	
SOL	[REDACTED]spgjLtZHT	
SOL	[REDACTED]a26LzhH	
ETH	[REDACTED]541aA	
ETH	[REDACTED]0f347	
ADA	[REDACTED]unqq83udzm	
ADA	[REDACTED]sfkfqqg	
ADA	[REDACTED]swk03	
ADA	[REDACTED]q062tz8	
ADA	[REDACTED]vdy6eu	
ADA	[REDACTED]zq3h3mre	
BAND	[REDACTED]s5eg22	
DOT	[REDACTED]wr3Cndh	
DOT	[REDACTED]2YwF9o4H5	

Network	[REDACTED]	
NEAR	[REDACTED]7cdf5f9ea68d	
NEAR	[REDACTED]0fe4b91199	
FTM	[REDACTED]40f347	
ONE	[REDACTED]c7dze	
ROSE	[REDACTED]0aj8f	
FLOW	[REDACTED]21e8f	
FET	[REDACTED]x6f72l	
XTZ	[REDACTED]2nCAT	
KSM	[REDACTED]UrGeP	
ALGO	[REDACTED]VGQ6YY	
ICP	[REDACTED]46995bf22c	
KAVA	[REDACTED]l7u24ekv	
KAVA	[REDACTED]wdhy9	

Network		
RVN	5nNXs	t2fbsTkd
		RUI
		t2vpzas
		esuu
		mqfc7dze
		p975nu3
QTUM	LrEW	FZatox
		W9h
		Z48Lt
ALGO	COVFKE	WN4 K3OI
		PRXSZU
		RL2TNM
		VGQ6YY
		RHKUE
EGLD	24e	0q8v4k
		e6srkqgdh
XLM	DMTYQXVQNIF	GINUL4
		FUZFC2
FLOW	f6	1e8f
		da0
NEAR	0d93c42f58	5f0fe4b91199
		a582e046c00
		d97cdf5f9ea68d
		0d2c7c7f7ce
VET	38c1	a6c29c6c
		C840452B
ETC	1938c1	8a3051
		c9490A5
ADA	n9qcul0a2	hdve4tdqvdy6eu
		mt5zq3h3mre
		74hzhshnwhwp9
		x4zjz4a9wpexnq06tz8
		mqs0yst0c
		s5tpk7m
		xswk03
		ysfkfagg
		ujmunqq83udzm
AVAXC	8c1	0x15 eE9

		103ac46b
		FEA92693D
		47
		a763d
		2e4ad
XTZ	EApUvKvL	JZj1wY
		NQix82CD
		2nCAT
		SF3Yafk
KSM	ajc48sv	J2LZUF
		UrGeP
		uVYbRvA
ROSE	ut9k827	s0aj8f
		cdzkjge
		huz3e65u
XRP	BPFuZK	CmZiZECV
		rB BGIBXY3
HBAR	979	58
		5
FET	nr6	x6f72l
		nu66e6g7gs6
		df0exlz
ATOM	rjqpqhzhthpd	me2jz
		cos
		e2vj06m2
		cd6jsza4
		7qlpyqt
SOL	ea2am5h	6LzhH
		iXwGGLyr
		FUVi2
		MK46hTRF
ETH	df1938c1	ae321
		59541aA
		0x15e
		e2
		09289
		019c
		0f347

ONT	A [REDACTED] K3kZ6	A [REDACTED] sQT	[REDACTED]
		[REDACTED] XcbLw	[REDACTED]
		A [REDACTED] 5n4SmK	[REDACTED]
BAND	[REDACTED] pqwdt4e9	[REDACTED] ky8s5eg22	[REDACTED]
		[REDACTED] 7qsgl48	[REDACTED]
		[REDACTED] ya0nf4jta0	[REDACTED]
DASH	Xt [REDACTED] DwuhW6	[REDACTED] UqV8s	[REDACTED]
		[REDACTED] veEx6g	[REDACTED]
BCH	[REDACTED] s43ce4	q [REDACTED] e9qh	[REDACTED]
BNB	[REDACTED] 5mqr	[REDACTED] 7cesi	[REDACTED]
		[REDACTED] sshup	[REDACTED]
		[REDACTED] 5766gy602n	[REDACTED]
		[REDACTED] l7zm7gp9	[REDACTED]
		br [REDACTED] m	[REDACTED]
BTC	[REDACTED] BPpuZK	[REDACTED] yvkt67zlu	[REDACTED]
		[REDACTED] wVuQwit	[REDACTED]
DOT	[REDACTED] dVMRA	[REDACTED] YwF9o4H5	[REDACTED]
		[REDACTED] 4tFnd	[REDACTED]
		1 [REDACTED] 8wr3Cndh	[REDACTED]
		[REDACTED] scmNdA	[REDACTED]
NEO	[REDACTED] 3kZ6	A [REDACTED] 6s5sH	[REDACTED]
		A [REDACTED] 2HxbTQv	[REDACTED]
LTC	L [REDACTED] Lxb5ha	L [REDACTED] Wvz	[REDACTED]
		[REDACTED] qU	[REDACTED]
KAVA	[REDACTED] hl2h2	[REDACTED] y2k53x5x	[REDACTED]
		[REDACTED] wdh9	[REDACTED]
		[REDACTED] dx8ytlj	[REDACTED]
		[REDACTED] u24ekv	[REDACTED]
BSC	[REDACTED] f1938c1	[REDACTED] 8aeE9	[REDACTED]
		[REDACTED] d1da807f	[REDACTED]
		[REDACTED] bB7F9A30a	[REDACTED]
ICP	[REDACTED] 2bb2d6380c	[REDACTED] a2814c	[REDACTED]
		14 [REDACTED] bf22c	[REDACTED]
DOGE	[REDACTED] YtTfdz	[REDACTED] t1WMt	[REDACTED]
		[REDACTED] 22EUz	[REDACTED]
TRX	[REDACTED] J5po9	[REDACTED] rCwp	[REDACTED]
		[REDACTED] 9KcneH5	[REDACTED]
		[REDACTED] gZmTUQA	[REDACTED]

FTM	[REDACTED] 1938c1	[REDACTED] 650eb3c	[REDACTED]
		[REDACTED] 40f347	

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<hr style="border: 0.5px solid black; margin-bottom: 5px;"/> <b>SECURITIES AND EXCHANGE COMMISSION,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 1:23-cv-01599</b>
	)	
<b>BINANCE HOLDINGS LIMITED, BAM TRADING SERVICES INC., BAM MANAGEMENT US HOLDINGS INC., AND CHANGPENG ZHAO,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	
	)	
<hr style="border: 0.5px solid black; margin-top: 5px;"/>	)	

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S  
CERTIFICATION PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 65 AND LOCAL RULE 65.1**

Plaintiff Securities and Exchange Commission (“SEC”) hereby submits this Certification Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1 (“Certification”) in support of its Emergency Motion for A Temporary Restraining Order Freezing Assets, Granting Other Relief, and Order to Show Cause Why Relief Should Not Continue (“Motion for a Temporary Restraining Order”), accompanying Memorandum of Law, and all supporting documents.

The purpose of this Certification is to notify the Court that, contemporaneously with the filing of the Emergency Motion for a Temporary Restraining Order and accompanying materials, the SEC has provided copies of all pleadings and papers filed in this action to date or to be presented to the Court at the hearing, including the Motion for a Temporary Restraining Order.

Dated: June 6, 2023  
Washington, D.C.

By: /s/ Matthew Scarlato  
Matthew Scarlato (D.C. Bar No. 484124)  
Jennifer L. Farer (D.C. Bar No. 1013915)  
J. Emmett Murphy\*

U.S. SECURITIES AND EXCHANGE  
COMMISSION

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*Attorneys for the Plaintiff*

*\*Government attorney certification pursuant to  
Local Rule 83.2(d) pending*

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Donna Norman  
Ann Rosenfield  
Colby Steele  
Martin Zerwitz

SECURITIES AND EXCHANGE  
COMMISSION