

EXHIBIT 13



U.S. Department of Justice

Michael R. Sherwin
Acting United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St. N.W.
Washington, D.C. 20530*

November 10, 2020

VIA Electronic Mail
Digital Ocean

Re: Grand Jury Subpoena #GJ2020111067990
USAO #2020R02030

Dear Sir/Madam:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the undersigned Assistant U.S. Attorney with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Michael R. Sherwin
Acting United States Attorney

By: /s/Jessica C. Brooks
Jessica C. Brooks
Assistant United States Attorney
202-252-7745

UNITED STATES DISTRICT COURT
for the
District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Digital Ocean

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3 rd Floor Grand Jury # 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Tuesday, November 17, 2020 at 9:00 AM
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You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the undersigned Assistant U.S. Attorney with the requested records.

Date: November 10, 2020

CLERK OF COURT



Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Jessica C. Brooks, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
555 4th Street, N.W. Room #10-840
Washington, DC 20530
Phone: 202-252-7745 Fax: 202-252-7792
Email: jessica.brooks@usdoj.gov

Subpoena #GJ2020111067990
USAO #2020R02030
Preparer: ESWIENC

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
 FINANCE SECTION, 555 4TH ST., N.W., WASHINGTON, D.C. 20530
 202-252-1700

DCN (FINANCE use only) If blank please call 202-252-1700	C1
	LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA Jessica C. Brooks	2. SUPPORT PERSON ESWIENC	3. REQUESTING DIV CRIMINAL DIVISION	4. TELEPHONE CONTACT 202-252-7745	5. USAO NUMBER	6. GJ DATE
7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE DIR <input type="radio"/> OCDEF <input type="radio"/> HCF <input type="radio"/> AF <input type="radio"/> ACE <input type="radio"/>			10. GJ NUMBER
11. ESTIMATED DELIVERY DATE 11/17/2020	12. EST. COST (If Over \$3,000, MUST be submitted to PROCUREMENT SECT.) \$75.00	13. VENDOR NAME Digital Ocean		14. VENDOR TAX I.D.	

15. TYPE OF OBLIGATION

<input type="radio"/> TRANSCRIPT (Grand Jury) (25225)	<input type="radio"/> CONSULTANT (25107/25LC)
<input type="radio"/> TRANSCRIPT (Court) (25225)	<input checked="" type="radio"/> LEGAL RESEARCH (25213)
<input type="radio"/> TRANSCRIPT (Deposition) (25225)	<input type="radio"/> CERTIFIED CONVICTION (25213)
<input type="radio"/> FILING (Copy Abstract of Title, Filing Document Required) (25215)	<input type="radio"/> OTHER (Specify below) (25107)
<input type="radio"/> STENOGRAPHY & INTERPRETER SERVICES (25206)	

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
<input type="radio"/> REGULAR <input type="radio"/> INTERMEDIATE <input type="radio"/> DAILY (Approval Required)	<input type="radio"/> SPECIAL (Hourly - Approval Required) <input type="radio"/> EXPEDITE (Approval Required) <input type="radio"/> EXPRESS (Approval Required) (3 Days)	<input type="radio"/> COPY <input type="radio"/> ORIGINAL <input type="radio"/> TAPE	<input type="radio"/> FULL PAGE <input type="radio"/> CONDENSED <input type="radio"/> ELECTRONIC

19. REQUESTED ITEM
GJ2020111067990

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price		Amount
					Cost	Per	
TOTAL							

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION
 I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

SIGNATURE

DATE

Printed or Typed Name and Title: _____

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2020111067990 dated November 10, 2020, signed by Assistant United States Attorney Jessica C. Brooks, requesting specified records of the business named below.

Attached hereto are _____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

- (1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;
- (2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and
- (3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____.
(date)

(signature of declarant)

(name and title of declarant)

(name of business)

(business address)

(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

- a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
 - i. In your record retention systems; and/or
 - ii. By your technology, data, or other service provider(s).
- b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

- a. Text data relating to transactions shall be produced within a data file:
 - i. Using a delimited ASCII text data format; or
 - ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.
- b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

- a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.
- b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
 - i. Produced in individual graphic data files with any associated endorsements; and
 - ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

- a. ESI may be transmitted in an encrypted container (*e.g. flash drive, CD/DVD*).
Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*
- b. Authentication, such as hash coding, may be set by agreement.
- c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

This Subpoena applies to the following records and information associated with the following individuals, entities, bitcoin addresses, including support tickets submitted by the account holders from January 1, 2016 to present:

- IP address 198.211.106.104
- unviral.com
- Demandpath.com
- HRMORGAN171@GMAIL.COM
- Ilya Lichtenstein
- Heather Morgan
- Phone: 847-208-2167
- Phone: 510-701-2734

In addition to the users identified through the above information, please also provide information on any additional accounts that can be identified and linked to a user above through the use of a common Internet Protocol (IP) address.

These records shall include, but are not limited to:

1. All account information, EIN, names, physical addresses, phone numbers, email addresses, user IDs, account creation date, and administrative comments;
2. IP addresses and logs (at each login);
3. Financial instruments added to the subject account(s);
4. Copies of KYC documents or other proofs of identification;
5. All wallet addresses associated with the identified user(s);
6. Correspondence with the accountholder;
7. Complete transactional information (including complaints if available) for 2014 through present

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

- A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;
- B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups,

operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

- C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;
- D. Documents that “relate to” a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.
- E. **Instructions for production of electronically stored records:**

- **General:** Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).
- **Text Data:** Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).
- **Image Data:** Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.
- **Encryption/Authentication:** Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.