

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SECURITIES AND EXCHANGE	)	
COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. _____
	)	
BINANCE HOLDINGS LIMITED,	)	
BAM TRADING SERVICES INC.,	)	
BAM MANAGEMENT US HOLDINGS	)	
INC., AND CHANGPENG ZHAO,	)	
	)	
Defendants.	)	

**DECLARATION OF SACHIN VERMA**

I, Sachin Verma, declare the following pursuant to Title 28, United States Code, Section 1746:

1. I am an active Certified Public Accountant with over 20 years of experience. I am currently employed by the United States Securities and Exchange Commission (“SEC”) in Washington, DC, as an Assistant Chief Accountant in the Division of Enforcement. As part of my daily activities, I have performed numerous reviews of financial records in connection with SEC investigations.

2. I submit this declaration in support of the SEC’s Motion for a Temporary Restraining Order and Preliminary Injunctions. The information set forth herein is based upon my personal review of financial records such as bank statements, deposits, cancelled checks, wire transfers, signature cards, and other account documents produced to the SEC by the defendants, Silvergate Bank,

Signature Bank, FedWire and other parties pursuant to subpoenas and document requests (“financial records”) as of this date. My classification and summarization of financial records in this Declaration may change based on additional information that may be produced at a later date.<sup>1</sup> I have cited to bates stamped document where applicable (“record documents”).

3. During the period from April 18, 2019 to April 5, 2023 (the “Relevant Period”), the corporate Defendants and many other corporate entities owned by Defendant Zhao held numerous accounts with two banks in the United States-- Silvergate Bank and Signature Bank.

4. According to their websites, both banks had proprietary networks designed to enable their digital currency and institutional investor customers to send U.S. dollars and euros 24 hours a day between their accounts and the accounts of other bank customers. Silvergate promoted its SEN network as “Real-time USD and EUR settlement between counterparties, used by some of the largest exchanges in the world,” and “enabling near real-time transfers and immediate availability of funds.” Signature promoted its Signet Platform as leveraging blockchain technology to allow its commercial clients to make payments in U.S. dollars 24 hours a day, and “transactions made on the Signet Platform settle in real time, are safe and secure and incur no transaction fees.”<sup>2</sup>

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<sup>1</sup> Given the volume of the documents, they are not being attached, but can be made available upon the Court’s request to the SEC’s counsel of record.

<sup>2</sup> Wayback Machine for January 2023: [Signet | Signature Bank \(archive.org\)](#); Wayback Machine December 2022: [Silvergate Exchange Network Solutions | Silvergate Bank | San Diego \(archive.org\)](#).

5. I have reviewed account statements produced by Silvergate Bank for the following company accounts: Binance Holdings Limited, Binance Capital Management Co Ltd., BAM Management US Holdings Inc., BAM Trading Services Inc., Binance (Switzerland) AG, Sigma Chain AG, Merit Peak Limited, and Key Vision Development Limited. Many of those accounts participated in the SEN network.

6. I have reviewed account statements produced by Signature Bank for the following company accounts: Binance Holdings Limited, Binance Capital Management Inc., BAM Management US Holdings Inc., BAM Trading Services Inc., and Merit Peak Limited. Dozens of other Binance and non-Binance entities, all beneficially owned by Zhao, also held accounts at Signature Bank. Many of these bank accounts participated in the Signet network.

7. Attachment 1 summarizes the monthly activity in the Silvergate and Signature bank accounts of the above-mentioned companies and provides an overview of significant amounts of money moving through these accounts during 2019-2023, including through SEN and Signet accounts described above. Attachments 2 and 3 summarize the corporate domicile, the beneficial owner, officers and signatories during the relevant period.

## **SILVERGATE ACCOUNTS**

8. The following is a summary of account activity in the above-mentioned accounts at Silvergate Bank during the relevant period:

KEY VISION DEVELOPMENT LIMITED

a. Key Vision Development Limited is a Seychelles company beneficially owned by Zhao. The website address was identified as “Binance.com,” the email address was identified as fiat.finance@binance.com, and the number of employees was disclosed as “1000 (Binance).” The nature of its business was described as a cryptocurrency exchange to allow users to exchange digital assets. The expected funds flow activity was described as “Deposits: Fiat is wired to bank account, transfer fee paid at this point, Fiat will automatically convert to stablecoin (BUSD) when deposited. Withdrawals: BUSD converted to USD and withdrawn to client’s account.”

b. In 2020 and 2021, Key Vision deposits and withdrawals both exceeded \$13 billion (or \$11 billion if internal transfers between Key Vision accounts at Silvergate Bank are excluded). Nearly all of the funds deposited into Key Vision accounts were transferred to an account in the name of Merit Peak Limited. Silvergate closed Key Vision’s accounts in mid-2021.

MERIT PEAK LIMITED

c. Relevant Merit Peak Limited financial records show that Merit Peak Limited is a British Virgin Islands company beneficially owned by Zhao.<sup>3</sup> Its email address was identified as [Solutions@Binance.com](mailto:Solutions@Binance.com), and the nature of its business was described as OTC desk and proprietary trading of digital assets. Silvergate closed Merit Peak’s accounts in mid-2022.

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<sup>3</sup> BHL-SEC-BUSD-0021710.

d. Between 2019 and 2021, Merit Peak accounts received \$22 billion, including approximately \$11 billion from Key Vision, \$7.2 billion from other Binance entities, and \$1.2 billion from BAM Trading. Merit Peak paid most of that money - \$21.6 billion - to a foreign affiliate of Paxos TrustCompany, LLC (“Paxos”) the issuer of BUSD, a so-called stablecoin. This is summarized here:

<b>Merit Peak Limited</b>	<b>2019-2021 Deposits</b>	<b>2019-2021 Withdrawals</b>
<b>Silvergate Bank Account</b>		
Key Vision Development Limited	\$11,076,701,000	
Binance Entities	\$7,187,710,000	
BAM Trading Services Inc.	\$1,207,794,133	
Paxos Global PTE LTD		\$21,557,032,027
Other	\$2,475,399,939	\$390,573,045
<b>Total</b>	<b>\$ 21,947,605,072</b>	<b>\$21,947,605,072</b>
<b>Silvergate Bank Account</b>	<b>\$287,729,139</b>	<b>\$287,729,139</b>
<b>Total</b>	<b>\$22,235,334,211</b>	<b>\$22,235,334,211</b>

#### SIGMA CHAIN

e. Sigma Chain AG is a Swiss company beneficially owned by Zhao.<sup>4</sup> Sigma Chain’s described business was as a market maker providing liquidity to fiat exchanges. Sigma Chain’s account was closed in February 2023.

f. Between 2019 and 2023, Sigma Chain’s account received \$494 million, including \$184 million from Binance Holdings Limited, \$145 million

<sup>4</sup> SEC-SGB-E-0022457.

from BAM Trading, \$36 million from Binance Capital Management, and \$15 million from Key Vision. During that period, Sigma Chain paid \$494 million, including \$160 million to BAM Trading Services, \$131 million to Binance Holdings Limited, \$21 million to Merit Peak , \$2 million to Binance (Switzerland) AG, \$32 million to Guangying Chen, and \$10 million to Simpson Marine. This is summarized here:

<b>Sigma Chain Limited</b>	<b>2019-2023 Select Deposits</b>	<b>2019-2023 Select Withdrawals</b>
<b>Silergate Bank Account</b>		
Binance Holdings Limited	\$184,250,000	\$131,188,691
BAM Trading Services Inc.	\$145,000,100	\$160,000,600
Binance Capital Management Co Ltd	\$36,000,000	
Key Vision Development Limited	\$15,000,000	
Merit Peak		\$21,000,100
Guangying Chen		\$32,430,435
Simpson Marine (S.E.A.) Pte Ltd		\$10,973,407
Binance (Switzerland) AG		\$2,253,649
Binance Capital Management Co Ltd		\$1,000,000
Other	\$113,382,576	\$134,780,183
<b>Total</b>	<b>\$493,632,676</b>	<b>\$493,627,065</b>

BAM MANAGEMENT US HOLDINGS INC.

g. BAM Management US Holdings Inc., is a Delaware Company owned by BAM Management Company Limited, all of which is beneficially

owned by Zhao.<sup>5</sup> The last transaction date is February 22, 2023. Between 2019 and 2023 deposits and withdrawals exceeded \$500 million.

BAM TRADING SERVICES, INC.

h. BAM Trading Services Inc., is a Delaware company owned by BAM Management US Holdings, Inc.<sup>6</sup> Between 2019 and 2023, deposits and withdrawals for these accounts exceeded \$11 billion. It received \$4 billion from Prime Trust, \$2.4 billion from Wintermute, \$760 million from Subspace Capital LLC, \$424 million from Coinbase, \$380 million from KBIT Global, \$349 million from Auros Tech Limited, \$326 million from Tagomi Trading LLC, \$318 million from Alameda Research Ltd Debtor in Possession, \$160 million from Sigma Chain, \$27 million from BAM Management Holdings, and \$5 million from Merit Peak Limited. It sent \$3.3 billion to Wintermute Trading, Limited, \$1.5 billion to Alameda Research Ltd Debtor in Possession, \$1.2 billion to Merit Peak Limited, \$924 million to Auros Tech Limited, \$683 million to Subspace Capital LLC, \$665 million to KBIT Global Limited, \$145 million to Sigma Chain.

BINANCE (SWITZERLAND) AG

i. Binance (Switzerland) AG is a Swiss company beneficially owned by Zhao.<sup>7</sup> This account was closed in February 2023. Between 2019 and 2023, deposits and withdrawals for this account exceeded \$300 million, most of which was received from Binance Holdings Limited, and paid out to a variety of

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<sup>5</sup> BHL-SEC-BUSD-0220886.

<sup>6</sup> BTS00462320.

<sup>7</sup> SEC-SGB-E-0022453.

companies, including other Binance entities, and \$20.6 million in 2022 to a company beneficially owned by Guangying Chen, and \$27.8 million to a company beneficially owned by Zhao. This is summarized here:

<b>Binance Switzerland AG</b>	<b>2019-2023 Select Deposits</b>	<b>2019-2023 Select Withdrawals</b>
<b>Silvergate Bank Account</b>		
Binance Holdings Limited	\$290,950,000	
Chaintecs Consulting Singapore Pte.		\$27,761,443
Binance Europe Ltd.		\$23,781,131
Binary Technology Development Pte.		\$20,612,531

#### BINANCE HOLDINGS LIMITED

j. Binance Holdings Limited is a Cayman Islands company beneficially owned by Zhao.<sup>8</sup> Between 2019 and 2023, deposits and withdrawals for these accounts exceeded \$6 billion. These accounts received approximately \$5.6 billion from Binance Holdings Limited Signature Bank account, \$131 million from Sigma Chain, \$95 million from Merit Peak Limited, \$5 million from Key Vision, and \$17 million from Binance Capital Management Co. Limited, and paid approximately \$4.2 billion to Merit Peak, \$442 million to Binance Capital Management Company Limited, \$270 million to Binance (Switzerland) AG, \$184 million to Sigma Chain, and \$29 million to Key Vision. This is summarized here:

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<sup>8</sup> SEC-SGB-E-0022398.



<b>Binance Holdings Limited</b>	<b>2019-2023 Select Deposits</b>	<b>2019-2023 Select Withdrawals</b>
<b>Silvergate Bank Accounts</b>		
Binance Holdings Limited – Signature Bank	\$5,672,812,271	
Sigma Chain	\$131,188,691	\$184,250,000
Merit Peak	\$95,063,978	\$4,205,230,000
Binance Capital Management Co Ltd	\$17,000,500	\$441,811,220
Binance (Switzerland) AG		\$270,000,000
Key Vision	\$5,000,000	\$29,040,486

#### BINANCE CAPITAL MANAGEMENT COMPANY LIMITED

k. Binance Capital Management Company Limited is a British Virgin Islands company beneficially owned by Zhao.<sup>9</sup> Between 2020 and 2023, deposits and withdrawals for these accounts exceeded \$480 million, primarily through deposits from Binance Holdings Limited, and it paid approximately \$36 million to Sigma Chain, and \$17 million to Binance Holdings.

#### SILVERGATE ACCOUNT CLOSURES

1. On December 23, 2022, Silvergate informed Binance that it would be closing accounts for Binance (Switzerland) AG, Sigma Chain, Binance Capital Management Company, and Binance Holdings Limited, and directed the transfer of funds to be completed by February 22, 2023, at which point the

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<sup>9</sup> SEC-SGB-E-0022071.

accounts would be closed. As of March 31, 2023, all of the accounts had zero balances.

## **SIGNATURE ACCOUNTS**

10. Many of the foregoing companies also held accounts at Signature Bank.

Account information from Signature Bank includes the following:

### BAM MANAGEMENT US HOLDINGS INC.

a. BAM Management US Holdings Inc., is a Delaware Company beneficially owned by Zhao. Between 2022 and 2023, deposits and withdrawals exceeded \$350 million.

### BAM TRADING SERVICES

b. BAM Trading Services is a Delaware Company beneficially owned by Zhao. Between 2019 and 2023, deposits and withdrawals exceeded \$500 million.

### MERIT PEAK LIMITED

c. Merit Peak bank accounts show no activity during the relevant period.

### KEY VISION DEVELOPMENT LIMITED<sup>i</sup>

d. Key Vision is a Seychelles company beneficially owned by Zhao. Between 2020 and 2023, deposits and withdrawals exceeded \$5.6 billion.

### BINANCE CAPITAL MANAGEMENT COMPANY LIMITED

e. Binance Capital Management is a British Virgin Islands company beneficially owned by Zhao. Between 2021 and 2023, deposits and withdrawals exceed \$900 million. Further information is summarized as follows:

<b>Binance Capital Management Company Limited</b>	<b>2021-2023 Select Deposits</b>	<b>2021-2023 Select Withdrawals</b>
<b>Signature Bank Accounts</b>		
Binance Holdings Limited	\$783,000,000	\$50,069,978
Swipewallet EU OU	\$45,564,454	\$9,000,000
Cyber Shaft Enterprises Limited	\$4,695,079	
Zhao Changpeng		\$62,500,000
INSURED AIRCRAFT TITLE SERVICE, LLC		\$54,705,000
Flowbank SA FFC Binary Technology Development PTE Ltd		\$46,975,166

**BINANCE HOLDINGS LIMITED**

f. Binance Holdings Limited is a Cayman company beneficially owned by Zhao. Between 2020 and 2022, deposits and withdrawals were approximately \$12 billion. Further information is summarized as follows:

<b>Binance Holdings Limited</b>	<b>2020-2022 Select Deposits</b>	<b>2020-2022 Select Withdrawals</b>
<b>Signature Bank Accounts</b>		
Bifinity UAB	\$6,546,897,038	
Worldpay B.V.	\$1,859,393,758	
Wallet ID: xxxx	\$2,807,113,068	
Binance Holdings Limited		\$5,557,501,000
Merit Peak		\$2,586,980,000
SWIPEWALLET EU OU		\$1,237,000,000

Binance Capital Management Co. Ltd.		\$714,000,000
Binance Investments Company Limited		\$199,000,000
Prime Link Management Limited		\$105,000,000
Binance Holdings (IE) Limited		\$57,000,000
Binance Technologies Limited		\$27,000,000
Binance (Services) Holdings Limited		\$27,000,000
Binance Technologies Limited		\$20,000,000

OTHER SIGNATURE BANK ACCOUNTS HELD BY ZHAO-OWNED ENTITIES

g. Zhao was also the beneficial owner of numerous other foreign companies with accounts at Signature Bank. These companies are foreign domiciled, including in Canada, UAE, Seychelles, Singapore, Lithuania, Kazakhstan, among others. These accounts were opened by a Binance.com employee, with Zhao as the listed beneficial owner, and Guangying Chen as the listed signatory. Some of these companies have “Binance” in their company name. Other companies do not bear the Binance name, but accounts were opened in the same fashion, listing Zhao as the beneficial owner and Guangying Chen as the signatory. Their links to Binance are consistent with a Binance organization chart<sup>10</sup>.

<sup>10</sup> BHL-SEC-BUSD-0289617.

## SIGNIFICANT TRANSFERS

11. Binance Holdings Limited and Binance Capital Management show large deposits and withdrawals from and to Signature accounts for some Zhao-owned companies, and hundreds of millions of dollars have been transferred.

### BIFINITY UAB TRANSFERS BILLIONS OF DOLLARS TO BINANCE COMPANIES

a. Bifinity UAB (fka Binance UAB) is a company located in Lithuania and beneficially owned by Zhao. The account opening documents state that Bifinity UAB is in the business of “provid[ing] revenue collection for Binance operators” conducting business in “Germany, UK, Netherlands and Switzerland.” The listed signatories on Bifinity accounts include Guangying Chen, and the account was opened by someone from Binance.com.<sup>11</sup>

b. Between 2020 and 2022, Bifinity UAB paid \$6.5 billion to a Binance Holdings Limited account. In 2021, that Binance Holdings Limited account received \$3 billion from Bifinity and \$1.8 billion from WorldPay,<sup>12</sup> making up the majority of deposits for the year. That money was transferred in 2021 out of Binance Holdings Limited to Merit Peak in direct wires for \$2.5 billion and transferred \$4.8 billion to another Binance Holdings account at Silvergate, which paid Merit Peak another \$3.7 billion.

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<sup>11</sup> SIGB-H-0001-00000063.

<sup>12</sup> WorldPay is a payments processing company that purports to provide Crypto trading platforms with the ability to move fiat money in and out of cryptocurrency. [<https://www.protocol.com/fintech/worldpay-crypto-payments>]. WorldPay paid Binance Holdings Limited \$1.76 billion in 2021.

<b>2021 Significant movements of money between Zhao-owned entities</b>	<b>Select Deposits</b>	<b>Select Withdrawals</b>
<b>Binance Holdings Limited Signature Bank Account</b>		
From Bifinity UAB Signature Bank Account	\$3,012,000,000	
From Worldpay B.V.	\$1,859,393,757	
To Binance Holdings Limited Silvergate Bank Account		\$4,879,000,000
To Merit Peak Silvergate Account		\$2,586,980,000
<b>Binance Holdings Limited Silvergate Bank</b>		
From Binance Holdings Limited Signature Bank	\$4,880,495,434	
To Merit Peak Silvergate Bank Account		\$3,735,000,000

c. In 2022, Bifinity transferred another \$3.5 billion to the same Binance Holdings Limited account. \$1.2 billion was transferred to an account held by Swipewallet EU OU, another Zhao-owned company. Bifinity sent another \$304 million directly to Swipewallet. Swipewallet thereafter sent \$1.5 billion in outgoing FX wires, in which USD is converted into a foreign currency before transmitting to the beneficiary.

d. As for the rest of the money transferred by Bifinity, Binance Holdings Limited distributed approximately \$911 million to other Binance Holdings accounts, \$697 million to Binance Capital Management, and more than \$415 million to other Zhao-owned companies. One of those Zhou-owned entities thereafter paid \$62.5 million to a personal account held by Zhao, and

in mid-March 2023 paid almost \$47 million to a company beneficially owned by Guangying Chen. On March 14, 2023, that account wired \$29,613,891.93 to an account held by Binance AP Holdings which was then wired out to the company owned by Guangying Chen that same day, transfers that are summarized here:

<b>2022 Significant movements of money between Zhao-owned entities</b>	<b>Select Deposits</b>	<b>Select Withdrawals</b>
<b>Binance Holdings Limited Signature Bank Account</b>		
From Bifinity UAB Signature Bank Account	\$3,534,897,037	
To Swipewallet Eu Ou Signature Bank Account		\$1,237,000,000
To Binance Holdings Limited Accounts		
- Binance Holdings Limited Silvergate Bank Account		\$463,000,000
- Binance Holdings Limited Signature Bank Account		448,000,000
- Sub-total		\$911,000,000
To Binance Capital Management Co. Ltd. Signature Bank Account		697,000,000
To Zhao-owned companies		
- Binance Investments Co. Ltd. Signature Bank Account		162,000,000
- Prime Link Management Limited Signature Bank Account		\$85,000,000
- Binance Holdings (IE) Limited Signature Bank Account		\$57,000,000

<b>2022 Significant movements of money between Zhao-owned entities</b>	<b>Select Deposits</b>	<b>Select Withdrawals</b>
- Binance Technologies Limited Signature Bank Account		\$27,000,000
- Binance (Services) Holdings Limited Signature Bank Account		\$27,000,000
- Swipewallet EU OU Signature Bank Account		\$23,400,000
- Binance Technologies Limited Signature Bank Account		\$20,000,000
- Other		\$13,695,750
- Sub-total		\$415,095,750
<b>Swipewallet EU OU Signature Bank Account</b>		
From Binance Holdings Limited Signature Bank	\$1,273,000,000	
From Bifinity UAB Silvergate Bank Account	\$304,000,000	
To Outgoing FX Wire		\$1,575,816,134
<b>Binance Capital Management Co. Ltd. Signature Bank Account (includes select 2023 withdrawals totaling \$79,089,058*)</b>		
From Binance Holdings Limited Signature Bank Account	\$697,000,000	
To Zhao Changpeng Signature Bank Account (\$60m in 2022 and \$2.5m in 2023)		\$62,500,000*
To Flowbank SA FFC Binary Technology Development PTE Ltd (a company beneficially owned by Guangying Chen)		\$46,975,166*



<b>2022 Significant movements of money between Zhao-owned entities</b>	<b>Select Deposits</b>	<b>Select Withdrawals</b>
To Binance (AP) Holding Limited Signature Bank Account; further transferred from Binance (AP) Holdings Limited on March 14, 2023 to Flowbank SA FFC FFC Binary Technology Development PTE Ltd (a company beneficially owned by Guangying Chen)		\$29,613,892*

#### **BINANCE COMMINGLED FUNDS AT MERIT PEAK FOR FURTHER TRANSFER TO PAXOS**

12. Millions of dollars from Binance related accounts were commingled in Merit Peak's accounts. For example, in 2021, funds from Key Vision (\$11.05 billion), Prime Trust (\$1.1 billion) (through BAM Trading) and Bifinity UAB (\$6.3 billion) (through Binance Holdings Limited) were transferred to Merit Peak and Merit Peak transferred all of that money as part of its transfers of almost \$20 billion to a foreign affiliate of Paxos in 2021, summarized as follows:

<b>2021 Merit Peak Select Account Activity</b>	<b>Select Deposits</b>	<b>Select Withdrawals</b>
<b>Merit Peak Silvergate Bank Account</b>		
From Key Vision Development Limited	\$ 11,054,700,000	
From Binance Holdings Limited	\$ 6,321,980,000	
From BAM Trading Services Inc.	\$1,154,753,502	
To Paxos Global PTE Ltd		\$19,975,961,032

#### **LARGE AMOUNTS OF MONEY MOVE ACROSS BINANCE AND ZHAO-OWNED BANK ACCOUNTS**

13. The transactions in many of the Binance or Zhao-owned company accounts held at Silvergate Bank and Signature Bank show large amounts of money

flowing in and out of the accounts. The large incoming credits are followed by outgoing debits within days, with the result that the accounts maintain a relatively much lower balance at month's beginning and end.

14. For example, in one Silvergate Binance Holdings 2022 account statement, money is credited monthly from another Binance Holdings account, accounting for most of monthly credits, and most of those credits are debited to Binance Capital Management Limited and Binance Switzerland in interbank transfers. In February 2022, for example, the account has a beginning balance of \$7.6M and an ending balance of \$7.7M, but in that month \$20 million was deposited from another Binance Holdings account, \$11M was wired to Binance Switzerland AG, and \$6M was wired to Binance Capital Management, as summarized here:

<b>Feb 2022 Binance Holdings Limited Silvergate Bank Account</b>	<b>Deposits</b>	<b>Withdrawals</b>
From Binance Holdings Limited	\$20,000,000	
To Binance (Switzerland) AG		\$11,000,000
To Binance Capital Management Co Ltd		\$6,000,000
Other	\$94,478	\$2,944,633
<b>Total</b>	<b>\$20,094,478</b>	<b>\$19,944,633</b>

15. This pattern of money flow repeats over months, as summarized here:

Month	Op Bal US\$	Credits #	Credits US\$	Debits #	Debits US\$	Cl Bal US\$
Jun-19	\$0.00	2	\$500,100.00	4	\$10,100.00	\$489,990.00
Jul-19	\$489,990.00	1	\$1,000,000.00	18	\$984,795.78	\$505,194.22
Aug-19	\$505,194.22	0	\$0.00	30	\$285,127.80	\$220,066.42
Sep-19	\$220,066.42	4	\$1,234,385.00	78	\$880,946.78	\$573,504.64
Oct-19	\$573,504.64	8	\$1,017,019.00	38	\$1,221,165.05	\$369,358.59
Nov-19	\$369,358.59	6	\$2,029,321.10	126	\$1,414,107.41	\$984,572.28
Dec-19	\$984,572.28	14	\$843,123.60	86	\$1,118,487.47	\$709,208.41
Jan-20	\$709,208.41	32	\$4,125,860.47	110	\$2,393,223.98	\$2,441,844.90
Feb-20	\$2,441,844.90	24	\$13,198,338.39	128	\$3,269,227.65	\$12,370,955.64

Month	Op Bal US\$	Credits #	Credits US\$	Debits #	Debits US\$	Cl Bal US\$
Mar-20	\$12,370,955.64	38	\$38,782,117.78	116	\$38,403,462.96	\$12,749,610.46
Apr-20	\$12,749,610.46	32	\$37,816,051.50	104	\$33,842,419.03	\$16,723,242.93
May-20	\$16,723,242.93	29	\$15,676,090.45	106	\$19,467,858.76	\$12,931,474.62
Jun-20	\$12,931,474.62	90	\$40,970,092.70	104	\$20,622,814.43	\$33,278,752.89
Jul-20	\$33,278,752.89	80	\$49,078,856.96	122	\$24,545,274.51	\$57,812,335.34
Aug-20	\$57,812,335.34	68	\$96,371,547.65	145	\$93,282,559.04	\$60,901,323.95
Sep-20	\$60,901,323.95	44	\$123,915,287.67	116	\$95,746,400.45	\$89,070,211.17
Oct-20	\$89,070,211.17	31	\$55,147,022.33	166	\$20,301,712.96	\$123,915,520.54
Nov-20	\$123,915,520.54	35	\$62,021,156.50	146	\$81,150,012.04	\$104,786,665.00
Dec-20	\$104,786,665.00	20	\$91,943,354.54	175	\$129,090,458.91	\$67,639,560.63
Jan-21	\$67,639,560.03	26	\$183,316,090.57	143	\$182,693,697.50	\$68,261,953.70
Feb-21	\$68,261,953.70	22	\$156,404,925.86	111	\$174,525,739.29	\$50,141,140.27
Mar-21	\$50,141,140.27	13	\$445,542,017.62	157	\$390,911,068.29	\$104,772,089.60
Apr-21	\$104,772,089.60	13	\$730,177,804.24	181	\$727,463,722.90	\$107,486,170.94
May-21	\$107,486,170.94	19	\$607,146,622.44	155	\$699,651,009.08	\$14,981,784.30
Jun-21	\$14,981,784.30	22	\$1,345,148,277.92	190	\$1,356,483,954.81	\$3,646,107.41
Jul-21	\$3,646,107.41	11	\$689,091,808.59	175	\$653,516,941.58	\$39,220,974.42
Aug-21	\$39,220,974.42	10	\$201,614,930.58	141	\$194,182,505.70	\$46,653,399.30
Sep-21	\$46,653,399.30	8	\$131,746,373.38	138	\$162,680,683.28	\$15,719,089.40
Oct-21	\$15,719,089.40	14	\$182,695,791.41	141	\$176,397,036.13	\$22,017,844.68
Nov-21	\$22,017,844.68	12	\$170,671,158.88	124	\$178,499,424.54	\$14,189,579.02
Dec-21	\$14,189,579.02	20	\$213,074,672.89	112	\$220,832,010.62	\$6,432,241.29
Jan-22	\$6,432,241.29	8	\$125,131,745.39	95	\$123,952,326.66	\$7,611,660.02
<b>Feb-22</b>	<b>\$7,611,660.02</b>	<b>5</b>	<b>\$20,094,477.98</b>	<b>85</b>	<b>\$19,944,633.00</b>	<b>\$7,761,505.00</b>
Mar-22	\$7,761,505.00	10	\$63,055,614.46	118	\$68,472,212.11	\$2,344,907.35
Apr-22	\$2,344,907.35	8	\$30,082,889.11	71	\$26,153,168.03	\$6,274,628.43
May-22	\$6,274,628.43	6	\$20,029,852.77	96	\$25,375,756.65	\$928,724.55
Jun-22	\$928,724.55	7	\$30,117,791.61	86	\$25,600,996.25	\$5,445,519.91
Jul-22	\$5,445,519.91	5	\$75,001,495.75	70	\$72,794,948.93	\$7,652,066.73
Aug-22	\$7,652,066.73	4	\$35,029,287.89	109	\$33,437,711.77	\$9,243,642.85
Sep-22	\$9,243,642.85	9	\$30,207,449.20	114	\$30,444,908.01	\$9,006,184.04
Oct-22	\$9,006,184.04	4	\$35,006,000.00	105	\$31,721,664.67	\$12,290,519.37
Nov-22	\$12,290,519.37	10	\$23,711,567.49	66	\$35,520,037.16	\$482,049.70
Dec-22	\$482,049.70	13	\$42,446,512.27	56	\$42,533,743.53	\$394,818.44
Jan-23	\$394,818.44	14	\$26,595,081.18	50	\$26,833,171.71	\$156,727.91
Feb-23	\$156,727.91	15	\$22,171,640.58	38	\$22,323,256.39	\$5,112.10

16. At times the amounts being credited and debited during a single month amounts to movement of more than a billion dollars. For example, in July 2021, one Signature Bank Binance Holdings account shows a starting balance of \$468 million, deposits of \$1 billion, withdrawals of \$1.3 billion, and an ending balance of \$179 million. Incoming wires come from WorldPay and are paid out to Merit Peak,

another Binance Holdings account and other assorted payments in wires ranging from \$10 million to \$100 million increments.

<b>July 2021 Binance Holdings Limited Signature Bank Account</b>	<b>Deposits</b>	<b>Withdrawals</b>
From Wallet ID:xxxx	\$561,043,603	
From Wallet ID: xxxx	\$265,807,069	
From WORLDPAY B.V.	\$169,925,973	
From UAB FINANSINES PASLAUGOS CONTIS	\$29,999,985	
To Binance Holdings Limited Silvergate Bank Account		\$689,000,000
To Merit Peak Limited Silvergate Bank		\$569,980,000
To UAB FINANSINES PASLAUGOS CONTIS		\$30,000,000
To Amazon Web Services, Inc. ACCT		\$15,000,000
To Stifel Bank		\$10,877,039
<b>Total</b>	<b>\$1,026,776,630</b>	<b>\$1,314,857,039</b>

17. A monthly summary of this Binance Holdings Limited account shows the following:

Month	Op Bal US\$	Credits #	Credits US\$	Debits #	Debits US\$	Cl Bal US\$
Mar-20	\$0.00	0	\$0.00	0	\$0.00	\$0.00
Apr-20	\$0.00	3	\$2,010,000.00	0	\$0.00	\$2,010,000.00
May-20	\$2,010,000.00	0	\$0.00	0	\$0.00	\$2,010,000.00
Jun-20	\$2,010,000.00	6	\$30,441.41	4	\$7,192.42	\$2,033,248.99
Jul-20	\$2,033,248.99	17	\$1,886,088.85	0	\$0.00	\$3,919,337.44
Aug-20	\$3,919,337.84	20	\$12,844,171.94	0	\$0.00	\$16,763,509.78
Sep-20	\$16,763,509.78	42	\$65,278,772.49	8	\$65,500,000.00	\$16,542,282.27
Oct-20	\$16,542,282.27	26	\$39,050,895.54	4	\$30,000,100.00	\$25,593,077.81
Nov-20	\$25,593,077.81	24	\$61,431,540.62	3	\$30,000,000.00	\$57,024,618.43
Dec-20	\$57,024,618.43	25	\$157,424,176.73	13	\$119,600,200.00	\$94,848,595.16
Jan-21	\$94,848,595.16	23	\$229,631,928.69	17	\$170,000,000.00	\$154,480,523.85
Feb-21	\$154,480,523.85	20	\$215,548,479.94	8	\$120,000,000.00	\$250,029,003.79
Mar-21	\$250,029,003.79	25	\$290,254,504.27	6	\$440,000,000.00	\$100,283,508.56
Apr-21	\$100,283,508.56	24	\$715,253,589.87	7	\$700,000,000.00	\$115,537,098.43
May-21	\$115,537,098.43	20	\$984,363,749.60	11	\$608,040,407.68	\$491,860,440.35

Month	Op Bal US\$	Credits #	Credits US\$	Debits #	Debits US\$	Cl Bal US\$
Jun-21	\$491,860,440.35	24	\$1,276,087,954.04	15	\$1,300,000,000.00	\$467,948,394.39
Jul-21	\$467,948,394.39	32	\$1,026,776,629.74	16	\$1,314,857,039.46	\$179,867,984.67
Aug-21	\$179,867,984.67	20	\$595,678,358.63	14	\$770,736,128.84	\$4,810,214.46
Sep-21	\$4,810,214.46	18	\$1,547,000,000.00	24	\$1,546,000,000.00	\$5,810,214.46
Oct-21	\$5,810,214.46	8	\$460,000,000.00	16	\$455,000,000.00	\$10,810,214.46
Nov-21	\$10,810,214.46	9	\$290,000,000.00	14	\$294,000,100.00	\$6,810,114.46
Dec-21	\$6,810,114.46	11	\$285,000,000.00	12	\$290,000,000.00	\$1,810,114.46
Jan-22	\$1,810,114.46	9	\$235,000,000.00	14	\$234,000,000.00	\$2,810,114.46
Feb-22	\$2,810,114.46	11	\$230,000,000.00	17	\$228,000,000.00	\$4,810,114.46
Mar-22	\$4,810,114.46	12	\$325,000,000.00	26	\$328,050,000.00	\$1,760,114.46
Apr-22	\$1,760,114.48	12	\$374,000,000.00	16	\$374,200,000.00	\$1,560,114.46
May-22	\$1,560,114.46	16	\$1,105,359,334.17	17	\$276,050,000.00	\$830,869,448.63
Jun-22	\$830,869,448.63			22	\$194,210,000.00	\$636,659,448.63
Jul-22	\$636,659,448.63	1	\$2,230.00	15	\$217,700,000.00	\$418,961,678.63
Aug-22	\$418,961,678.63	1	\$760.00	24	\$265,555,750.08	\$153,406,688.55
Sep-22	\$153,406,688.55	2	\$446,330,382.26	27	\$345,200,000.00	\$254,537,070.81

#### THE WIND DOWN AND TRANSFER OF FUNDS

18. On January 1, 2023, eight Binance/Zhao-owned companies had \$58.7 million on deposit. During that same time frame, \$840 million was deposited into, and \$899 million was withdrawn, from those accounts. At the end of March, those accounts had a zero balance except for one account with \$180,000. Between January and March 2023, multiple Binance accounts paid Binary Technology Development Private Limited more than \$162 million in offshore wires, as summarized here:

<b>Paying Entity</b>	<b>Beneficiary FI - Flowbank SA London FFIC Binary Technology Development PTE LTD US\$</b>
BINANCE CAPITAL MANAGEMENT CO	\$46,975,166
BINANCE HOLDINGS LIMITED	\$45,000,000
BINANCE HOLDINGS LIMITED	\$37,945,943
BINANCE (AP) HOLDINGS LIMITED	\$29,613,892

<b>Paying Entity</b>	<b>Beneficiary FI - Flowbank SA London FFIC Binary Technology Development PTE LTD US\$</b>
BINANCE HOLDINGS (IE) LIMITED	\$1,686,560
BINANCE (SERVICES) HOLDINGS	\$1,122,835
BINANCE INVESTMENTS CO. LTD	\$2,200
	\$162,346,596

19. As of May 27, 2023 all of these accounts have been closed or have a \$0 balance.

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

Executed on June 5, 2023 in Washington, D.C.

*Sachin S. Verma.*

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Sachin Verma

## Attachment 1

## Bank Account Activity in select Binance related accounts at Silvergate Bank and Signature Bank

Bank	Entity	Account	Deposits #	Deposits US\$	Withdrawals #	Withdrawals US\$	First Transaction Date	Last Transaction Date
Silvergate Bank	BINANCE HOLDINGS LIMITED	xxxxxx6709	866	\$6,270,981,606	4,845	\$6,270,976,494	6/13/2019	2/22/2023
Silvergate Bank	BINANCE HOLDINGS LIMITED	xxxxxx6717	34	\$146,203,978	26	\$146,203,978	6/21/2019	8/24/2020
				<u>\$6,417,185,584</u>		<u>\$6,417,180,472</u>		
Signature Bank	BINANCE HOLDINGS LIMITED	xxxxxx5685	464	\$11,795,340,667	393	\$11,513,836,918	4/27/2020	10/28/2022
Signature Bank	BINANCE HOLDINGS LIMITED	xxxxxx7894	31	\$464,452,500	291	\$463,936,859	12/17/2021	10/27/2022
				<u>\$12,259,793,167</u>		<u>\$11,977,773,777</u>		
<b>TOTAL - BINANCE HOLDINGS LIMITED</b>				<u><b>\$18,676,978,750</b></u>		<u><b>\$18,394,954,249</b></u>		
Silvergate Bank	BINANCE CAPITAL MANAGEMENT CO LTD	xxxxxx1220	145	\$484,131,038	2,080	\$483,131,038	2/24/2020	2/22/2023
Signature Bank	Binance Capital Management Co. LTD	xxxxxx7217	11	\$17,196,736	150	\$17,196,736	8/13/2021	1/25/2023
Signature Bank	Binance Capital Management Co. LTD	xxxxxx7908	61	\$904,981,456	308	\$904,981,456	12/29/2021	3/20/2023
				<u>\$922,178,192</u>		<u>\$922,178,192</u>		
<b>TOTAL - BINANCE CAPITAL MANAGEMENT CO. LTD</b>				<u><b>\$1,406,309,230</b></u>		<u><b>\$1,405,309,230</b></u>		
Silvergate Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx7846	47	\$276,818,473	30	\$276,818,473	3/22/2022	2/3/2023
Silvergate Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx4563	339	\$260,852,762	2,801	\$260,852,762	4/30/2019	2/22/2023
Silvergate Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx9810	6	\$9,500,000	6	\$9,500,000	1/22/2020	7/20/2020
Silvergate Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx7853	21	\$586	83	\$586	8/17/2022	2/22/2023
				<u>\$547,171,821</u>		<u>\$547,171,821</u>		
Signature Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx0684	24	\$336,763,392	24	\$336,094,401	5/24/2022	4/4/2023
Signature Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx8310	34	\$13,436,798	316	\$12,704,912	1/24/2023	4/5/2023
Signature Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx3338	2	\$453	1	\$453	2/3/2023	3/30/2023
Signature Bank	BAM MANAGEMENT US HOLDINGS INC	xxxxxx3346	1	\$92	1	\$92	2/22/2023	3/30/2023
				<u>\$350,200,735</u>		<u>\$348,799,857</u>		
<b>TOTAL - BAM MANAGEMENT US HOLDINGS INC.</b>				<u><b>\$897,372,556</b></u>		<u><b>\$895,971,678</b></u>		
Silvergate Bank	BAM TRADING SERVICES INC. SEN ACCOUNT	xxxxxx3432	22,629	\$10,069,945,157	22,989	\$10,069,945,157	7/2/2020	2/21/2023
Silvergate Bank	BAM TRADING SERVICES INC.	xxxxxx1295	17,886	\$625,601,386	12,260	\$625,601,386	8/26/2021	2/22/2023
Silvergate Bank	BAM TRADING SERVICES INC.	xxxxxx6245	904	\$479,138,011	14,410	\$479,138,011	8/26/2021	3/6/2023
Silvergate Bank	BAM TRADING SERVICES INC.	xxxxxx1113	979	\$463,137,117	5,877	\$463,137,117	12/30/2019	2/22/2023
Silvergate Bank	BAM TRADING SERVICES INC.	xxxxxx7416	259	\$33,718,466	7	\$33,718,466	1/21/2022	2/9/2023
Silvergate Bank	BAM TRADING SERVICES INC.	xxxxxx1377	7	\$6,750,000	3	\$83,192	9/22/2021	3/6/2023
Silvergate Bank	BAM TRADING SERVICES INC.	xxxxxx1121	2	\$1,000,100	-	\$0	12/30/2019	2/3/2023

Silvergate Bank	BAM TRADING SERVICES INC.	xxxxxx3424	2	\$526	4	\$526	9/29/2020	2/3/2023
				<u>\$11,679,290,764</u>		<u>\$11,671,623,856</u>		
Signature Bank	BAM TRADING SERVICES INC.	xxxxxx5315	28	\$230,931,536	382	\$229,250,897	11/25/2019	4/5/2023
Signature Bank	BAM TRADING SERVICES INC.	xxxxxx2547	135	\$191,814,339	243	\$187,670,282	10/21/2022	4/5/2023
Signature Bank	BAM TRADING SERVICES INC.	xxxxxx2555	208	\$45,404,285	4	\$39,100,000	7/27/2022	4/4/2023
Signature Bank	BAM TRADING SERVICES INC.	xxxxxx5323	185	\$30,888,393	238	\$27,789,032	5/31/2022	4/4/2023
Signature Bank	BAM TRADING SERVICES INC.	xxxxxx5331	7	\$15,139,830	5	\$15,139,593	5/31/2022	4/4/2023
Signature Bank	BAM TRADING SERVICES INC.	xxxxxx7211	4	\$6,005,270	2	\$5,270	11/1/2022	4/4/2023
Signature Bank	BAM TRADING SERVICES INC. (Collateral Account)	xxxxxx6907	2	\$1,238,101	1	\$238,001	12/12/2019	4/4/2023
				<u>\$521,421,755</u>		<u>\$499,193,075</u>		
<b>TOTAL - BAM TRADING SERVICES INC.</b>				<b><u>\$12,200,712,519</u></b>		<b><u>\$12,170,816,931</u></b>		
Silvergate Bank	Merit Peak Limited	xxxxxx5271	1,122	\$21,947,605,072	882	\$21,947,605,072	4/18/2019	12/8/2021
Silvergate Bank	Merit Peak Limited	xxxxxx5263	230	\$287,729,139	190	\$287,729,139	5/20/2019	12/7/2021
				<u>\$22,235,334,211</u>		<u>\$22,235,334,211</u>		
Signature Bank	MERIT PEAK LIMITED	xxxxxx3512	1	\$100	1	\$100	5/6/2021	2/17/2023
<b>TOTAL - MERIT PEAK LIMITED</b>				<b><u>\$22,235,334,311</u></b>		<b><u>\$22,235,334,311</u></b>		
Silvergate Bank	KEY VISION DEVELOPMENT LIMITED	xxxxxx5981	7,323	\$11,288,369,703	408	\$11,288,369,703	9/30/2020	6/18/2021
Silvergate Bank	KEY VISION DEVELOPMENT LIMITED	xxxxxx6500	197,206	\$2,086,776,079	43,183	\$2,086,776,079	10/16/2020	7/23/2021
				<u>\$13,375,145,782</u>		<u>\$13,375,145,782</u>		
Signature Bank	KEY VISION DEVELOPMENT LIMITED	xxxxxx6221	512,239	\$5,366,444,576	134,836	\$5,366,444,576	8/10/2021	2/13/2023
Signature Bank	KEY VISION DEVELOPMENT LIMITED	xxxxxx9952	1	\$500	-	\$0	8/19/2020	8/19/2020
Signature Bank	KEY VISION DEVELOPMENT LIMITED	xxxxxx6795	9	\$250,017,808	17	\$250,000,000	1/4/2022	4/13/2022
				<u>\$5,616,462,884</u>		<u>\$5,616,444,576</u>		
<b>TOTAL - KEY VISION DEVELOPMENT LIMITED</b>				<b><u>\$18,991,608,666</u></b>		<b><u>\$18,991,590,358</u></b>		
Silvergate Bank	SIGMA CHAIN AG	xxxxxx6683	168	493,632,676	664	493,627,065	6/13/2019	2/22/2023
Silvergate Bank	BINANCE (SWITZERLAND) AG	xxxxxx6667	135	\$308,644,449	702	\$308,644,448	6/13/2019	2/22/2023

\* Deposits and withdrawals totals include data up to March 31, 2023



**Attachment 2****Select Information from Silvergate Bank Account Opening and Corporate Documents**

<b>Entity</b>	<b>Corporate Domicile</b>	<b>Accounts</b>	<b>Beneficial Owner</b>	<b>Principal Officers*</b>	<b>Bank Accounts Signatory*</b>
Binance Holdings Limited	Delaware	xxxxxx6709 xxxxxx6717 (SEN)	Changpeng Zhao	Guangying Chen	Changpeng Zhao Guangying Chen
Binance Capital Management Company Limited	British Virgin Islands	xxxxxx1220	Changpeng Zhao	Changpeng Zhao	Changpeng Zhao Guangying Chen
BAM Management US Holdings, Inc.	Delaware	xxxxxx7846 xxxxxx4563 xxxxxx9810 (SEN) xxxxxx7853	BAM Management Company Limited	Wei Zhou	Wei Zhou Catherine Coley Joshua Sroge William Plon Brian Shroder Jasmine Yoonjung Lee
BAM Trading Services, Inc.	Delaware	xxxxxx3432 (SEN) xxxxxx1295 xxxxxx6245 xxxxxx1113 xxxxxx7416 xxxxxx1377 xxxxxx1121 xxxxxx3424	BAM Management US Holdings, Inc.	Guangying Chen	Guangying Chen Jasmine Yoonjung Lee Brian Walker Shroder Catherine Coley Elaine Stone Joshua Sroge William Plon
Binance Switzerland AG	Switzerland	xxxxxx6667 xxxxxx6675 (SEN)	Changpeng Zhao	Guangying Chen	Changpeng Zhao Guangying Chen
Merit Peak Limited	British Virgin Islands	xxxxxx5271 (SEN) xxxxxx5263	Changpeng Zhao	Leslie Tam Vincent Kwok Guangying Chen	Changpeng Zhao Guangying Chen
Sigma Chain	Switzerland	xxxxxx6683 xxxxxx6691 (SEN)	Changpeng Zhao	Guangying Chen	Guangying Chen
Key Vision Development Limited	Seychelles	xxxxxx5981 (SEN) xxxxxx6500	Changpeng Zhao	Changpeng Zhao Guangying Chen	Changpeng Zhao Guangying Chen

\* At least for one of several accounts and for some points during the relevant period

**Attachment 3****Select Information from Signature Bank Account Opening and Corporate Documents**

<b>Entity</b>	<b>Corporate Domicile</b>	<b>Accounts</b>	<b>Beneficial Owner</b>	<b>Principal Officers*</b>	<b>Bank Accounts Signatory*</b>
Binance Holdings Limited	Cayman Islands	xxxxxx5685 xxxxxx7894 xxxxxx5693	Changpeng Zhao	Guangying Chen	Guangying Chen Kaiser Ying Kit NG
Binance Capital Management Company Limited	British Virgin Islands	xxxxxx7908 xxxxxx7217	Changpeng Zhao	Guangying Chen	Guangying Chen Kaiser Ying Kit NG
BAM Management US Holdings, Inc.	Delaware	xxxxxx0684 xxxxxx8310 xxxxxx3338 xxxxxx3346	Changpeng Zhao		William Plon Jasmine Lee Brian Shroder
BAM Trading Services, Inc.	Delaware	xxxxxx5315 xxxxxx2547 xxxxxx2555 xxxxxx5323 xxxxxx5331 xxxxxx7211 xxxxxx6907	Changpeng Zhao		Guangying Chen Catherine Coley William Plon Jasmine Lee
Bifinity UAB (fka Binance UAB)	Lithuania	xxxxxx9360 xxxxxx7924 xxxxxx8615 xxxxxx8381	Changpeng Zhao		Changpeng Zhao Guangying Chen Kaiser Ying Kit NG Saulius Galatiltis
Merit Peak Limited	British Virgin Islands	xxxxxx3512 xxxxxx3520	Changpeng Zhao		Guangying Chen
Key Vision Development Limited	Seychelles	xxxxxx6221 xxxxxx9952 xxxxxx6795	Changpeng Zhao		Guangying Chen
SWIPEWALLET EU OU	Estonia	xxxxxx7878 xxxxxx7886 xxxxxx7319 xxxxxx7327	Changpeng Zhao (80%)		Guangying Chen Kaiser Ying Kit Ng Joselito Lizarondo
Cyber Shaft Enterprise Limited	Virgin Islands (UK)	xxxxxx7993	Changpeng Zhao		Kaiser Ying Kit Ng
Binary Technology Development PTE Limited	Singapore	xxxxxx1441	Guangying Chen		Guangying Chen Adrian Rhui Keong Darren Makarem
Binance Investment Company Limited	Seychelles	xxxxxx2361	Changpeng Zhao		Guangying Chen
Prime Link Management Limited	Virgin Islands (UK)	xxxxxx7225 xxxxxx7916	Changpeng Zhao		Guangying Chen Kaiser Ying Kit NG
Binance Holdings (IE) Limited	Ireland	xxxxxx7139	Changpeng Zhao		Kaiser Ying Kit Ng
Binance Technologies Limited	Ireland	xxxxxx2030	Changpeng Zhao		Guangying Chen Kaiser Ying Kit NG
Binance (Services) Holdings Limited	Ireland	xxxxxx4989	Changpeng Zhao		Kaiser Ying Kit Ng
Binance (AP) Holdings Limited	Ireland	xxxxxx8000	Changpeng Zhao		Kaiser Ying Kit Ng

Binance Asia Services Pte Ltd	Singapore	xxxxxx6693	Changpeng Zhao		Guangying Chen Adrian Rhui Keong Darren Makarem
Binance Canada Asset Management Inc	Canada	xxxxxx9031 xxxxxx9325	Changpeng Zhao		Guangying Chen Lawrence Trong Loung Truong Susan Scullion
Binance Canada Capital Markets Inc	Canada	xxxxxx9058 xxxxxx0912 xxxxxx9333	Changpeng Zhao		Guangying Chen Lawrence Trong Loung Truong Susan Scullion
Binance Canada Holdings Limited	Canada	xxxxxx9066 xxxxxx9341	Changpeng Zhao		Guangying Chen Lawrence Trong Loung Truong Susan Scullion
Binance Canada Limited	Canada	xxxxxx9368 xxxxxx9074	Changpeng Zhao		Guangying Chen Lawrence Trong Loung Truong Susan Scullion
Binance (AD) Limited	UAE	xxxxxx7814	Changpeng Zhao		Guangying Chen Dominic Longman
Binance FZE	UAE	xxxxxx8934	Changpeng Zhao		Guangying Chen Alexander Chehade
BV Investment Management Limited	UAE	xxxxxx9795	Changpeng Zhao		Guangying Chen Vishal Sacheendran
BWIN Private Limited	Singapore	xxxxxx0808	Changpeng Zhao		Guangying Chen
Chaintecs Consulting Singapore Private Limited	Singapore	xxxxxx1433	Changpeng Zhao		Guangying Chen Kaiser Ying Kit Ng Adrian Rhui Keong Darren Makarem
Infozone Technologies Private Limited	Singapore	xxxxxx1277	Changpeng Zhao		Guangying Chen Adrian Rhui Keong Darren Makarem
Tornado Singapore Technologies Private Limited	Singapore	xxxxxx0350	Changpeng Zhao (80%)		Guangying Chen Adrian Rhui Keong Darren Makarem
BN KZ Technologies Limited	Kazakhstan	xxxxxx8810	Changpeng Zhao		Guangying Chen Anton Keen
Cyper Technologies SDN BHD	Malaysia	xxxxxx0378	Changpeng Zhao		Guangying Chen Adrian Rhui Keong Darren Makarem

\* At least for one of several accounts and for some points during the relevant period