

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION
and STATE OF GEORGIA,

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**PLAINTIFFS' MOTION FOR ORDER FOR TO SHOW CAUSE WHY
DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT OF COURT
FOR VIOLATING MULTIPLE PROVISIONS OF THE TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiffs Federal Trade Commission ("FTC") and State of Georgia respectfully move this Court for an order to show cause why Defendants Laptop &

Desktop Repair, LLC (“LDR”), and Vadim O. Kruchinin a/k/a David Kruchin (“Kruchinin”), should not be held in contempt of Court for violating multiple provisions of the temporary restraining order [ECF No. 9] and stipulated preliminary injunction [ECF No. 14].

For the reasons set forth more fully in *Plaintiffs’ Memorandum In Support Of Their Motion For Order To Show Cause Why Defendants Should Not Be Held In Contempt Of Court For Violating Multiple Provisions Of The Temporary Restraining Order and Preliminary Injunction*, the Court should require Defendants LDR and Kruchinin to: (1) provide a full accounting of all assets taken in violation of the asset freeze; (2) turn over all assets transferred or concealed in violation of the asset freeze to the Receiver; (3) appear for depositions on their financial disclosures; (4) repatriate their assets; and (5) cooperate with the Receiver by providing all passwords needed by the Receiver to carry out its duties. Alternatively, the Court should require Defendants to show cause as to why the Court should not hold them in contempt.

Signatures appear on next page

Respectfully submitted,

Dated: October 26, 2016

DAVID C. SHONKA,
Acting General Counsel

/s/ Anna M. Burns

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STATE OF GEORGIA

LOCAL RULE 7.1(D) CERTIFICATION OF COMPLIANCE

Undersigned counsel certifies that **PLAINTIFFS' MOTION FOR ORDER FOR TO SHOW CAUSE WHY DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT OF COURT FOR VIOLATING MULTIPLE PROVISIONS OF THE TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION** uses Times New Roman 14 pt font in compliance with Local Rule 5.1(C).

/s/ Anna M. Burns

ANNA M. BURNS

Ga. Bar No. 558234

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2016, I electronically filed the foregoing document with the Clerk of the Court using *CM/ECF*. I also certify that the foregoing document is being served on all parties and the persons identified below via transmission of Notice of Electronic Filing generated by *CM/ECF*, which will automatically send email notification of such filing to the counsel of record, or by causing it to be sent via First Class Mail.

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**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION
and STATE OF GEORGIA,

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION FOR
ORDER TO SHOW CAUSE WHY DEFENDANTS SHOULD NOT BE
HELD IN CONTEMPT OF COURT FOR VIOLATING MULTIPLE
PROVISIONS OF THE TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Defendants' willful violations of the Temporary Restraining Order ("TRO", [ECF No. 9] began almost immediately after Defendants received notice of its existence. Within hours after being served with the TRO, Defendant Vadim Kruchinin a/k/a David Kruchin ("Kruchinin") systematically began to hide Defendants' assets. First, Defendant Kruchinin transferred \$22,000 from Laptop & Desktop Repair, LLC's ("LDR") PayPal account to Happy Smiles, LLC, of which his purported girlfriend, Valerie Fuentes, is the sole member. Thereafter, on October 5, 2016, the same day he signed the stipulated preliminary injunction order ("PI," [ECF No. 14]), and while the TRO was still in effect, Defendant Kruchinin transferred over \$100,000 from an undisclosed Charles Schwab account, and used over \$90,000 of this money to purchase precious metals, including gold bars. Plaintiffs are concerned that Defendant Kruchinin may have purchased the precious metals to make his assets easily transportable and concealable and that he might be planning to leave the United States. Finally, in violation of Section VIII of the TRO and PI, Defendants have failed to repatriate their assets to the United States, despite Plaintiffs' numerous requests that they do so.

To date, Defendants have transferred, concealed, or dissipated over \$150,000 in assets, in violation of the TRO and PI, and should be made to show

cause as to why they should not be held in contempt for violating the Court's Orders.

II. FACTUAL BACKGROUND

On September 29, 2016, at approximately 9:00 a.m. PDT, local law enforcement, representatives of the receiver, Hays Financial Consulting, LLC, and S. Gregory Hays (collectively, "Receiver"), its counsel Henry Sewell, and representatives from Plaintiff Federal Trade Commission ("FTC") entered Defendant LDR's business premises, where a process server immediately served Defendant Kruchinin, individually, and on behalf of LDR. [ECF Nos., 19 and 20.] Pursuant to the TRO, Plaintiff FTC also served third-party financial institutions, including PayPal and American Express, with copies of the TRO and notice of the asset freeze.¹ (Declaration of Michael Liggins, attached hereto as Exhibit "A," at ¶ 5.)

A. Defendants Violated the Asset Freeze.

Despite having notice of the asset freeze, Defendants withdrew \$22,000 from LDR's PayPal account on September 29, 2016, and made two separate

¹ The FTC served PayPal with the TRO and notice of asset freeze at 9:32 a.m. PDT on September 29, 2016. (See Exhibit "A," ¶ 5).

transfers to Happy Smiles, LLC.² (*See* Declaration of S. Gregory Hays, attached hereto as Exhibit “B,” at ¶ 6.) Defendants have refused to return the money, instead allegedly providing the Receiver with the password and log-in for a PayPal account belonging to Happy Smiles, LLC. (*Id.*, ¶8.) However, the log-in information did not work, and the \$22,000 has not been returned to the Receiver. (*Id.*)

Subsequently, on October 4, 2016, Defendant Kruchinin paid APMEX, Inc., an online retailer of precious metals, \$27,486.76 for 32 gold bars, via wire transfer from his personal account at Umpqua Bank. (Exhibit “A,” at ¶ 6.) The next day, on October 5, 2016, Defendant Kruchinin transferred \$103,369.66 from his personal, online brokerage account at OptionsXpress Holdings, Inc.,³ into his account at Umpqua Bank. (*Id.*, ¶ 7.) On October 6, 2016, Defendant Kruchinin transferred another \$74,029.45 to APMEX, Inc., to purchase 55 additional gold bars.⁴ (*Id.*, ¶ 9.)

² The registered address for Happy Smiles, LLC is also Kruchinin’s residence. (Exhibit “B,” ¶ 6.) Valerie Fuentes, who is listed with the Nevada Secretary of State as the sole member of Happy Smiles, LLC, is, upon information and belief, romantically involved with Vadim Kruchinin.

³ Since 2012, Defendant Kruchinin has deposited over \$595,000 into his OptionsXpress Account. (Exhibit “A,” ¶ 8.) According to records produced by OptionsXpress, after Defendant Kruchinin’s October 5, 2016 wire transfer, the account has no funds remaining in it. (*Id.*)

⁴ Since January 1, 2011, Defendant Kruchinin has purchased over \$200,000 in precious metals from AMPEX, Inc. (Exhibit “A,” ¶ 11.) And while Defendant Kruchinin stated on his financial disclosures that he has a safety deposit box at Nevada State Bank, containing approximately

After transferring a total of \$101,515.90 to AMPEX, Inc., Defendant Kruchinin further continued to drain his Umpqua bank account. (*Id.*, ¶ 10.) On October 5, 2016, he withdrew \$11,259.00 from the account, writing Valerie Fuentes⁵ a check for \$1,600 and himself a check for \$8,800. (*Id.*)

In addition, after the entrance of the Asset Freeze, Defendant Kruchinin made eight separate trades through an online foreign exchange market, Gain Capital Group, LLC. (Exhibit “A,” ¶ 13.) These trades began within 30 minutes of his being served with the TRO and continued through October 5, 2016, the day he signed the PI. (*Id.*) Defendant Kruchinin also debited approximately \$9,133.97 from this exchange account. (*Id.*, ¶ 14.)

B. Defendant Kruchinin Also Has Failed to Repatriate Assets.

Defendant Kruchinin also has violated Section VIII of the TRO and PI, “Repatriation of Foreign Assets,” as he has failed to repatriate his assets held overseas. Section VI required Defendants, within five days of entry of the Orders, to:

\$90,000 of coins, records provided by Nevada State Bank show that, after signing his financial disclosures on October 9, 2016, Defendant Kruchinin accessed the safety deposit box on October 11, 2016. (Exhibit “A,” ¶ 12.)

⁵ At stated above, Valerie Fuentes is believed to be romantically involved with Kruchinin, and Defendants transferred \$22,000 to her Happy Smiles, LLC, within hours of receiving notice of the TRO.

A. Provide counsel for the Plaintiffs with a full accounting of all assets, accounts, funds, and documents outside of the territory of the United States that are held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

B. Transfer to the territory of the United States all assets, accounts, funds, and documents in foreign countries held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

C. Hold and retain all repatriated assets, accounts, funds, and documents, and prevent any transfer, disposition, or dissipation whatsoever of any such assets, accounts, funds, or documents.

[ECF. Nos. 9 and 14, at Section VIII.] According to his own financial disclosures, Defendant Kruchinin has at least \$44,853.05 held in overseas financial institutions, (Exhibit “A,” ¶ 15) which he has failed to repatriate, despite repeated requests from Plaintiffs. (*See* Declaration of Anna M. Burns, attached hereto as Exhibit “C,” at ¶¶ 5, 7-8, 10.)

Defendant Kruchinin’s failure to repatriate his assets becomes more troubling in light of several other factors. The first is that Defendant Kruchinin recently has had overseas business interests in the Philippines (Exhibit “A,” ¶ 16) in a company that bills itself online as a subsidiary of the “Cashforlaptops family.” (*Id.*) Second, on October 1, 2016, while the Receiver was at LDR’s business

premises, Defendant Kruchinin looked for his passport and wanted to take it with him. (Exhibit “B,” at ¶ 5.) While Defendant Kruchinin wishing to obtain his passport is not in and of itself problematic, when coupled with his failure to repatriate his assets, his purchase of foreign currency, and his purchase of easily transported and concealed gold bars, Plaintiffs are concerned that Defendant Kruchinin may attempt to leave the United States, taking with him his assets and the Court’s ability to redress consumers at the end of this case.

C. Defendant Kruchinin Has Failed to Cooperate with the Receiver.

Defendant Kruchinin also has violated the TRO and PI by failing to cooperate with the Receiver. Section XIII of the TRO and PI, “Cooperation with the Receiver,” requires that Defendants:

shall fully cooperate with and assist the Receiver. Defendants’ cooperation and assistance shall include, but not be limited to:

1. Providing any information to the Receiver that the Receiver deems necessary to exercising the authority and discharging the responsibilities of the Receiver under this Order, including but not limited to allowing the Receiver to inspect documents and assets and to partition office space;
2. Providing any password and executing any documents required to access any computer or electronic files in any medium, including but not limited to electronically stored information stored, hosted, or otherwise maintained by an electronic data host

[ECF Nos. 9 and 14, at Section XIII.] As indicated in the Receiver's Report [ECF No. 15, at ¶ 27], when the Receiver asked Defendant Kruchinin for passwords to access his computer and other company records, Defendant Kruchinin refused to provide them, claiming he could not remember them and could not locate the piece of paper on which he had written them. [*Id.*] According to the Receivers' Report, these claims were not credible. ([*Id.*]; *see also* Ex. B, ¶ 4).

III. ARGUMENT AND CITATION OF AUTHORITY

A. This Court Has the Authority to Grant the Requested Relief.

Plaintiffs seek an order to show cause why Defendants should not be held in contempt for violations of the TRO and PI. The Eleventh Circuit has described the procedure for seeking an order to show cause in the following way:

Precedent dictates that a plaintiff seeking to obtain the defendant's compliance with the provisions of an injunctive order move the court to issue an order requiring the defendant to show cause why he should not be held in contempt and sanctioned for his noncompliance. *See Newman v. State of Alabama*, 683 F.2d 1312, 1318 (11th Cir.1982), *cert. denied*, 460 U.S. 1083, 103 S.Ct. 1773, 76 L.Ed.2d 346 (1983). In his motion, the plaintiff cites the provision(s) of the injunction he wishes to be enforced, alleges that the defendant has not complied with such provision(s), and asks the court, on the basis of his representation, to order the defendant to show cause why he should not be adjudged in contempt and sanctioned. If the court is satisfied that the plaintiff has made out a case for an order to show cause, it issues the order to show cause.

Wyatt By & Through Rawlins v. Rogers, 92 F.3d 1074, 1078 n.8 (11th Cir. 1996).

To establish a defendant's liability for civil contempt in a proceeding, as opposed to the need for a show cause order, the plaintiff must show clear and convincing evidence that a valid court order exists, that the order was clear and unambiguous, and that the alleged violator had the ability to comply with the order. *FTC v. Leshin*, 618 F.3d 1221, 1232 (11th Cir. 2010); *Riccard v. Prudential Ins. Co. of America*, 307 F.3d 1277, 1280 (11th Cir. 2002); *Commodity Futures Trading v. Wellington Precious Metals, Inc.*, 950 F.2d 1525, 1528 (11th Cir. 1992). As shown below, Plaintiffs have met all of these conditions, and the Court may ultimately impose civil contempt sanctions against Defendants.

B. The Temporary Restraining Order and Preliminary Injunction Were Valid.

The TRO and Stipulated Preliminary Injunction entered by the Court fully satisfied the requirements of Fed. R. Civ. P. 65 and has not been challenged or overruled. Indeed, Defendants stipulated to the terms of the PI, which left all substantive points of the TRO in place. [ECF No. 14]. In the TRO, the Court found that there was good cause to believe that Defendants engaged in, and were likely to continue to engage in, acts or practices that violate the FTC Act and FBPA. [ECF No. 9, at p. 2] The Court further found that Plaintiffs were likely to prevail on the merits of their complaint, and that the entry of the TRO was in the public interest. *Id.* In the PI, Defendants stipulated that Plaintiffs satisfied these

factors. [ECF No. 14, at pp. 2 and 3.] Thus, the TRO and PI were factually supported, lawful, and valid.

C. Defendants Violated Clear and Unambiguous Provisions of the Order.

Fed. R. Civ. P. 65(d) requires injunctions and restraining orders to describe the enjoined conduct in reasonable detail without merely referencing the complaint or other documents. Both the TRO and PI are clear and unambiguous in compliance with Rule 65(d). However, Defendants violated at least three provisions of the Orders by: (1) dissipating, withdrawing, or concealing over \$150,000.00 in assets in violation of TRO and PI Section IV, “Asset Freeze;”(2) failing to repatriate assets in violation of Section VIII, “Repatriation of Assets”, of the TRO and PI; and (3) by failing to provide the Receiver with passwords to LDR’s computer system, in violation of Section XIII of the TRO and PI.

IV. REMEDY

A. Defendants Should Be Required to Provide a Full Accounting of All Monies and Return the Funds Taken in Violation of the Asset Freeze.

Appropriate contempt remedies may include coercing compliance with the Court’s order, requiring compensation for losses sustained as a result of the violation, or both. *United Mine Workers of Am.*, 330 U.S. 258, 303-04 (1947); *McGregor v. Chierico*, 206 F.3d 1378, 1385 (11th Cir. 2000). In fashioning an

appropriate sanction, a court should consider “the character and magnitude of the harm threatened by continued contumacy and the probable effectiveness of any suggested sanction in bringing about the result desired.” *EEOC v. Guardian Pools, Inc.*, 828 F.2d 1507, 1515 (11th Cir. 1987) (citing *United States v. United Mine Workers*, 330 U.S. 258, 304, 67 S. Ct. 677, 701 (1947)). Courts have punished violations of asset freezes by contempt. *Levine v. Comcoa Ltd.*, 70 F.3d 1191, 1993-1994 (11th Cir. 1995) (upholding contempt finding for violation of asset freeze); *SEC v. Lauer*, No. 03-80612-Civ-MARRA/VITUNAC, 2006 U.S. Dist. LEXIS 65383, at *16 (S.D. Fla. Jan. 24, 2006); *SEC v. Dowdell*, No. 3:01CV00116, 2002 U.S. Dist. LEXIS 18982, at *15 (W.D. Va. Sep. 30, 2002) (holding two defendants in contempt for dissipation of assets following asset freeze and TRO.)

As relief for Defendants’ violations of the Asset Freeze provisions of the TRO, Plaintiffs request that the Court: (1) require a full accounting of monies removed from accounts covered by the asset freeze, including: (a) the location of the money, or (b) if spent in an arm’s length transaction, when it was spent, for whose benefit it was spent, what was purchased, and copies of any invoices or records concerning the expenditure; and (2) require Defendants to turn over all funds which they concealed or transferred in violation of the Asset Freeze to the

Receiver. Full restoration of the misappropriated funds is especially necessary in this case because Plaintiffs are seeking to redress consumers who were injured by Defendants' deceptive scheme; (3) require Defendants to appear for depositions to provide sworn statements concerning the existence and location of their assets; and (4) require that Defendant Kruchinin surrender his passport to the Court until such time as he repatriates his overseas assets and returns any assets he transferred or concealed in violation of the Asset Freeze.

In the alternative, Plaintiffs request the Court schedule a Show Cause hearing, directing Defendants to appear and show cause why Defendants should not be held in contempt for violations of the TRO and PI, until such time as they remit to the Receiver funds that were transferred or concealed in violation of the TRO, repatriate Defendants' monies located overseas, and provide an accurate and complete accounting of their assets.

V. CONCLUSION

For the foregoing reasons, the Court should require Defendants LDR and Kruchinin to: (1) provide a full accounting of all assets taken in violation of the asset freeze; (2) turn over all assets transferred or concealed in violation of the asset freeze to the Receiver; (3) appear for depositions on their financial disclosures; (4) repatriate their foreign assets; and (5) cooperate with the Receiver

by providing all passwords needed by the Receiver to carry out its duties. Alternatively, the Court should require Defendants to show cause as to why the Court should not hold them in contempt.

Respectfully submitted,

Dated: October 26, 2016

DAVID C. SHONKA,
Acting General Counsel

/s/ Anna M. Burns

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/s/ Katherine D. Schuessler
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Attorneys for Plaintiff
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/s/ Anna M. Burns

ANNA M. BURNS

Ga. Bar No. 558234

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EXHIBIT A

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION
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LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**FIRST SUPPLEMENTAL DECLARATION OF MICHAEL S. LIGGINS
Pursuant to 28 U.S.C. § 1746**

I, Michael S. Liggins declare that I have personal knowledge of the facts set forth below. If called as a witness before any court, I could and would testify as

follows:

A. Professional Experience and Background

1. I am a citizen of the United States and am over the age of 18. I am employed as a Senior Investigator with the Federal Trade Commission ("FTC") in the Southeast Regional Office. My office address is 225 Peachtree Street, N.E., Suite 1500, Atlanta, Georgia 30303. I have been employed with the FTC since 2000.

2. I earned a Master of Arts degree from Luther Rice University in 2012 and a Bachelor of Arts degree in Criminology from Saint Leo University in 1991. Prior to joining the FTC in 2000, I was employed as a Senior Investigator with the District Attorney's Office, White Collar Crime Unit, Atlanta Judicial Circuit, Atlanta, Georgia, and prior to that, I was enlisted in the US Army. During my enlistment with the US Army, I was assigned to Law Enforcement duties, first with the US Army Military Police Corps, then as a Special Agent with the US Army Criminal Investigation Command (CID).

3. As an Investigator with the FTC, my primary duties include, but are not limited to, the following: identifying patterns of unfair and deceptive trade practices; conducting computer research using a variety of Internet search engines,

public record and law enforcement databases, and computer software-based investigative tools; requesting, receiving and examining information provided by third parties, including information provided by state regulatory authorities and other regulatory organizations; and analyzing data related to possible violations of the FTC Act and other laws enforced by the FTC.

4. As part of my duties, I have been assigned to assist in investigating the business practices of Laptop & Desktop Repair, LLC (“LDR”), also d/b/a, but not limited to, cashforiphones.com, cashforlaptops.com, ecyclebest.com, smartphonetraders.com, and sell-your-cell.com and their principal, Vadim Olegovich Kruchinin, a/k/a Vadim Kruchin, David Kruchin, David Vadim Kruchin, and Dave Kruch. I previously provided a declaration in support of *Plaintiffs’ Motion for Temporary Restraining Order, with an Asset Freeze and Other Equitable Relief, and Order to Show Cause as to Why a Preliminary Injunction Should Not Enter* [ECF No. 5], which the Court granted on September 26, 2016 (“TRO,” at [ECF No. 9].)

5. Pursuant to the TRO, Plaintiff FTC served third-party financial institutions, including PayPal and American Express, with copies of the TRO and notice of the asset freeze (“Asset Freeze”). The FTC served PayPal with the TRO

and notice of Asset Freeze at 9:32 a.m. PDT on September 29, 2016. (See PayPal TRO service letter and response, attached hereto as Exhibit “1.”)

**RECORDS PROVIDED IN RESPONSE TO THE ASSET FREEZE SHOW
THAT DEFENDANTS TRANSFERRED OR CONCEALED ASSETS
AFTER THE ENTRANCE OF THE TRO AND PI.**

6. Records provided by APMEX, Inc., an online retailer of precious metals, in response to the Asset Freeze show that on October 4, 2016, Defendant Kruchinin paid APMEX, Inc., \$27,486.76 for 32 gold bars, via wire transfer from his personal account at Umpqua Bank. (A true and correct copy of related records received from AMPEX, Inc., attached hereto as Exhibit “2.”)

7. The next day, on October 5, 2016, Defendant Kruchinin transferred \$103,369.66 from his personal, online brokerage account at OptionsXPress Holdings, Inc. (“OptionsXpress”), into his account at Umpqua Bank. (A true and correct copy of related records received from OptionsExpress attached hereto as Exhibit “3.”)

8. Records provided by OptionsExpress show that since 2012, Defendant Kruchinin has deposited over \$595,000 into his OptionsXpress Account. (See Exhibit “3.”) Despite this, after Defendant Kruchinin’s October 5, 2016 wire transfer, the account has no funds remaining in it. (See October 17, 2016, email, a

true and correct copy of which is attached hereto as Exhibit “4.”)

9. On October 6, 2016, Defendant Kruchinin transferred another \$74,029.45 to AMPEX, Inc., to purchase 55 additional gold bars. (*See* Exhibit “3.”)

10. After transferring a total of \$101,515.90 to AMPEX, Inc., Defendant Kruchinin further continued to drain his Umpqua bank account. On October 5, 2016, he withdrew \$11,259.00 from the account, writing Valerie Campos Fuentes a check for \$1,600 and himself a check for \$8,800. (A true and correct copy of related records received from Umpqua Bank attached hereto as Exhibit “5.”)

11. Since January 1, 2011, Defendant Kruchinin has purchased over \$200,000 in precious metals from AMPEX, Inc. (*See* Exhibit “3.”)

12. Defendant Kruchinin stated on his Financial Information Sheet (a true and correct copy of which is attached hereto as Exhibit “6.”), which he was required to complete under the TRO and PI, that he has a safety deposit box at Nevada State Bank, containing approximately \$90,000 of coins. (*See* Exhibit 6, p. 6 of 10.) However, records provided in response to the Asset Freeze by Nevada State Bank show that, after signing his financial disclosures on October 9, 2016, Defendant Kruchinin accessed the safety deposit box on October 11, 2016. (A true

and correct copy of related records received from Nevada State Bank attached hereto as Exhibit “7.”)

13. In addition, records provided in response to the Asset Freeze by Gain Capital Group, LLC, an online foreign exchange market, show that Defendant Kruchinin made eight separate trade on the exchange. (A true and correct copy of related records received from Gain Capital Group, LLC, attached hereto as Exhibit “8.”) These trades began within 30 minutes of his being served with the TRO and continued through October 5, 2016.

14. Defendant Kruchinin also debited approximately \$9,133.97 from this exchange account. (*See* Exhibit 8.)

15. According to Defendant Kruchinin’s financial disclosures, (*see* Exhibit “6,” p. 4 of 10), he has at least \$44,853.05 held in overseas financial institutions.

16. According to his financial disclosures (*see* Exhibit “6,” p. 2 of 10), Defendant Kruchinin recently has had overseas business interests in the Philippines. This company, One Jump Web, Inc., has billed itself online as a subsidiary of the “Cashforlaptops family.”

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

Signed on OCTOBER 20th, 2016.



Michael S. Liggins

EXHIBIT 1

From: [Jackson, Tonia C.](#)
To: ["Lawenforcement@paypal.com"](mailto:Lawenforcement@paypal.com)
Subject: Asset Freeze, FTC v. Laptop & Desktop Repair, et al.
Date: Thursday, September 29, 2016 12:32:00 PM
Attachments: [paypal.pdf](#)
[TRO Laptop and Desktop Repair.pdf](#)

Paypal Holdings Inc.,

Please see the attached cover letter and Temporary Restraining Order regarding the case of Federal Trade Commission vs. Laptop & Desktop Repair. The U.S District Court for the Northern District of Georgia has frozen the assets of the Defendants in this case.

Tonia Jackson
Paralegal
Federal Trade Commission
Atlanta, GA 30303
(404) 656-1373

EXHIBIT 2

10/13/16 15:22:53 4846561379

->

18884641258 Jackson, Tonia C. Page 846

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, Tallie Stubbs, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity of the records produced by ApMex Inc., which are attached hereto.

3. The documents produced and attached hereto by Tallie Stubbs are originals or true copies of records of regularly conducted activity that:

a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

b) Were kept in the course of the regularly conducted activity of

ApMex Inc.; and

c) Were made by the regularly conducted activity as a regular practice of

ApMex Inc.

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

Executed on Oct. 17, 2016.

Tallie Stubbs
Signature

Tallie Stubbs
Print Name

ApMex Compliance Officer
Title

Order Summary Report - 12326651

Oct 04, 2016

Order Shipped**\$27,486.76****USER**
276301

Kruchin, David

BILLING
David Kruchin

RENO, NV 89523-1825 USA

SHIPPING
David Kruchin

RENO, NV 89523-1825 USA

Special Instructions:

How Heard	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	20GRAMGBAR-	20 gram Gold Bar - Secondary Market Based on Gold spot price of \$1,283.90	12105	\$847.54	\$847.54
17			Y	20GRAMGBAR-	20 gram Gold Bar - Credit Suisse Statue of Liberty Based on Gold spot price of \$1,283.90	46777	\$858.54	\$14,595.18
11			Y	20GRAMGBAR-	20 gram Gold Bar - Perth Mint (In Assay) Based on Gold spot price of \$1,283.90	57161	\$860.54	\$9,465.94
3			Y	20GRAMGBAR-	20 gram Gold Bar - Istanbul Gold Refinery (In Assay) Based on Gold spot price of \$1,283.90	78365	\$848.54	\$2,545.62

Payment Type (2) Bank Wire

Credit Card Info:

No.: XXXX XXXX XXXX /

Subtotal: \$27,454.28

Shipping: \$32.48

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: **\$27,486.76**Paid on: 10/04/2016 **\$27,486.76****Admin Notes:**

Carrier	Tracking Number	Ship Date	Name
UPS	1Z89F353A498225451	10/05/2016	Marc Ivanhoe

Notes

10/10/2016 6:00:08 AM By Hollon, Marcey

Order delivered on Oct 7 2016 7:06PM - Call Reminder.

10/5/2016 2:45:05 PM By User, System

Status Changed to Order Shipped

10/5/2016 2:44:21 PM By Ivanhoe, Marc

Status changed to Order Double Checked

10/5/2016 2:44:20 PM By Ivanhoe, Marc

Package information: Package ID: 7010084, Shipment Method: UPS Next Day Air Sav, Value: \$27454.28 Postage: \$23.49, Product Weight: 27.8 ,Oz. , Pkg Weight: 27.8 Oz., Packing Material: DW/SW , Size: 10" X 8" X 5", DC Station: DT-MV-11, Postage Label Selected, Rate Source: True

10/5/2016 2:40:55 PM By Ivanhoe,Marc

This ship method: United Parcel Service Next Day Air Saver and this rate source: Endicia qualify for a postage label.

10/5/2016 2:19:34 PM By Ivanhoe,Marc

Ship lock removed on Product ID: 46777

10/5/2016 2:18:03 PM By Rook,Deign

Red Folder.

10/5/2016 2:03:58 PM By Koyck,Katy

Ship lock placed on Product ID: 46777

10/5/2016 2:03:44 PM By Koyck,Katy

Order Status changed from "Inventory" to "Red Folder"

10/5/2016 2:00:41 PM By Merritt,Rebecca

Thank you for ordering with APMEX. We apologize for the delay, but our inventory of this item #46777 (20 gram Gold Bar - Credit Suisse Statue of Liberty) has not yet arrived from the mint. We expect to have the item shortly and be able to ship those items then. The remainder of your order will be shipping shortly.
We sincerely apologize for the error and any inconvenience.
Customer Service Team

10/4/2016 4:26:51 PM By Koyck,Katy

Order Status changed from "Printed Downstairs in B Vault" to "Inventory"

10/4/2016 4:26:51 PM By Koyck,Katy

Inventory reason has been changed from None to Oversold/Product Management for product 46777

10/4/2016 1:46:09 PM By Koyck,Katy

Status changed to Printed Downstairs in B Vault - Batch ID 20161004134015

10/4/2016 1:10:04 PM By Application,Bankwire

Payment Received in the amount of \$27486.76 on 10/04/2016

10/4/2016 1:10:04 PM By Application,Bankwire

Order qualified for Bankwire Auto Good To Process. Bankwire ID: 5824

Order Summary Report - 12318857**Order Shipped**

Oct 02, 2016

\$74,029.45USER
276301

Kruchin, David

BILLING
David Kruchin

RENO, NV 89523-1825 USA

SHIPPING
David Kruchin

RENO, NV 89523-1825 USA

Special Instructions:

How Heard	Flagged	# Prev. Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext Price
55			Y	1GBAR-CS	1 oz Gold Bar - Credit Suisse (In Assay) Based on Gold spot price of \$1,318.00	11950	\$1,345.99	\$74,029.45

Payment Type (2) Bank Wire	
Credit Card Info:	Mastercard
No.: XXXX XXXX XXXX	/

Subtotal:	\$74,029.45
Shipping:	\$0.00
Int'l Ship Cost:	\$0.00
Taxes:	\$0.00
Coupon Discount:	\$0.00
Ext Area Surcharge:	\$0.00
Order Total:	\$74,029.45
Paid on: 10/06/2016	\$74,029.45

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z86F353A297666936	10/06/2016	William Pantoja

Notes

10/10/2016 8:00:08 AM By Hollon, Marcey

Order delivered on Oct 7 2016 9:48AM - Call Reminder.

10/6/2016 4:45:13 PM By User, System

Status Changed to Order Shipped

10/6/2016 4:44:52 PM By Pantoja, William

Status changed to Order Double Checked. Approved(pkg limit) by eric.Walorski

10/6/2016 4:44:51 PM By Pantoja, William

Package information: Package ID: 7018988, Shipment Method: UPS Next Day Air, Value: \$74029.45 Postage: \$28.62, Product Weight: 74.3 ,Oz. , Pkg Weight: 74.2 Oz., Packing Material: DW/SW , Size: 10" X 8" X 5", DC Station: DT-MV-21, Postage Label Selected, Rate Source: True

10/6/2016 4:43:05 PM By Pantoja, William

This ship method: United Parcel Service Next Day Air and this rate source: Endicia qualify for a postage label.

10/6/2016 4:11:11 PM By Tsin, ida

Status changed to Order Pulled, Work Station: DT-SHIP-05

10/6/2016 2:36:58 PM By Koyck,Katy

Status changed to Printed Downstairs in B Vault - Batch ID 20161006143525

10/6/2016 1:39:12 PM By Elder,Devin

Payment Received in the amount of \$74029.45 on 10/06/2016

10/6/2016 1:30:01 PM By Lindsey,Bailey

No OB Follow-up Required – Customer has called to discuss payment status.

10/6/2016 12:57:01 PM By Adrian,Lynda

cci to verify bw here. said order will be over nighted since plat. member order over 50,000.

10/6/2016 12:45:39 PM By Adrian,Lynda

sent wire today. ack payment.

10/6/2016 12:45:05 PM By Adrian,Lynda

Customer Acknowledged Payment Sent

10/6/2016 6:00:19 AM By Lindsey,Bailey

Unpaid Order12318857 with Market Loss - Call Reminder.

Order Summary Report - 9094235**Order Shipped**

Dec 09, 2014

\$6,213.45**USER**

Kruchin, David

BILLING

David Kruchin

RENO, NV 89523-1825 USA

SHIPPING

David Kruchin

RENO, NV 89523-1825 USA

Special Instructions:

How Heard	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext Price
1			Y	5GBAR-SM	5 oz Gold Bar - Secondary Market Based on Gold spot price of \$1,204.70	24508	\$6,213.45	\$6,213.45

Payment Type (6) Personal Check

Credit Card Info:

No.: XXXX XXXX XXXX

Subtotal: \$6,213.45

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$6,213.45

Paid on: 12/12/2014 \$6,213.45

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z89F353A850524906	12/19/2014	System User

Notes

12/19/2014 11:45:04 AM By User, System

Status Changed to Order Shipped

12/19/2014 11:41:54 AM By Williams, Nicole

Status changed to Order Wrapped Package ID: 3802331, Wrapped Station: DT-SHIP-01

12/19/2014 9:52:01 AM By Adams, Jeremy

Status changed to Order Wrapped Package ID: 3802331, Wrapped Station: DT-SHIP-08

12/19/2014 8:08:44 AM By Pantoja, William

Status changed to Order Double Checked

12/19/2014 8:08:43 AM By Pantoja, William

Package information: Package ID: 3802331, Shipment Method: UPS Ground, Value: \$6213.45
 Postage: \$12.32, Product Weight: 5.6 ,Oz. , Pkg Weight: 13.8 Oz., Packing Material: PBA ,
 Size: 9" X 5" X 3", DC Station: DT-MV-14

12/19/2014 7:19:33 AM By Hale, Matt

Status changed to Order Pulled, Work Station: DT-MV-20

12/17/2014 12:52:17 AM By Hammonds, Andrew

Status changed to Printed Upstairs - Batch ID 20141217005202

12/12/2014 3:03:09 PM By Application,LockBox

Payment Received in the amount of 6213.45 on 12/12/2014.

Order Summary Report - 9005780**Order Shipped**

Nov 22, 2014

\$6,207.45**USER**

Kruchin, David

BILLING

David Kruchin

RENO, NV 89523-1825 USA

SHIPPING

David Kruchin

RENO, NV 89523-1825 USA

Special Instructions:

How Many

Flagged

If Prior Orders

If Cancelled orders

Date Account Opened

Other

Yes

14

3

12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	5GBAR-SM	5 oz Gold Bar - Secondary Market Based on Gold spot price of \$1,203.50	24508	\$6,207.45	\$6,207.45

Payment Type (6) Personal Check

Credit Card Info:

No.: XXXX XXXX XXXX

Subtotal: \$6,207.45

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$6,207.45

Paid on: 11/28/2014 \$6,207.45

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z89F353A851129494	12/05/2014	System User

Notes

12/11/2014 6:00:01 AM By Hollon, Marcey

Order delivered on Dec 10 2014 6:46PM. - Call Reminder.

12/5/2014 12:26:11 PM By User, System

Status Changed to Order Shipped

12/5/2014 12:15:47 PM By Wickham, Matthew

Status changed to Order Wrapped Package ID: 3722618, Wrapped Station: DT-SHIP-03

12/5/2014 8:50:42 AM By Torres, Alaan

Status changed to Order Double Checked

12/5/2014 8:50:42 AM By Torres, Alaan

Package information: Package ID: 3722618, Shipment Method: UPS Ground, Value: \$6207.45
 Postage: \$12.32, Product Weight: 5.6 Oz., Pkg Weight: 13.8 Oz., Packing Material: PBA,
 Size: 9" X 5" X 3", DC Station: DT-DC-01

12/5/2014 7:25:18 AM By Shaver, Chris

Status changed to Order Pulled, Work Station: DT-MV-33

12/4/2014 12:22:30 AM By Hammonds, Andrew

Status changed to Printed Upstairs, Work Station: DT-AHAMMONDS

11/28/2014 3:03:02 PM By Application,LockBox

Payment Received in the amount of 6207.45 on 11/28/2014.

Order Summary Report - 8961347**Order Shipped**

Nov 11, 2014

\$6,001.95**USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions: Apply refund from Cancelled order per Christine

How Heard	Flagged	In Prev. Orders	In Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	FIVE OZ GBAR-	5 oz Gold Bar - Pamp Suisse Lady Fortuna (w/Assay) Based on Gold spot price of \$1,166.10	59448	\$6,001.95	\$6,001.95

Payment Type (6) Personal Check

Credit Card Info:

No.: XXXX XXXX XXXX /

Subtotal: \$6,001.95

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$6,001.95

Payment Pending \$0.00

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z89F353A849271478	11/14/2014	System User

Notes

11/24/2014 6:00:01 AM By Lichitter,Cindy

Order delivered on Nov 21 2014 7:42PM. - Call Reminder.

11/14/2014 2:34:39 PM By Rafferty,Maggie

Refund check #183931 for \$378.50 mailed 11/14/2014 via UPS Next Air Tracking # 1Z89F3530193940748.

11/14/2014 2:21:21 PM By Rafferty,Maggie

Refund paperwork completed, taken to AP to process for \$378.50 (overpayment).

11/14/2014 11:09:03 AM By User,System

Status Changed to Order Shipped

11/14/2014 10:51:53 AM By Guest,Apmex

Status changed to Order Wrapped Package ID: 3636458, Wrapped Station: DT-SHIP-03

11/14/2014 10:15:38 AM By Harrison,Abraham

overpayment of \$378.50, will give to maggie to issue refund

11/14/2014 9:46:19 AM By Nhin,Andy

Status changed to Order Double Checked

11/14/2014 9:46:18 AM By Nhin,Andy

Package information: Package ID: 3636458, Shipment Method: UPS Ground, Value: \$6001.95
Postage: \$12.36, Product Weight: 8 ,Oz. , Pkg Weight: 15.4 Oz., Packing Material: PBA , Size:
9" X 5" X 3", DC Station: DT-MV-02

11/14/2014 8:13:16 AM By Walters,Lyle

Order has been released successfully.

11/14/2014 7:41:14 AM By Felton,Maverick

Status changed to Order Pulled, Work Station: DT-MV-05

11/14/2014 2:37:24 AM By Hammonds,Andrew

Order printed from GP and released to shipping per Greg.

11/14/2014 2:37:00 AM By Hammonds,Andrew

Order Status changed from "Awaiting Payment" to "Printed Upstairs"

11/11/2014 4:50:07 PM By User,System

Order 8961347 created by Jana Smith. Approved by Chris Boswell

11/11/2014 4:50:07 PM By Smith,Jana

SO 8961347 Created

Order Summary Report - 8847953**Order Cancelled**

Oct 16, 2014

\$6,380.45**USER**

[REDACTED]
 Kruchin, David
 [REDACTED]

BILLING

Vadim Kruchinin
 [REDACTED]
 RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin
 [REDACTED]
 RENO, NV 89523-1825 USA

Special Instructions:

Cancelled On: 11/13/2014 9:32:56 AM

Reason:

How Hazed	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	5GBAR-SM	5 oz Gold Bar - Secondary Market Based on Gold spot price of \$1,241.10	24508	\$6,380.45	\$6,380.45

Payment Type (6) Personal Check

Credit Card Info:

No.: XXXX XXXX XXXX /

Subtotal: \$6,380.45

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: **\$6,380.45**Paid on: 10/22/2014 **\$6,380.45****Admin Notes:**

Carrier	Tracking Number	Ship Date	Name
---------	-----------------	-----------	------

Notes

11/13/2014 1:13:07 PM By Dunn,Christine

NSF Changed from 0 to 1

11/13/2014 1:13:07 PM By Dunn,Christine

Order Cancelled Reason Changed from Management Decline - Market Loss to None

11/13/2014 9:40:35 AM By Tower,Greg

NSF Changed from 1 to 0

11/13/2014 9:32:57 AM By Tower,Greg

Order Cancelled Reason Changed from None to Management Decline - Market Loss

11/13/2014 9:32:57 AM By Tower,Greg

Order Cancelled

11/13/2014 9:32:46 AM By Tower,Greg

cancel per management waive all M/L an fee on this order and past order. spot \$1,164.00 Pur \$1,241.10 M/L of \$385.50

11/13/2014 9:30:33 AM By Tower,Greg

Please cancel this order and put notes on the account that per Bryan all prior fees on his account and any ML fees from this cancelled order are waived. We created a reorder which will ship today

10/29/2014 6:10:35 AM By Tower,Greg

email was sent to cust that M/L an fee owing of \$2,755.60 on order 4380488 for NSF

10/28/2014 12:49:04 AM By Hammonds,Andrew

Holding order in tray for further notification.

10/28/2014 12:48:48 AM By Hammonds,Andrew

Order Status changed from "Printed Upstairs" to "Supervisor Hold See Notes"

10/28/2014 12:48:45 AM By Hammonds,Andrew

Order Status changed from "Payment Received" to "Printed Upstairs"

10/22/2014 3:03:02 PM By Stubbs,Tallie

Please follow up.Lockbox payment received on flagged account and order marked as NSF

10/22/2014 3:03:02 PM By Application,LockBox

Lockbox payment received on flagged account. Order marked as NSF. Please contact Accounting

10/22/2014 3:03:02 PM By Application,LockBox

Payment Received in the amount of 6380.45 on 10/22/2014.

10/17/2014 3:17:26 PM By Smlth,Jana

Row, section and bin information was updated successfully for product 24508 and Line Item Seq. 32768

Order Summary Report - 4925948**Order Shipped**

Aug 17, 2011

\$453.52**USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:

How Heard	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	10SBAR-APMEX	10 oz APMEX Silver Bar .999 Fine Based on Silver spot price of \$40.07	27087	\$443.52	\$443.52

Payment Type (1) Credit Card

Credit Card Info: Mastercard

No.: XXXX XXXX XXXX

Subtotal: \$443.52

Shipping: \$10.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$453.52

Paid on: 08/17/2011 \$453.52

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
USPS	9121936503019154648549	08/18/2011	System User

Notes

8/18/2011 1:20:07 PM By User, System

Status Changed to Order Shipped

8/18/2011 12:53:03 PM By Franklin, Evan

Status changed to Order Wrapped Package ID: 82322

8/18/2011 9:24:35 AM By Henry, Wade

Status Changed to Order Double Checked

8/18/2011 7:27:08 AM By Fife, Mike

Status changed to Order Pulled

8/18/2011 6:59:06 AM By Bearden, Chanelle

Status changed to Checked into B Vault

8/17/2011 8:39:01 PM By Fowler, Keisha

Status changed to Printed Waiting to Ship

8/17/2011 2:15:00 PM By Stevens, Michelle

Credit Card Processed on Aug 17 2011 2:15PM.

Order Summary Report - 4460471**Order Shipped**

Feb 10, 2011

\$62,260.00**USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:**How Heard**

Other

Flooded

Yes

Prev Orders

14

Cancelled orders

3

Date Account Opened

12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
20			Y	100SBAR-JM	100 oz (NEW - Johnson Matthey) .999 Fine Silver Bars Based on Silver spot price of \$30.14	35629	\$3,113.00	\$62,260.00

Payment Type (6) Personal Check

Credit Card Info:

Discover

No.: XXXX XXXX XXXX

Subtotal: \$62,260.00

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$62,260.00

Paid on: 02/17/2011 \$62,260.00

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z15TT58A840474261	02/28/2011	System User
UPS	1Z15TT58A841813473	02/28/2011	System User
UPS	1Z15TT58A842551487	02/28/2011	System User

Notes

2/28/2011 5:00:39 PM By User, System

Status Changed to Order Shipped

2/28/2011 5:00:36 PM By User, System

Status Changed to Order Shipped

2/28/2011 5:00:36 PM By User, System

Status Changed to Order Shipped

2/28/2011 3:47:13 PM By Latimer, Lonnie

Status changed to Order Wrapped

2/28/2011 3:37:26 PM By Henry, Wade

Status changed to Order Double Checked

2/28/2011 3:23:05 PM By Kilpatrick, Ranae

Status changed to Order Pulled

2/25/2011 2:55:35 PM By Klinghamer,Matt

Status changed to Checked into B Vault

2/18/2011 1:20:34 AM By Beavers,Joshua

Status changed to Printed Waiting to Ship

2/17/2011 1:50:26 PM By Grass,Cheryl

Payment Received in the amount of 62260.00 on 02/17/2011.

Order Summary Report - 4454999

Feb 07, 2011

Order Shipped**\$36,492.00****USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:

How Held	Flagged	# Prev. Orders	# Cancelled Orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
12			Y	100SBAR-JM	100 oz (NEW - Johnson Matthey) .999 Fine Silver Bars Based on Silver spot price of \$29.42	35629	\$3,041.00	\$36,492.00

Payment Type (6) Personal Check

Credit Card Info:

Mastercard

No.: XXXX XXXX XXXX /

Subtotal: \$36,492.00

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$36,492.00

Paid on: 02/10/2011 \$36,492.00

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z15TT58A841040772	02/23/2011	System User
UPS	1Z15TT58A841022783	02/23/2011	System User

Notes

2/23/2011 5:40:02 PM By User, System

Status Changed to Order Shipped

2/23/2011 5:40:02 PM By User, System

Status Changed to Order Shipped

2/23/2011 4:54:31 PM By Keasling, Kevin

Status changed to Order Wrapped

2/23/2011 12:45:03 PM By Bearden, Chanelle

Status changed to Order Pulled

2/18/2011 3:41:03 PM By Kilpatrick, Ranae

Status changed to Order Pulled

2/18/2011 2:31:09 PM By Klinghamer, Matt

Status changed to Checked into B Vault

2/11/2011 1:15:27 AM By Beavers, Joshua

Status changed to Printed Waiting to Ship

2/10/2011 1:15:47 PM By Grass, Cheryl

Payment Received in the amount of 36492.00 on 02/10/2011.

2/8/2011 9:25:12 AM By Freeman, Lorrie

Thank you email sent

2/8/2011 3:41:29 AM By Beavers, Joshua

account flagged

Order Summary Report - 4411556**Order Cancelled**

Jan 15, 2011

\$28,584.99**USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:

Cancelled On: 2/7/2011 12:04:22 PM

Reason:

How Hired	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	SOSM(SALE-	989.10 oz Silver Bar .999+ Fine - (JOHNSON MATTHEY) Based on Silver spot price of \$28.51	60296	\$28,584.99	\$28,584.99

Payment Type (6) Personal Check

Credit Card Info:

Visa

No.: XXXX XXXX XXXX

Subtotal: \$28,584.99

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$28,584.99

Cancelled \$0.00

Admin Notes:

Garment	Tracking Number	Ship Date	Name
---------	-----------------	-----------	------

Notes

2/10/2011 10:11:59 AM By Tower,Greg

sent notice charged cc \$35.00

2/8/2011 5:35:45 PM By Stevens,Michelle

Credit card was charged for \$35.00 for market loss and cancellation fee per the terms and conditions of our user agreement with all APMEX account holders

2/7/2011 12:04:22 PM By Tower,Greg

Order Cancelled

2/7/2011 12:04:22 PM By Tower,Greg

Order Cancelled Reason Changed from None to Payment Not Received

2/7/2011 12:04:01 PM By Tower,Greg

cancel nonpayment spot \$29.39 pur at \$28.51 no M/L pert agreement try to charge cc fee of \$35.00

1/28/2011 4:12:11 PM By Tower,Greg

2nd notice

1/17/2011 1:02:23 PM By Tower,Greg

cust owes M/L and fee on order 4411556 give to Greg when we receive funds

1/17/2011 1:00:22 PM By Heard,Bud

email thanks sent to cust.

Order Summary Report - 4380488**Order Cancelled**

Dec 31, 2010

\$32,805.86**USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:

Cancelled On: 1/17/2011 1:01:00 PM

Reason:

How Heard	Flagged	# Prev. Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	SOSM(SALE-	1050.46 oz Silver Bar .999 Fine - (Industrial Minera Mexico SA) Based on Silver spot price of \$30.94	60068	\$32,805.86	\$32,805.86

Payment Type (6) Personal Check

Credit Card Info:

Visa

No.: XXXX XXXX XXXX

Subtotal: \$32,805.86

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$32,805.86

Paid on: 01/05/2011 \$32,805.86

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
---------	-----------------	-----------	------

Notes

1/17/2011 1:01:00 PM By Tower,Greg

Order Cancelled

1/17/2011 1:01:00 PM By Tower,Greg

Order Cancelled Reason Changed from None to NSF – Bounced Check

1/17/2011 1:00:30 PM By Tower,Greg

cancel nonpayment /NSF spot \$28.35 pur at \$30.94 M/L of \$2,720.69 + \$35.00 fee owes \$2,755.69. cust placed another order flagged account will off set when we receive ck

1/13/2011 7:03:51 PM By Stubbs,Tallie

Sent NSF notice

1/7/2011 7:52:39 AM By Smith,Jana

bank notified of NSF check

1/5/2011 11:38:28 PM By Beavers,Joshua

Status changed to Printed Waiting to Ship

1/5/2011 12:45:29 PM By Highfill,Sharon

Payment Received in the amount of 32805.86 on 01/05/2011.

Order Summary Report - 4369055**Order Shipped**

Dec 26, 2010

\$29,726.11**USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:

How Heard	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	S05M(SALE-	1004.80 oz Silver Bar .999 Fine - (BUNKER HILL Bar) Based on Silver spot price of \$29.30	60065	\$29,726.11	\$29,726.11

Payment Type (6) Personal Check

Credit Card Info:

Mastercard

No.: XXXX XXXX XXXX /

Subtotal: \$29,726.11

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$29,726.11

Paid on: 12/28/2010 \$29,726.11

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z15TT58A841459311	01/07/2011	System User

Notes

1/7/2011 12:00:17 PM By User, System

Status Changed to Order Shipped

1/7/2011 8:40:29 AM By Keasling, Kevin

Status changed to Order Wrapped

1/7/2011 8:13:25 AM By Baldwin, Michael

Status changed to Order Double Checked

1/6/2011 11:21:38 AM By Laskey, Richard

Status changed to Order Pulled

1/6/2011 7:06:16 AM By Balfour, Kevin

Status changed to Checked into B Vault

12/29/2010 12:40:29 AM By Beavers, Joshua

Status changed to Printed Waiting to Ship

12/28/2010 12:10:33 PM By Highfill, Sharon

Payment Received in the amount of 29726.11 on 12/28/2010.

12/27/2010 11:50:53 AM By Schwimmer,Ryan

ty email sent

Order Summary Report - 4368323**Order Shipped**

Dec 25, 2010

\$28,303.48**USER**

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:

How Heard	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M.	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	SOSM(SALE-	953.30 oz Silver Bar .999+ Fine - (JOHNSON MATTHEY) Based on Silver spot price of \$29.30	60062	\$28,303.48	\$28,303.48

Payment Type (6) Personal Check

Credit Card Info:

Visa

No.: XXXX XXXX XXXX

Subtotal: \$28,303.48

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$28,303.48

Paid on: 12/28/2010 \$28,303.48

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z15TT58A841168650	01/12/2011	System User

Notes

1/12/2011 4:40:04 PM By User, System

Status Changed to Order Shipped

1/12/2011 8:08:45 AM By Burkert, Aaron

Status changed to Order Wrapped

1/12/2011 7:51:22 AM By Henry, Wade

Status changed to Order Double Checked

1/12/2011 7:18:09 AM By Balfour, Kevin

Status changed to Order Pulled

1/11/2011 2:59:53 PM By Klinghamer, Matt

Status changed to Checked into B Vault

12/30/2010 11:42:23 AM By Keeler, Jack

cust sd will be sending in a new check to cover the nsf check

12/30/2010 8:15:34 AM By Stubbs, Tallie

Rec'd NSF Notice

12/29/2010 12:40:23 AM By Beavers,Joshua

Status changed to Printed Waiting to Ship

12/28/2010 12:10:30 PM By Highfill,Sharon

Payment Received in the amount of 28303.48 on 12/28/2010.

Order Summary Report - 4368272**Order Shipped**

Dec 24, 2010

\$27,783.90

USER

Kruchin, David

BILLING

Vadim Kruchinin

RENO, NV 89523-1825 USA

SHIPPING

Vadim Kruchinin

RENO, NV 89523-1825 USA

Special Instructions:

How Heard	Flagged	# Prev Orders	# Cancelled orders	Date Account Opened
Other	Yes	14	3	12/24/2010

Qty	Pulled	Checked	M.M	Item Number	Description	Web ID	Unit Price	Ext. Price
1			Y	SOSM(SALE-	\$35.80 oz Silver Bar .999+ Fine - (JOHNSON MATTHEY) Based on Silver spot price of \$29.30	60061	\$27,783.90	\$27,783.90

Payment Type (6) Personal Check

Credit Card Info:

Visa

No.: XXXX XXXX XXXX

Subtotal: \$27,783.90

Shipping: \$0.00

Int'l Ship Cost: \$0.00

Taxes: \$0.00

Coupon Discount: \$0.00

Ext Area Surcharge: \$0.00

Order Total: \$27,783.90

Paid on: 12/28/2010 \$27,783.90

Admin Notes:

Carrier	Tracking Number	Ship Date	Name
UPS	1Z15TT58A841921025	01/06/2011	System User

Notes

1/6/2011 5:40:07 PM By User, System

Status Changed to Order Shipped

1/6/2011 3:52:09 PM By Keasling, Kevin

Status changed to Order Wrapped

1/6/2011 2:57:08 PM By Benefee, Don

Status changed to Order Double Checked

1/6/2011 11:07:26 AM By Balfour, Kevin

Status changed to Order Pulled

1/6/2011 7:06:18 AM By Balfour, Kevin

Status changed to Checked into B Vault

12/29/2010 12:40:22 AM By Beavers, Joshua

Status changed to Printed Waiting to Ship

12/28/2010 12:10:30 PM By Highfill, Sharon

Payment Received in the amount of 27783.90 on 12/28/2010.

Bank Wire Transaction - 5624

Bank Wire Amount: \$27,405.76
Value Date: 20151004
General GBT: DAVID KRUCHIN
Sending Bank: [REDACTED] - UMPQUA BANK
Fed Reference: [REDACTED] FT03
Credit Account: [REDACTED] 4041
Originating Account: [REDACTED] 0632
Originating Party: [REDACTED] 0632
DAVID KRUCHIN
[REDACTED]
RENOMV 89523-1825
Beneficiary Party: [REDACTED]
APMEX-CLEARING ACCOUNT
226 DEAN A MCGEE AVE
OKLAHOMA CITY OK 73102
US
Receiving Bank: [REDACTED] 0036

Bank Wire Transaction - 5138

Bank Wire Amount: \$74,029.85
Value Date: 20151002
Sending Bank: [REDACTED] - UMPQUA BANK
Fed Reference: [REDACTED] FT03
Credit Account: [REDACTED] 4041
Originating Account: [REDACTED] 0632
Originating Party: AC [REDACTED] 0632
DAVID KRUCHIN
[REDACTED]
RENOMV 89523-1825
Beneficiary Party: AC [REDACTED]
APMEX - CLEARING ACCOUNT
226 DEAN A MCGEE AVE
OKLAHOMA CITY OK 73102
US
Receiving Bank: [REDACTED] 0036

EXHIBIT 3



October 17, 2016

VIA EMAIL

Tonia Jackson
Federal Trade Commission
225 Peachtree Street, N.E., Suite 1500
Atlanta, GA 30303

RE: Subpoena / Vadim Olegovich Kruchinin
Case No. 1:16-cv-3591

To Whom It May Concern:

optionsXpress hereby responds to the subpoena issued to optionsXpress in the above-captioned matter on or about October 5, 2016. This response is based on the best information currently available to optionsXpress. optionsXpress reserves the right to amend, supplement, or correct our response if and when we discover additional responsive information or documents. To the extent the subpoena may be interpreted to seek additional documents not provided, optionsXpress objects to the production on the grounds stated in the attached Notice of General Objections and Reservations.

Please note that account statements are only generated for months in which activity occurs in the account(s).

For the Firm,

A handwritten signature in blue ink that reads "Brittany Harris".

Brittany Harris
Sr. Legal Specialist, Office of Corporate Counsel
Tel (720) 418-2754
Fax (888) 368-6355

Enclosures

10/13/16 15:04:24 4846561379

→

CS (72B) Jackson, Tonia C. Page 846

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, Brittany Harris, have personal knowledge of the facts set forth below and am competent to testify as follows:
2. I have authority to certify the authenticity of the records produced by optionsXpress by Charles Schwab, which are attached hereto.
3. The documents produced and attached hereto by optionsXpress by Charles Schwab are originals or true copies of records of regularly conducted activity that:
 - a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
 - b) Were kept in the course of the regularly conducted activity of optionsXpress by Charles Schwab; and
 - c) Were made by the regularly conducted activity as a regular practice of optionsXpress by Charles Schwab.

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

Executed on October 17, 2016.

Brittany Harris
Signature

Brittany Harris
Print Name


Dr legal specialist
Title


Electronic New Account Authorization

Vadim Kruchinin

1 of 2

Primary Applicant Information:

Username: 
 Account Entity: Individual

Account Type: cash, margin, & option
 Name: Vadim Kruchinin
 Address: 
 38513 United States

Phone (day): 
 E-mail: 

Marital Status: single

Dependents: ☐

Employment Status: employed

Employer: Laptop and Desktop Repair

Occupation: managing member

SEC Rule 14B-1(C): no

Money Market: no

e-Delivery Settings: Confirm: Electronic Only
 Statements: Electronic Only
 Tax Documents: Electronic Only

Date of Birth: 

Citizenship: citizen

SSN: 

Passport: 

Tax Bracket: 30 to 45%

Liquid Net Worth: 50k to 100k

Net Worth: Over 250k

Annual Income: 180k to 250k

Trades Stocks Since: 2001

Trades Options Since: 2002

My investment objectives include:
 speculation

I am not associated or employed by an FINRA or an Exchange Member Firm.

Primary Futures Information:

Discretionary Trading Authorization

You said that:

a. No other person will have control of trading in this account.

b. No other person will guarantee this account.

c. No other person will have interest in this account.

Additional Signatories do not have Futures accounts or control the trading in such accounts.

Your Investment Objectives include: Speculation

Years Trading Futures: 3

Futures Rep Number: 

Security Futures Rep Number: 

I certify that this entity allows Futures Trading.

SCH000001

Electronic New Account Authorization

Vadim Kruchinin

2 of 2

New Account Terms and Conditions:**New Account Terms and Conditions**

Agreement to "Account Terms and Conditions": I or we ("I") hereby request that optionsXpress ("optionsXpress") open an account as indicated above, and I acknowledge that I have read and understood both the "Account Terms & Conditions" agreement that governs this account and all agreements regarding use of data and exchange quotes, and I agree to be bound by these agreements as currently in effect and as amended from time to time that may be applicable to my account including, if applicable, additional terms and conditions that may apply to my/our Savings Accounts, and such other agreements posted on the optionsXpress website. I have legal capacity to enter into and be bound by this legal contract. I agree to promptly advise optionsXpress in writing of any change in my residential, employment, and financial or legal status. I agree to receive all account notices, including all confirmation of trade, by electronic means and to access my account regularly to receive such notices. I EXPRESSLY ACKNOWLEDGE THAT optionsXpress DOES NOT MAKE RECOMMENDATIONS REGARDING INVESTMENTS, TAXES, OR LEGAL MATTERS. I understand that my account is governed by a pre-dispute arbitration clause contained in optionsXpress' "Account Terms and Conditions" section 446.

Options Terms

Options Agreement Terms: I represent that I am aware of the inherent risks associated with options trading and that I am financially able to bear such risks and withstand options trading losses. I have read and understood the terms and conditions that govern the options account and the special risk statement for uncovered option writers, where applicable, and agree to be bound by them as currently in effect and as amended from time to time. I have also fully read and understand the disclosure document entitled "Characteristics and Risks of Standardized Options" issued by the Options Clearing Corporation and delivered to me by optionsXpress either electronically or in hard copy, a copy of which is available on the optionsXpress website.

Marginal Terms

Loan or Pledge of Securities (Margin Customers Only): I hereby authorize optionsXpress ("optionsXpress") to lend either in itself or as agent any securities held by the broker in my margin account and to carry such property in its general issue. I agree to the conditions contained in the "Appendix A: Margin Account Special Agreement Terms" and will be charged interest in accordance with such terms. Such property may be pledged, sold, hypothecated or subordinated without notice to me either separately or in conjunction with other such property for any amounts due to optionsXpress from or for a greater sum and optionsXpress shall have the obligation to retain a like amount of similar property in its possession and control. By signing this agreement I acknowledge that I hold in my margin account may be loaned to optionsXpress or loaned out to others. I also acknowledge optionsXpress' right held in my account at any time and without prior notice to me, in optionsXpress' sole discretion when such action is anticipated or deemed necessary to protect optionsXpress from potential loss.

Customer Agreement to New Account Terms & Conditions, Margin Account Terms, Options Account Terms, Characteristics and Risks of Standardized Options and its employment
Date and Time: 4/21/2009 1:57:16 PM
IP: 71.84.112.77

W-9

Substitute IRS Form W-9: Under penalty of perjury, I certify that:
1. The number shown on this form is my correct taxpayer identification number for I am waiting for a number to be issued to me, and
2. I am not subject to backup withholding because:
(a) I am exempt from backup withholding, or
(b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all income or dividends, or
(c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. person (including a U.S. resident alien). The Internal Revenue Service does not require your consent to any provision of this document other than the certification required to avoid backup withholding.
Document Certification of W-9:
Date and Time: 4/21/2009 4:00:25 PM
IP: 71.84.112.77

Futures Terms and Conditions:**Futures Customer Account Agreement Version 03/07/17 to Certification, Acknowledgments and Agreements****1. Agreement**

I or We ("I") hereby request that optionsXpress open an account as indicated above, and, by signing below, I acknowledge that I have read and understood both the Futures Customer Account Agreement that governs this account and all applicable supplements, including the Electronic Services Supplement, and I agree to be bound by these agreements as currently in effect and as amended from time to time as posted on the optionsXpress website. I have legal capacity to enter into and be bound by this legal contract. I represent that all of the information that I have provided, including but not limited to the information contained herein, is true and correct and I agree to promptly advise optionsXpress in writing of any change in my/our residential, employment, and financial or legal status. I agree to receive all legal notices for terms of optionsXpress Electronic Services Supplement posted online. I EXPRESSLY ACKNOWLEDGE THAT I AM SOLELY RESPONSIBLE FOR ALL INVESTMENT DECISIONS MADE REGARDING MY ACCOUNT, AND THAT optionsXpress DOES NOT MAKE RECOMMENDATIONS REGARDING INVESTMENTS, TAXES, OR LEGAL MATTERS.

I understand that the majority of retail futures customers lose money trading futures, and a significant number of such customers trading for more than half of the money they have allocated to Source within the first two years of opening a futures account. I represent that I am aware of the inherent risks associated with futures trading, that I am financially able to bear such risks and withstand trading loss of the amount utilizing only risk capital (funds that I can afford to lose without affecting my lifestyle) for such trading. I have read and understand this Futures Customer Account Agreement that governs this Source account and agree to be bound by the terms as currently in effect as posted from time to time.

2. Authorization and Consent

By signing below, I hereby confirm my consent specifically as to the following provisions:

- Authorization to Transfer Funds (Agreement Section 24)
- Consent to Close Transactions (Agreement Section 25)

Date and Time: 4/21/2009 1:58:03 PM

IP: 71.84.112.77

- Terms of the Futures Arbitration Agreement

Date and Time: 4/21/2009 1:58:07 PM

IP: 71.84.112.77

3. Risk Disclosure Acknowledgment

By signing below, I hereby acknowledge that I have received, read, understood, and agree to each of the following documents prior to signing opening of the account and that I may request additional copies of such documents from optionsXpress or access such documents on optionsXpress' website:

- optionsXpress Privacy Notice
- Futures Account Additional Risk Warning
- Risk Disclosure Statement for Futures & Options (PDF)
- Electronic Services Supplement
- Uniform Electronic Trading Disclosure
- Futures Quotes Agreement
- Options Agreement (Arbitration)
- Security Futures Risk Document
- Additional Risk Disclosure

Date and Time: 4/21/2009 1:58:06 PM

IP: 71.84.112.77

Kruchinin, Vadim agreed on 04/21/2009 02:00:24 PM to the above and electronically signed his/her/their application from 71.84.112.77
Kruchinin, Vadim electronically submitted his/her/their application to optionsXpress on 04/21/2009 04:00:25 PM from 71.84.112.77

File Creation Date: 4/21/2009 4:00:25 PM

SCH000002

Expanding Your Capabilities

[illegible][illegible]

Wire Transfer Activity:

10/15/2015	10/05/2016		103,555.66	02.51
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FEDWIRE DEBIT
 STRAIGHT
 YOUR REF: 2855566302
 PAID TO: UNIFORM BANK 445 SE MAIN ST PO BOX 5753 HILLSBORO OR 97140-4900
 FED ID: 1034
 B/C CUSTOMER: 1941 DAVID VADIM KRUCHININ
 ACCT PARTY: 1932 DAVID VADIM KRUCHININ
 REMARK: CREDIT REF EPO OF 191105
 REC GRP: 10051347
 MRN SEQ: 001702080178
 FED REF: 1984 "VIA FED"
 200,000.00
 1625

FEDWIRE CREDIT
 STRAIGHT
 YOUR REF: 162112025705
 REC FROM: U.S. BANK ONE E LIBERTY STREET RENO NV
 FED ID: 1624
 B/C CUSTOMER: 1971 DAVID V KRUCHININ
 REMARK: FURTHER CREDIT TO DAVID VADIM KRUCHININ ACCT# 193984 DEBIT REF 193984
 REC TIME: 1623
 REC GRP: 01222144
 MRN SEQ: 162112025706
 FED REF: 162112025706
 1623 "VIA FED"
 50,000.00
 01/12/2015 01/12/2016
 YOUR REF: 110818028520
 REC FROM: U.S. BANK ONE E LIBERTY STREET RENO NV
 FED ID: 1694
 B/C CUSTOMER: 19235 VADIM OLEGOVICH KRUCHININ DBA LAPTOP
 ACCT PARTY: VADIM KRUCHININ NO ADDRESS GIVEN
 REMARK: 1994 /TIME/09:05
 REC GRP: 08191305
 MRN SEQ: 110818028520
 FED REF: 19325 "VIA FED"
 1625

SCH0000004

180,000.00 FEDWIRE DEBIT
YOUR REF: 151987372

FED 4CZO 10:34 05/20/2011 STRAIGHT

PAID TO: US BK NEV RENC U.S. BANK RENO NV

FED ID: 1894

B/O CUSTOMER: 1941 VADIM KRUCHININ RENO NV US 89523

ACCT PARTY: 5771 VADIM KRUCHININ

REC GFP: 05201431

MRN SEQ: 0014CZC80349

FED REF: 12761 "VIA FED"

52,000.00 FEDWIRE CREDIT
YOUR REF: 142FF 11:39 02/11/2011 STRAIGHT

REC FROM: FIRST NATIONAL BANK OF OMAHA INTERNATIONAL TRADE SERVICE 1620
DODGE STREET 11TH FL EAST END OMAHA NE 68102

FED ID: 1016

B/O CUSTOMER: 1948 VADIM KRUCHININ RENO NV 59523-

S/O BANK: 3101 TD AMERITRADE CLEARING INC ATTN CASHIERING DEPT 4211 S
102ND STREET OMAHA NE 68127-1031

ACCT PARTY: 5994 VADIM KRUCHININ

REMARK: TIME/11:36

REC GFP: 02111636

MRN SEQ: 2011021100001272

FED REF: 0211 J4Q5049C 000605 "VIA FED"

SCH000005

0593-5994 David Vadim Kruchin

Eaton/Action/Transaction															
Bank Name	ABA	Bank Acct #	Bank Acct Title	Acct Type	Payee	Bank Type	Amount 1	Amount 2	Recur/H Date	Processed Date	Forward Amount	Remittance Date	Frequency	Status	Action
US Bank		550	Wash Natl Bank	Checking		DD	0.0	0.0	5/13/2010 2:31:17 PM	5/14/2010 8:17:47 AM		12:00:00 AM		Debited	
US Bank		551	Wash Natl Bank	Checking		DD	0.0	0.0	7/28/2011 11:35:53 PM	8/1/2011 1:55:47 PM		12:00:00 AM		Debited	
US Bank		552	Wash Natl Bank	Checking		DD	0.0	0.0	7/28/2010 10:35:52 AM	7/27/2010 4:59:19 PM		12:00:00 AM		Debited	

Account ID

Account Name

Account Number

Branch

Routing

SWIFT

Bank Name

Bank Address

Bank City

Bank State

Bank Zip

Bank Phone

Bank Fax

Bank Email

Bank Website

Bank Logo

Bank Icon

Bank Type

Bank Category

Bank Subcategory

Bank Subtype

Bank Subcode

Bank Subdesc

Bank Subflag

Bank Subnote

Bank Subcomment

Bank Subremark

Bank Subreason

Bank Subresult

Bank Substatus

Bank Subaction

Bank Submessage

Bank Subdata

Bank Subinfo

Bank Subdetail

Bank Subnote2

Bank Subcomment2

Bank Subremark2

Bank Subreason2

Bank Subresult2

Bank Substatus2

Bank Subaction2

Bank Submessage2

Bank Subdata2

Bank Subinfo2

Bank Subdetail2

Bank Subnote3

Bank Subcomment3

Bank Subremark3

Bank Subreason3

Bank Subresult3

Bank Substatus3

Bank Subaction3

Bank Submessage3

Bank Subdata3

Bank Subinfo3

Bank Subdetail3

Bank Subnote4

Bank Subcomment4

Bank Subremark4

Bank Subreason4

Bank Subresult4

Bank Substatus4

Bank Subaction4

Bank Submessage4

Bank Subdata4

Bank Subinfo4

Bank Subdetail4

Bank Subnote5

Bank Subcomment5

Bank Subremark5

Bank Subreason5

Bank Subresult5

Bank Substatus5

Bank Subaction5

Bank Submessage5

Bank Subdata5

Bank Subinfo5

Bank Subdetail5

Bank Subnote6

Bank Subcomment6

Bank Subremark6

Bank Subreason6

Bank Subresult6

Bank Substatus6

Bank Subaction6

Bank Submessage6

Bank Subdata6

Bank Subinfo6

Bank Subdetail6

Bank Subnote7

Bank Subcomment7

Bank Subremark7

Bank Subreason7

Bank Subresult7

Bank Substatus7

Bank Subaction7

Bank Submessage7

Bank Subdata7

Bank Subinfo7

Bank Subdetail7

Bank Subnote8

Bank Subcomment8

Bank Subremark8

Bank Subreason8

Bank Subresult8

Bank Substatus8

Bank Subaction8

Bank Submessage8

Bank Subdata8

Bank Subinfo8

Bank Subdetail8

Bank Subnote9

Bank Subcomment9

Bank Subremark9

Bank Subreason9

Bank Subresult9

Bank Substatus9

Bank Subaction9

Bank Submessage9

Bank Subdata9

Bank Subinfo9

Bank Subdetail9

Bank Subnote10

Bank Subcomment10

Bank Subremark10

Bank Subreason10

Bank Subresult10

Bank Substatus10

Bank Subaction10

Bank Submessage10

Bank Subdata10

Bank Subinfo10

Bank Subdetail10

Bank Subnote11

Bank Subcomment11

Bank Subremark11

Bank Subreason11

Bank Subresult11

Bank Substatus11

Bank Subaction11

Bank Submessage11

Bank Subdata11

Bank Subinfo11

Bank Subdetail11

Bank Subnote12

Bank Subcomment12

Bank Subremark12

Bank Subreason12

Bank Subresult12

Bank Substatus12

Bank Subaction12

Bank Submessage12

Bank Subdata12

Bank Subinfo12

Bank Subdetail12

Bank Subnote13

Bank Subcomment13

Bank Subremark13

Bank Subreason13

Bank Subresult13

Bank Substatus13

Bank Subaction13

Bank Submessage13

Bank Subdata13

Bank Subinfo13

Bank Subdetail13

Bank Subnote14

Bank Subcomment14

Bank Subremark14

Bank Subreason14

Bank Subresult14

Bank Substatus14

Bank Subaction14

Bank Submessage14

Bank Subdata14

Bank Subinfo14

Bank Subdetail14

Bank Subnote15

Bank Subcomment15

Bank Subremark15

Bank Subreason15

Bank Subresult15

Bank Substatus15

Bank Subaction15

Bank Submessage15

Bank Subdata15

Bank Subinfo15

Bank Subdetail15

Bank Subnote16

Bank Subcomment16

Bank Subremark16

Bank Subreason16

Bank Subresult16

Bank Substatus16

Bank Subaction16

Bank Submessage16

Bank Subdata16

Bank Subinfo16

Bank Subdetail16

Bank Subnote17

Bank Subcomment17

Bank Subremark17

Bank Subreason17

Bank Subresult17

Bank Substatus17

Bank Subaction17

Bank Submessage17

Bank Subdata17

Bank Subinfo17

Bank Subdetail17

Bank Subnote18

Bank Subcomment18

Bank Subremark18

Bank Subreason18

Bank Subresult18

Bank Substatus18

Bank Subaction18

Bank Submessage18

Bank Subdata18

Bank Subinfo18

Bank Subdetail18

Bank Subnote19

Bank Subcomment19

Bank Subremark19

Bank Subreason19

Bank Subresult19

Bank Substatus19

Bank Subaction19

Bank Submessage19

Bank Subdata19

Bank Subinfo19

Bank Subdetail19

Bank Subnote20

Bank Subcomment20

Bank Subremark20

Bank Subreason20

Bank Subresult20

Bank Substatus20

Bank Subaction20

Bank Submessage20

Bank Subdata20

Bank Subinfo20

Bank Subdetail20

Bank Subnote21

Bank Subcomment21

Bank Subremark21

Bank Subreason21

Bank Subresult21

Bank Substatus21

Bank Subaction21

Bank Submessage21

Bank Subdata21

Bank Subinfo21

Bank Subdetail21

Bank Subnote22

Bank Subcomment22

Bank Subremark22

Bank Subreason22

Bank Subresult22

Bank Substatus22

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Bank Subcomment25

Bank Subremark25

Bank Subreason25

Bank Subresult25

Bank Substatus25

Bank Subaction25

Bank Submessage25

Bank Subdata25

Bank Subinfo25

Bank Subdetail25

Bank Subnote26

Bank Subcomment26

Bank Subremark26

Bank Subreason26

Bank Subresult26

Bank Substatus26

Bank Subaction26

Bank Submessage26

Bank Subdata26

Bank Subinfo26

Bank Subdetail26

Bank Subnote27

Bank Subcomment27

Bank Subremark27

Bank Subreason27

Bank Subresult27

Bank Substatus27

Bank Subaction27

Bank Submessage27

Bank Subdata27

Bank Subinfo27

Bank Subdetail27

Bank Subnote28

Bank Subcomment28

Bank Subremark28

Bank Subreason28

Bank Subresult28

Bank Substatus28

[illegible]

SCH00006

EXHIBIT 4

Burns, Anna

From: Harris, Brittany <Brittany.Harris@schwab.com>
Sent: Monday, October 17, 2016 3:01 PM
To: Jackson, Tonia C.
Subject: RE: Case Number 1:16-cv-3591

Hi Tonia,

I just reached out to OptionsXpress and was advised the account was at a \$0.00 balance when the order was received. Please let me know if you have any additional questions.

Thank you,

Brittany Harris

Sr. Specialist – Legal Support | Corporate Legal Group
Charles Schwab & Co., Inc.
Phone: (720) 418-2754
Fax: (888) 368-6355
9825 Schwab Way, Lone Tree, CO 80124

DO NOT CUT/PASTE/FORWARD THIS EMAIL OUTSIDE SCHWAB WITHOUT PRIOR AUTHORIZATION FROM SENDER.

NOTICE: All email sent to or from the Charles Schwab corporate email system is subject to archiving, monitoring and/or review by Schwab personnel

From: Jackson, Tonia C. [<mailto:TJACKSON@ftc.gov>]
Sent: Monday, October 17, 2016 11:31 AM
To: Harris, Brittany
Subject: RE: Case Number 1:16-cv-3591

Ms. Harris,

Can you please tell me how much money optionsXpress has frozen?

Thanks,

*Tonia Jackson
Paralegal
Federal Trade Commission
Atlanta, GA 30303
(404) 656-1373*

From: brittany.harris@schwab.com [<mailto:brittany.harris@schwab.com>]
Sent: Monday, October 17, 2016 10:53 AM
To: Jackson, Tonia C.
Subject: Case Number 1:16-cv-3591

EXHIBIT 5



UMPQUA
BANK

Operations Legal Process Management
Subpoena Processing
PO Box 1820
Roseburg, OR 97470

DECLARATION FOR RECORDS OF REGULARLY CONDUCTED BUSINESS ACTIVITY	
Re: Laptop & Desktop Repair, LLC	Our Reference #: 16-554
Agency Case #: 1:16-cv-3591	Date Served: 10/07/16
Entity Served: Umpqua Bank (the "Bank")	

I, Karen Parker, declare that I am employed by Umpqua Bank in the Operations Legal Process Management Department (the "Department") and the Bank's designated duly authorized custodian of records for documents and/or information produced under the above referenced legal order. The Bank reserves its right to designate another custodian, as it deems appropriate in the event an actual appearance is required concerning the records produced herein. I certify the authenticity of the records produced herewith and that they were:

- A) Made at or near the time of the occurrence, condition or event of the matters set forth by, or from information transmitted by, a person with knowledge of those matters.
- B) Kept in the course of regularly conducted activity.
- C) Made by the regularly conducted activity as a regular practice, by the personnel of the business.

The identities of the records produced herewith are as follows:

- ☐ Signature Card(s)
- ☐ Statement(s)
- ☐ Cashiers' Check(s)
- ☐ Deposit(s)/Credit(s)
- ☐ Check(s)/Withdrawal(s)
- ☒ Wire Transfer(s)
- ☐ Other:

Records necessary for compliance may have been limited as indicated below:

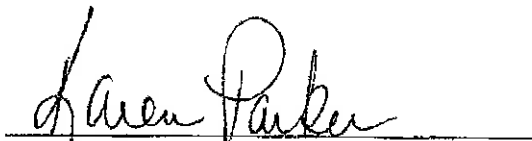
- ☐ The Bank does not possess any of the records as described in the above referenced legal order.
- ☒ The enclosed records are true copies of bank records in the custodian's possession as described in the above referenced legal order. This constitutes final production, unless notified otherwise.
- ☐ The enclosed records are true copies of bank records. This submission constitutes only part of the records in the custodian's possession as described in the above referenced legal order. _____
- ☐ The Bank and/or the Department received notification that no further production is required. File closed.
- ☐ Compliance with the above referenced legal order was limited to the following through agreement with the requesting party: _____
- ☐ The Bank is unable to provide the following records as described in the above referenced legal order: _____

Imaged copies of requested transactions may be missing for the following reasons: Item(s) not imaged or not available. Items piggybacked on other imaged items or other reasons may prevent the Bank from completing a thorough search of records. The Bank's Operations Legal Process Management Department will direct compliance for credit card, various types of loan information, and other non-depository information subject to the above referenced legal order.

I am familiar with the mode of preparation of the enclosed records. They were prepared as follows:

- ☐ Signature Card(s): The customer(s) whose name appears on the signature card/account application and agreement form submitted the form to us requesting checking and/or savings account(s). The customer(s) submitted personal and financial information which were relied upon by the Bank. The customer(s) signed the form. The Bank opened the savings and/or checking account(s) listed on the signature card. The signature card was stored at and retrieved from the Bank's designated retention site(s).
- ☐ Check(s): The check(s) drawn on the customer(s) account(s) were presented to the Bank and paid. During the process of paying the check(s), an image of the front and back of the check(s) is taken in the sequence the check(s) is processed by the Bank. The image is then stored in the Bank's secured facilities. In response to this legal order, the Bank retrieved and produced an image of the check(s).
- ☐ Withdrawal Slip(s)/Deposit(s): The withdrawal(s) (as evidenced by a withdrawal slip) made by customer at a teller window and all deposits made either at a teller window or through an ATM are processed by the Bank at designated central processing centers. When the transaction is processed, an image of the front and back of the item is taken in the sequence the item is processed by the Bank. The image is then stored in the Bank's secured facilities. In response to this legal order, the Bank retrieved and produced an image of the withdrawal slip(s)/deposit(s).
- ☐ Statement(s): Each monthly statement was prepared immediately after the closing date of the monthly account cycle as indicated on the statement(s). The statement(s) accurately reflects all debit entries (checks, point of sale, ATM, teller withdrawals, fees, etc.) and credits (deposits, etc.) which occurred on the account(s) during the monthly account cycle.
- ☒ Other: Original records were prepared or received at or near the time of their creation and were stored by Bank in the ordinary course of business. Upon receipt of this subpoena, we searched and retrieved the original records and prepared a true and correct copy using generally accepted photocopying techniques.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 18th day of October, 2016, in the City of Roseburg, State of Oregon.



Subpoena Processing
Name: Karen Parker
Phone: 866-486-7782

Imaged copies of requested transactions may be missing for the following reasons: Item(s) not imaged or not available. Items piggybacked on other imaged items or other reasons may prevent the Bank from completing a thorough search of records. The Bank's Operations Legal Process Management Department will direct compliance for credit card, various types of loan information, and other non-depository information subject to the above referenced legal order.

PAYMENT ARCHIVE AND RESEARCH CENTER**Query Results Report**

Printed On - 10/18/2016

MSG_SOURCE_TYPE PPUSA
Account No [REDACTED] 0632
Amount 74,029.45
Beneficiary APMEX - CLEARING ACCOUNT
BNF ADDR1 226 DEAN A MCGEE AVE
BNF ADDR2 OKLAHOMA CITY, OK 73102
BNF ID [REDACTED] 4041
Branch ID UMPQ
Country Code US
Currency USD
Direction O
Fee 0.00
IMAD [REDACTED] 0112
MID [REDACTED] 0SE01
Msg Status COMPLETE
Msg Subtype 00
Msg Type 10
Office 001
OMAD [REDACTED] 2FT03
ORG ADDR1 [REDACTED]
ORG ADDR2 RENO, NV 89523-1825
ORG ID [REDACTED] 0632
ORG ID Code AC
Originator DAVID KRUCHIN
Paymt Method FED
Recv ABA [REDACTED] 0036
Recv Name BOK TULSA
Reference [REDACTED] SE01
Sender ABA [REDACTED] 5054
Sender Name UMPQUA BANK
Time 09:32:13
UserID SAMEMERICK
Value Date 10/06/2016
Wire Date 10/06/2016

MSG_SOURCE_TYPE PPUSA
Account No [REDACTED] 0632
Amount 103,369.66
BB [REDACTED] 7872 OPTIONSPRESS INC CHICAGO IL 60606-
Beneficiary DAVID VADIM KRUCHIN
BNF ID [REDACTED] 0632
Branch ID UMPQ
Country Code US
Currency USD
Direction I
Fee 0.00
IMAD [REDACTED] 5664
MID [REDACTED] 2F400
Msg Status COMPLETE
Msg Subtype 00
Msg Type 10
Office 001
OMAD [REDACTED] 8FT03
ORG ADDR1 [REDACTED]
ORG ADDR2 RENO NV US 895231825
ORG ID 059359941
ORG ID Code AC

PAYMENT ARCHIVE AND RESEARCH CENTER**Query Results Report**

Printed On 10/18/2016

Originator DAVID VADIM KRUCHIN
Paymt Method FED
Paymt Source FLS
Recv ABA [REDACTED] 5054
Recv Name UMPQUA BANK
Reference [REDACTED] 79ZO
Sender ABA [REDACTED] 0021
Sender Name JPMORGAN CHASE
Time 07:49:01
UserID DEBORAHKITE
Value Date 10/05/2016
Wire Date 10/05/2016

MSG_SOURCE_TYPE PPUSA
Account No [REDACTED] 0832
Amount 27,486.76
Beneficiary APMEX-CLEARING ACCOUNT
BNF ADDR1 226 DEAN A MCGEE AVE
BNF ADDR2 OKLAHOMA CITY,OK 73102
BNF ID [REDACTED] 4041
Branch ID UMPQ
Country Code US
Currency USD
Direction O
Fee 0.00
IMAD [REDACTED] 00186
MID [REDACTED] VR99
Msg Status COMPLETE
Msg Subtype 00
Msg Type 10
OBI David Kruchin / [REDACTED] 6651
Office 001
OMAD [REDACTED] 3FT03
ORG ADDR1 [REDACTED]
ORG ADDR2 RENO,NV 89523-1625
ORG ID [REDACTED] 0632
ORG ID Code AC
Originator DAVID KRUCHIN
Paymt Method FED
Recv ABA [REDACTED] 0036
Recv Name BOK TULSA
Reference [REDACTED] VR99
Sender ABA [REDACTED] 5054
Sender Name UMPQUA BANK
Time 10:22:53
UserID VETORAMIREZ
Value Date 10/04/2016
Wire Date 10/04/2016

Total messages : 3

Total Amount : 204,885.87

1130
10/05/16
Pay to the Order of Samuel Polanco \$1350.00
Three hundred thirty five dollars
For [Signature]
1130

1130
10/05/16
Pay to the Order of Samuel Polanco \$1350.00
Three hundred thirty five dollars
For [Signature]
1130

Account 0632 Serial 1130 Amount 330.00 Sequence 46827070
TR 5054 TranCode 0 Date 10-07-2016 DepAccountNum
Branch 0 Teller 0 XmitTC 0 Run 4 PocketNun 0 Batch 6 SiteNumber 0

WITHDRAWAL TICKET
Virtual Document
Account: 0632
Description: Checking Withdrawal
\$8,800.00
State Drivers License
Name: David Kruchin
Cash Drawer: 0004 User
13 N 13:44:4 N N N
A5552-0950A B0000880000B

WITHDRAWAL TICKET
Virtual Document
Account: 0632
Description: Checking Withdrawal
\$8,800.00
State Drivers License
Name: David Kruchin
Cash Drawer: 0004 User
13 N 13:44:4 N N N
A5552-0950A B0000880000B

Account 0632 Serial 0 Amount 8800.00 Sequence 2014590805
TR 55520550 TranCode 0 Date 10-06-2016
DepAccountNum Branch 50199 Teller 0 XmitTC 0 Run 97
PocketNun 2

1128
10/05/16
Pay to the Order of Victoria Campos \$1600.00
One thousand six hundred dollars
For [Signature]
1128

1128
10/05/16
Pay to the Order of Victoria Campos \$1600.00
One thousand six hundred dollars
For [Signature]
1128

Account 0632 Serial 1128 Amount 1600.00 Sequence 46245170
TR 123205054 TranCode 0 Date 10-06-2016 DepAccountNum 103205
Branch 0 Teller 0 XmitTC 0 Run 25 PocketNun 0 Batch 72
SiteNumber 0

1188
09/30/16
Pay to the Order of Progenie \$529.00
Five hundred twenty nine dollars
For [Signature]
1188

1188
09/30/16
Pay to the Order of Progenie \$529.00
Five hundred twenty nine dollars
For [Signature]
1188

Account 0632 Serial 1188 Amount 529.00 Sequence 43937670
TR 123205054 TranCode 0 Date 10-04-2016 DepAccountNum 103035
Branch 0 Teller 0 XmitTC 0 Run 6 PocketNun 0 Batch 17
SiteNumber 0

1189
5/16/2043
7/24/16
Pay to the Order of Perfect Lawn \$40.00
forty dollars
For [Signature]
1189

1189
5/16/2043
7/24/16
Pay to the Order of Perfect Lawn \$40.00
forty dollars
For [Signature]
1189

Account 0632 Serial 1189 Amount 40.00 Sequence 43570520
TR 123205054 TranCode 0 Date 10-03-2016 DepAccountNum 103205
Branch 0 Teller 0 XmitTC 0 Run 229 PocketNun 0 Batch 18
SiteNumber 0

1221
8/31/16
Pay to the Order of Elizabeth Schuler \$236.00
two hundred thirty six dollars
For [Signature]
1221

1221
8/31/16
Pay to the Order of Elizabeth Schuler \$236.00
two hundred thirty six dollars
For [Signature]
1221

Account 973170632 Serial 1221 Amount 236.00 Sequence 37649950
TR 123205054 TranCode 0 Date 09-26-2016 DepAccountNum 103205
Branch 0 Teller 0 XmitTC 0 Run 6 PocketNun 0 Batch 1 SiteNumber 0

EXHIBIT 6

BACKGROUND INFORMATION**Item 1. Information About You**

Full Name

David Kaudin

Social Security No.

Current Address of Primary Residence

Driver's License No.

State Issued

Phone Numbers

Home: ()

Date of Birth

Fax: ()

Place of Birth

☐ Rent ☒ OwnFrom (Date): *09 / 2007*
(mm/dd/yyyy)

E-Mail Address

Internet Home Page

Previous Addresses for past five years (if required, use additional pages at end of form)

Address

*Same*From: / /
(mm/dd/yyyy)Until: / /
(mm/dd/yyyy)☐ Rent ☐ Own

Address

From: / / Until: / /

☐ Rent ☐ Own

Address

From: / / Until: / /

☐ Rent ☐ Own

Identify any other name(s) and/or social security number(s) you have used, and the time period(s) during which they were used:

Item 2. Information About Your Spouse or Live-In Companion

Spouse/Companion's Name

Social Security No.

Date of Birth

Address (if different from yours)

Phone Number

(mm/dd/yyyy)

Place of Birth

☐ Rent ☐ OwnFrom (Date): / /
(mm/dd/yyyy)

Identify any other name(s) and/or social security number(s) you have used, and the time period(s) during which they were used:

Employer's Name and Address

Job Title

Years in Present Job

Annual Gross Salary/Wages
\$**Item 3. Information About Your Previous Spouse**

Name and Address

Olga Amy Berger

Social Security No.

unknown

Date of Birth

(mm/dd/yyyy)

Item 4. Contact Information (name and address of closest living relative other than your spouse)

Name and Address

None alive

Phone Number

()

Initials: *DK*

Item 5. Information About Dependents (whether or not they reside with you)

Name and Address [Redacted]	Social Security No.	Date of Birth / / (mm/dd/yyyy)
	Relationship <i>daughter</i>	
Name and Address [Redacted]	Social Security No.	Date of Birth / / (mm/dd/yyyy)
	Relationship	
Name and Address [Redacted]	Social Security No.	Date of Birth / / (mm/dd/yyyy)
	Relationship	
Name and Address [Redacted]	Social Security No.	Date of Birth / / (mm/dd/yyyy)
	Relationship	

Item 6. Employment Information/Employment Income

Provide the following information for this year-to-date and for each of the previous five full years, for each business entity of which you were a director, officer, member partner, employee (including self-employment), agent, owner, shareholder, contractor, participant or consultant at any time during that period. "Income" includes, but is not limited to: any salary, commissions, distributions, draws, consulting fees, loans, loan payments, dividends, royalties, and benefits for which you did not pay (e.g., health insurance premiums, automobile lease or loan payments) received by you or anyone else on your behalf.

TOTAL PERSONAL INCOME NUMBERS

Company Name and Address <i>Laptop & Desktop Repair LLC</i>	Dates Employed		Income Received: This year to date	
Ownership Interest? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	From (Month/Year) <i>08 '2008</i>	To (Month/Year) <i>09 '2016</i>	Year	Income
Positions Held <i>President</i>	From (Month/Year)	To (Month/Year)	2012	\$ 306k
			2013	\$ 123k
			2014	\$ 139k
			2015	\$ 117k
			2016	\$ 270k
				\$
Company Name and Address <i>84 Coney Island St</i>	Dates Employed		Income Received: This year to date	
Ownership Interest? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	From (Month/Year) <i>04 '2012</i>	To (Month/Year) <i>current</i>	Year	Income
Positions Held	From (Month/Year)	To (Month/Year)	2012	\$
			2013	\$
			2014	\$
			2015	\$
			2016	\$
				\$
Company Name and Address <i>One Jump Web inc Philippine Co</i>	Dates Employed		Income Received: This year to date	
Ownership Interest? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	From (Month/Year) <i>01 '2012</i>	To (Month/Year) <i>12/31/2015</i>	Year	Income
Positions Held <i>Partner</i>	From (Month/Year)	To (Month/Year)	2012	\$ 0
			2013	\$ 0
			2014	\$ 0
			2015	\$ 0
				\$ 0
				\$

Initials: *DK*

Item 7. Pending Lawsuits Filed By or Against You or Your Spouse

List all pending lawsuits that have been filed by or against you or your spouse in any court or before an administrative agency in the United States or in any foreign country or territory. Note: At item 12 list lawsuits that resulted in final judgments or settlements in your favor. At item 21, list lawsuits that resulted in final judgments or settlements against you.

Caption of Proceeding	Court or Agency and Location	Case No.	Nature of Proceeding	Relief Requested	Status or Disposition
	Federal Court Georgia, ATLANTA	16-cv - 3591			

Item 8. Safe Deposit Boxes

List all safe deposit boxes, located within the United States or in any foreign country or territory, whether held individually or jointly and whether held by you, your spouse or any of your dependents, or held by others for the benefit of you, your spouse or any of your dependents.

Name of Owner(s)	Name & Address of Depository Institution	Box No.	Contents
David Kradin	[REDACTED]	[REDACTED]	jewelry, coins collectibles

Initials: DK

FINANCIAL INFORMATION

REMINDER: When an item asks for information regarding your "assets" and "liabilities" include ALL assets and liabilities, located within the United States or in any foreign country or territory, or institution, whether held individually or jointly, and whether held by you, your spouse, or any of your dependents, or held by others for the benefit of you, your spouse, or any of your dependents. In addition, provide all documents requested in Item 24 with your completed Financial Statement.

ASSETS**Item 9. Cash, Bank, and Money Market Accounts**

List cash on hand (as opposed to cash in bank accounts or other financial accounts) and all bank accounts, money market accounts, or other financial accounts, including but not limited to checking accounts, savings accounts, and certificates of deposit. The term "cash on hand" includes but is not limited to cash in the form of currency, uncashed checks, and money orders.

a. Amount of Cash on Hand \$ 12,000Form of Cash on Hand CASH

b. Name on Account

Name & Address of Financial Institution

Account No.

Current Balance

David Krudih

US Bank
UMULIA BANK\$ 4,034.64
- 294.58

David Krudih

Wells Fargo

\$ 376.90

David Krudih

BoFA
Forex.COM\$ 1230.98
- 8800

David Krudih

Boon Hong Kong
HSB & Hong Kong\$ 16,995.73
- 200.00

David Krudih

SABO BANK

\$ 27857.30

Item 10. Publicly Traded Securities

List all publicly traded securities, including but not limited to, stocks, stock options, corporate bonds, mutual funds, U.S. government securities (including but not limited to treasury bills and treasury notes), and state and municipal bonds. Also list any U.S. savings bonds.

Owner of Security

Issuer

Type of Security

No. of Units Owned

Broker House, Address

Broker Account No.

Current Fair Market Value

Loan(s) Against Security

Owner of Security

Issuer

Type of Security

No. of Units Owned

Broker House, Address

Broker Account No.

Current Fair Market Value

Loan(s) Against Security

Owner of Security

Issuer

Type of Security

No. of Units Owned

Broker House, Address

Broker Account No.

Current Fair Market Value

Loan(s) Against Security

Initials: DK

Item 11. Non-Public Business and Financial Interests

List all non-public business and financial interests, including but not limited to any interest in a non-public corporation, subchapter-S corporation, limited liability corporation ("LLC"), general or limited partnership, joint venture, sole proprietorship, international business corporation or personal investment corporation, and oil or mineral lease

Entity's Name & Address	Type of Business or Financial Interest (e.g., LLC, partnership)	Owner (e.g., self, spouse)	Ownership %	If Officer, Director, Member or Partner, Exact Title
Laptop & Desktop Repair LLC	LLC	owner	100	President
84 Corey Island Inc	INC	owner	100	Manager

Item 12. Amounts Owed to You, Your Spouse, or Your Dependents

N/A

Debtor's Name & Address	Date Obligation Incurred (Month/Year)	Original Amount Owed \$	Nature of Obligation (if the result of a final court judgment or settlement, provide court name and docket number)
	Current Amount Owed \$	Payment Schedule \$	
Debtor's Telephone	Debtor's Relationship to You		
Debtor's Name & Address	Date Obligation Incurred (Month/Year)	Original Amount Owed \$	Nature of Obligation (if the result of a final court judgment or settlement, provide court name and docket number)
	Current Amount Owed \$	Payment Schedule \$	
Debtor's Telephone	Debtor's Relationship to You		

Item 13. Life Insurance Policies

List all life insurance policies (including endowment policies) with any cash surrender value.

N/A

Insurance Company's Name, Address, & Telephone No.	Beneficiary	Policy No.	Face Value \$
	Insured	Loans Against Policy \$	Surrender Value \$
Insurance Company's Name, Address, & Telephone No.	Beneficiary	Policy No.	Face Value \$
	Insured	Loans Against Policy \$	Surrender Value \$

Item 14. Deferred Income Arrangements

List all deferred income arrangements, including but not limited to, deferred annuities, pensions plans, profit-sharing plans, 401(k) plans, IRAs, Keoghs, other retirement accounts, and college savings plans (e.g., 529 Plans)

N/A

Trustee or Administrator's Name, Address & Telephone No.	Name on Account		Account No.
	Date Established / / (mm/dd/yyyy)	Type of Plan	Surrender Value before Taxes and Penalties \$
Trustee or Administrator's Name, Address & Telephone No.	Name on Account		Account No.
	Date Established / /	Type of Plan	Surrender Value before Taxes and Penalties \$

Initials: DLK

Item 15. Pending Insurance Payments or Inheritances

List all pending insurance payments or inheritances owed to you.

N/A

Type	Amount Expected	Date Expected (mm/dd/yyyy)
	\$	/ /
	\$	/ /
	\$	/ /

Item 16. Vehicles

List all cars, trucks, motorcycles, boats, airplanes, and other vehicles.

Vehicle Type Audi	Year 2004	Registered Owner's Name David Krachin	Purchase Price \$ 30,000	Original Loan Amount \$ 0	Current Balance \$ 0
Make		Registration State & No.	Account/Loan No.	Current Value \$ 4,500	Monthly Payment \$ 0
Model A8		Address of Vehicle's Location	Lender's Name and Address		
Vehicle Type Mercedes	Year 2012	Registered Owner's Name David Krachin	Purchase Price \$ 43,000	Original Loan Amount \$ 43,000	Current Balance \$ 23,000
Make		Registration State & No.	Account/Loan No.	Current Value \$ 22,000	Monthly Payment \$ 1100
Model GL450		Address of Vehicle's Location	Lender's Name and Address Mercedes Benz Financial Services		
Vehicle Type	Year	Registered Owner's Name	Purchase Price	Original Loan Amount	Current Balance
Make		Registration State & No.	Account/Loan No.	Current Value	Monthly Payment
Model		Address of Vehicle's Location	Lender's Name and Address		
Vehicle Type	Year	Registered Owner's Name	Purchase Price	Original Loan Amount	Current Balance
Make		Registration State & No.	Account/Loan No.	Current Value	Monthly Payment
Model		Address of Vehicle's Location	Lender's Name and Address		

Item 17. Other Personal Property

List all other personal property not listed in Items 9-16 by category, whether held for personal use, investment or any other reason, including but not limited to coins, stamps, artwork, gemstones, jewelry, bullion, other collectibles, copyrights, patents, and other intellectual property.

Property Category (e.g., artwork, jewelry)	Name of Owner	Property Location	Acquisition Cost	Current Value
Jewelry, Pins. 2012-2013	David Kradin		\$ ≈ 18,000	\$ ≈ 19,000
			\$	\$
			\$	\$

Item 18. Real Property List all real property interests (including any land contract)			
Property's Location [REDACTED]	Type of Property Residential	Name(s) on Title or Contract and Ownership Percentages David Kudrin 100%	
Acquisition Date (mm/dd/yyyy) 4/2007	Purchase Price \$ 270,000	Current Value \$ 315,000	Basis of Valuation Zillow
Lender's Name and Address US Bank	Loan or Account No.		Current Balance On First Mortgage or Contract \$ 169,000 Monthly Payment \$ 1150
Other Mortgage Loan(s) (describe)	Monthly Payment \$	Current Balance \$	<input type="checkbox"/> Rental Unit Monthly Rent Received \$
Property's Location 84 Coney Island	Type of Property Commercial	Name(s) on Title or Contract and Ownership Percentages 84 Coney Island Inc 100%	
Acquisition Date (mm/dd/yyyy) 1/2012	Purchase Price \$ 880,000	Current Value \$ 1,100,000	Basis of Valuation Real Estate agent
Lender's Name and Address Wells Fargo US Bank	[REDACTED] is a combination of 2 loans		Current Balance On First Mortgage or Contract \$ ≈ 700,000 Monthly Payment \$ 4500
Other Mortgage Loan(s) (describe) \$240,000 loan received on the Building to help secure a loan (left forward)	Monthly Payment \$	Current Balance \$	<input type="checkbox"/> Rental Unit Monthly Rent Received \$ ≈ 1600
LIABILITIES			
Item 19. Credit Cards List each credit card account held by you, your spouse, or your dependents, and any other credit cards that you, your spouse, or your dependents use, whether issued by a United States or foreign financial institution.			
Name of Credit Card (e.g., Visa, MasterCard, Department Store)	Account No.	Name(s) on Account	Current Balance
US Bank Visa	[REDACTED]	David Kudrin	\$ 470.00
Amex	[REDACTED]	- 1 -	\$ 42,500.00
Citi	[REDACTED]	- 11 -	\$ 41,600.00
			\$
			\$
Item 20. Taxes Payable List all taxes, such as income taxes or real estate taxes, owed by you, your spouse, or your dependents. N/A			
Type of Tax	Amount Owed	Year Incurred	
	\$		
	\$		
	\$		

Initials: DK

Item 21. Other Amounts Owed by You, Your Spouse, or Your DependentsList all other amounts, not listed elsewhere in this financial statement, owed by you, your spouse, or your dependents. **N/A**

Lender/Creditor's Name, Address, and Telephone No.

Nature of Debt (if the result of a court judgment or settlement, provide court name and docket number)

Lender/Creditor's Relationship to You

Date Liability Was Incurred

(mm/dd/yyyy)

Original Amount Owed

\$

Current Amount Owed

\$

Payment Schedule

Lender/Creditor's Name, Address, and Telephone No.

Nature of Debt (if the result of a court judgment or settlement, provide court name and docket number)

Lender/Creditor's Relationship to You

Date Liability Was Incurred

(mm/dd/yyyy)

Original Amount Owed

\$

Current Amount Owed

\$

Payment Schedule

OTHER FINANCIAL INFORMATION**N/A****Item 22. Trusts and Escrows**

List all funds and other assets that are being held in trust or escrow by any person or entity for you, your spouse, or your dependents. Include any legal retainers being held on your behalf by legal counsel. Also list all funds or other assets that are being held in trust or escrow by you, your spouse, or your dependents, for any person or entity.

Trustee or Escrow Agent's Name & Address	Date Established (mm/dd/yyyy)	Grantor	Beneficiaries	Present Market Value of Assets*
	/ /			\$
	/ /			\$
	/ /			\$

*If the market value of any asset is unknown, describe the asset and state its cost, if you know it.

Item 23. Transfers of AssetsList each person or entity to whom you have transferred, in the aggregate, more than \$5,000 in funds or other assets during the previous five years by loan, gift, sale, or other transfer (exclude ordinary and necessary living and business expenses paid to unrelated third parties). For each such person or entity, state the total amount transferred during that period. **N/A**

Transferee's Name, Address, & Relationship	Property Transferred	Aggregate Value*	Transfer Date (mm/dd/yyyy)	Type of Transfer (e.g., Loan, Gift)
		\$	/ /	
		\$	/ /	
		\$	/ /	

*If the market value of any asset is unknown, describe the asset and state its cost, if you know it.

Initials: **DK**

Item 24. Document Requests

Provide copies of the following documents with your completed Financial Statement.

	Federal tax returns filed during the last three years by or on behalf of you, your spouse, or your dependents.
	All applications for bank loans or other extensions of credit (other than credit cards) that you, your spouse, or your dependents have submitted within the last two years, including by obtaining copies from lenders if necessary.
Item 9	For each bank account listed in Item 9, all account statements for the past 3 years.
Item 11	For each business entity listed in Item 11, provide (including by causing to be generated from accounting records) the most recent balance sheet, tax return, annual income statement, the most recent year-to-date income statement, and all general ledger files from account records.
Item 17	All appraisals that have been prepared for any property listed in Item 17, including appraisals done for insurance purposes. You may exclude any category of property where the total appraised value of all property in that category is less than \$2,000.
Item 18	All appraisals that have been prepared for real property listed in Item 18.
Item 21	Documentation for all debts listed in Item 21.
Item 24	All executed documents for any trust or escrow listed in Item 22. Also provide any appraisals, including insurance appraisals that have been done for any assets held by any such trust or in any such escrow.

SUMMARY FINANCIAL SCHEDULES**Item 25. Combined Balance Sheet for You, Your Spouse, and Your Dependents**

Assets		Liabilities	
Cash on Hand (Item 9)	\$ 12,000	Loans Against Publicly Traded Securities (Item 10)	\$
Funds Held in Financial Institutions (Item 9)	\$ 58,048	Vehicles - Liens (Item 16)	\$ 23,000
U.S. Government Securities (Item 10)	\$	Real Property - Encumbrances (Item 18)	\$ 869,000 + 297,500 (Litt Forward, Loan)
Publicly Traded Securities (Item 10)	\$	Credit Cards (Item 18)	\$ 81,470
Non-Public Business and Financial Interests (Item 11)	\$	Taxes Payable (Item 20)	\$
Amounts Owed to You (Item 12)	\$	Amounts Owed by You (Item 21)	\$ 16,000 Attorney's Fees
Life Insurance Policies (Item 13)	\$	Other Liabilities (Itemize)	
Deferred Income Arrangements (Item 14)	\$	LDR LLC Liabilities (approx)	\$ 1,490,000
Vehicles (Item 16)	\$ 26,500	(excluding Litt Forward)	\$
Other Personal Property (Item 17)	\$ 93,000		\$
Real Property (Item 18) Residential	\$ 315,000		\$
Other Assets (Itemize) Commercial	1,100,000		\$
LDR LLC Assets	\$		\$
Liquidation Value Approx	\$ 150,000		\$
	\$		\$
Approx → Total Assets	\$ 1,758,548	Approx → Total Liabilities	\$ 2,719,470

Item 26. Combined Current Monthly Income and Expenses for You, Your Spouse, and Your Dependents

Provide the current monthly income and expenses for you, your spouse, and your dependents. Do not include credit card payments separately; rather, include credit card expenditures in the appropriate categories.

Income (State source of each item)		Expenses	
Salary - After Taxes	\$ 0	Mortgage or Rental Payments for Residence(s)	\$ 1,150
Source:		Property Taxes for Residence(s)	\$ included
Fees, Commissions, and Royalties	\$ 0	Rental Property Expenses, Including Mortgage Payments, Taxes, and Insurance	\$ 5,500
Source:		Car or Other Vehicle Lease or Loan Payments	\$ 1,100
Interest	\$ 0	Food Expenses	\$ 500
Source:		Clothing Expenses	\$ 200
Dividends and Capital Gains	\$ 0	Utilities	\$ 500
Source:			\$ 1,500
Gross Rental Income 84 Wally Inc	\$		
Source: \$ 2000 - Frozen	\$		
Profits from Sole Proprietorships	\$ 0		
Source:			
Distributions from Partnerships, S-Corporations, and LLCs	\$ 0		
Source:			

daughter's school and EC activities

Initials: DK

Item 27. Combined Current Monthly Income and Expenses for You, Your Spouse, and Your Dependents (cont.)

Distributions from Trusts and Estates	\$ 0	Medical Expenses, Including Insurance	\$ 1,000
Source:	\$ 0	Other Insurance Premiums	\$
Distributions from Deferred Income Arrangements	\$ 0	Other Transportation Expenses	\$ 100
Source:	\$ 0	Other Expenses (Itemize)	
Social Security Payments	\$ 0	Attorney's Fees (Unknown)	\$
Alimony/Child Support Received	\$ 0		\$
Gambling Income	\$ 0		\$
Other Income (Itemize)			\$
Provided	\$		\$
Commercial RE income	\$		\$
REMAINS FROZEN	\$		\$
	\$		\$
Total Income	\$ 0	Total Expenses	min. \$ 11,550

ATTACHMENTS**Item 28. Documents Attached to this Financial Statement**

List all documents that are being submitted with this financial statement.

Item No. Document Relates To	Description of Document

I am submitting this financial statement with the understanding that it may affect action by the Federal Trade Commission or a federal court. I have used my best efforts to obtain the information requested in this statement. The responses I have provided to the items above are true and contain all the requested facts and information of which I have notice or knowledge. I have provided all requested documents in my custody, possession, or control. I know of the penalties for false statements under 18 U.S.C. § 1001, 18 U.S.C. § 1621, and 18 U.S.C. § 1623 (five years imprisonment and/or fines). I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on:

10/9/16

(Date)

David Kurlin

Signature

EXHIBIT 7

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY

Pursuant to 28 U.S.C. § 1746

1. I, JOSH FRANCIES, have personal knowledge of the facts set forth below and am competent to testify as follows:

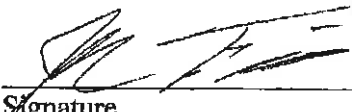
2. I have authority to certify the authenticity of the records produced by ZB, N.A. dba NEVADA STATE BANK, which are attached hereto.

3. The documents produced and attached hereto by JOSH FRANCIES are originals or true copies of records of regularly conducted activity that:

- a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
- b) Were kept in the course of the regularly conducted activity of ZB, N.A. dba NEVADA STATE BANK; and
- c) Were made by the regularly conducted activity as a regular practice of ZB, N.A. dba NEVADA STATE BANK.

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

Executed on OCTOBER 18, 2016.



Signature

JOSH FRANCIES

Print Name

LEGAL SPECIALIST

Title

ZB, N.A. dba Nevada State Bank**Safe Deposit Box Signature Card and Agreement**

Card Date	Cost Center	Branch ID	Supersedes Card Dated	Replaced by Card Dated	FileNet Document ID
10/11/2016	4040	040			
Safe Box Lessee(s) Name	DAVID V KRUCHIN			Account Structure: Individual	
Safe Box Number	Key Deposit	Initial Annual Rent	Discount Type & Amount	Rental Term Begins	Box Closed Date
9914	\$100.00	\$30.00	\$.00	10/11/2016	
Box Size	Auto Debit	Debit Account Number	Opened/Revised By		Approved
2 X 5	N		J Cornejo- Guillen		MA
Name(s) of Person(s) Authorized to Access Box		TIN	Authorized Signatures		Relationship
1. DAVID V KRUCHIN			David Kruchin		Sole Owner
2.					
3.					
4.					
5.					
6.					

Number of authorized persons required to access or surrender the box is: 1.

Lease Agreement

The lessee named above ("Lessee") executes this Agreement with Bank and leases the Box identified above contained in the vault in the Bank and agrees:

- To lease the above-identified Box from Bank for the term of one (1) year at the non-refundable annual rental rate indicated above.
- To be bound by, and its relationship with Bank regarding said Box shall be governed by, this Agreement and the Safe Deposit Box Lease Agreement (which is contained in the Deposit Agreement).
- The Safe Deposit Box Lease agreement is made a part of, and is incorporated by reference into, this Agreement.
- That Lessee has received a copy of the Deposit Agreement (which contains the Safe Deposit Box Lease Agreement).
- The Lessee has been given two (2) keys to the above identified Box.

These terms are meant to conform to all applicable state and federal laws and to all applicable regulations or enactments of appropriate federal and state regulatory agencies. In the event any term is determined to be unlawful, the balance of this Agreement shall remain in full force and effect. The Safe Deposit Box Lease Agreement may be amended at any time by Bank. Notifications of such amendments will be made by mailing notice to the last known address of Lessee on the Bank's records.

Signature of Lessee: David Kruchin By: David Kruchin Its: Owner Date: 10/08/16
 Signature of Lessee: _____ By: _____ Its: _____ Date: _____
 Signature of Lessee: _____ By: _____ Its: _____ Date: _____

Automatic Payment

I hereby authorize Bank to charge my account, as identified above, with rentals due on my Safe Deposit Box.

Signature of Lessee: _____ By: _____ Its: _____ Date: _____
 Signature of Lessee: _____ By: _____ Its: _____ Date: _____

Resolution/Authorization

Surrender of Safe Deposit Box			
Lessee hereby surrenders the Box opened under this Agreement and certifies that all contents have been removed, and releases Bank from all claims, obligations and liability concerning all property placed therein. Compliance with the terms of this Agreement and the Safe Deposit Box Lease Agreement is acknowledged and Bank is released from all liability.			
Signature of Lessee	By: _____	Its: _____	Office/Title
Date: _____	Lessee Name		
Signature of Lessee	By: _____	Its: _____	Office/Title
Date: _____	Lessee Name		
In the presence of the person(s) signing the surrender of this box, I have examined said box and certify that it is empty.			
Signature of Vault Attendant	Reviewed by Officer		

Date Forged: _____ Signature: _____ Signature: _____ Materials in Box: Y / N

Non-Consumer Information		CIP Verification: <input type="checkbox"/>	
Physical Address	ChexSystems Contacted:	Override Approved By:	
	Phone Number	ID Type and Issuer	
	Fax Number	Number/Description	
	Tax ID Number	Issue Date	
Primary Contact Name	Primary Contact Number		

Authorized Signer #1		CIP Verification: <input type="checkbox"/>		Authorized Signer #2		CIP Verification: <input type="checkbox"/>	
ChexSystems Contacted:	Override Approved By:			ChexSystems Contacted:	Override Approved By:		
Phone Number	Physical Address			Phone Number	Physical Address		
Secondary Phone	RENO NV 89523-1825			Secondary Phone			
Cell				Cell			
DOB	Primary ID ↓	Secondary ID ↓		DOB	Primary ID ↓	Secondary ID ↓	
ID Type and Issuer	DL	NV		ID Type and Issuer			
Number/Description	491			Number/Description			
Issue and Exp. Date	//	//		Issue and Exp. Date	//	//	

Authorized Signer #3		CIP Verification: <input type="checkbox"/>		Authorized Signer #4		CIP Verification: <input type="checkbox"/>	
ChexSystems Contacted:	Override Approved By:			ChexSystems Contacted:	Override Approved By:		
Phone Number	Physical Address			Phone Number	Physical Address		
Secondary Phone				Secondary Phone			
DOB	Primary ID ↓	Secondary ID ↓		DOB	Primary ID ↓	Secondary ID ↓	
ID Type and Issuer				ID Type and Issuer			
Number/Description				Number/Description			
Issue and Exp. Date	//	//		Issue and Exp. Date	//	//	

Authorized Signer #5		CIP Verification: <input type="checkbox"/>		Authorized Signer #6		CIP Verification: <input type="checkbox"/>	
ChexSystems Contacted:	Override Approved By:			ChexSystems Contacted:	Override Approved By:		
Phone Number	Physical Address			Phone Number	Physical Address		
Secondary Phone				Secondary Phone			
DOB	Primary ID ↓	Secondary ID ↓		DOB	Primary ID ↓	Secondary ID ↓	
ID Type and Issuer				ID Type and Issuer			
Number/Description				Number/Description			
Issue and Exp. Date	//	//		Issue and Exp. Date	//	//	

NEVADA STATE BANK
THE DOOR TO YOUR FUTURE



RECORD OF ACCESS

Safe Deposit Box # 91911 - 14

Number of signatures required for access ☒ 1 ☐ 2

Lessee David V. Kruchin David Kruchin
Print Name Signature

Lessee _____

 Print Name Signature

Lessee _____
Print Name Signature

Lessee _____

 Print Name Signature

Signature comparisons are used to allow entrance for each signer above
ID may be requested when signatures do not compare favorably

[illegible]☐ CLOSED ☐ DRILLED ☐ SUPERSEDED DATE

SD0123 R 12/2013

EXHIBIT 8

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, Alex Bobinski, have personal knowledge of the facts set forth below and am competent to testify as follows:


2. I have authority to certify the authenticity of the records produced by GAIN Capital Group, LLC, which are attached hereto.

3. The documents produced and attached hereto by GAIN Capital Group, LLC are originals or true copies of records of regularly conducted activity that:

- a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
- b) Were kept in the course of the regularly conducted activity of GAIN Capital Group, LLC; and
- c) Were made by the regularly conducted activity as a regular practice of GAIN Capital Group LLC.

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

Executed on October 19, 2016.


Signature

Alex Bobinski
Print Name

Chief Executive Officer
Title







GAIN Capital Group, LLC
Bedminster One, Suite 11
135 US Highway 202/206
Bedminster, NJ 07921

October 19, 2016

U.S. Federal Trade Commission
Tonia Jackson
225 Peachtree Street, N.E. Suite 1500
Atlanta, GA 30303

Via Email

***Re: Asset Freeze & Document Request – Laptop & Desktop Repair, LLC et al.,
Case No. 1:16-cv-3591, US District Court Northern District of Georgia***

Dear Ms. Jackson,

Pursuant to the above referenced Asset Freeze Order and request for documents, dated October 13, 2016 (the "Request"), we searched our customer database, which contains both current and historical customer account information, and we have concluded that the following persons do not hold an account with GAIN Capital Group, LLC d/b/a FOREX.com ("GAIN Capital"):

Laptop and Desktop Repair LLC
cashforiphones.com
cashforlaptops.com
ecyclebest.com
smartphonetraders.com
sell-your-cell.com
Vadim Kruchin
Dave Kruch

We can, however, confirm that David Kruchin and Vadim Kruchinin are former customers of GAIN Capital. The details of their accounts are as follow:

Vadim Kruchinin – Account No. [REDACTED] 311 [Individual, Self-directed Account] Current account balance: \$0.00; Account opened on or around April 18, 2011; Account closed on or around April 9, 2012.

David Kruchin – Account No. [REDACTED] 812 [Individual, Self-directed Account] Current account balance: \$0.00; Account opened on or around September 10, 2016; Account closed on or around October 5, 2016.

GAIN Capital offers its customers the ability to trade foreign currencies via an online trading platform on a "spot" basis, meaning that no physical delivery of foreign currencies takes place. Mr. Kruchinin and Mr. Kruchin both opened individual, self-directed accounts, meaning they were the only persons authorized by our company to access, fund, and hold security interest in their respective accounts.

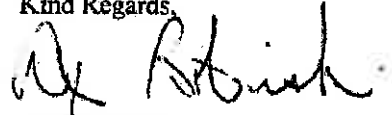
In response to the request for documents, please see the following items are included in the attached file:

1. "Item 1" contains account opening documents, consisting of copies of the online account applications completed by Kruchin and Kruchinin.

2. "Item 2" contains monthly account statements for the life of each of the accounts. The statements reflect all trading and funding / withdrawal activity in the accounts.
3. "Item 3" contains internal reports showing all available information for each debit / credit card deposits and withdrawal processed for the above accounts. Each of the accounts was funded exclusively using debit or credit cards.

We hope that the information and the documentation provided in this response are helpful to you. Should you have any questions, please feel free to contact us directly at USLegal@GAINCapital.com or at 1-908-212-3917.

Kind Regards,

A handwritten signature in black ink, appearing to read "Alex Bobinski".

Alex Bobinski
Chief Executive Officer
GAIN Capital Group, LLC

GAIN Capital Group, LLC

Account: 7812 Name: David Kruchin Currency: USD Leverage: 1:50 2016 October 19, 13:57

Closed Transactions:

Ticket	Open Time	Type	Volume	Item	Price	S / L	T / P	Close Time	Price	Commission	Taxes	Swap	Profit
29035724	2016.09.13 02:40:02	buy	0.01	gbpusdpro	1.33333	0.00000	1.31230	2016.10.03 00:42:12	1.29293	0.00	0.00	0.00	-40.40
													Swan_3MA_Dual_N2.07
29037926	2016.09.13 07:40:15	buy	0.01	gbpusdpm	1.33098	0.00000	1.31230	2016.10.03 00:42:16	1.29293	0.00	0.00	0.00	-38.05
													Swan_3MA_Dual_N2.07 - 1
29039544	2016.09.13 10:00:01	buy	0.02	gbpusdpro	1.32653	0.00000	1.31230	2016.10.03 00:46:08	1.29331	0.00	0.00	0.00	-66.44
													Swan_3MA_Dual_N2.07 - 2
29043387	2016.09.13 13:05:00	buy	0.03	gbpusdpro	1.32046	0.00000	1.31230	2016.10.03 00:46:12	1.29331	0.00	0.00	0.00	-81.45
													Swan_3MA_Dual_N2.07 - 3
29060734	2016.09.14 17:35:00	sell	0.01	audcadpro	0.98561	0.00000	0.99814	2016.10.03 00:42:19	1.00304	0.00	0.00	0.00	-13.30
													Swan_3MA_Dual_N2.07
29071339	2016.09.15 10:40:02	buy	0.01	gbpchfpro	1.28778	0.00000	1.27220	2016.10.03 00:42:27	1.25679	0.00	0.00	0.00	-31.88
													Swan_3MA_Dual_N2.07 - 1
29073819	2016.09.15 15:30:00	sell	0.01	eursekpro	9.52995	0.00000	9.57139	2016.10.03 00:42:31	9.64373	0.00	0.00	0.00	-13.25
													Swan_3MA_Dual_N2.07
29074932	2016.09.15 18:55:01	sell	0.01	audcadpro	0.98852	0.00000	0.99814	2016.10.03 00:42:34	1.00317	0.00	0.00	0.00	-11.17
													Swan_3MA_Dual_N2.07 - 1
29080049	2016.09.16 05:35:05	buy	0.01	euraudpro	1.49658	0.00000	1.48263	2016.10.03 00:42:38	1.46797	0.00	0.00	0.00	-21.88
													Swan_3MA_Dual_N2.07
29080575	2016.09.16 08:45:17	sell	0.01	eursekpro	9.54675	0.00000	9.57139	2016.10.03 00:42:42	9.64373	0.00	0.00	0.00	-11.29
													Swan_3MA_Dual_N2.07 - 1
29081550	2016.09.16 12:50:01	buy	0.04	gbpusdpro	1.31370	0.00000	1.31230	2016.10.03 00:46:17	1.29331	0.00	0.00	0.00	-81.56
													Swan_3MA_Dual_N2.07 - 4
29081551	2016.09.16 12:50:01	buy	0.01	euraudpro	1.49389	0.00000	1.48263	2016.10.03 00:42:46	1.46794	0.00	0.00	0.00	-19.85
													Swan_3MA_Dual_N2.07 - 1
29082079	2016.09.16 13:50:01	buy	0.02	gbpchfpro	1.28202	0.00000	1.27220	2016.10.03 00:46:28	1.25709	0.00	0.00	0.00	-51.30
													Swan_3MA_Dual_N2.07 - 2
29083356	2016.09.16 17:05:01	buy	0.05	gbpusdpro	1.30598	0.00000	1.31230	2016.10.03 00:46:24	1.29331	0.00	0.00	0.00	-63.35
													Swan_3MA_Dual_N2.07 - 5
29084201	2016.09.16 20:10:11	buy	0.02	euraudpro	1.48948	0.00000	1.48263	2016.10.03 00:47:02	1.46741	0.00	0.00	0.00	-33.77
													Swan_3MA_Dual_N2.07 - 2
29086609	2016.09.18 21:30:08	buy	0.03	gbpchfpro	1.27496	0.00000	1.27220	2016.10.03 00:47:07	1.25719	0.00	0.00	0.00	-54.84
													Swan_3MA_Dual_N2.07 - 3
29087949	2016.09.19 01:55:02	buy	0.03	euraudpro	1.48378	0.00000	1.48263	2016.10.03 00:47:15	1.46742	0.00	0.00	0.00	-37.56
													Swan_3MA_Dual_N2.07 - 3
29092611	2016.09.19 12:50:01	sell	0.02	audcadpro	0.99440	0.00000	0.99814	2016.10.03 00:47:18	1.00324	0.00	0.00	0.00	-13.49
													Swan_3MA_Dual_N2.07 - 2
29096220	2016.09.19 13:55:04	buy	0.04	euraudpro	1.47715	0.00000	1.48263	2016.10.03 00:47:22	1.46742	0.00	0.00	0.00	-29.78
													Swan_3MA_Dual_N2.07 - 4
29105745	2016.09.20 10:35:01	buy	0.08	gbpusdpro	1.29708	0.00000	1.31230	2016.10.03 00:47:25	1.29339	0.00	0.00	0.00	-29.52
													Swan_3MA_Dual_N2.07 - 6
29106394	2016.09.20 13:25:22	sell	0.02	eursekpro	9.58019	0.00000	9.57139	2016.10.03 00:47:28	9.64373	0.00	0.00	0.00	-14.80
													Swan_3MA_Dual_N2.07 - 2
29122550	2016.09.21 05:20:01	buy	0.01	sgdjpypro	75.267	0.000	74.962	2016.10.03 00:42:50	74.317	0.00	0.00	0.00	-9.37
													Swan_3MA_Dual_N2.07
29123369	2016.09.21 07:35:01	buy	0.01	sgdjpypro	74.859	0.000	74.962	2016.10.03 00:42:53	74.315	0.00	0.00	0.00	-5.37

29123374	2016.09.21 07:35:04	buy	0.05	euraudpro	1.46991	0.00000	1.48263	2016.10.03 00:47:31	1.46714	Swan_3MA_Dual_N2.07 - 1
										0.00 0.00 0.00 -10.60
29129652	2016.09.21 13:45:30	buy	0.01	usdnokpro	8.31482	0.00000	8.16722	2016.10.03 00:42:57	7.99265	Swan_3MA_Dual_N2.07 - 5
										0.00 0.00 0.00 -40.31
29132292	2016.09.21 15:00:01	buy	0.02	sgdjpypro	74.060	0.000	74.962	2016.10.03 00:47:37	74.298	Swan_3MA_Dual_N2.07
										0.00 0.00 0.00 4.69
29132582	2016.09.21 15:40:00	buy	0.01	usdnokpro	8.29926	0.00000	8.16722	2016.10.03 00:43:00	7.99265	Swan_3MA_Dual_N2.07 - 2
										0.00 0.00 0.00 -38.36
29134014	2016.09.21 18:15:00	sell	0.03	audcadpro	1.00182	0.00000	0.99814	2016.10.03 00:47:40	1.00350	Swan_3MA_Dual_N2.07 - 1
										0.00 0.00 0.00 -3.85
29134623	2016.09.21 18:45:00	buy	0.02	usdnokpro	8.27312	0.00000	8.16722	2016.10.03 00:46:38	7.99126	Swan_3MA_Dual_N2.07 - 3
										0.00 0.00 0.00 -70.54
29141823	2016.09.22 07:30:51	buy	0.03	usdnokpro	8.22170	0.00000	8.16722	2016.10.03 00:46:48	7.99170	Swan_3MA_Dual_N2.07 - 2
										0.00 0.00 0.00 -86.34
29141997	2016.09.22 08:05:00	buy	0.04	usdnokpro	8.16784	0.00000	8.16722	2016.10.03 00:46:54	7.99170	Swan_3MA_Dual_N2.07 - 3
										0.00 0.00 0.00 -88.16
29142283	2016.09.22 08:40:02	buy	0.05	usdnokpro	8.12792	0.00000	8.16722	2016.10.03 00:46:59	7.99170	Swan_3MA_Dual_N2.07 - 4
										0.00 0.00 0.00 -85.23
29149587	2016.09.22 15:10:07	sell	0.01	usdplnpro	3.80344	0.00000	3.81465	2016.10.03 00:47:44	3.82634	Swan_3MA_Dual_N2.07 - 5
										0.00 0.00 0.00 -5.98
29150027	2016.09.22 16:20:07	buy	0.03	gbpchfpro	1.26585	0.00000	1.27220	2016.10.03 00:47:47	1.25715	Swan_3MA_Dual_N2.07
										0.00 0.00 0.00 -26.86
29150672	2016.09.22 18:05:03	sell	0.01	usdplnpro	3.81545	0.00000	3.81465	2016.10.03 00:47:51	3.82634	Swan_3MA_Dual_N2.07 - 3
										0.00 0.00 0.00 -2.85
29151433	2016.09.22 20:35:05	sell	0.01	eurtrypro	3.29791	0.00000	3.33823	2016.10.03 00:47:55	3.37560	Swan_3MA_Dual_N2.07 - 1
										0.00 0.00 0.00 -25.86
29156583	2016.09.23 07:10:04	sell	0.01	eurtrypro	3.30376	0.00000	3.33823	2016.10.03 00:47:58	3.37560	Swan_3MA_Dual_N2.07
										0.00 0.00 0.00 -23.91
29158229	2016.09.23 09:55:06	sell	0.01	usdtrypro	2.94890	0.00000	2.97883	2016.10.03 00:48:02	3.00427	Swan_3MA_Dual_N2.07 - 1
										0.00 0.00 0.00 -18.43
29161885	2016.09.23 14:05:17	sell	0.02	eurtrypro	3.31377	0.00000	3.33823	2016.10.03 00:48:04	3.37554	Swan_3MA_Dual_N2.07
										0.00 0.00 0.00 -41.12
29162079	2016.09.23 14:35:03	sell	0.01	usdtrypro	2.95531	0.00000	2.97883	2016.10.03 00:48:07	3.00432	Swan_3MA_Dual_N2.07 - 2
										0.00 0.00 0.00 -16.31
29166490	2016.09.25 21:05:06	sell	0.03	eurtrypro	3.35479	0.00000	3.33823	2016.10.03 00:48:11	3.37554	Swan_3MA_Dual_N2.07 - 1
										0.00 0.00 0.00 -20.72
29166491	2016.09.25 21:05:06	sell	0.02	usdtrypro	2.98921	0.00000	2.97883	2016.10.03 00:48:14	3.00432	Swan_3MA_Dual_N2.07 - 3
										0.00 0.00 0.00 -10.06
29169932	2016.09.26 07:25:02	buy	0.04	gbpchfpro	1.25471	0.00000	1.27220	2016.10.03 00:48:17	1.25711	Swan_3MA_Dual_N2.07 - 2
										0.00 0.00 0.00 9.88
29173747	2016.09.26 14:00:01	sell	0.03	eursekpro	9.62255	0.00000	9.57139	2016.10.03 00:48:20	9.64350	Swan_3MA_Dual_N2.07 - 4
										0.00 0.00 0.00 -7.32
29185789	2016.09.27 01:00:01	sell	0.04	audcadpro	1.01104	0.00000	0.99814	2016.10.03 00:48:23	1.00360	Swan_3MA_Dual_N2.07 - 3
										0.00 0.00 0.00 22.70
29191539	2016.09.27 07:15:00	buy	0.08	usdnokpro	8.07960	0.00000	8.16722	2016.10.03 00:48:27	7.99035	Swan_3MA_Dual_N2.07 - 4
										0.00 0.00 0.00 -89.36
29191685	2016.09.27 07:45:00	buy	0.01	nzdacapro	0.96640	0.00000	0.96365	2016.10.03 00:48:31	0.95183	Swan_3MA_Dual_N2.07 - 6
										0.00 0.00 0.00 -11.12
29194933	2016.09.27 14:15:01	buy	0.01	eurnokpro	9.13633	0.00000	9.04344	2016.10.03 00:48:34	8.97423	Swan_3MA_Dual_N2.07
										0.00 0.00 0.00 -20.29
										Swan_3MA_Dual_N2.07

29196179	2016.09.27 14:55:03	buy	0.01	eurnokpro	9.12757	0.00000	9.04344	2016.10.03 00:48:38	8.97423	0.00	0.00	0.00	-19.19
										Swan_3MA_Dual_N2.07 - 1			
29198628	2016.09.27 18:30:04	buy	0.02	eurnokpro	9.11297	0.00000	9.04344	2016.10.03 00:48:41	8.97423	0.00	0.00	0.00	-34.70
										Swan_3MA_Dual_N2.07 - 2			
29206226	2016.09.28 00:25:12	buy	0.01	nzdcaopro	0.96315	0.00000	0.96365	2016.10.03 00:48:45	0.95179	0.00	0.00	0.00	-8.67
										Swan_3MA_Dual_N2.07 - 1			
29206338	2016.09.28 00:45:03	buy	0.03	eurnokpro	9.09461	0.00000	9.04344	2016.10.03 00:48:48	8.97423	0.00	0.00	0.00	-45.20
										Swan_3MA_Dual_N2.07 - 3			
29213126	2016.09.28 13:35:00	buy	0.04	eurnokpro	9.07239	0.00000	9.04344	2016.10.03 00:48:51	8.97423	0.00	0.00	0.00	-49.14
										Swan_3MA_Dual_N2.07 - 4			
29215182	2016.09.28 16:10:01	sell	0.02	usdplnpro	3.83985	0.00000	3.81465	2016.10.03 00:48:55	3.82634	0.00	0.00	0.00	7.06
										Swan_3MA_Dual_N2.07 - 2			
29215214	2016.09.28 16:15:01	buy	0.05	eurnokpro	9.04808	0.00000	9.04344	2016.10.03 00:48:59	8.97386	0.00	0.00	0.00	-46.45
										Swan_3MA_Dual_N2.07 - 5			
29215808	2016.09.28 18:15:01	buy	0.02	nzdcaopro	0.95652	0.00000	0.96365	2016.10.03 00:49:02	0.95191	0.00	0.00	0.00	-7.03
										Swan_3MA_Dual_N2.07 - 2			
29216029	2016.09.28 18:30:01	buy	0.08	eurnokpro	9.01993	0.00000	9.04344	2016.10.03 00:49:06	8.97383	0.00	0.00	0.00	-46.16
										Swan_3MA_Dual_N2.07 - 6			
29225011	2016.09.29 09:30:01	sell	0.04	eurtrypro	3.36774	0.00000	3.33823	2016.10.03 00:49:09	3.37559	0.00	0.00	0.00	-10.45
										Swan_3MA_Dual_N2.07 - 4			
29225309	2016.09.29 10:40:00	sell	0.03	usdtrypro	3.00607	0.00000	2.97883	2016.10.03 00:49:12	3.00422	0.00	0.00	0.00	1.85
										Swan_3MA_Dual_N2.07 - 3			
29240610	2016.09.30 08:40:01	buy	0.01	gbpaudpro	1.70660	0.00000	1.69962	2016.10.03 00:49:15	1.68913	0.00	0.00	0.00	-13.38
										Swan_3MA_Dual_N2.07			
29240683	2016.09.30 09:00:02	buy	0.01	gbpaudpro	1.70329	0.00000	1.69962	2016.10.03 00:49:19	1.68917	0.00	0.00	0.00	-10.81
										Swan_3MA_Dual_N2.07 - 1			
29242420	2016.09.30 13:55:00	buy	0.02	gbpaudpro	1.69650	0.00000	1.69962	2016.10.03 00:49:21	1.68922	0.00	0.00	0.00	-11.14
										Swan_3MA_Dual_N2.07 - 2			
29243604	2016.09.30 15:55:00	buy	0.01	eurusdpro	1.12444	0.00000	1.12744	2016.10.03 00:49:25	1.12295	0.00	0.00	0.00	-1.49
										Swan_3MA_Dual_N2.07			
29247222	2016.10.02 21:10:10	buy	0.02	gbpaudpro	1.68841	0.00000	1.69962	2016.10.03 00:49:28	1.68925	0.00	0.00	0.00	1.28
										Swan_3MA_Dual_N2.07 - 3			
29248123	2016.10.03 00:45:53	buy	0.11	eurnokpro	8.97977	0.00000	9.04344	2016.10.03 00:49:31	8.97403	0.00	0.00	0.00	-7.90
										Swan_3MA_Dual_N2.07 - 7			
29291110	2016.10.05 15:40:07	balance	>	Credit Cards									-500.00
29291111	2016.10.05 15:40:07	balance	>	Credit Cards									-1
													000.00
29291112	2016.10.05 15:40:07	balance	>	Credit Cards									-4
													000.00
29291113	2016.10.05 15:40:07	balance	>	Credit Cards									-2
													633.97
29291114	2016.10.05 15:40:07	balance	>	Credit Cards									-1
													000.00
										0.00	0.00	0.00	-1
													781.50
										Closed P/L: -1 781.50			

Open Trades:

Ticket	Open Time	Type	Volume	Item	Price	S / L	T / P	Price	Commission	Taxes	Swap	Profit
No transactions												
										0.00	0.00	0.00
										Floating P/L: 0.00		

Working Orders:

Ticket	Open Time	Type	Volume	Item	Price	S / L	T / P	Market Price
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No transactions

Summary:

Deposit/Withdrawal:	-9 133.97	Credit Facility:	0.00		
Closed Trade P/L:	-1 781.50	Floating P/L:	0.00	Margin:	0.00
Balance:	0.00	Equity:	0.00	Free Margin:	0.00

ID_CashTransactionLog	Entry Date	TransactionType	TransactionSubType	Amount	Status
4592	10/5/2016 11:39	Client Transfer	Debit Cards	-1000	S
4586	10/5/2016 11:39	Client Transfer	Debit Cards	-2633.97	S
585	10/5/2016 11:39	Client Transfer	Debit Cards	-4000	S
4584	10/5/2016 11:39	Client Transfer	Debit Cards	-1000	S
4580	10/5/2016 11:39	Client Transfer	Debit Cards	-500	S
2559	9/14/2016 0:23	Client Transfer	Debit Cards	4500	S
1806	9/12/2016 20:51	Client Transfer	Debit Cards	4000	S
3507	9/12/2016 19:20	Client Transfer	Debit Cards	1000	S
9177	9/12/2016 17:13	Client Transfer	Debit Cards	1000	S
6151	9/10/2016 11:42	Client Transfer	Debit Cards	500	S

Account ID	Account_Name	Account Type	CardNumber	CardIssuingBank
7812	David Kruchin	Individual	*****9436	Sterling Savings Bank
812	David Kruchin	Individual	*****4908	U.S. Bank National Association
7812	David Kruchin	Individual	****4908	U.S. Bank National Association
7812	David Kruchin	Individual	***4908	U.S. Bank National Association
7812	David Kruchin	Individual	*****4908	U.S. Bank National Association
7812	David Kruchin	Individual	*****4908	U.S. Bank National Association
7812	David Kruchin	Individual	*****4908	U.S. Bank National Association
812	David Kruchin	Individual	*****4908	U.S. Bank National Association
7812	David Kruchin	Individual	*****9436	Sterling Savings Bank
7812	David Kruchin	Individual	*****4908	U.S. Bank National Association

EXHIBIT B

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**FEDERAL TRADE COMMISSION
and STATE OF GEORGIA,**

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and **VADIM OLEGOVICH
KRUCHININ**, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**DECLARATION OF S. GREGORY HAYS
Pursuant to 28 U.S.C. § 1746**

I, S. Gregory Hays declare that I have personal knowledge of the facts set forth below. If called as a witness before any court, I could and would testify as follows:

1. I am a citizen of the United States and am over the age of 18. I am the Managing Principal with Hays Financial Consulting, LLC (“HFC”). On September 26, 2016, in the Temporary Restraining Order [ECF No. 9] entered in the above-captioned case, HFC and I were appointed as the Receiver (collectively, “Receiver”) for the Receivership Defendant Laptop & Desktop Repair, LLC (“LDR” or “Receivership Defendant”). The Court reappointed the Receiver in the Stipulated Preliminary Injunction Order entered on October 5, 2016 [ECF No. 14.]

2. On September 29, 2016, along with local law enforcement and agents of the Federal Trade Commission, the Receiver entered the business premises of LDR located at 84 Coney Island Drive in Sparks, Nevada at approximately 9:00 a.m. PDT. A process server employed by the FTC served a copy of the TRO upon Vadim “David” Kruchinin upon entering the premises. Mr. Kruchinin is a named defendant in this case and the owner of the Receivership Defendant. Either I or my counsel had several conversations with Mr. Kruchinin and his counsel several times during the day on September 29, 2016. I requested Mr. Kruchinin’s cooperation in complying with the TRO and he agreed to cooperate.

3. On Saturday, October 1, 2016, Henry F. Sewell, Jr., counsel for the Receiver, and I were at 84 Coney Island Dr. to continue to secure the assets of the

Receivership Estate and to meet with Mr. Kruchinin. Mr. Kruchinin requested that he be permitted to remove personal items, including several hard cover books and pictures in his office.

4. During our meeting, I asked Mr. Kruchinin to provide log ins and passwords for his computer accounts. Mr. Kruchinin claimed he could not remember his password and claimed they were written on a piece of paper in his office. Under my direct supervision, I allowed him to search his desk to see if he could locate passwords, but claimed that he was unable to locate it. The Receiver did not find Mr. Kruchinin's claims with respect to his password to be credible.

5. As he was searching through the desk, he asked if I had seen his passport and wanted to take it. My assumption is that he was searching for this when he asked to search his desk. I told him I had not seen his passport. He then asked to remove \$506 in cash from his desk which I refused to release to him.

6. On October 3, 2016, the Receiver discovered that Mr. Kruchinin made two separate transfers from PayPal Bank accounts established for the Receivership Defendant on September 29, 2016. Both transfers were made to an entity named Happy Smile, LLC. This entity is controlled by Valeria Campos Fuentes. We have been informed that Mr. Kruchinin may be in a romantic relationship with Ms.

Fuentes. The principal place of business for this entity is listed as Mr. Kruchinin's home. (See Exhibit A, Nevada Secretary of State Business Entity Information Sheet).

7. On October 5, 2016, counsel for the Receiver demanded that Mr. Kruchinin return the funds. (See Exhibit B, October 5, 2016 Letter of Henry F. Sewell, Jr. to John Arrascada and Robert Angres).

8. On October 6, 2016, Mr. Kruchinin, through his counsel, e-mailed a response to the Letter, claiming that the account was already under the umbrella of the Receivership. He provided what he stated was Happy Smiles LLC's PayPal log-in information and password. However, when the Receiver attempted to log in to the PayPal account using the information provided by Mr. Kruchinin, the log-in and password information were not correct. To date, Mr. Kruchinin has failed to return the \$22,000 to the Receiver.

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

Signed on this 25th day of October, 2016.


S. Gregory Flays

EXHIBIT A

HAPPY SMILES L.L.C.

Business Entity Information			
Status:	Active	File Date:	9/18/2014
Type:	Domestic Limited-Liability Company	Entity Number:	
Qualifying State:	NV	List of Officers Due:	9/30/2017
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20141593620	Business License Exp:	9/30/2017

Additional Information	
Central Index Key:	

Registered Agent Information			
Name:	VALERIA CAMPOS FUENTES	Address 1:	5390 VISTA RIDGE WAY
Address 2:		City:	RENO
State:	NV	Zip Code:	89523
Phone:		Fax:	
Mailing Address 1:	5390 VISTA RIDGE WAY	Mailing Address 2:	
Mailing City:	RENO	Mailing State:	NV
Mailing Zip Code:	89523		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

- Officers ✓ Include Inactive Officers			
Manager - VALERIA C FUENTES			
Address 1:	5390 VISTA RIDGE WAY	Address 2:	
City:	RENO	State:	NV
Zip Code:	89523	Country:	USA
Status:	Historical	Email:	
Manager - VALERIA C FUENTES			
Address 1:	5390 VISTA RIDGE WAY	Address 2:	
City:	RENO	State:	NV
Zip Code:	89523	Country:	USA
Status:	Active	Email:	

- Actions\Amendments	
Action Type:	Articles of Organization

Document Number:	20140671672-46	# of Pages:	1
File Date:	9/18/2014	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20140671674-68	# of Pages:	1
File Date:	9/18/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150369340-43	# of Pages:	1
File Date:	8/19/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160298558-76	# of Pages:	1
File Date:	7/2/2016	Effective Date:	
(No notes for this action)			

EXHIBIT B

LAW OFFICES OF HENRY F. SEWELL, JR. LLC
SUITE 200
3343 PEACHTREE ROAD, NE
ATLANTA GEORGIA 30326

October 5, 2016

Via Email
John L. Arrascada, Esq.
145 Ryland Street
Reno, Nevada 89501

RE: *Federal Trade Commission and State of Georgia v. Laptop & Desktop Repair, LLC et.al.*, United States District Court for the Northern District of Georgia; 1:16-cv-3591

Dear John:

As you know from prior communications, this firm represents the duly authorized and acting Receiver in the above captioned case.

During the preliminary investigation conducted by the Receiver, the Receiver has discovered that David Kruchinin made two separate transfers from PayPal Bank accounts established for the Receivership Defendant on September 29, 2016. Both transfers were made to an entity named Happy Smiles LLC. This entity is controlled by Valeria Campos Fuentes. We have been informed that Mr. Kruchinin may be involved in a romantic relationship with Ms. Fuentes. The principal place of business for this entity is listed as Mr. Kruchinin's home.

I have attached two receipts showing the transfers. The first, in the amount of \$19,000, was completed at 11:44 am, PDT on September 29 and the second, in the amount of \$3,000, was completed at 10:56 am, PDT on September 29. As you know, the FTC and the Receiver entered the premises at approximately 9:00 am PDT and Mr. Kruchinin was served with a copy of the TRO at that time.

The purpose of this letter is to provide Mr. Kruchinin with one opportunity to return these funds within twenty-four hours. If these funds are not returned by 5:00 pm PDT on Thursday, October 6, 2016, the Receiver will file a Motion with the Court seeking to hold Mr. Kruchinin, Ms. Fuentes and Happy Smiles LLC in contempt of Court and will seek all remedies to which the Receiver may be entitled including an award of interest, attorneys fees and sanctions.

I have copied Mr. Angres on this letter as well. If I need to send the letter to another person or entity, please let me know as soon as possible.


Page 2 | Letter to John L. Arrascada

Please be advised that the Receiver continues to review the books and records of the Receivership Defendant and if additional transfers are found reserves all rights to seek to avoid and recover all amounts unlawfully transferred.

Mr. Kruchinin's prompt response to this letter is Expected and Demanded.

Law Offices of Henry F. Sewell, Jr. LLC

By:


Henry F. Sewell, Jr.

10/3/2016

Transaction Details - PayPal

Transaction DetailsYour account has open issues. [Click to Resolve or Check Status](#)**Payment to Happy Smiles LLC****Manage my transaction**[Contact seller](#)[Report unauthorized transaction](#)

You have until 3/28/2017 11:44 PDT to [notify the seller](#) directly about any problems with this order.
See the [Purchase Protection Policy](#) for more details.

Payment Sent (Unique Transaction ID: [REDACTED])**Original Transaction**

Date	Type	Status	Details	Amount
Sep 29, 2016	Payment To Happy Smiles LLC	Completed	...	-\$19,000.00 USD

Related Transaction

Date	Type	Status	Details	Amount
Sep 29, 2016	Charge From Credit Card	Completed	Details	\$5,882.71 USD

Business Name: Happy Smiles LLC (The recipient of this payment is Verified)**Email:** cellphonecity.com@gmail.com**Amount sent:** -\$19,000.00 USD**Fee amount:** \$0.00 USD**Net amount:** -\$19,000.00 USD**Date:** Sep 29, 2016**Time:** 11:44:26 PDT**Status:** Completed**Subject:** You have sent \$19,000.00 USD to Happy Smiles LLC with PayPal**Funding Type:** PayPal Balance and Credit Card**Funding Source:** \$13,117.29 USD - PayPal Account

\$5,882.71 USD - American Express Credit Card XXXX-XXXXXX-X2002

This transaction will appear on your bill as "PAYPAL *HAPPYSMILES".

[Return to Account Overview](#)

10/3/2016

Transaction Details - PayPal

Transaction Details

Payment Sent (Unique Transaction ID # [REDACTED])

Business Name: Happy Smiles LLC (The recipient of this payment is **Verified**)

Email: cellphonecity.com@gmail.com

Amount sent: -\$3,000.00 USD

Fee amount: \$0.00 USD

Net amount: -\$3,000.00 USD

Date: Sep 29, 2016

Time: 10:56:39 PDT

Status: Completed

Subject: You have sent \$3,000.00 USD to Happy Smiles LLC with PayPal

Funding Type: PayPal Balance

Funding Source: \$3,000.00 USD - PayPal Account

You can report a transaction problem in the Resolution Center within 180 days of this payment. Have a problem with this transaction? [Click here to resolve](#)

[Return to Account Overview](#)

[https://history.paypal.com/webscr?cmd=_history-details-from-hub&id=\[REDACTED\]](https://history.paypal.com/webscr?cmd=_history-details-from-hub&id=[REDACTED])

HAPPY SMILES L.L.C.

Business Entity Information			
Status:	Active	File Date:	9/18/2014
Type:	Domestic Limited-Liability Company	Entity Number:	
Qualifying State:	NV	List of Officers Due:	9/30/2017
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20141593620	Business License Exp:	9/30/2017

Additional Information	
Central Index Key:	

Registered Agent Information			
Name:	VALERIA CAMPOS FUENTES	Address 1:	5390 VISTA RIDGE WAY
Address 2:		City:	RENO
State:	NV	Zip Code:	89523
Phone:		Fax:	
Mailing Address 1:	5390 VISTA RIDGE WAY	Mailing Address 2:	
Mailing City:	RENO	Mailing State:	NV
Mailing Zip Code:	89523		
Agent Type:	Noncommercial Registered Agent		

Financial Information	
No Par Share Count:	0
Capital Amount:	\$ 0
No stock records found for this company	

- Officers		<input checked="" type="checkbox"/> Include Inactive Officers	
Manager - VALERIA C FUENTES			
Address 1:	5390 VISTA RIDGE WAY	Address 2:	
City:	RENO	State:	NV
Zip Code:	89523	Country:	USA
Status:	Historical	Email:	
Manager - VALERIA C FUENTES			
Address 1:	5390 VISTA RIDGE WAY	Address 2:	
City:	RENO	State:	NV
Zip Code:	89523	Country:	USA
Status:	Active	Email:	

- Actions\Amendments	
Action Type:	Articles of Organization

Document Number:	20140671672-46	# of Pages:	1
File Date:	9/18/2014	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20140671674-68	# of Pages:	1
File Date:	9/18/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150369340-43	# of Pages:	1
File Date:	8/19/2015	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20160298558-76	# of Pages:	1
File Date:	7/2/2016	Effective Date:	
(No notes for this action)			

EXHIBIT C

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION
and STATE OF GEORGIA,

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

**DECLARATION OF ANNA M. BURNS
Pursuant to 28 U.S.C. § 1746**

I, Anna M. Burns, declare that I have personal knowledge of the facts set forth below. If called as a witness before any court, I could and would testify as follows:

1. I have been an attorney at the Federal Trade Commission (“FTC”) since 2013, and am lead counsel for Plaintiff FTC in the above-captioned matter.

2. Under the *Temporary Restraining Order, with an Asset Freeze and Other Equitable Relief, and Order to Show Cause as to Why a Preliminary Injunction Should Not Enter* entered by the Court on September 26, 2016 (“TRO,” at [ECF No. 9]), Defendants Laptop & Desktop Repair, LLC (“LDR”) and Vadim O. Kruchinin a/k/a David Kruchin (“Kruchinin”) were required to fill out Attachment A, entitled “Financial Statement of Individual Defendant, and Attachment B, entitled “Financial Statement of Corporate Defendant,” within three (3) business days of service of the Order. [ECF No. 9, at Section VI, “Financial Accounting.”] In the Stipulated Preliminary Injunction Order, [“PI,” ECF No. 14], entered October 5, 2016, Defendants were again required to fill out these Financial Statements within three (3) business days of service of the Order, unless they had otherwise done so. [*Id.*, at Section VI.]

3. Both the TRO and PI also required Defendants within five (5) business days following the service of this Order, to , if they had not already done so:

A. Provide counsel for the Plaintiffs with a full accounting of all assets, accounts, funds, and documents outside of the territory of the United States that are

held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

B. Transfer to the territory of the United States all assets, accounts, funds, and documents in foreign countries held either: (1) by them; (2) for their benefit; (3) in trust by or for them, individually or jointly; or (4) under their direct or indirect control, individually or jointly;

4. Hold and retain all repatriated assets, accounts, funds, and documents, and prevent any transfer, disposition, or dissipation whatsoever of any such assets, accounts, funds, or documents.

[See TRO and PI, at Section VIII “Repatriation of Foreign Assets.”]

5. On October 11, 2016, after Plaintiffs had not received Defendants’ Financial Statements, I wrote to counsel John Arrascada and Robert Angres, who appeared as counsel for Defendants at the Immediate Access into LDR’s business premises on September 29, 2016, and who had been representing and/or assisting Defendants in negotiating the stipulation to the preliminary injunction, requesting the financial statements and disclosures and also requesting that Defendants repatriate any foreign held assets. (See October 11 and 13 emails of Anna M. Burns, a true and correct copy of which is attached hereto as Exhibit “1.”) On October 12, 2016, Mr. Arrascada responded that he was not representing the defendants in this matter.

6. On October 12, 2016, Mr. Angres requested that Plaintiffs agree to allow him to place a lien on the building at 84 Coney Island Dr., Sparks, Nevada, the business premises of LDR, to serve as a retainer of his representation of Mr. Kruchinin in this matter. I informed him that I could not agree to release any assets until I received the Defendants' financial statements.

7. On October 13, 2016, Mr. Angres, on behalf of Defendants LDR and Kruchinin, emailed the signed Financial Statements. Defendant Kruchinin's financial statements indicated that he had assets held in overseas bank accounts. That same day, I emailed Mr. Angres, requesting that Defendant Kruchinin repatriate these funds immediately.

8. On October 18, 2016, I emailed Mr. Angres, again requesting that Defendant Kruchinin repatriate his assets and demanding the return of assets transferred by Defendant Kruchinin in violation of the TRO and PI. (*See* October 18, 2016 e-mail, a true and correct copy of which is attached hereto as Exhibit "2.") I also requested that if he was no longer representing Mr. Kruchinin, that he please let me know. (*See id.*)

9. Later that day, after I spoke with him on the phone, he confirmed by e-mail that he had informed Defendant Kruchinin by e-mail that morning that he

would not be representing him in the above-captioned matter. (See October 18, 2016 Angres email, at Exhibit "2"). However, Mr. Angres did agree to attempt to contact Defendant Kruchinin and inform him that he have his new counsel contact me, or, that he contact me if he was representing himself *pro se*. Mr. Angres also agreed to inform Defendant Kruchinin of the unauthorized transfers.

10. On October 21, 2016, after not hearing from Defendant Kruchinin, I called him on the phone number provided on his Financial Statements. His phone went straight to voice mail. I left a message requesting that, if represented, he have his attorney call me, or if he was representing himself *pro se*, that he call me directly to discuss the violations of the PI and Asset Freeze and to instruct him that Defendants' Answers to the Complaint had been due on October 20, 2016. I have not received any response from Defendant Kruchinin or any counsel on his behalf.

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

Signed on October 26, 2016.

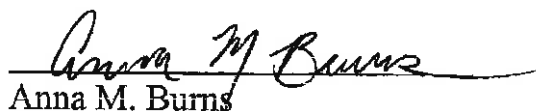

Anna M. Burns

EXHIBIT 1

Burns, Anna

From: Burns, Anna
Sent: Thursday, October 13, 2016 11:59 AM
To: 'Robert Angres'
Cc: Clausen, Hans; Katherine D. Schuessler; 'Henry Sewell'; 'Greg Hays'
Subject: RE: [WARNING: MESSAGE ENCRYPTED]docs requested

Thanks, we are trying to access them now. I will let you know if there is any issue.

I also wanted to address with you that we received documents from Umqua Bank today. The bank's records evidence that on October 6, Mr. Kruchin, in violation of the Court's order and asset freeze, withdrew \$8,800 from the account ending in 0632. Mr. Kruchin needs to return these funds immediately. Moreover, Mr. Kruchin lists overseas accounts on his financial disclosures, and Mr. Kruchin needs to repatriate those funds immediately. Please let us know what steps Mr. Kruchin is undertaking to return these funds.

Best regards,

Anna Burns
Attorney
Federal Trade Commission
225 Peachtree St.
Suite 1500
Atlanta, GA 30303
404-656-1350

From: Robert Angres [<mailto:rjangres@gmail.com>]
Sent: Thursday, October 13, 2016 10:41 AM
To: Burns, Anna
Subject: Re: [WARNING: MESSAGE ENCRYPTED]docs requested

Here are the passwords: [REDACTED] for business returns, [REDACTED] for personal returns.

It took me three times to get in, I hope you do not have the same problem. Sorry my attempts at removing the encryption were not successful. rja

Sent from my iPad

On Oct 13, 2016, at 7:29 AM, Burns, Anna <aburns@ftc.gov> wrote:

Mr. Angres,

Will you please provide the password for the encrypted tax return documents?

Best regards,

Anna Burns
Attorney
Federal Trade Commission
225 Peachtree St.

From: Burns, Anna

Sent: Tuesday, October 11, 2016 9:58 AM

To: 'rjangres@gmail.com'; 'John Arrascada'

Cc: 'Katherine D. Schuessler'; Clausen, Hans; 'Henry Sewell'; 'Greg Hays'

Subject: Overdue Financial Statements and Disclosures from LDR and Kruchinin

John and Robert:

The financial statements and disclosures that LDR and Mr. Kruchinin are required to complete under the TRO (and again under the Preliminary Injunction) are now a week overdue. The orders also require Mr. Kruchinin and LDR to repatriate overseas assets, which, to my understanding, they have not done. Please let me know when we can expect to receive the disclosures and the transfer of the funds, as I would like to resolve this without going to the Court.

If you are no longer representing LDR or Mr. Kruchinin, please let me know if they have obtained other counsel or if Mr. Kruchinin is representing himself *pro se*. I am in the office all day and am happy to discuss this matter at your convenience.

Best regards,

Anna Burns
Attorney
Federal Trade Commission
225 Peachtree St.
Suite 1500
Atlanta, GA 30303
404-656-1350

EXHIBIT 2

Burns, Anna

From: Robert Angres <rjangres@gmail.com>
Sent: Tuesday, October 18, 2016 2:16 PM
To: Burns, Anna; Henry Sewell
Subject: representation of Mr. Kruchin personally

Dear Ms. Burns, pursuant to our conversation of this past hour, I had let Mr. Kruchin know earlier today that this office will not be representing him in the matters involving your office and that of the Receiver. At your request I am confirming that, but agreed to attempt to inform Mr. Kruchin of your urging that he be in contact with you by counsel or as a *pro se* and to inform him that you have records, I believe pertaining to unauthorized transfers, that can only be shared with the direct, authorized recipient.

My continued communication with your office and that of Mr. Sewell will be to provide information as to the LDR matters outlined in Mr. Sewell's letter to assist with pursuit or defense of matters still of importance to the Receiver Defendant.

Best regards, rja

--
Robert Julian Angres, Esq.

From: Burns, Anna

Sent: Tuesday, October 18, 2016 10:26 AM

To: 'Robert Angres'

Cc: Henry F. Sewell Jr (hsewell@sewellfirm.com); Clausen, Hans; 'Katherine D. Schuessler'

Subject: FW: FTC, et al. v. Laptop & Desktop Repair, LLC

Mr. Angres:

Per the email below, it is my understanding that you no longer represent Mr. Kruchinin. Please advise us if he has obtained other counsel in this matter, or, if Mr. Kruchinin is representing himself *pro se*, please provide us with his most recent contact information. If I am mistaken as to your intent in the email below and you still represent Mr. Kruchinin in any capacity in this matter, please let us know.

Likewise, in response to your request that we unfreeze funds to allow your client to pay you for your representation, the FTC will not agree to unfreeze any funds in this matter. Mr. Kruchinin is in willful violation of the asset freeze at this time. Not only did he take \$22,000 out of the company's PayPal account, which has not been returned, we also have heard no response to our request that he return the \$8,800 he removed from the Umpqua bank account. Moreover, we discovered yesterday that Mr. Kruchinin wire transferred \$103,369.66 from his Charles Schwab account at 9:51 am on October 5, 2016. He must hand over these funds immediately.

Mr. Kruchinin also continues to be in violation of the Preliminary Injunction Order, as he has not repatriated his foreign assets. If Mr. Kruchinin has not arranged to return all of the above-mentioned funds and returned them by 12:00 pm EST tomorrow, October 19, 2016, we will be filing a motion with the Court to hold Mr. Kruchinin in contempt.

Best regards,

Anna Burns

Anna Burns

Attorney

Federal Trade Commission

225 Peachtree St.

Suite 1500

Atlanta, GA 30303

404-656-1350