

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

Plaintiff,

v.

ROMAN STERLINGOV

Defendant.

**No. 21-cr-399 (RDM)**

**NOTICE REGARDING COURT'S PROPOSED PROTECTIVE ORDER  
GOVERNING REVIEW OF CHAINALYSIS'S PROPRIETARY INFORMATION**

Counsel for Defendant Roman Sterlingov has conferred with counsel for Ciphertrace, Jonelle Still's employer, regarding the Court's proposed protective order (Dkt. 196) for the recent production of evidence from Chainalysis, Inc. The Court has requested that counsel for Ciphertrace appear (either in-person or via Zoom) at a hearing before the Court concerning the protective order and Chainalysis, Inc.'s recent production on this Thursday, September 21, 2023 at 10:00 am.

Defense Counsel, in order to be efficient with the Court's resources, wishes to inform the Court in advance of the hearing that Counsel for Ciphertrace has informed us that:

1. Neither Ciphertrace nor Ms. Still may accept, receive, handle, analyze, or otherwise opine on any of the heuristic data from Chainalysis, Inc., regardless of the scope of any protective order.

2. Ciphertrace and Ms. Still cannot accept and review proprietary Chainalysis, Inc. heuristic data because, among other reasons; (a) Ciphertrace and Chainalysis, Inc. are direct competitors, and sharing proprietary data raises competition concerns; (b) review of such proprietary data would subject Ciphertrace to extensive potential intellectual property and other claims by Chainalysis, Inc.; (c) any such review would interfere with her work at Ciphertrace and her ability to work for future employers in blockchain related fields.
3. Accordingly, Ciphertrace and Ms. Still must respectfully decline the Court's invitation to review and opine on proprietary data of a competitor.

Dated: September 20, 2023  
Alexandria, Virginia

Respectfully submitted,

/s/ Tor Ekeland  
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*Counsel for Defendant Roman Sterlingov*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of September 2023, the forgoing document was filed with the Clerk of Court using the CM/ECF System, and sent by email to the attorneys for the Government listed below:

s/ Tor Ekeland

U.S. Department of Justice  
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