

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
CIVIL ACTION NO. 25-1290

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

ASX,

Defendant.

RECEIVED

MAY 19 2023

SUPERIOR COURT - CIVIL
JOHN E. POWERS, III
CLERK MAGISTRATE

Affidavit of Lilia DuBois

I, Lilia DuBois, make this affidavit in support of the Commonwealth of Massachusetts' Motion for Preliminary Injunction.

1. I am an attorney admitted in Massachusetts am currently employed as an Assistant Attorney General at the Massachusetts Attorney General's Office (the "AGO"). I submit this affidavit to place before the Court certain facts and documents referred to in the Commonwealth of Massachusetts' Memorandum in Support of its Motion for Preliminary Injunction.
2. As part of the AGO's investigation of the investment scam operated by Defendant, ASX a/k/a "Renderbitget" ("ASX"), the AGO traced fraudulently obtained funds to one Binance.com ("Binance") wallet ending in -7067 (the "Binance Wallet") and to two unhosted wallets ending in -3FE3 and -396a (the "Unhosted Wallets"). The Unhosted Wallets contain Tether coins, also known as "USDT," the smart contracts for which are managed by Tether Limited.

3. On April 9, 2025, the AGO requested that Tether Limited blacklist or freeze USDT in the Wallets ending in -3FE3 and -396a to prevent scammers from absconding with the funds and to allow the AGO to obtain a court order.
4. On April 14, 2025, Tether Limited notified the AGO that it had placed a courtesy temporary freeze on the Unhosted Wallets.
5. On April 15, 2025, the AGO requested that Binance freeze USDT in a Wallet ending in -7067 to prevent scammers from absconding with the funds and to allow the AGO to obtain a court order.
6. On April 17, 2025, Binance granted a courtesy temporary freeze that is set to expire on May 19, 2025.
7. Attached to this affidavit are true and correct copies of the following documents:
 - a. Affidavit of Benjamin Potter, a Senior Financial Investigator of the Investigations Division of the Massachusetts Attorney General's Office (Exhibit 1);
 - b. Affidavit of Barry Perla, a victim of Defendant's fraud (Exhibit 2).

SIGNED UNDER THE PENALTIES OF PERJURY IN BOSTON, MASSACHUSETTS, ON
THE 19th OF MAY, 2025.

By: 
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