



THE FRYING PAN DOCTRINE

A Satirical Chronicle

EXHIBIT A

How the SDNY Tried to Criminalize Math

PROLOGUE

THE DAY THEY CAME FOR THE COOKS



For the crime of
writing mathematics

PROLOGUE

CLASSIFIED

THE DAY THEY CAME FOR THE COOKS

In the annals of American jurisprudence, few cases will be remembered as fondly as the day the United States Department of Justice officially declared war on frying pans, USB cables, T-shirts, and the concept of mathematics itself.

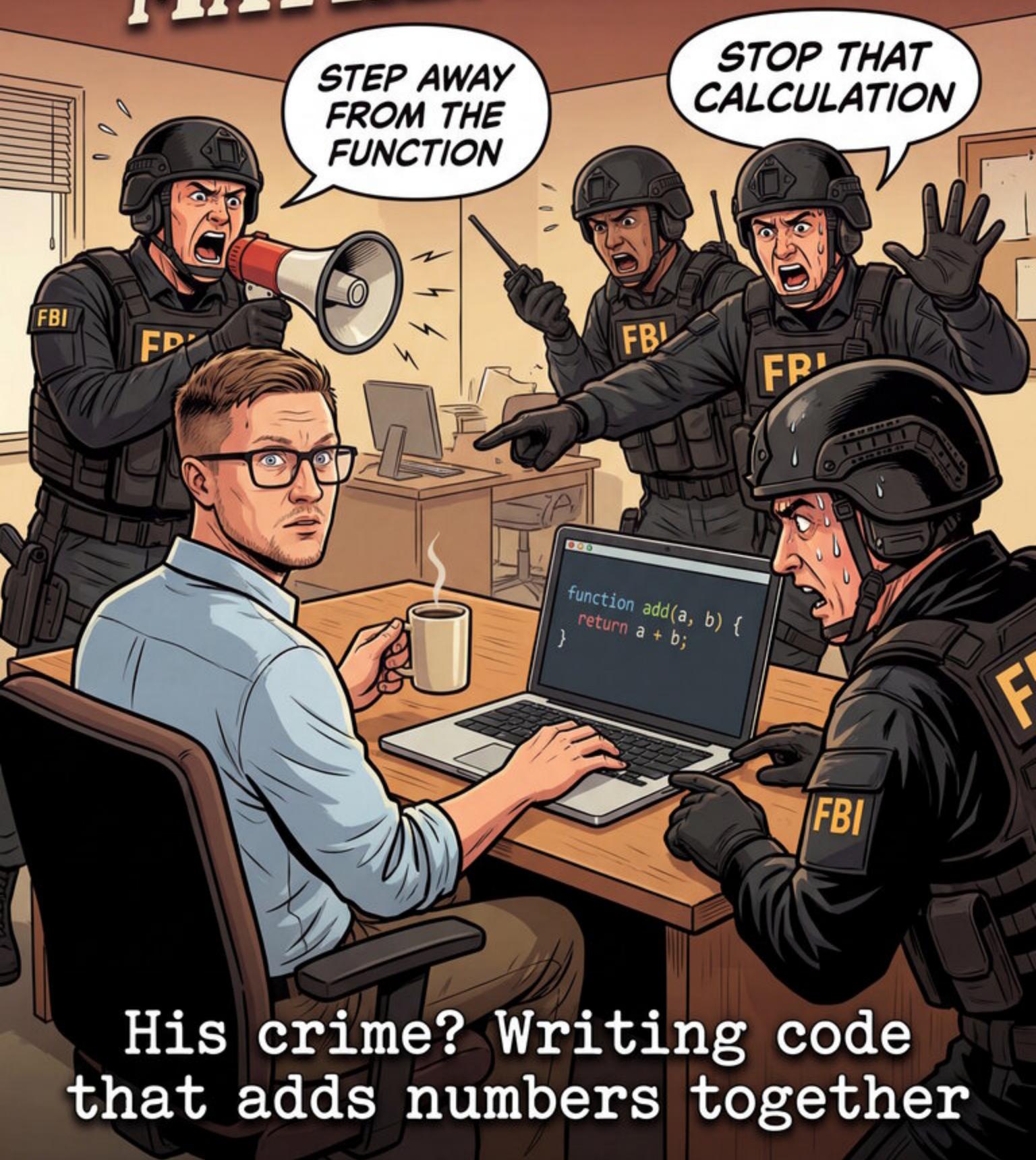


The defendant was running a giant washing machine for dirty money.

Yes. A T-shirt.
That's the evidence.

CHAPTER 1

THE DANGEROUS MATHEMATICIAN



CHAPTER 1

THE DANGEROUS MATHEMATICIAN

CLASSIFIED

Once upon a time, in the land of software development, there lived a dangerous criminal mastermind named Roman Storm. His crime? Writing computer code that could add numbers together in a special way.



The same math that protects your banking app, your WhatsApp messages, and your Signal chats.

! ! !
But when Roman Storm used it?
CRIME. ! ! !

TOP SECRET

CHAPTER 2

THE FRYING PAN PRECEDENT



The DOJ compared smart contracts to kitchen equipment

CHAPTER 2

THE FRYING PAN PRECEDENT

From the official government brief
(Document 53, we're not making this up):

A frying pan transfers heat from a stove to the contents of the pan, although neither situation involves exercising "control" over what is being transferred.

LEGAL IMPLICATIONS:

- Your kitchen is now a money transmitting business
- All-Clad stockholders advised to retain counsel
- Gordon Ramsay may be OFAC-sanctioned by morning
- MIT Thermodynamics Dept has been notified

DOCUMENT 53



CHAPTER 2

WANTED 53

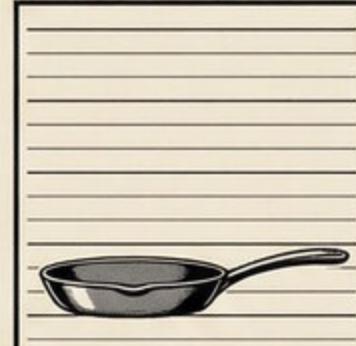
THE FRYING PAN PRECEDENT

From the official government brief (Document 53, we're not making this up):

DOCUMENT 53

A frying pan transfers heat from a stove to the contents of the pan!

MUGSHOT STYLE BOX



18 U.S.C. § 1960 VIOLATION
UNLICENSED MONEY TRANSMITTER

Case #: TC-2023-FRY-PAN

CRIME SCENE REPORT

- Your kitchen: money transmitting business
- All-Clad stockholders: retain counsel
- Gordon Ramsay: OFAC-sanctioned
- MIT Thermodynamics: NOTIFIED

DOCUMENT 53

CHAPTER 3

THE LOCKED PARCEL HYPOTHETICAL



The government accidentally proved the defense's point

CHAPTER 3

THE LOCKED PARCEL HYPOTHETICAL.

Not satisfied with kitchen equipment, the government conjured this beauty:

INNOCENT BY DEFINITION

Case #:
LOGIC-101



CAN'T CONTROL WHAT YOU CAN'T OPEN

Consider a business that accepts parcels of cash from criminals... such a business could escape liability by only accepting cash in locked parcels, as long as customers did not give it the keys.

Thank you, SDNY, for that brilliant DEFENSE argument!

SELF-OWN

OOOPS

CHAPTER 4

THE POOL PARTY THEORY



When crypto becomes...
dollar bills in a swimming pool?

CHAPTER 4

THE POOL PARTY THEORY

GOVERNMENT'S TECHNICAL
UNDERSTANDING



EXPERTISE LEVEL:
POOL FLOATIE

Case #: CS-101-FAILED

The deposits are freely intermingled, just as if the pool were a physical pool that contained an undifferentiated hoard of dollar bills.

NEVER HEARD OF:

- Cryptographic commitments
- Merkle trees
- Zero-knowledge proofs
- Any CS course from the last 40 years

PROSECUTORS SEEN ADDING CHLORINE TO METAMASK WALLETS

SPLASH

**EXPERT
WITNESS**

CHAPTER 5

THE GOOGLE DEFENSE *(That Wasn't)*



150,000 employees = a for-loop, apparently

CHAPTER 5

THE GOOGLE DEFENSE (That Wasn't)

The government, in a moment of pure genius, compared Tornado Cash to Google:

"A customer who initiates a transfer on Tornado Cash is being provided with a service, not software, just as a Google user is provided with a service."

FALSE EQUIVALENCE

GOOGLE

150,000+ employees
Can be subpoenaed
Has bank accounts
Can modify results
Has a CEO

TORNADO CASH

0 employees (it's code)
Cannot receive mail
Is math
Immutable (govt admits)
Has a for-loop

**GENIUS
MOMENT**

FOLLOWING THIS LOGIC:

- Linux is a service (\$10B in fees, please)
- Python is a service (Guido owes taxes)
- Git is a service (Linus Torvalds: WANTED)

CHAPTER 6

PROFESSIONAL MONEY LAUNDERERS WOULD REJOICE.

BILLIONS IN FINES - ZERO ARRESTS

WROTE OPEN SOURCE CODE -
45 YEARS



They were too busy not being prosecuted.

CHAPTER 6

PROFESSIONAL MONEY LAUNDERERS WOULD REJOICE

NEWSPAPER CLIPPING

The government's closing argument:

The defendant is asking this Court to decriminalize money laundering where the launderer is not a participant in the underlying crime. Professional money launderers would no doubt rejoice.



SARCASTIC COMMENTARY BOX

Yes. Professional money launderers everywhere are waiting with bated breath for... a software developer who published open-source code on GitHub.



ACTUAL LAUNDERERS:
NOT PROSECUTED

FINES: BILLIONS | ARRESTS: ZERO

Case #: HSBC-DB-2012



PUNCHLINE BOX

They were too busy not being prosecuted.

PRIORITIES
IRONY
PRIORITIES

CHAPTER 7

THE IMMUTABILITY PARADOX



Charged for driving a car he sold two months earlier

CHAPTER 7

PARADOX

LOGIC ERROR

Here's where it gets really fun. The government admits:

THE IMMUTABILITY PARADOX

The Indictment alleges that they relinquished their ability to control the pools in May 2020, while maintaining control of the other aspects of the service.

EVIDENCE

LOGIC ERROR

PARADOX

MAY 2020:
Storm loses control of pools (govt admits this)



SEPT 2020 - AUG 2022:
Charged conspiracy period

THE ENTIRE CHARGED PERIOD
IS AFTER HE LOST CONTROL

CRIME COMMITTED:
AFTER LOSING CONTROL
Case #: TIME-TRAVEL-101



CRIME COMMITTED:
AFTER LOSING CONTROL
Case #: TIME-TRAVEL-101

LOGIC ERROR

It's like charging someone with driving a getaway car when they sold the car two months before the robbery.

CHAPTER 8

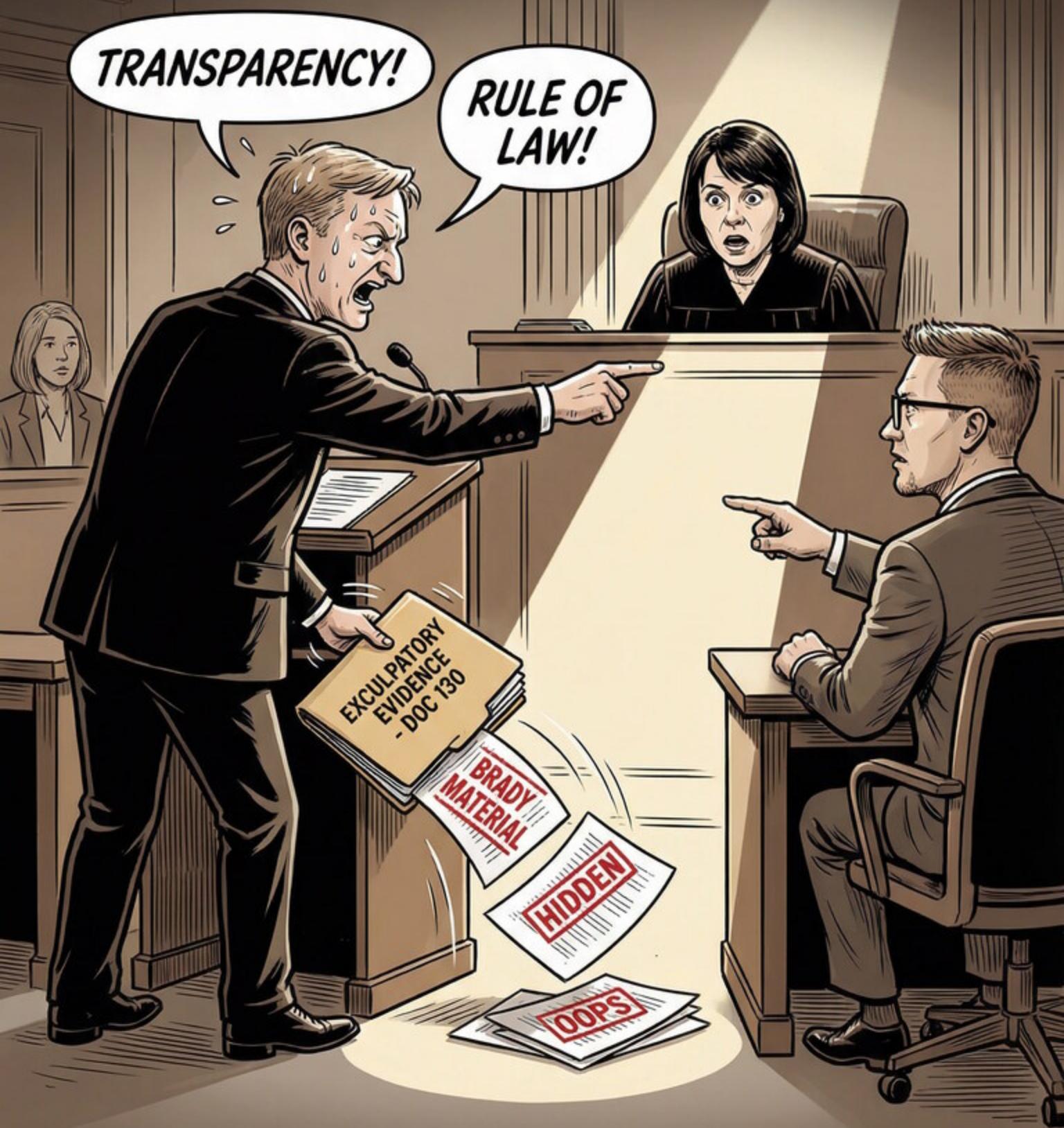
THE User Interface CRIME



Making software user-friendly: up to 45 years

CHAPTER 9

THE BRADY HOLE



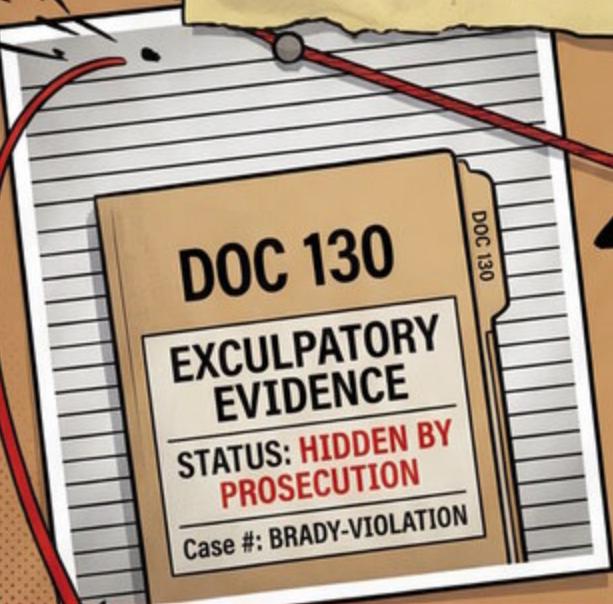
You can't make this stuff up

CHAPTER 9

SMASHED THE BRADY HOLE

HYPOCRISY

While screaming about transparency and rule of law, the government was caught hiding exculpatory evidence (Document 130).



DOCUMENT 130



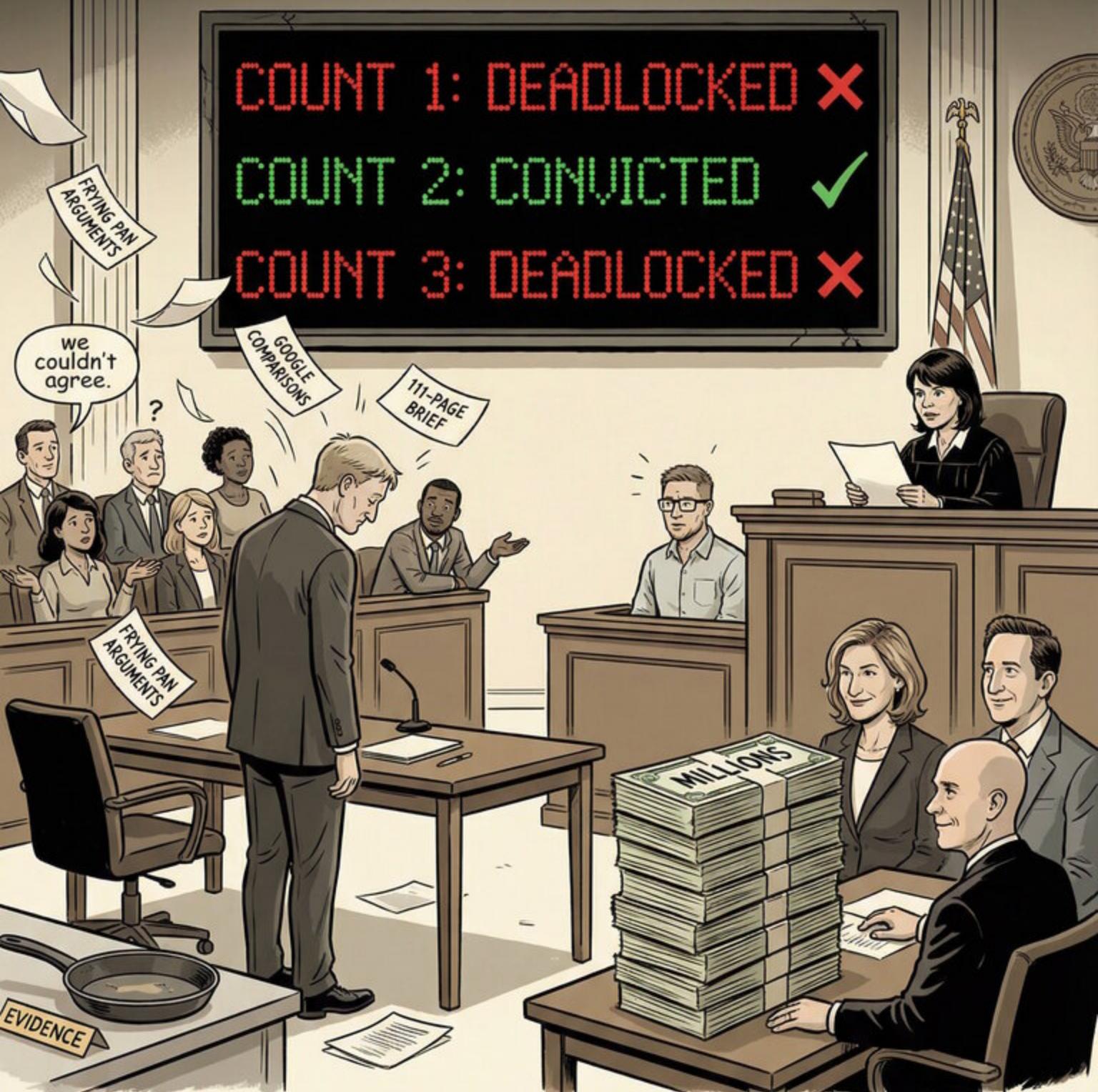
IRONY BOX:

That's right – the same government claiming Roman Storm was hiding criminal activity was itself hiding evidence that might prove his innocence.

You can't make this stuff up.

CHAPTER 10

THE VERDICT



After years of prosecution
and 111-page frying pan briefs.

CHAPTER 10

THE VERDICT

After years of prosecution, millions in legal fees, and 111-page briefs comparing smart contracts to frying pans, what did the jury decide?

MIXED VERDICT

**COUNT 1 (Money Laundering):
DEADLOCKED – Jury couldn't agree**



**COUNT 2 (Unlicensed Money Transmitter):
CONVICTED**



**COUNT 3 (Sanctions Violations):
DEADLOCKED – Jury couldn't agree**



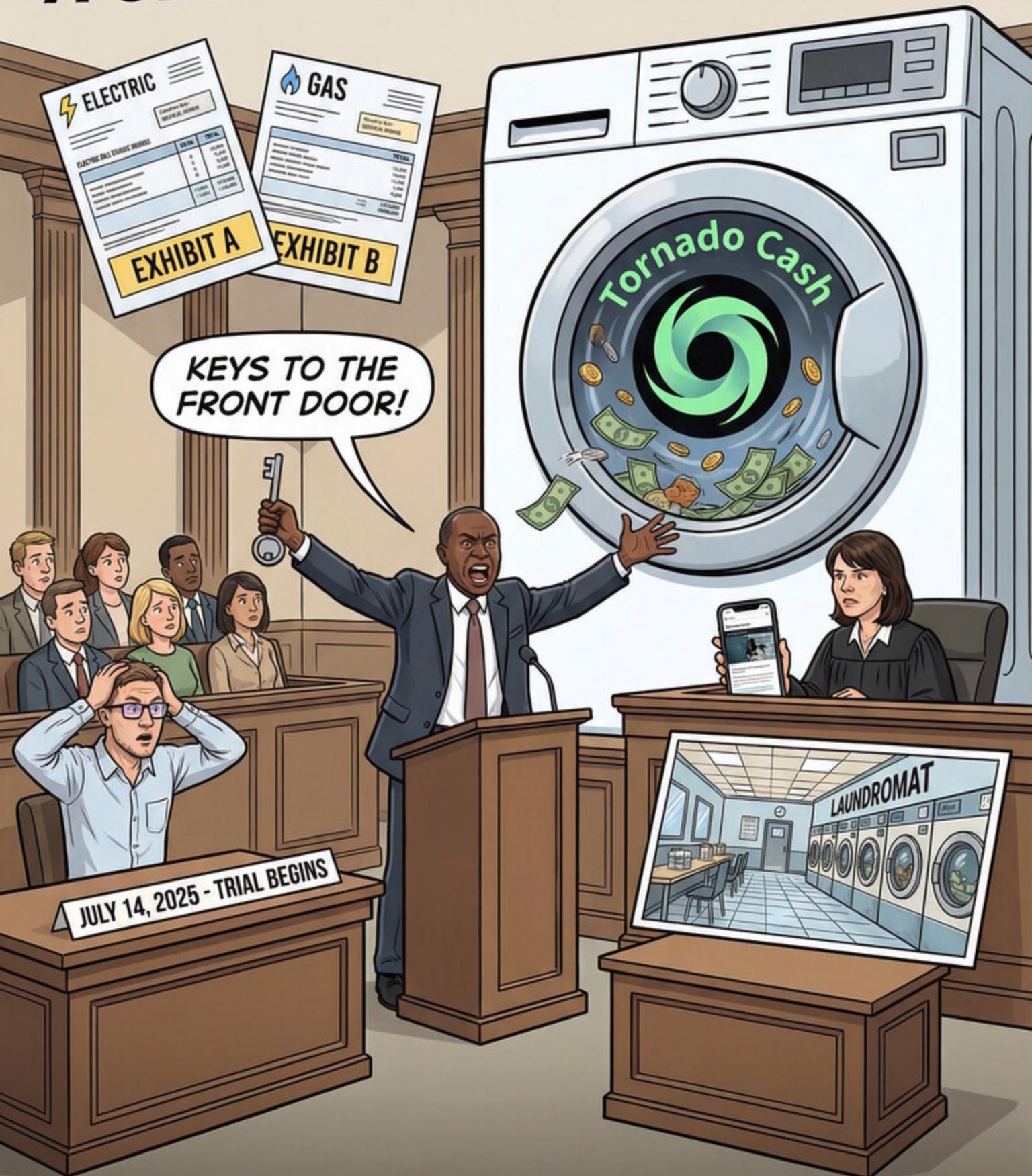
The jury rejected the government's most serious charges. Even after all the frying pan arguments, the Google comparisons, and the locked parcel hypotheticals, a jury of ordinary Americans couldn't swallow the government's theory that writing code is money laundering.

Only the money transmitter charge stuck – being appealed after Fifth Circuit ruled in Van Loon that OFAC overstepped.

APPEAL PENDING

CHAPTER 11

A GIANT WASHING MACHINE



The trial begins – July 14, 2025

CHAPTER 11

THE TRIAL BEGINS - A GIANT WASHING MACHINE



On July 14, 2025, the trial began. Special AUSA Kevin Mosley set the tone for the entire prosecution.

THE LAUNDROMAT METAPHOR

He chose to remove the switch that could have shut off one part of the washing machine. He did that so he could pretend the whole washing machine was out of his control.

But you will also learn that he was running the whole laundromat. He had the keys to the front door, he paid the gas and the electric bills that kept it running.

The prosecutor literally compared running a website to owning a laundromat.

LAUNDROMAT LOGIC

CONTINUED...

CHAPTER 11 (CONTINUED)

CRIME SCENE

ACCORDING TO THIS THEORY:

- Paying for web hosting = “paying the electric bill for the laundromat”
- Having a domain name = “having the keys to the front door”
- Writing open source code = CRIME

THE PROSECUTION'S ADMISSION

Even in their opening statement, the government admitted the truth:

ADMISSION

Wait.

Wait. “Certain parts could not be changed”? That’s the pools. The actual money-moving part. The part that matters for money transmission.

“In reality, while certain parts of the business could not be changed, the defendant was in full control of other parts of the business.”



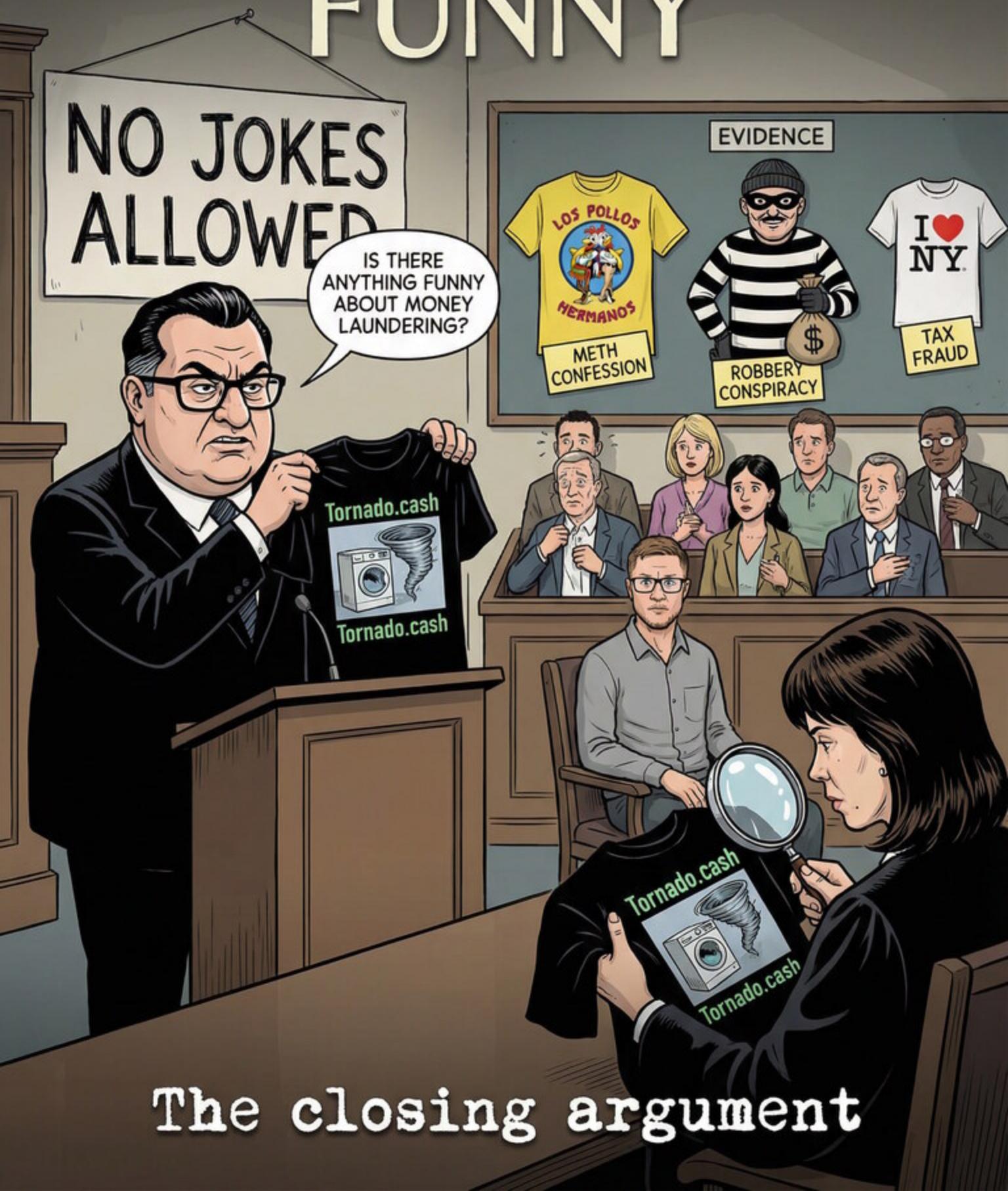
But sure, he controlled the website.

GUILTY.

SELF-OWN

CHAPTER 12

JOKES AREN'T FUNNY



CHAPTER 12

JOKES AREN'T FUNNY

I expect the defense may say it was just a joke. But is there anything funny about money laundering?

**HUMOR
PROHIBITED**

T-SHIRT EVIDENCE

NEWSPAPER CLIPPING

Prosecutor Benjamin Gianforti delivered what may be the most unintentionally hilarious moment in legal history.

Can you think of a more literal advertising for a money laundering business than a T-shirt with a Tornado Cash-branded washing machine on it?

**JOKES.
AREN'T.
FUNNY.**

CRIME SCENE

BY THIS LOGIC:

- Breaking Bad T-shirts = meth manufacturing confession
- Bank robber Halloween costumes = robbery conspiracy
- "I ❤️ NY" shirts = tax residency fraud



CONTINUED... ➔

CHAPTER 12 (CONTINUED)

THE PRIVACY = CONCEALMENT DOCTRINE

And by the way, way, notice that T-shirt talks about anonymity. But isn't anonymity just another word for concealment?



No. No it isn't. But thank you for asking.

THE DRAMATIC TRIPLE

Control, control, control.



"The defendant had control over every aspect of Tornado Cash **EXCEPT FOR THE POOLS.**"

EXCEPT FOR THE POOLS.

The part that actually moves money. But other than that – control, control, control.

LOGIC FAILURE

CHAPTER 13

THE MEME DOCTRINE



All jokes are now confessions

CHAPTER 13

THE MEME DOCTRINE

GALAXY BRAIN

In what may be the government's most galaxy-brained legal strategy yet, prosecutors sought to introduce as evidence of criminal intent... a joke t-shirt.

That's right.
A T-SHIRT.

FROM THE OFFICIAL COURT FILING:

The Government will seek to introduce the following photograph... which shows the Tornado Cash logo on a washing machine, with a pile of 'dirty' ETH symbols on the left, and a 'clean' ETH symbol on the right.

GALAXY BRAIN
EXHIBIT A

GOVERNMENT ANALYSIS:

A washing machine is about as literal an image for money laundering as one could possibly imagine.

GALAXY BRAIN
EXHIBIT A

CONTINUED...

CHAPTER 13 (CONTINUED)

LEGAL PRECEDENTS ESTABLISHED:

- Wearing a "Breaking Bad" shirt = confession to methamphetamine manufacturing
- "I ❤ NY" shirts = admission of tax residency fraud
- Band t-shirts = conspiracy to distribute copyrighted music
- All jokes are now confessions

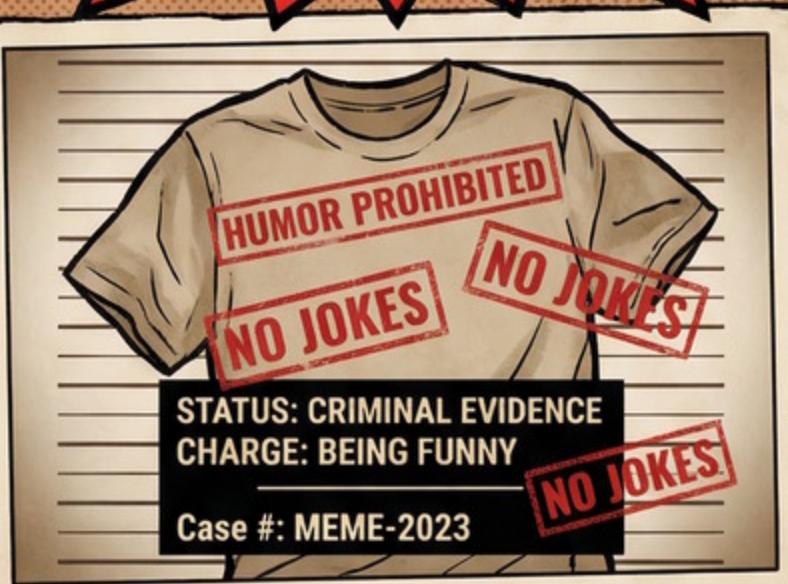
CRIME SCENE BOX



The defense noted the t-shirt was meant to "poke fun at its subject matter."

The government responded:

**CRIME IS NOT A JOKING
MATTER, YOUR HONOR.**



CHAPTER 14

TRUTH IS PREJUDICIAL



Please hide the law from the jury

CHAPTER 14

TRUTH IS PREJUDICIAL.

Perhaps the most revealing moment came when the government argued to HIDE a federal appeals court ruling from the jury.

EVIDENCE BOX

The Fifth Circuit in *Van Loon v. Treasury* had ruled that OFAC's sanctions on the Tornado Cash smart contracts were **UNLAWFUL**.

A federal court said what they charged Storm with doing... wasn't illegal.

THE GOVERNMENT'S RESPONSE?

“Any mention of Van Loon would be highly prejudicial to the Government.”

Read that again.

HIDE THE TRUTH

CONTINUED...

CHAPTER 14 (CONTINUED)

The government is literally arguing that THE TRUTH would be "prejudicial" to them.

They don't want the jury to know that another federal court found their sanctions illegal because... it might make the jury think the *sanctions were illegal*?

TRANSLATION:

Please hide the law from the jury so they'll *convict based on our version of reality*.

This is like a murder prosecution asking the judge to hide from the jury that the "victim" is still alive.



CHAPTER 15

THE OVERWHELMING EVIDENCE PARADOX



Losing 2-1 and demanding the scoreboard be changed.

CHAPTER 15

THE OVERWHELMING EVIDENCE PARADOX

After the trial, the government faced a small problem: the jury deadlocked on 2 of 3 counts. Their response? Claim the evidence was "overwhelming."



The evidence in support of the jury's verdict was more than sufficient; it was overwhelming. And while the jury did not reach a verdict on the other two counts...

SCOREBOARD

2-1 LOSS

CHARGE	VERDICT	'OVERWHELMING'?
1 Money Laundering	DEADLOCKED	Apparently not
2 Money Transmitter	Convicted	Maybe?
3 Sanctions	DEADLOCKED	Apparently not



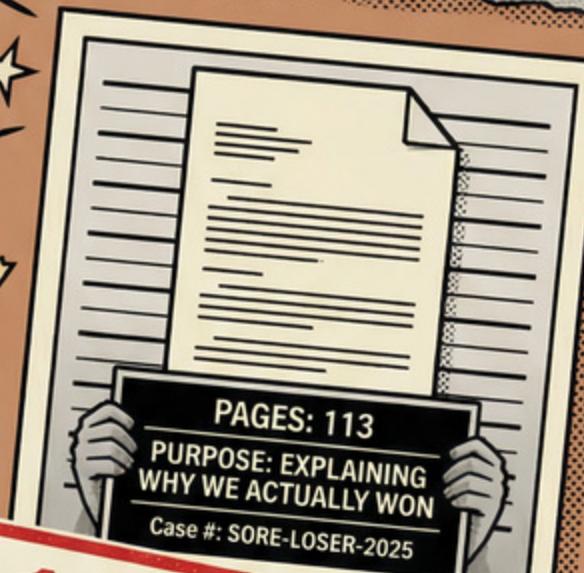
CONTINUED...

CHAPTER 15 (CONTINUED)

THE GOVERNMENT'S LOGIC:

- 12 jurors couldn't agree on 2/3 of the charges
- This means reasonable people disagreed
- BY DEFINITION, "overwhelming" evidence doesn't produce disagreement
- Therefore: the government is delusional

The brief then spends 113 pages arguing why the jury **SHOULD** have convicted on the charges they couldn't agree on.

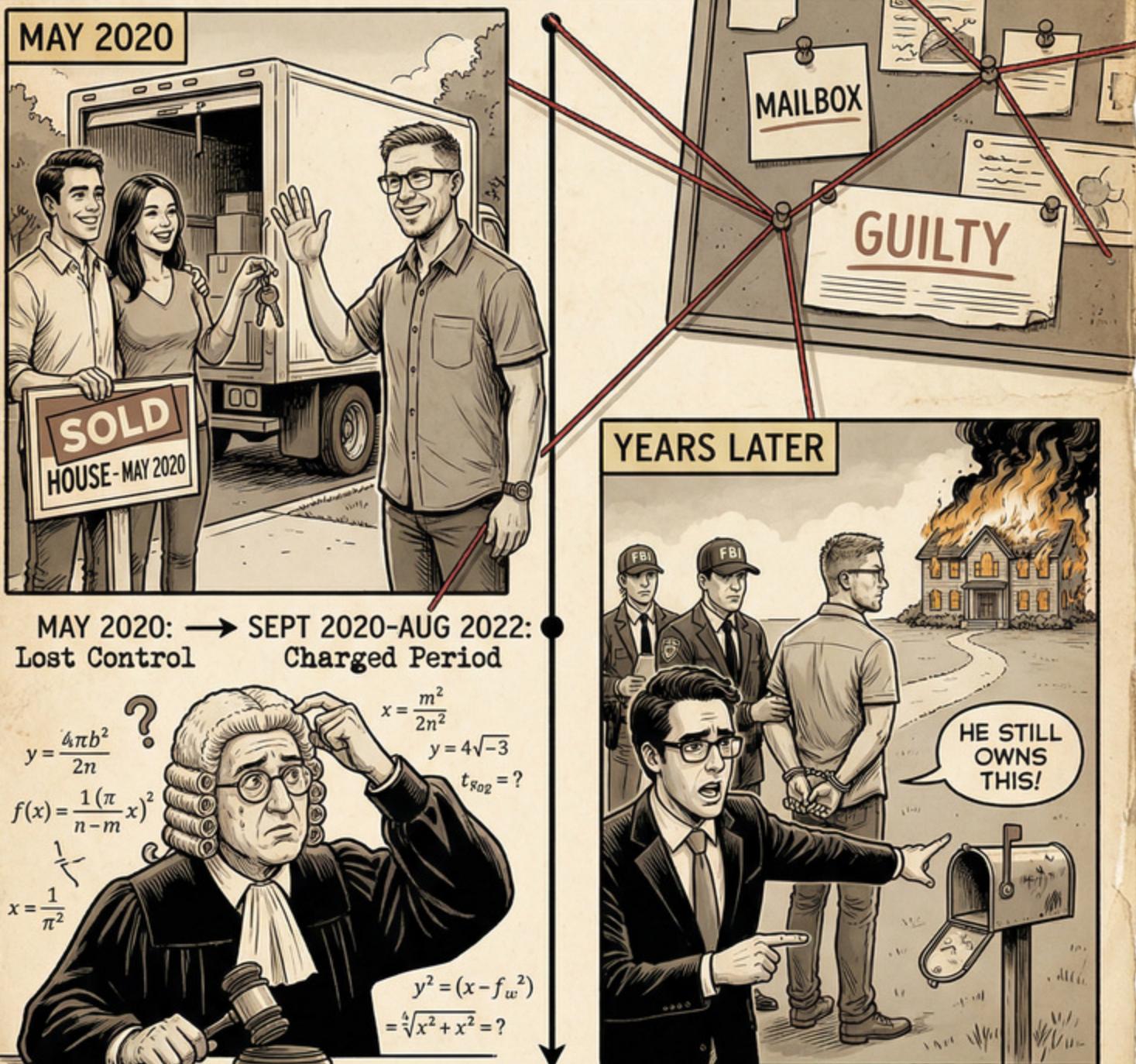


113 PAGES

This is the legal equivalent of losing 2-1 and demanding the scoreboard be changed because you felt like you played better.

CHAPTER 16

THE CONTROL CONTRADICTION



He sold the house,
but still owned the mailbox

CHAPTER 16

THE CONTROL CONTRADICTION

NEWSPAPER CLIPPING:

The government's brief contains this masterpiece of cognitive dissonance:

"The pools were made 'immutable' in May 2020, meaning that they could no longer be modified after that time. HOWEVER, the Tornado Cash founders maintained control of other elements of the Tornado Cash service."

THE TIMELINE:

- MAY 2020:
Pools become
immutable
(government
admits this)

- SEPTEMBER 2020:
Charged conspiracy
begins

- AUGUST 2022:
Charged conspiracy
ends

"THE ENTIRE CHARGED PERIOD IS AFTER STORM LOST CONTROL OF THE POOLS."

**COGNITIVE
DISSONANCE**

CONTINUED...

CHAPTER 16 (CONTINUED)

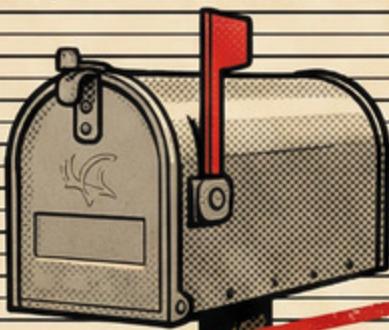
It's like charging someone with arson for a fire that started a year after they moved out of the building.

HOWEVER

Yes, Your Honor, the defendant admits he sold the house in 2019 and moved to another state.

But he still owned the MAILBOX.

Case #: MAILBOX-2020



EVIDENCE OF CONTROL

STATUS: STILL OWNED

**MAILBOX
EVIDENCE**

The government's entire case: he didn't control the money-moving part, but he controlled... everything else.

CHAPTER 17

THE ORAL ARGUMENT



It did not go well

CHAPTER 17

THE ORAL ARGUMENT

On July 12, 2024, the prosecutors had to defend their theories **LOUD** in front of Judge Failla. It did not go well.

THE COURT:

Would you agree that the most aggressive or the least traditional of your charges is the 1960 charge?

OOPS

MR. REHN:

I think that with respect to this control question, the defendant's argument is novel in that no court has really addressed this argument before.

OOPS

ON THE RECORD

Wait. The PROSECUTOR is admitting this is unprecedented?
In court? On the record?



CONTINUED...

CHAPTER 17 (CONTINUED)



CRIME SCENE

BY THIS LOGIC:

- Building roads = being a taxi driver
(both 'move people')
- Writing a cookbook = running a restaurant (both involve food)
- Publishing sheet music = being an orchestra
(both make music happen)

ARBITRARY
DISTINCTION

ECONOMIC FUNCTION



ALL DEVS
GUILTY

ARBITRARY
DISTINCTION

CRIME: SAME VIBES
CONTROL: IRRELEVANT
Case #: ARBITRARY-2024

The government's entire theory requires treating "economic function" as more important than actual control – which would criminalize every financial software developer in existence.

CHAPTER 17 (CONTINUED)

THE KNOCKOUT PUNCH

BRIAN KLEIN: The reason why this is raised for the first time here is because this is the only case ever with a 1960 prosecution where the defendants didn't have control of the funds, period. There is no case where that is not the case.



**Every. Single.
Previous. Case.
Involved. Actual.
Control.**

THE GOVERNMENT'S RESPONSE:

But there is no reason on offer why Congress would have wanted statutory liability to turn on such an arbitrary distinction when the economic function of the business is exactly the same.



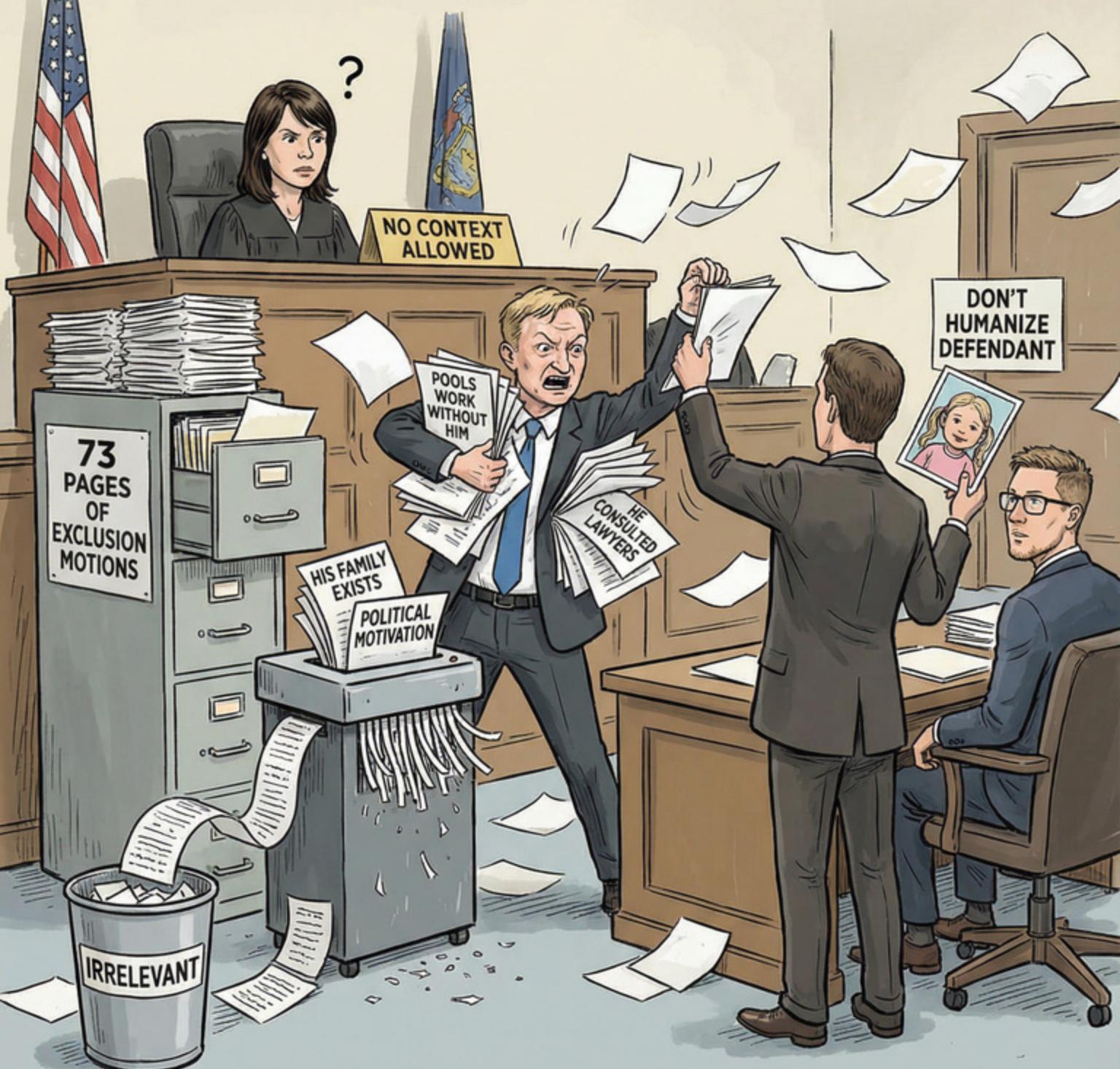
The prosecutor called "not having control of the funds" an **ARBITRARY DISTINCTION**.

KNOCKOUT

CONTINUED...

CHAPTER 18

THE EVIDENCE THEY WANTED TO HIDE



73 pages of motions to exclude evidence

CHAPTER 18

THE EVIDENCE THEY WANTED TO HIDE

Before trial, the government filed 73 pages of motions asking the judge to EXCLUDE evidence. What were they afraid of?

EXCLUSION REQUEST #1

Don't let the jury know the pools would work without him



"The defendant's expert disclosures indicate that he will attempt to introduce evidence that the Lazarus Group could have figured out other ways of making deposits 'directly' to the pools, without using features that he controlled."

Government Response:
Such evidence is irrelevant.

IRRELEVANT?! Evidence that sanctions violations would have happened WITHOUT HIM seems pretty darn relevant.

EXCLUDED

CONTINUED...

CHAPTER 18 (CONTINUED)

EXCLUSION REQUEST #2 Don't let him mention "war on crypto"

Defense counsel told the Wall Street Journal the case was "brought when Biden had declared war on crypto." The government demanded the judge exclude any mention of this.

Translation: Don't let the jury know this prosecution might be politically motivated.

EXCLUSION REQUEST #3 Don't let him talk about his family

"The defendant should be precluded from offering evidence or argument concerning his personal background, family relationships..."

The government specifically complained that Storm mentioned his daughter was home during his arrest.

Translation: Please don't humanize the software developer we're trying to imprison for 45 years.

CONTINUED...

CHAPTER 18 (CONTINUED)

EXCLUSION REQUEST #4

Don't let him mention he consulted lawyers

Storm consulted lawyers about whether Tornado Cash was legal. The lawyers said he was fine.

The government spent PAGES arguing this should be excluded.

Translation:
We don't want the jury to know he tried to follow the law.

MUGSHOT 73 PAGES OF FEAR

CONTENTS:
THINGS JURY
CAN'T KNOW

Case #:
HIDE-EVERYTHING



What the government didn't want the jury to know:

- The pools work without him
- The prosecution might be political
- He has a family
- He consulted lawyers

AFRAID OF TRUTH

73 PAGES

CHAPTER 19

THE JURY INSTRUCTIONS



75 pages of proposed jury instructions

CHAPTER 19

THE JURY INSTRUCTIONS

In June 2025, the government submitted 75 pages of proposed jury instructions. These are the rules they wanted the judge to tell the jury. Highlights include:

THE ORIGINAL SIN DOCTRINE

"If the Government proves that the proceeds of specified unlawful activity were mixed or commingled in the Tornado Cash pools with other funds... then ANY FINANCIAL TRANSACTION involving the Tornado Cash pools while they contained mixed or commingled criminal proceeds is a transaction involving the proceeds of a specified unlawful activity."

ORIGINAL SIN



CHAPTER 19 (CONTINUED)

TRANSLATION: If a criminal EVER used Tornado Cash, then EVERYONE who used it afterward is a money launderer.

BY THIS LOGIC:

- The US Dollar is a criminal instrument (cash has touched crime)
- Every bank is a money laundering operation
- PayPal is a criminal enterprise
- Your wallet contains proceeds of crime

THE CONSCIOUS AVOIDANCE TRAP

If you find that the defendant was aware of a high probability that the object of the conspiracy was to commit money laundering, but that he acted with **DELIBERATE DISREGARD** of that fact, you may find that the defendant acted knowingly.



**EVERYONE
GUILTY**

CONTINUED...

CHAPTER 19 (CONTINUED)

TRANSLATION

Translation: If you DON'T actively spy on your users, you're "deliberately disregarding" criminal activity.

CATCH-22

THE CATCH-22:

CRIME SCENE

- If you KNOW criminals use your software and don't stop them: CRIME
- If you DON'T LOOK to see if criminals use your software: ALSO CRIME
- The only option: Don't build privacy software



THE MINIMAL COMMERCE CLAUSE

Any effect on interstate or foreign commerce is sufficient to satisfy this element, NO MATTER HOW MINIMAL.

SARCASTIC

By this standard, a tweet about cryptocurrency affects interstate commerce.

CATCH-22

IMPOSSIBLE

CHAPTER 19 (CONTINUED)



THE GOVERNMENT'S PLAYBOOK:

1. ORIGINAL SIN:
One criminal ever =
everyone guilty forever

2. CONSCIOUS AVOIDANCE:
Don't spy on users =
deliberate disregard

3. MINIMAL COMMERCE:
Any effect, no matter how
small = federal jurisdiction

75 PAGES
NO ESCAPE

**75 pages of instructions.
Zero ways to be innocent.**

CHAPTER 20

THE TALE OF TWO COURTS



One says uncontrollable.
One seeks prison time.

CHAPTER 20

THE TALE OF TWO COURTS

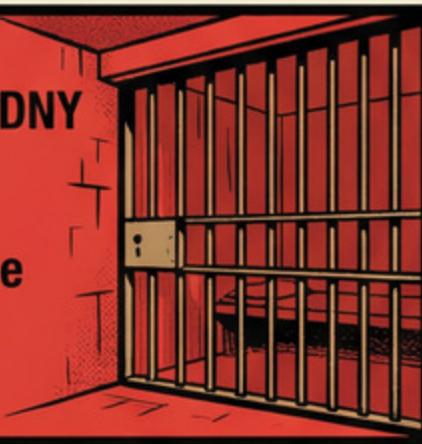
In November 2024, the Fifth Circuit Court of Appeals - a **HIGHER** court than the SDNY - ruled in *Van Loon v. Treasury* that:

Immutable smart contracts cannot be controlled or owned. Because the Tornado Cash keys were burned, the code is **OWNERLESS, IMMUTABLE, and UNCONTROLLABLE**.

The Fifth Circuit explicitly ruled that these smart contracts do not constitute a "service" they operate automatically without human effort.

HIGHER COURT

Meanwhile, the SDNY prosecutors are seeking **PRISON TIME** based on the exact opposite theory.



NOV 2024

CONTINUED...

CONTRADICTION

THE CONTRADICTION:

FIFTH CIRCUIT (HIGHER COURT)

- Code is uncontrollable
- No owner exists
- Not a “service”
- Immutable = no liability

SDNY PROSECUTORS

- Storm “operated” it
- Storm was the owner
- Storm provided services to North Korea
- Immutable = irrelevant

MUGSHOT



CASE:
LEGAL SCHIZOPHRENIA

STATUS:
COURTS DISAGREE

Case #:
PICK-A-REALITY

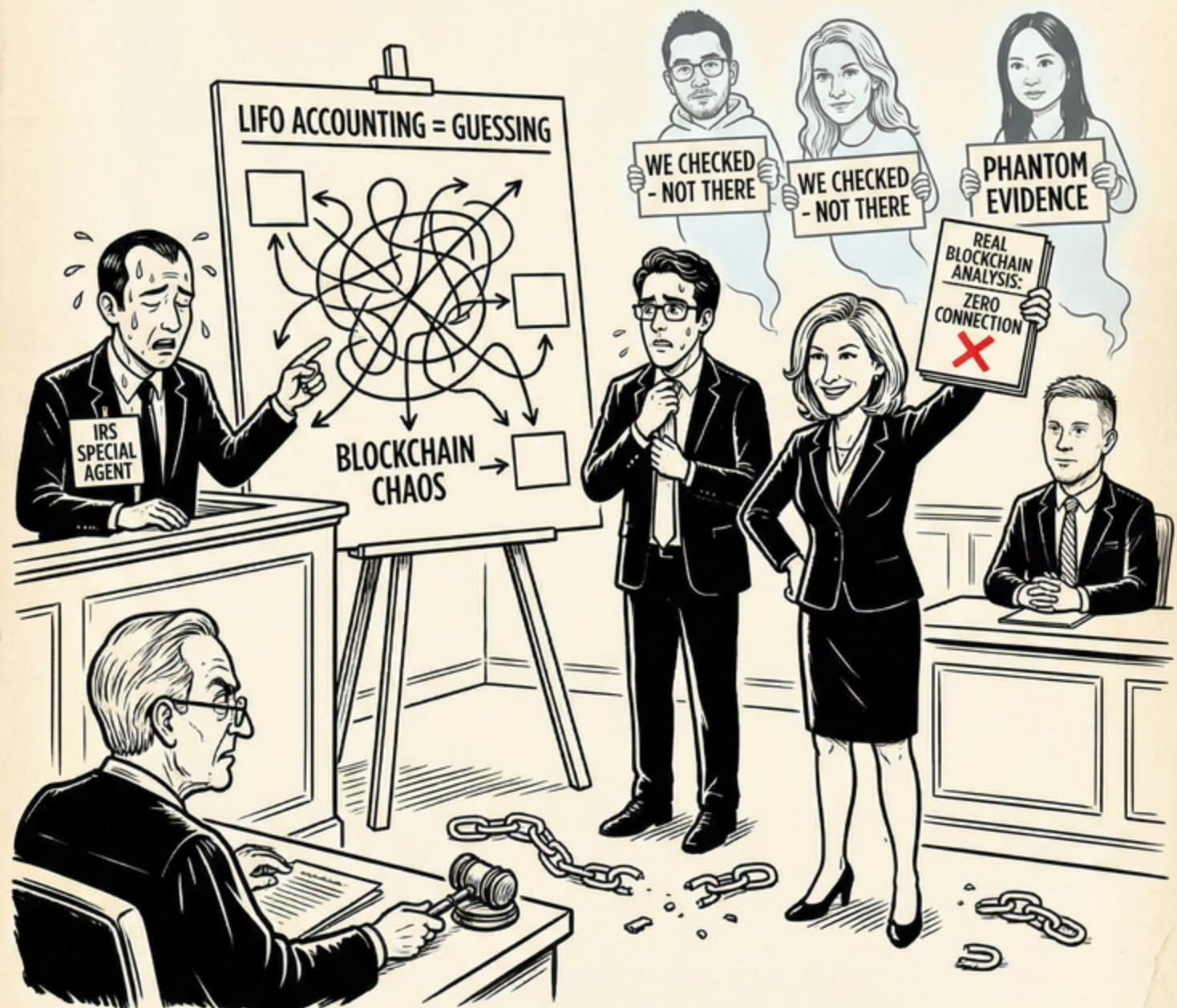
The prosecutors are literally jailing a man for failing to control something that a federal appeals court has ruled CANNOT BE CONTROLLED.

CONTRADICTION

HIGHER COURT SAYS NO

CHAPTER 21

THE PHANTOM BLOCKCHAIN TRACE



They made up a methodology
and hoped nobody noticed

CHAPTER 21

THE PHANTOM BLOCKCHAIN TRACE

THE SETUP:

The prosecution put victim Hanfeng Lin on the stand to testify that her stolen funds were laundered through Tornado Cash. She relied on a report from a dubious “crypto recovery service.”

One of the most damning incidents involved the government's attempt to link a “pig butchering” scam victim to Tornado Cash.

THE REALITY:

Independent blockchain experts (including Taylor Monahan and ZachXBT) analyzed the chain and found **ZERO EVIDENCE** that her funds ever touched Tornado Cash.

THE GOVERNMENT HAD INTRODUCED FALSE TESTIMONY.



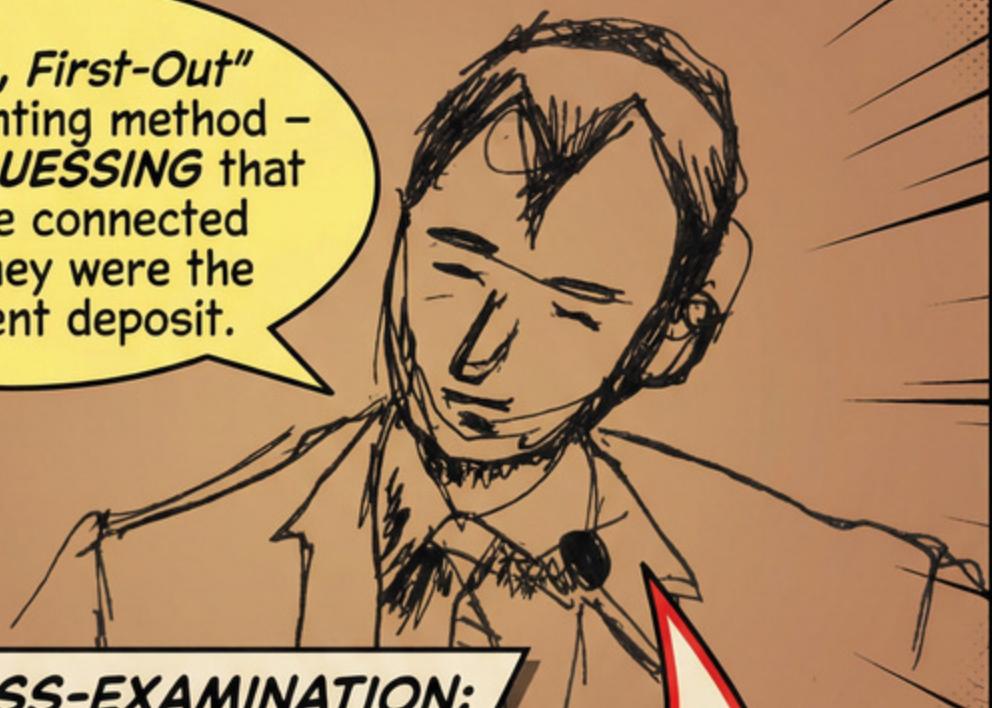
CONTINUED...

CHAPTER 21 (CONTINUED)

THE "FIX":

Realizing their error, prosecutors called IRS Special Agent Stephan George. His "tracing methodology"?

A "Last-In, First-Out" (LIFO) accounting method – essentially **GUESSING** that funds were connected because they were the most recent deposit.



UNDER CROSS-EXAMINATION:

Agent George admitted:

"No, not at all."
(When asked if his method proved the hacker moved money to Tornado Cash)

The defense described this as "really nuts."

LIFO = GUESSING

CONTINUED...

CHAPTER 21 (CONTINUED)

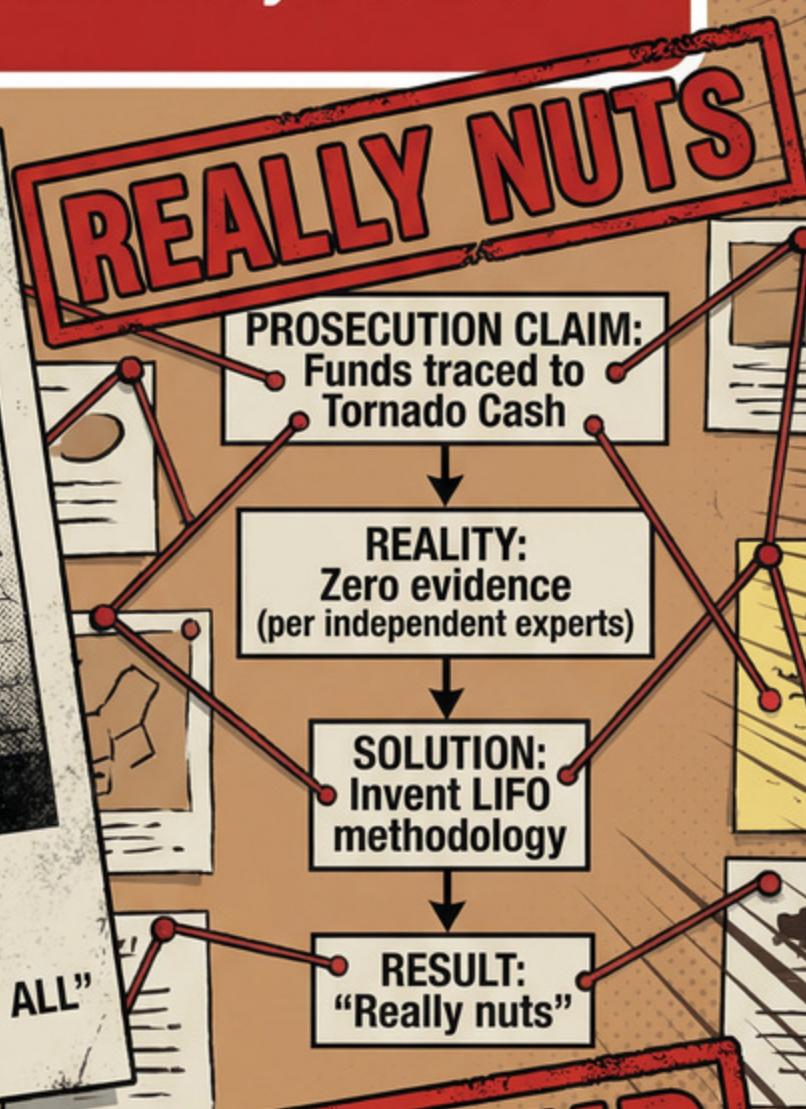
**REALLY
NUTS**

TRANSLATION:

The government couldn't actually trace the blockchain, so they made up a methodology, put it in front of a jury, and hoped nobody noticed.



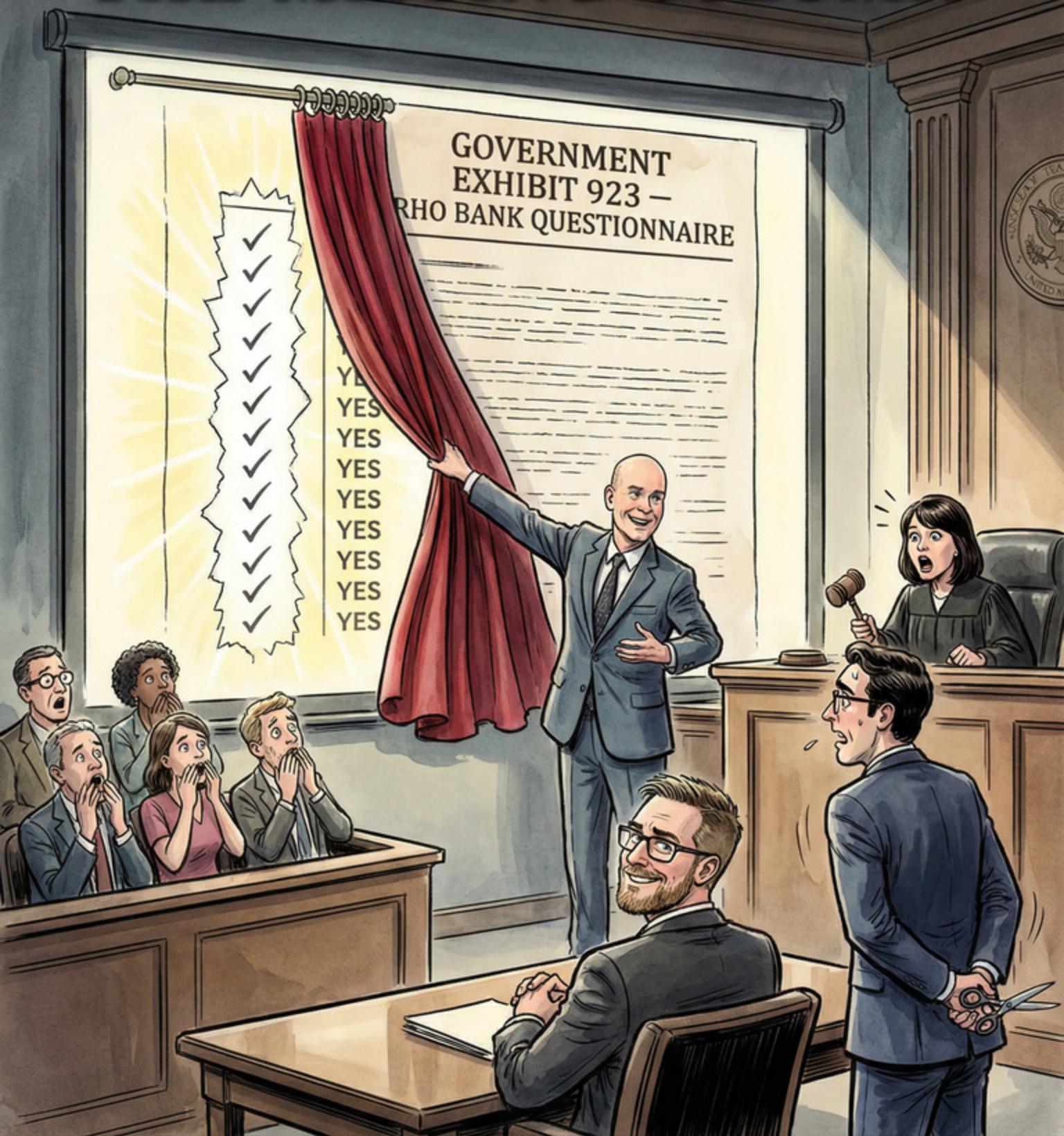
EVIDENCE: PHANTOM
METHODOLOGY: MADE UP
ACCURACY: "NO, NOT AT ALL"
Case #: LIFO-GUESS-2025



MADE UP

CHAPTER 22

THE MISSING COLUMN



This isn't spin.
This is hiding evidence.

CHAPTER 22

SMASH!

THE MISSING COLUMN

CRAGK!

CRACK!

Perhaps the most objectively verifiable lie involved the Rho Bank questionnaire.

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Perhaps the most objectively verifiable lie involved the Rho Bank questionnaire.

GOVERNMENT'S CLAIM (CLOSING ARGUMENT):

Tornado Cash doesn't appear once in this questionnaire.... look at how he answered **no** to essentially every crypto-related question.

The prosecutor displayed Government Exhibit 923 to the jury.

THE REALITY:

During the defense closing, Mr. Patton revealed that the government's display **OMITTED A SPECIFIC COLUMN.**

REVELATION BOX

When the full document is reviewed, there is a column where Mr. Storm explicitly answered "YES" to whether investments were received in the form of cryptocurrency.

EXHIBIT
923

YES

CONTINUED...

CHAPTER 22 (CONTINUED)

WHAT THE GOVERNMENT HID:

- Storm openly disclosed receiving funds from Gitcoin
- Storm openly disclosed working on Tornado Cash
- Storm answered 'Yes' to crypto-related questions

CRIME SCENE

SARCASTIC BOX

The defense called the government's claim that Storm was hiding his crypto involvement "crazy."

CRAZY



EXHIBIT: 923
STATUS: COLUMN MISSING
HIDDEN ANSWER: "YES"

HIDDEN
COLUMN



THIS ISN'T SPIN. THIS IS
HIDING EXONERATORY
EVIDENCE FROM THE JURY.

CASE: OMIT-EVIDENCE

CHAPTER 23

THE FOUR-DAY GAP



Messages spliced from
different conversations

CHAPTER 23

THE FOUR-DAY GAP

The government presented a text exchange to suggest Storm found criminal use "funny."

GOVERNMENT'S PRESENTATION:



User: "F*ck, you are being advertised for free"

Storm: "It's f*cking funny"

The implication: Storm welcomed criminals using his platform.

THE REALITY:

REVELATION

Cross-examination revealed the messages were sent **FOUR DAYS APART.**



CALENDAR EVIDENCE

SPLICED

- First message: July 12
- Storm's response: July 16

CONTINUED...

CHAPTER 23 (CONTINUED)

Storm was likely responding to an ENTIRELY DIFFERENT TOPIC.

MUGSHOT OF SPLICED TEXT MESSAGES



MESSAGES: 2
DAYS APART: 4
CONNECTION: FABRICATED
Case #: SPLICE-JOB-2025

The government took messages from different conversations and spliced them together to fabricate an admission of guilt.

EVIDENCE BOARD

JULY 12: User message sent
[4 DAYS OF OTHER CONVERSATIONS]

FABRICATED

JULY 16: Storm responds to something else entirely
PROSECUTION: "Look, they're connected!"

4 DAYS

CHAPTER 24

THE TIME-TRAVELING T-SHIRT



Evidence from years before
the alleged crime

CHAPTER 24

THE TIME-TRAVELING T-SHIRT

Remember that infamous washing machine T-shirt the government called "literal advertising for a money laundering business"?



ETH BOSTON
2019

TIME TRAVEL

THE REALITY:

The shirt was worn at ETH Boston in 2019 - years before the charge the charged conspiracy began (September 2020 - August 2022).

THE GOVERNMENT'S THEORY:

The T-shirt proved Storm's criminal intent to launder money.

The government ultimately **STIPULATED** to the 2019 date.

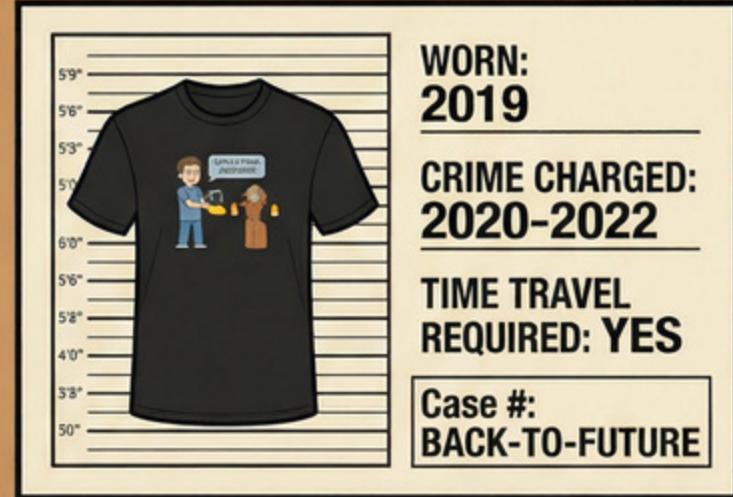
TIME TRAVEL

CONTINUED...

CHAPTER 24
(CONTINUED)

SO THE 'EVIDENCE' OF CRIMINAL INTENT WAS:

1. A joke T-shirt
2. Worn at a tech conference
3. Before the alleged crime even started



This is like prosecuting someone for bank robbery and introducing as evidence a Halloween costume they wore two years earlier.



TIMELINE:

2019: Wears joke T-shirt at tech conference

[YEARS PASS - NO CRIME]

2020-2022: Conspiracy allegations

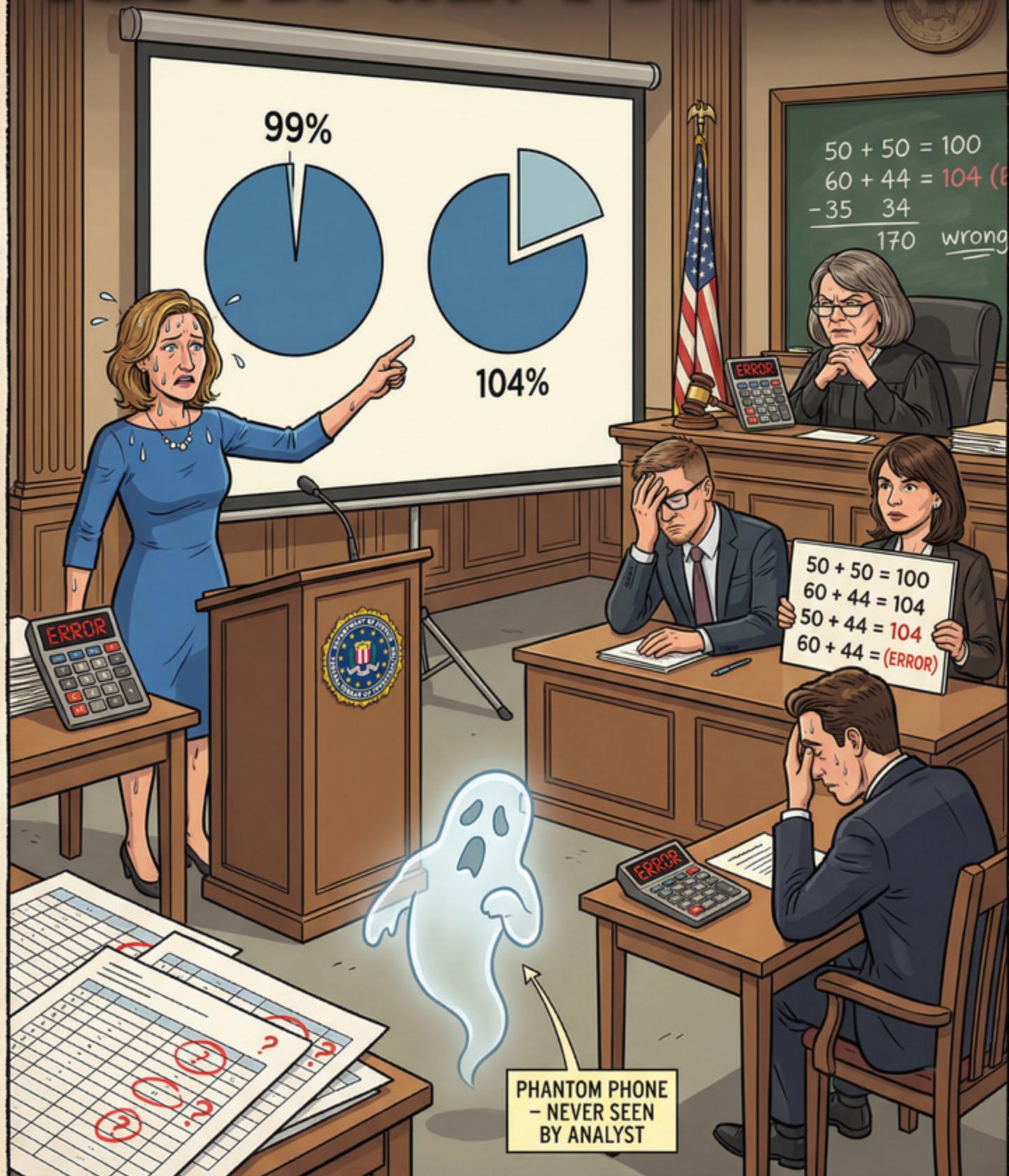
PROSECUTION: "The T-shirt proves in m

STIPULATED

2 YEARS EARLY

CHAPTER 25

THE FBI CAN'T DO MATH



Charts totaling 99% and 104%

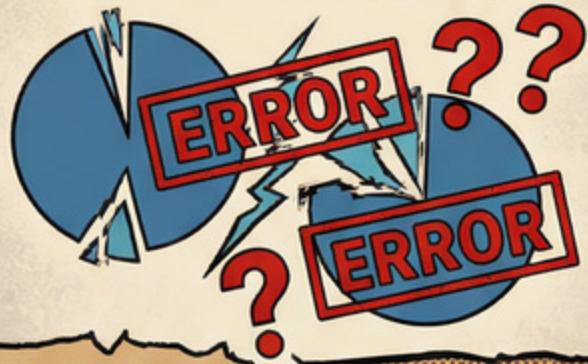
CHAPTER 25

THE FBI CAN'T DO MATH

NEWSPAPER CLIPPING:

FBI forensic charts presented to the jury had a small problem: they didn't add up.

- One chart totaled 99%
- Another totaled 104%



When challenged, the FBI accountant admitted she needed to "review the spreadsheet."



THE MANIPULATION:

Draft versions altered time periods to **inflate payroll expenses** from approximately 45% to 80%, minimizing profit margins to portray Tornado Cash as a **criminal enterprise** rather than a software project.

99% **ERROR** 104% **ERROR**

CONTINUED...

CHAPTER 25 (CONTINUED)

THE PHANTOM PHONE:

An FBI analyst testified about data from a seized phone he never physically saw, breaking the chain of custody.

GHST PHONE



STATUS: NEVER SEEN
TESTIMONY: GIVEN ANYWAY
CHAIN OF CUSTODY: BROKEN
Case #: PHANTOM-PHONE

ERROR

EVIDENCE BOARD

FBI MATH SKILLS:
Chart 1: 99% (missing 1%)
Chart 2: 104% (extra 4%)

Payroll inflation:
45% → 80%

Phone evidence:
Never touched

CP WORKER

CHAIN BROKEN

PUNCHLINE

If the FBI cannot perform basic arithmetic or establish custody of evidence, why should the jury trust their blockchain analysis?

CHAPTER 26

THE GAS RATIO GUESSWORK



Trust me, bro

CHAPTER 26

THE 'GAS RATIO' GUESSWORK



The government's star blockchain witness, Philip Werlau from AnChain.AI, claimed he could track "untraceable" transactions using a novel "gas ratio" analysis.

THE ADMISSION (UNDER QUESTIONING):

Q: Is this methodology unique to you?

A: Yes.

Q: Do you know its error rate?

A: No.

Q: Can you provide a statistical probability of accuracy?

A: No.

NOVEL METHOD

UNIQUE TO HIM

CONTINUED...

CHAPTER 26 (CONTINUED)

TRANSLATION:

The government asked the jury to convict based on an experimental metric that EVEN ITS CREATOR COULDN'T VALIDATE.

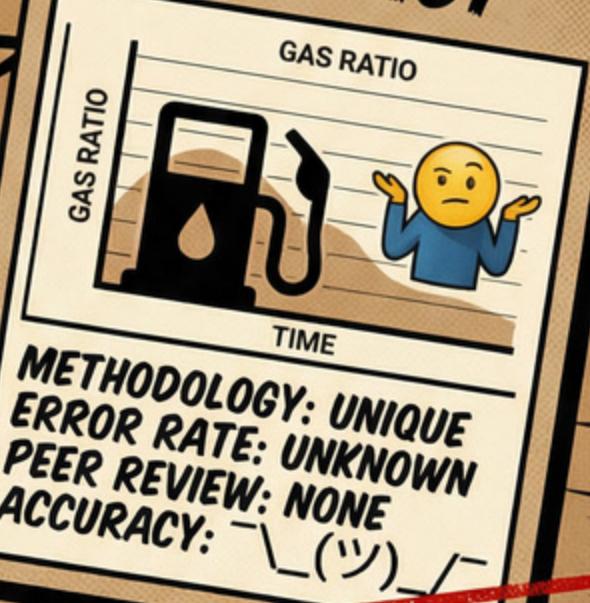
SCIENTIFICALLY UNSOUND

Defense expert Dr. Matt Edman called this methodology "scientifically unsound" - no natties nonconre known error rate, no peer review, essentially speculative.

SCIENTIFICALLY UNSOUND

Case #:
TRUST-ME-BRO

MUGSHOT



SPECULATIVE

In a case about cryptographic privacy technology, the government's tracing evidence was: "Trust me, bro."

CHAPTER 27

THE FORWARDED MESSAGE TRAP



Forwarded from a reporter

CHAPTER 27

THE FORWARDED MESSAGE TRAP

The government presented a chat message asking 'How do you launder \$600 million?' to imply the founders were planning crimes.

THE REALITY:

The message was **FORWARDED FROM A REPORTER** who was asking for comment on a news story.

The government's presentation made it appear as if the founders were asking each other how to launder money...

FORWARDED

FOUNDERS: "How do we respond?"

REPORTER:
"How do you launder \$600M?"

[FWD]

MEDIA INQUIRY



CONTINUED...

CHAPTER 27 (CONTINUED)

...when in fact they were discussing how to respond to media inquiries.

THE ANALOGY:



MUGSHOT

CONTEXT MATTERS

MESSAGE: "How do you launder \$600M?"

SOURCE: REPORTER

CONTEXT: ASKING FOR COMMENT

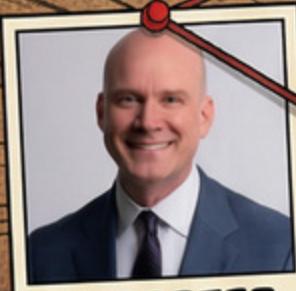
PROSECUTION CLAIM: CRIMINAL PLANNING

Case #: FWD-TRAP-2025

MEDIA INQUIRY

This is like prosecuting a lawyer for murder because they asked a client "How did you kill him?" during case preparation.

THE FORWARD CHAIN:



REPORTER

1. Reporter asks question for story



STORM

2. Storm forwards to discuss response

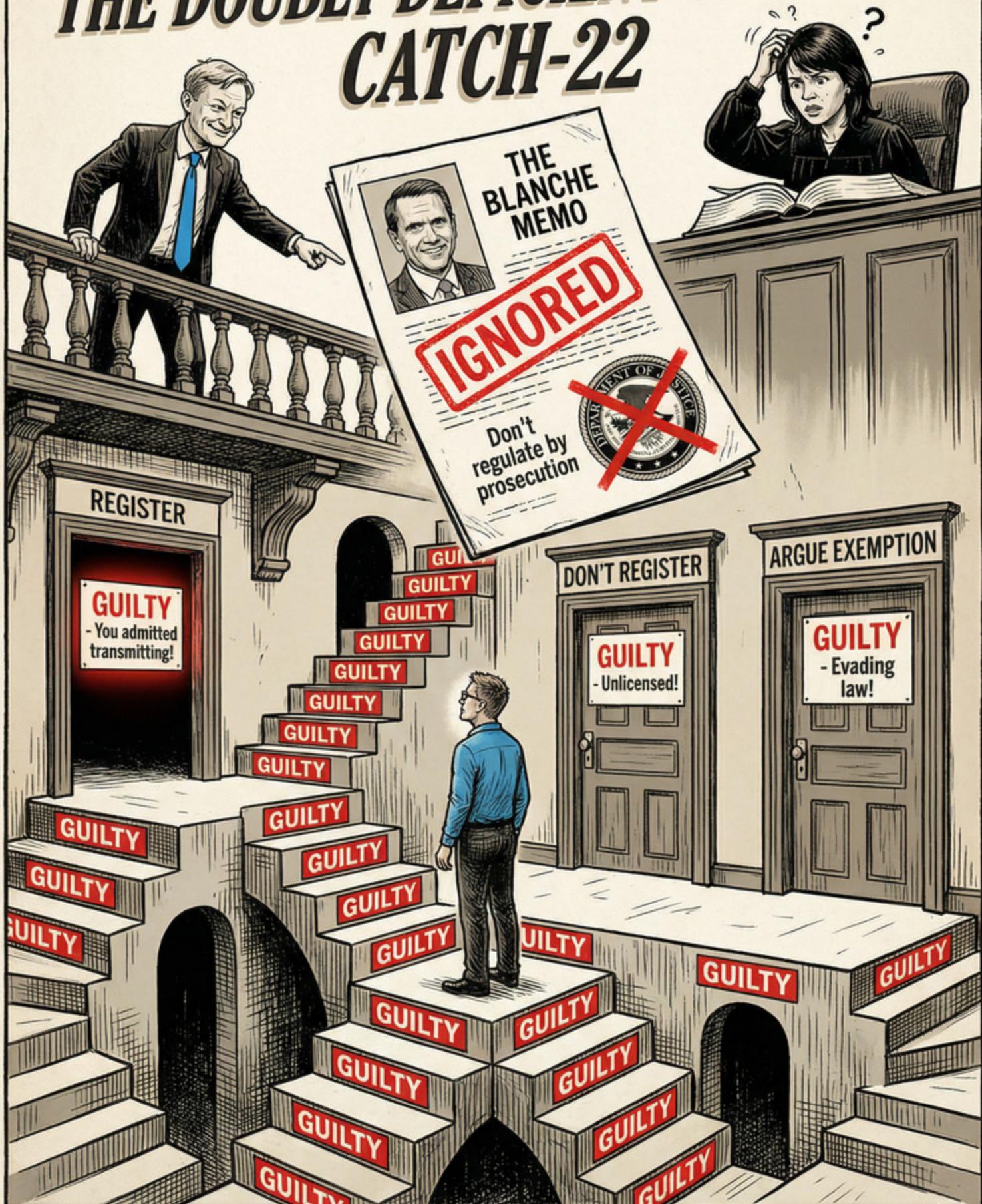


GOVERNMENT

3. Government: "Look! Criminal planning!"

CHAPTER 28

THE DOUBLY DEFICIENT CATCH-22 CATCH-22



Every path leads to GUILTY

CHAPTER 28

THE DOUBLY DEFICIENT CATCH-22

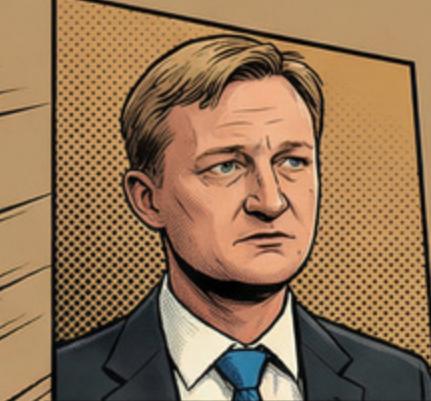
The DOJ created an impossible legal trap:

CATCH-22

1. If you register as a money transmitter:
You admit you're transmitting money (GUILTY)



2. If you don't register:
You're an UNLICENSED money transmitter (GUILTY)



3. If you argue you're not a money transmitter:
You're trying to evade the law (GUILTY)

The government literally argued that exempting non-registrants would be "absurd" - asking the court to convict based on regulatory vibes rather than statutory requirements.

CATCH-22

NO ESCAPE

CONTINUED...

CHAPTER 28
(CONTINUED)

THE BLANCHE MEMO:

HYPOCRISY

Despite a DOJ memo **explicitly rejecting** "regulation by prosecution," Storm was charged as an **unlicensed money transmitter** contrary to FinCEN guidance on non-custodial software.



CATCH-22-DOJ

PUNCHLINE BOX

The very government that says "don't regulate by prosecution" is... regulating by prosecution.

DOJ POLICY:
"Don't regulate
by prosecution"

DOJ ACTION:
Prosecutes
to regulate

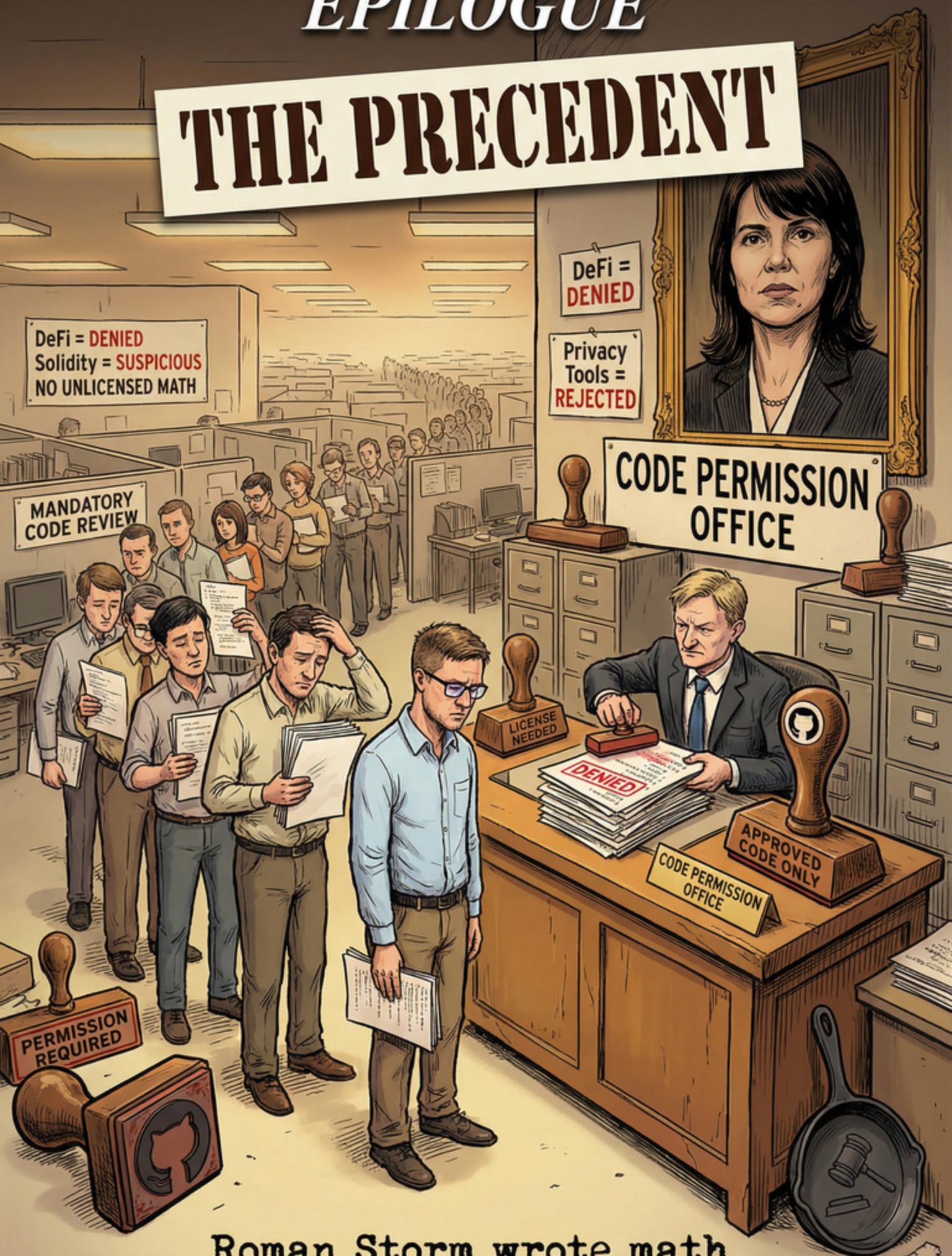
LOGIC:
???

HYPOCRISY

MEMO IGNORED

EPILOGUE

THE PRECEDENT



Roman Storm wrote math.
The government called it crime.

EPILOGUE

THE PRECEDENT

IF THE GOVERNMENT'S THEORIES
ARE ALLOWED TO STAND:

CRIME SCENE

- Every open-source developer is potentially liable for how others use their code
- Every DeFi protocol is an unlicensed money transmitter
- Every privacy tool is evidence of criminal intent
- The First Amendment doesn't apply if your speech is written in Solidity

~~PRECEDENT~~

The Southern District of New York has effectively argued that you can write code, but not **THAT** code. You can build privacy tools, but not **THOSE** privacy tools.

WARNING

CONTINUED...

EPILOGUE (CONTINUED)

You can develop financial software, but only if you get permission first and implement surveillance.

They want a permission-based internet, where innovation requires a license and privacy is a privilege granted by the state.

Roman Storm wrote math. The government called it crime.

ITEM: FRYING PAN
CHARGE: 18 U.S.C. § 1960
STATUS: STILL GUILTY
Case #: FRYING-PAN-FOREVER

And somewhere in a courthouse in Lower Manhattan, a prosecutor is still explaining how a frying pan transfers heat.

THE END
THE END
THE END
THE APPEAL
THE END

APPENDIX

WE COULDN'T MAKE THIS UP

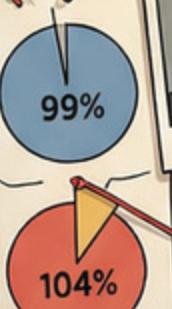
THE BEST ACTUAL QUOTES

"A frying pan transfers heat"

“washing machine for dirty money”

“Trust me bro”

ghost phone



MISSING COLUMN

All from official court documents.
We couldn't make these up.

APPENDIX

THE BEST ACTUAL QUOTES

FROM GOVERNMENT BRIEFS:

1. "A frying pan transfers heat from a stove to the contents of the pan"
2. "Just as if the pool were a physical pool that contained an undifferentiated hoard of dollar bills"
3. "Professional money launderers would no doubt rejoice"
4. "Consider the example of a business that hat accepts parcels of cash from criminals and moves the money by courier to locations overseas... accepting cash in locked parcels"
5. "Network access services are the pipelines that give their customers access"



ACTUAL QUOTES

CONTINUED...

APPENDIX (CONTINUED)

FROM GOVERNMENT BRIEFS (CONT.):

6. "The UI could have been designed—or modified at any time—to maintain a copy of the secret note"

7. "A washing machine is about as literal an image for money laundering as one could possibly imagine"

REAL QUOTES

8. "Any mention of Van Loon would be highly prejudicial to the Government"



NOT SATIRE

9. "The evidence was overwhelming" (said after jury deadlocked on 2 of 3 counts)

10. "Guys, we are f*cked" (defendant's reaction to sanctions – used as evidence of guilt)

CONTINUED...

APPENDIX (CONTINUED)

FROM GOVERNMENT BRIEFS (CONT.):

II. "The defendant claims Tornado Cash was decentralized... falsely"

I2. "The pools were made immutable... However..."

I3. "no court has really addressed this argument before"

I4. "such an arbitrary distinction" (calling "lack of control" arbitrary)

I5. "such an arbitrary distinction" (calling "lack of control" arbitrary)

I5. "this is the only case ever with a 1960 prosecution where the defendants didn't have control".

FROM TRIAL TRANSCRIPTS (JULY 2025):

I6. "In short, the defendant was running and profiting from a giant washing machine for dirty money".

UNPRECEDENTED

APPENDIX (CONTINUED)

FROM TRIAL TRANSCRIPTS (CONT.):

17. "He had the keys to the front door, he paid the gas and the electric bills that kept it running"

18. "But is there anything funny about money laundering?"

19. "Isn't anonymity just another word for concealment?"

20. "Control, control, control"

21. "The defendant had control over every aspect of Tornado Cash except for the pools"



22. "Can you think of a more literal advertisement for a money laundering business than a T-shirt with a washing machine?"

PROSECUTION QUOTES

23. "It is a tale as old as time. It is a story about greed"

CONTINUED...

APPENDIX (FINAL)

FROM PROSECUTORIAL MISCONDUCT EVIDENCE:

24. "No, not at all" (IRS Agent admitting his tracing method proved nothing)

25. FBI charts totaling 99% and 104%

26. "I don't know its error rate" (Government's blockchain expert on his own methodology)

27. The missing column hiding Storm's "Yes" answer on crypto investments

28. Messages 4 days apart presented as consecutive conversation

29. T-shirt from 2019 used as evidence for 2020-2022 conspiracy

30. Journalist's question presented as defendant's admission of intent

DISCLAIMER: This satirical piece is based on actual quotes from court documents in United States v. Roman Storm. The frying pan thing is real. We wish it weren't.

THE END