



THE FRYING PAN DOCTRINE

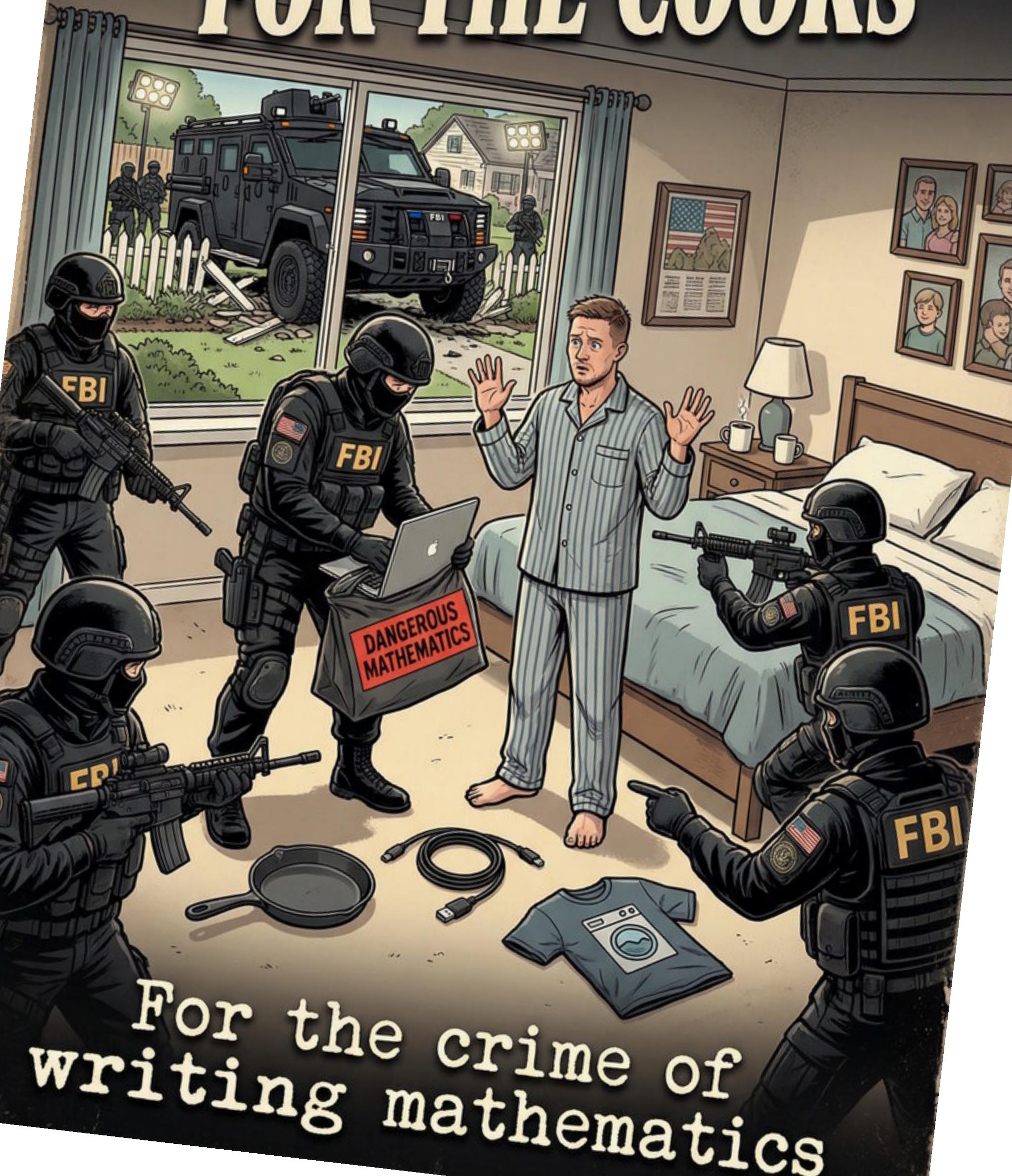
A Satirical Chronicle

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.

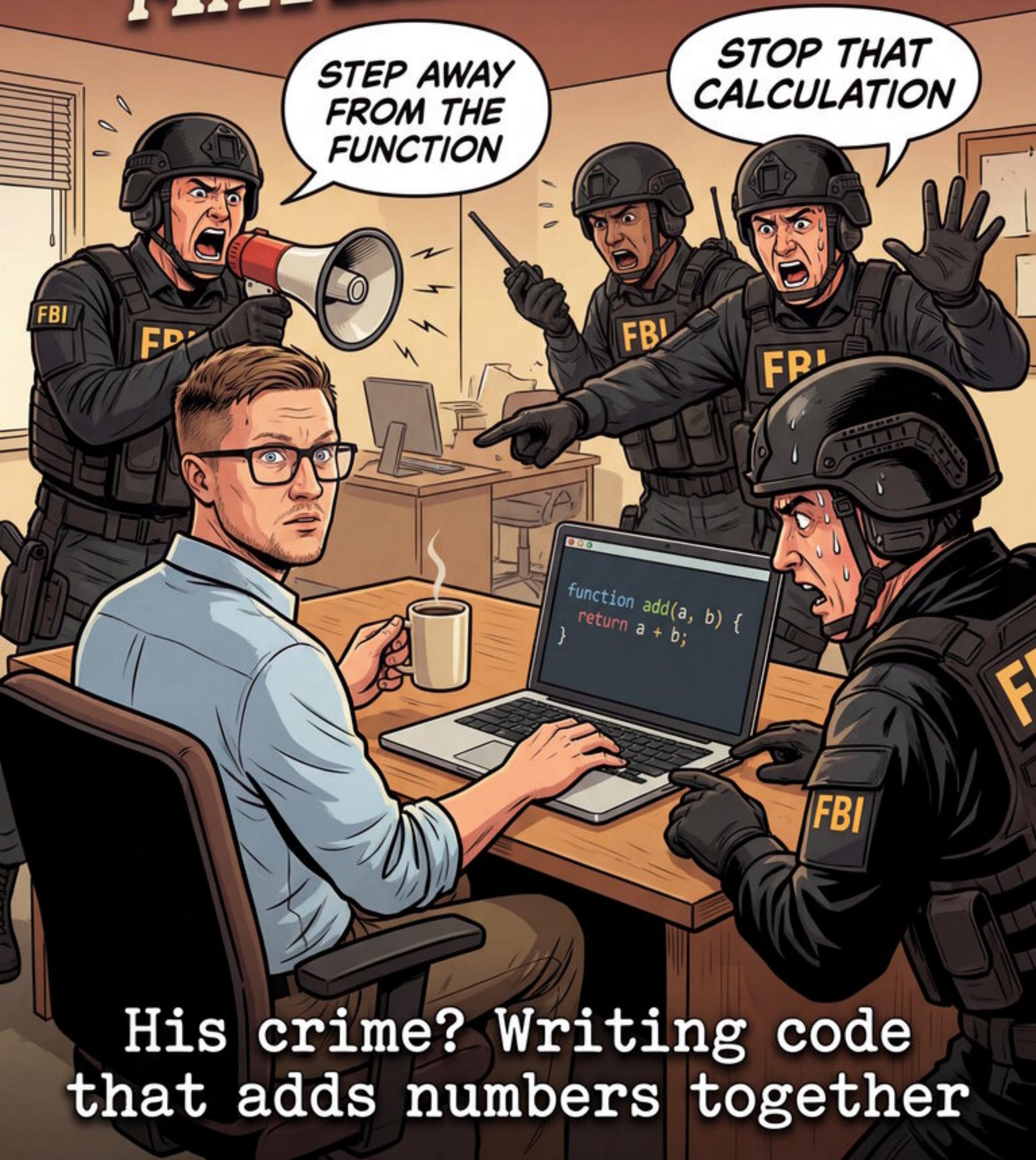


The defendant was running a giant washing machine for dirty money.

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

CHAPTER 1

THE DANGEROUS MATHEMATICIAN



STEP AWAY FROM THE FUNCTION

STOP THAT CALCULATION

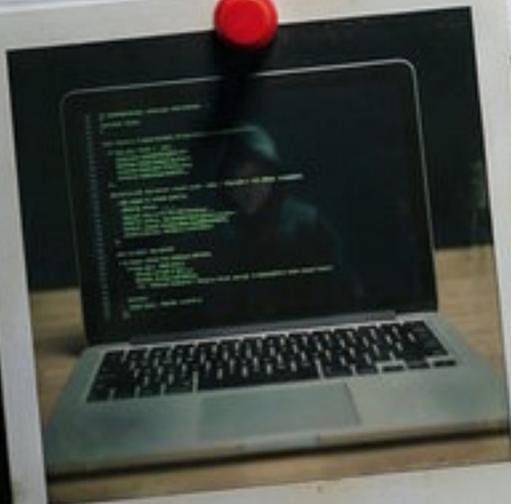
His crime? Writing code that adds numbers together

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.



SILENCE,
CITIZEN.
THIS IS
SPECIAL
MATH.

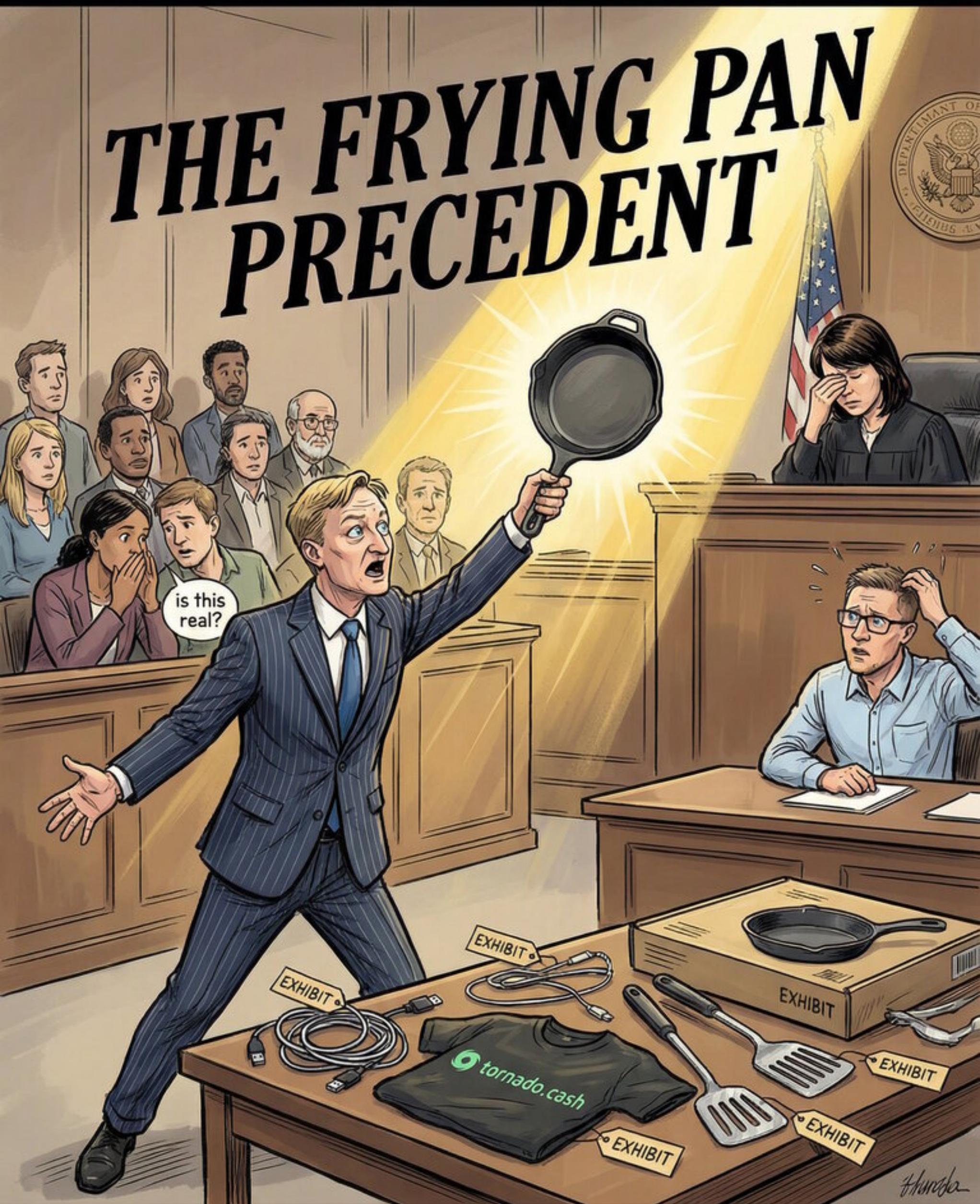
The same math that protects your banking app, your WhatsApp messages, and your Signal chats.

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

WANTED 53

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!

DOCUMENT 53

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

MUGSHOT STYLE BOX

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

Case #: TC-2023-FRY-PAN

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

510"
90"
55"
60"
75"



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

OOPS

CHAPTER 4

THE POOL PARTY THEORY

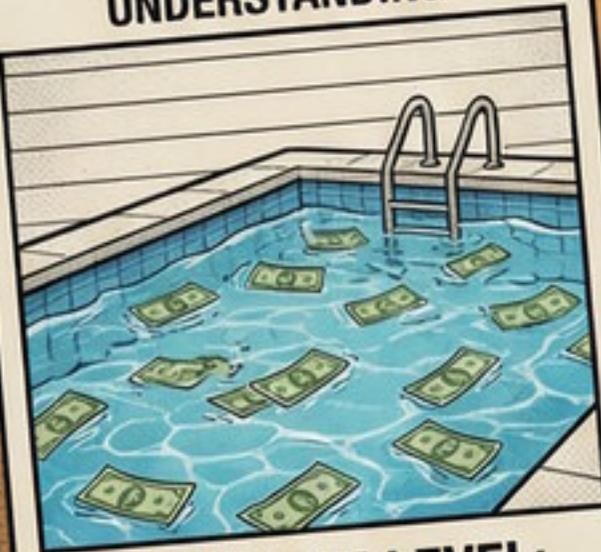


When crypto becomes...
dollar bills in a swimming pool?

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.



WROTE OPEN SOURCE CODE -
45 YEARS

BILLIONS IN FINES - ZERO ARRESTS



They were too busy not being prosecuted.

CHAPTER 6

PRIORITIES

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

THE IMMUTABILITY PARADOX

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

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



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



THE ENTIRE CHARGED PERIOD IS AFTER HE LOST CONTROL
CRIME COMMITTED:
AFTER LOSING CONTROL
Case #: TIME-TRAVEL-101



TEMPORAL IMPOSSIBILITY
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 8

THE UI CRIME

But he ran the website!

- the government cries

What the “website” actually did:

1. Provided a pretty interface to interact with immutable smart contracts
2. That’s it. That’s the whole thing.

The smart contracts would run with or without the website. The website just made it easier.

It’s like prosecuting someone for:

- Making a nice front-end for Ethereum
- Writing documentation
- Not being ugly

CRIME: Making software user-friendly

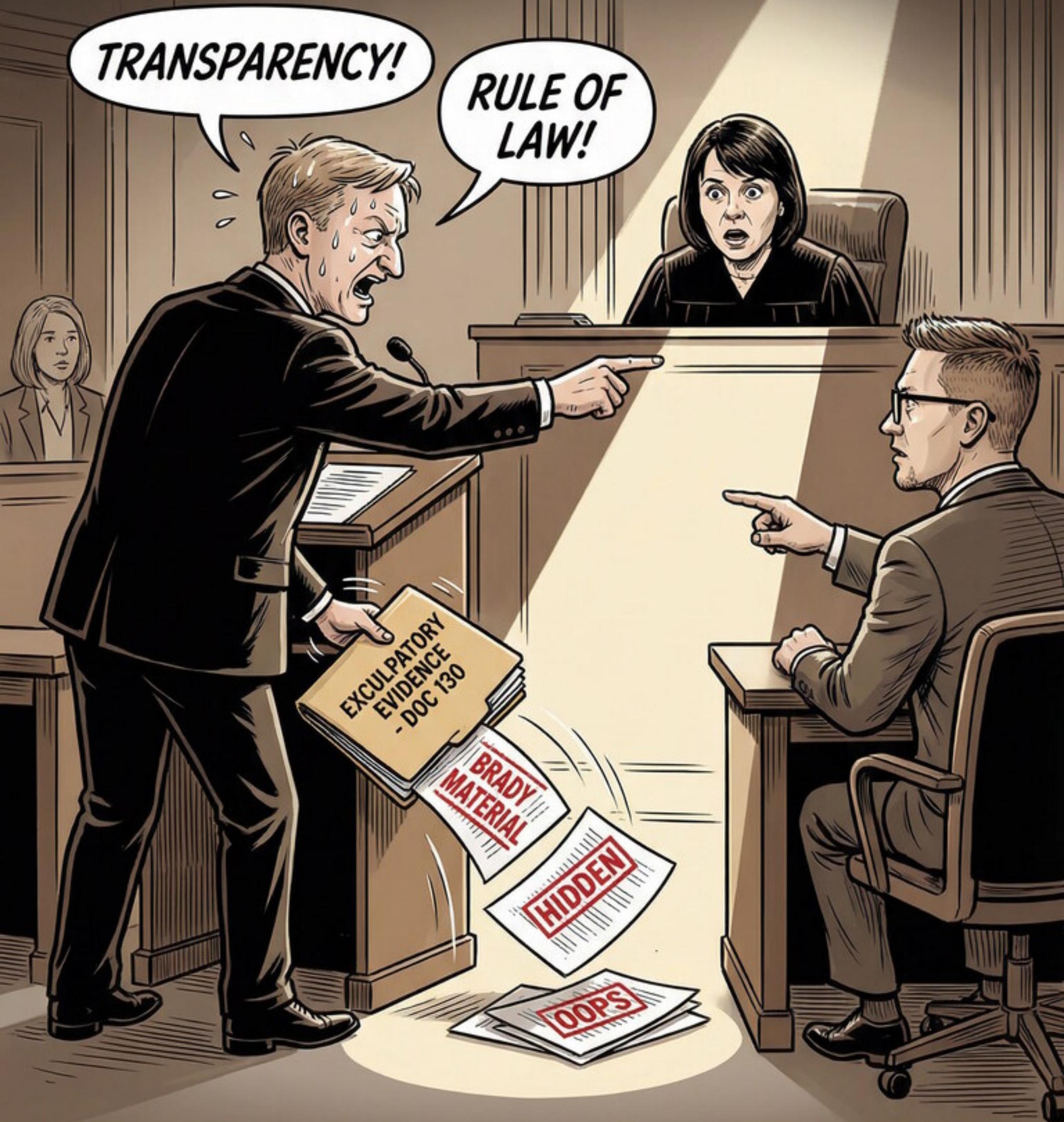
SENTENCE: Up to 45 years

UX VIOLATION!

PRETTY INTERFACE!

CHAPTER 9

THE BRADY HOLE



You can't make this stuff up

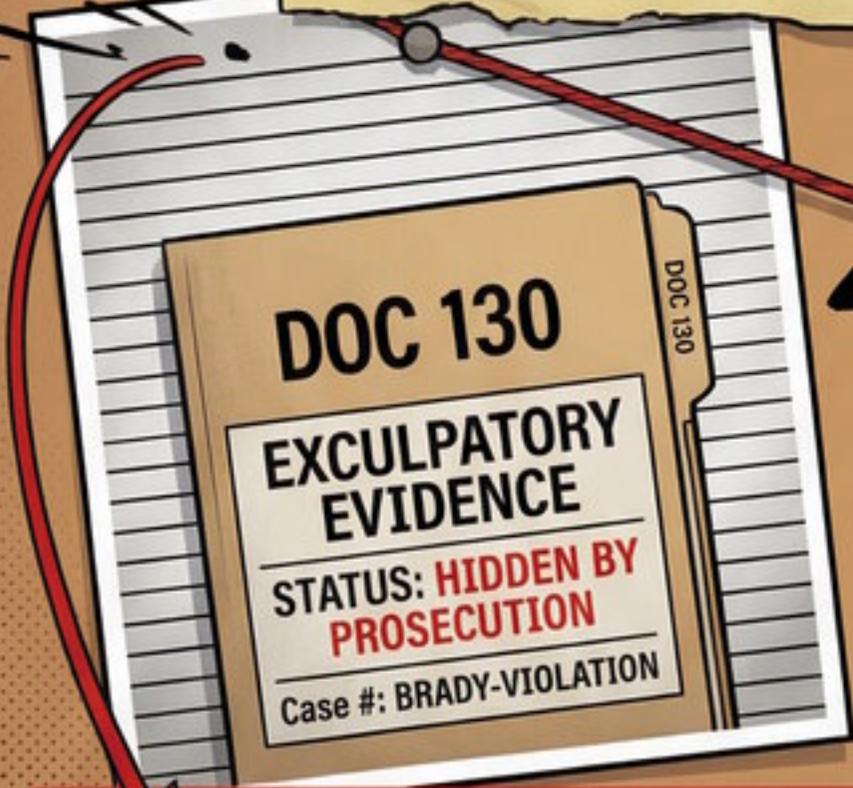
CHAPTER 9

SMASHED THE BRADY HOLE

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

HYPOCRISY

DOCUMENT 130



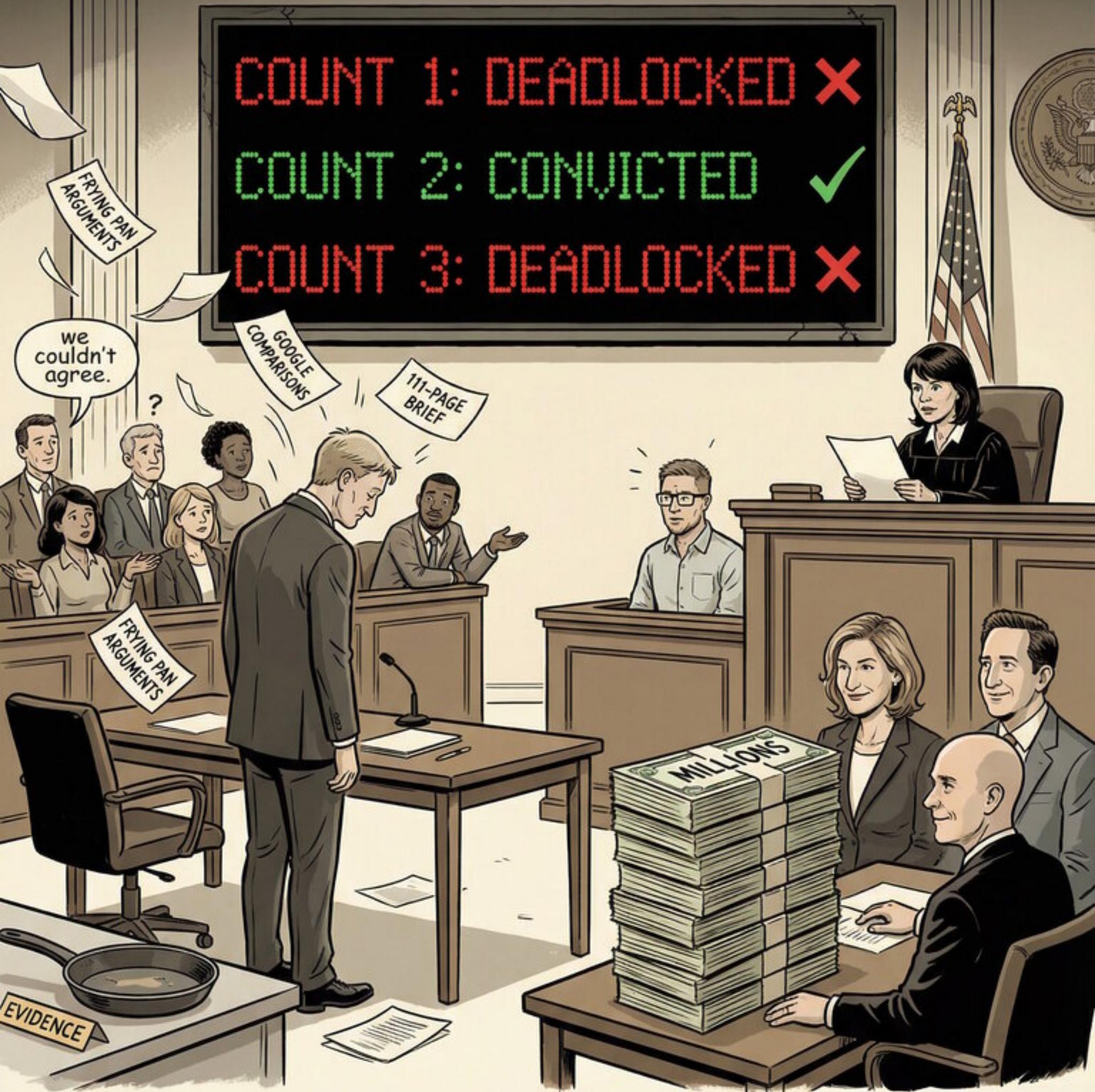
CAUGHT RED-HANDED

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**



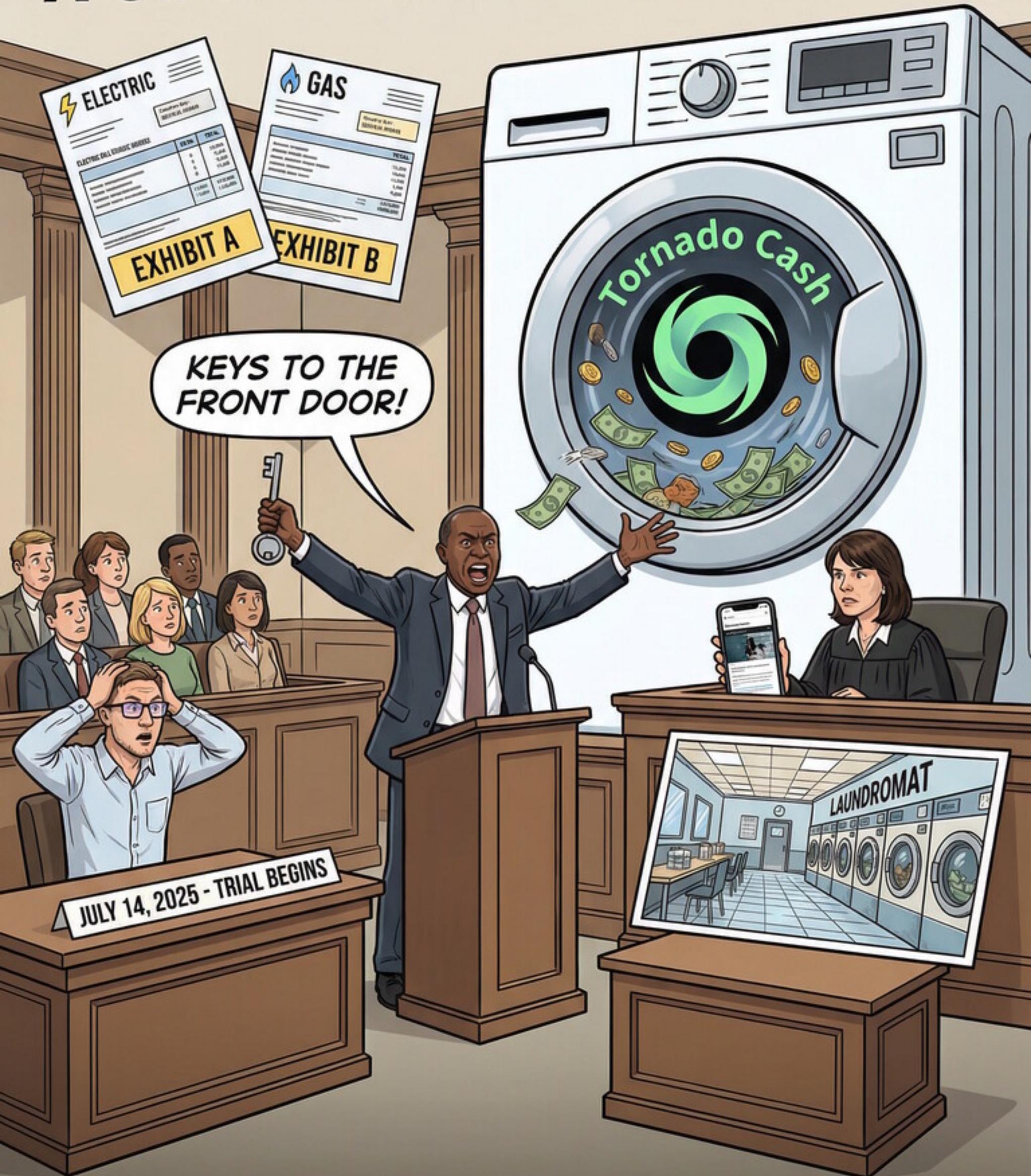
The jury rejected the government's most serious charges. Even after all the frying pan arguments, the Google comparisons, and the locked parcel hypotheticals, a jury of ordinary Americans couldn't swallow the government's theory that writing code is money laundering.

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

CRIME SCENE

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."

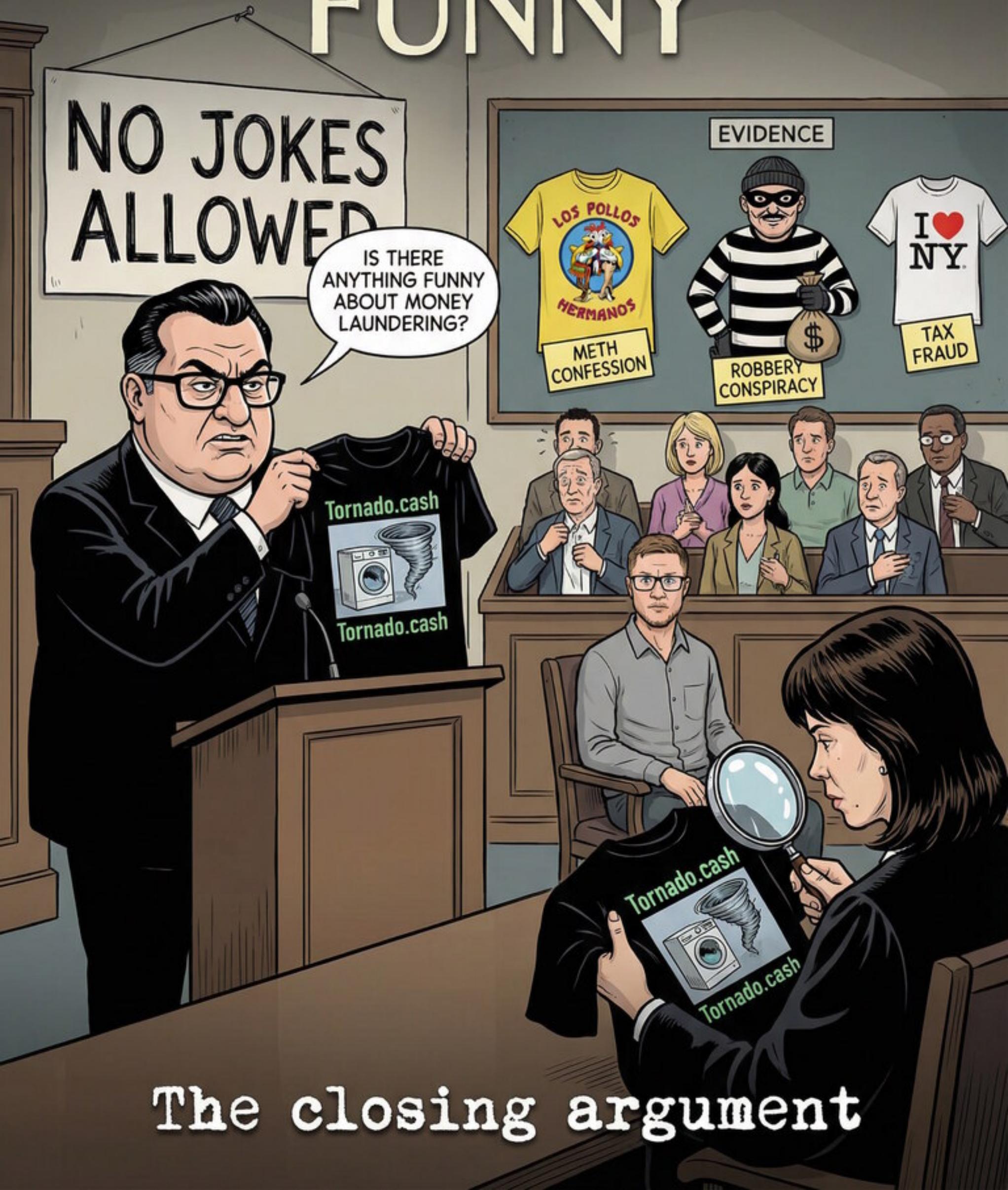


But sure, he controlled the website.
GUILTY.

SELF-OWN

CHAPTER 12

JOKES AREN'T FUNNY



The closing argument

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?

JOKES. AREN'T. FUNNY.

HUMOR 
PROHIBITED

T-SHIRT EVIDENCE

NEWSPAPER CLIPPING

Prosecutor Benjamin
Gianforti delivered what
may be the most uninten-
tionally 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?

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
isn't anonymity just
another word for
concealment?



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



LOGIC CHAIN

Privacy = Concealment

Concealment = Hiding

Hiding = Crime

Therefore:
PRIVACY = CRIME

**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 MEMIE 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.**



STATUS: CRIMINAL EVIDENCE
CHARGE: BEING FUNNY

Case #: MEME-2023

NO JOKES

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.

VAN LOON RULING

STATUS: TOO TRUTHFUL
CRIME: BEING CORRECT
Case #: TRUTH-HURTS

PREJUDICIAL FACTS
REALITY BANNED

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."

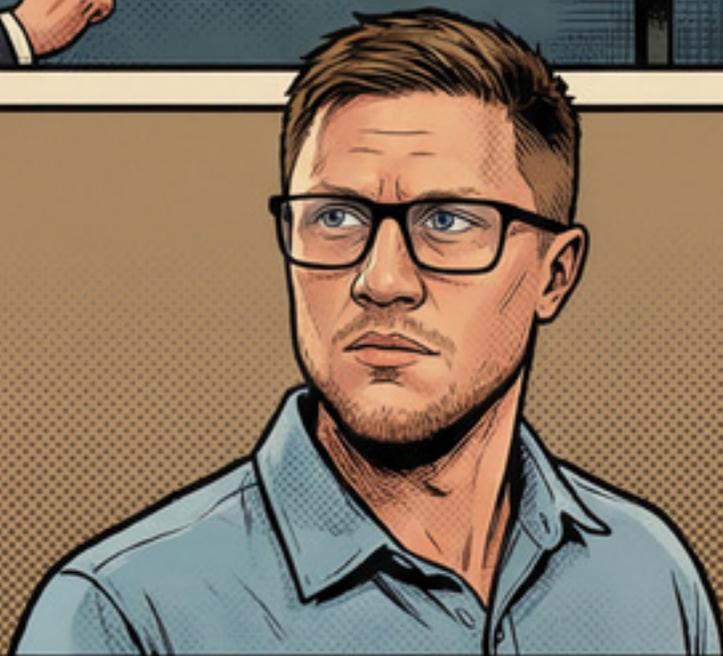
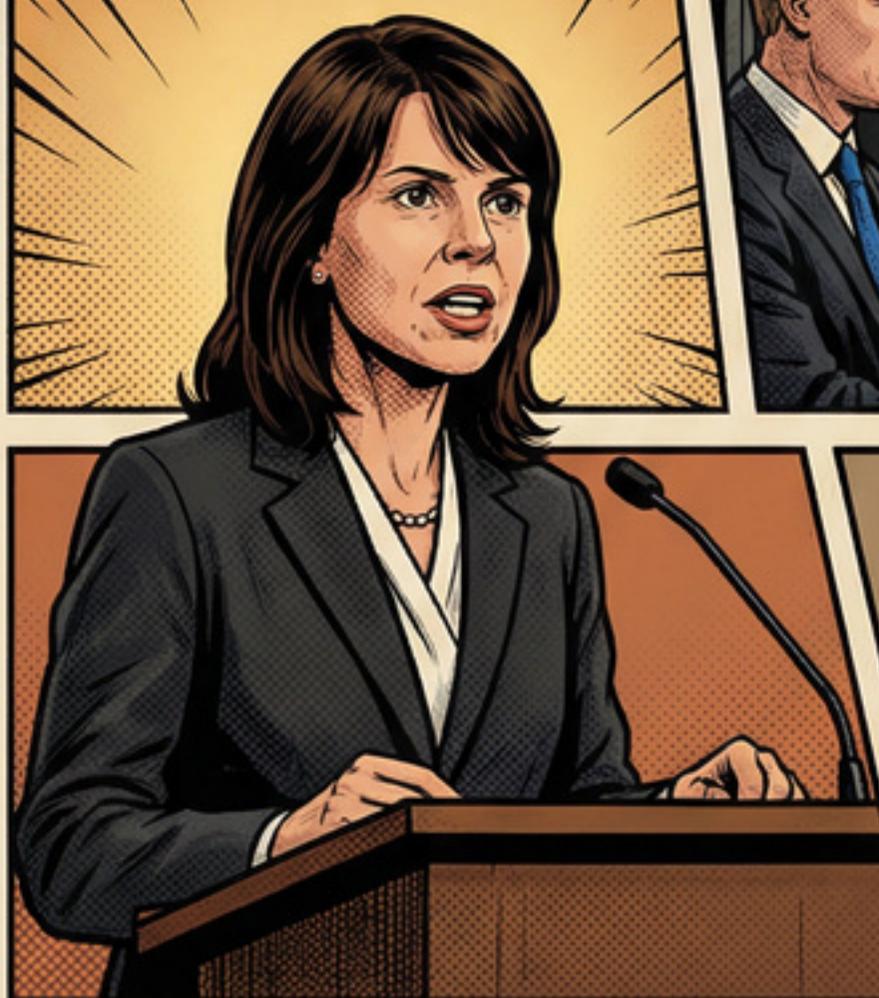


The evidence in support of the jury's verdict was more than sufficient; it was overwhelming. And while the jury did not reach a verdict on the other two counts...

SCOREBOARD

2-1 LOSS

| NT | 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

DELUSIONAL

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

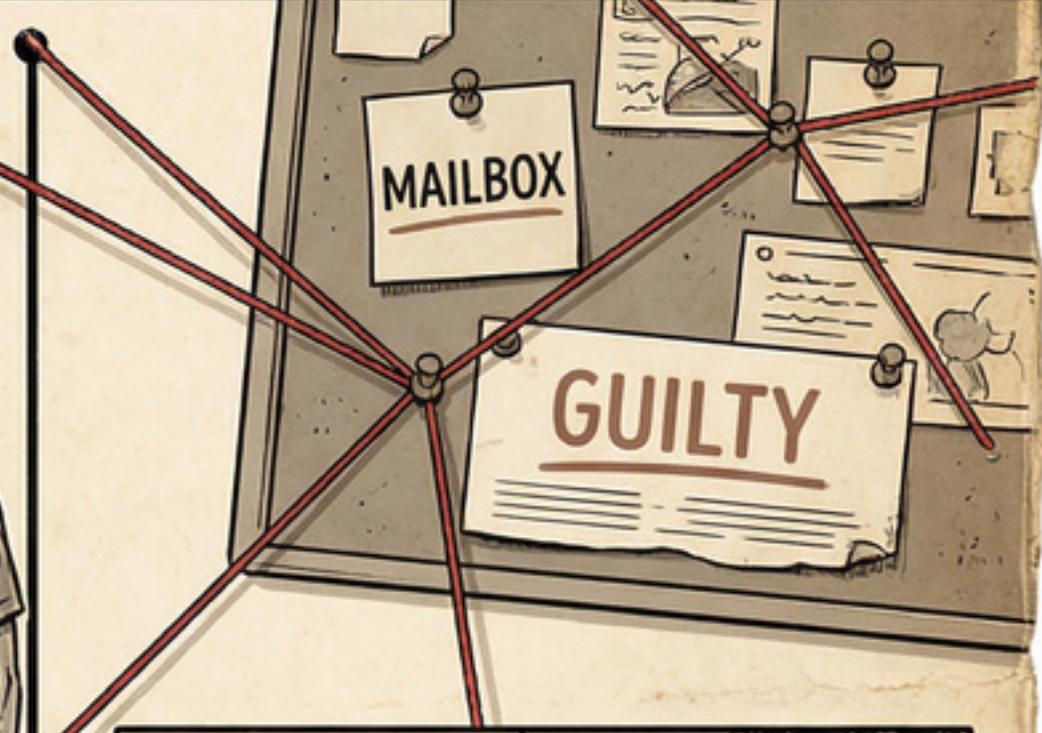
PAGES: 113
PURPOSE: EXPLAINING WHY WE ACTUALLY WON
Case #: SORE-LOSER-2025

113 PAGES

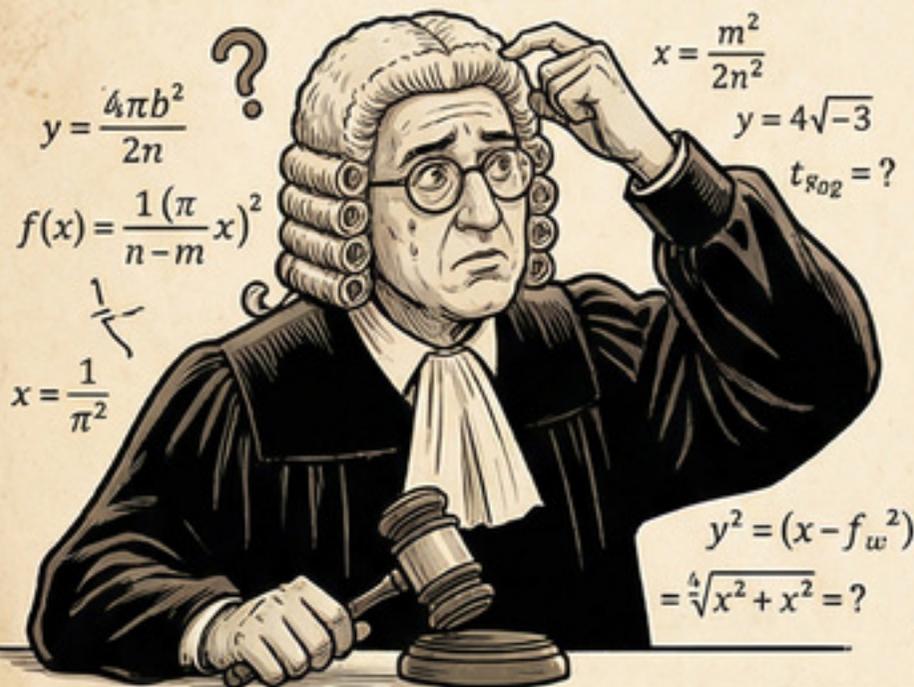
This is the legal equivalent of losing 2-1 and demanding the scoreboard be changed because you felt like you played better.

CHAPTER 16

THE CONTROL CONTRADICTION



MAY 2020: → SEPT 2020-AUG 2022:
Lost Control Charged Period



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)**

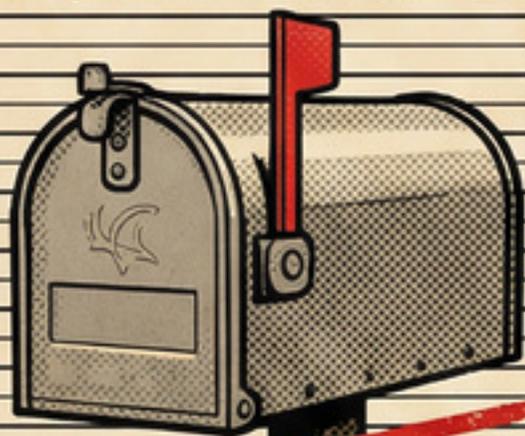
It's like charging someone with arson for a fire that started a year after they moved out of the building.

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

HOWEVER

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 **OUT 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?

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

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

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

~~ARBITRARY
DISTINCTION~~

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

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:



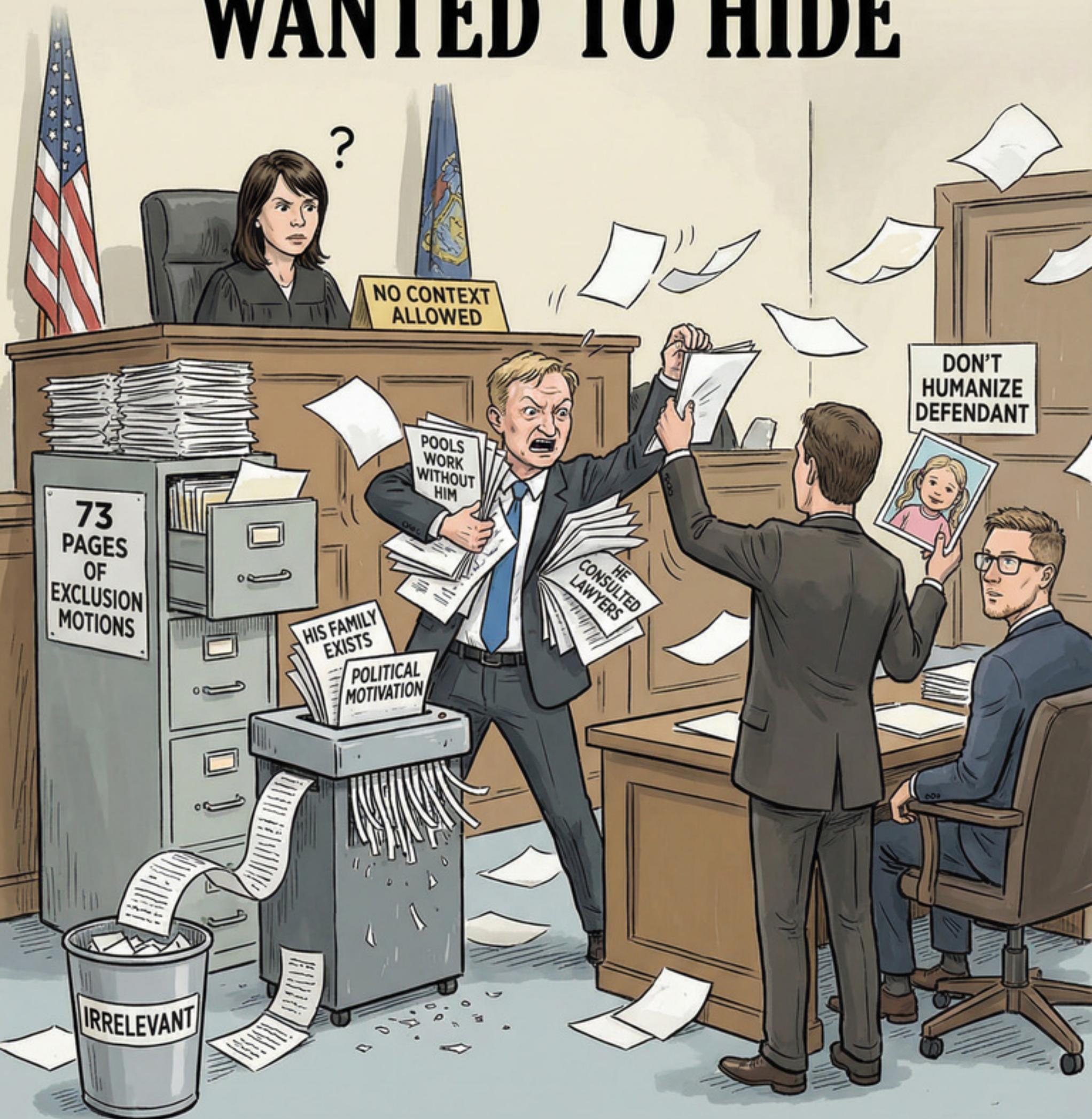
But there is no reason on offer why Congress would have wanted statutory liability to turn on such an *arbitrary distinction* when the economic function of the business is exactly the same.

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

KNOCKOUT

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"



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

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.



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..."

CENSORED



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

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



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.

BY NOEBRYTHING

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

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.

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



HIGHER COURT

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

CONTRADICTION
MUGSHOT

HIGHER COURT SAYS NO



CASE:
LEGAL SCHIZOPHRENIA

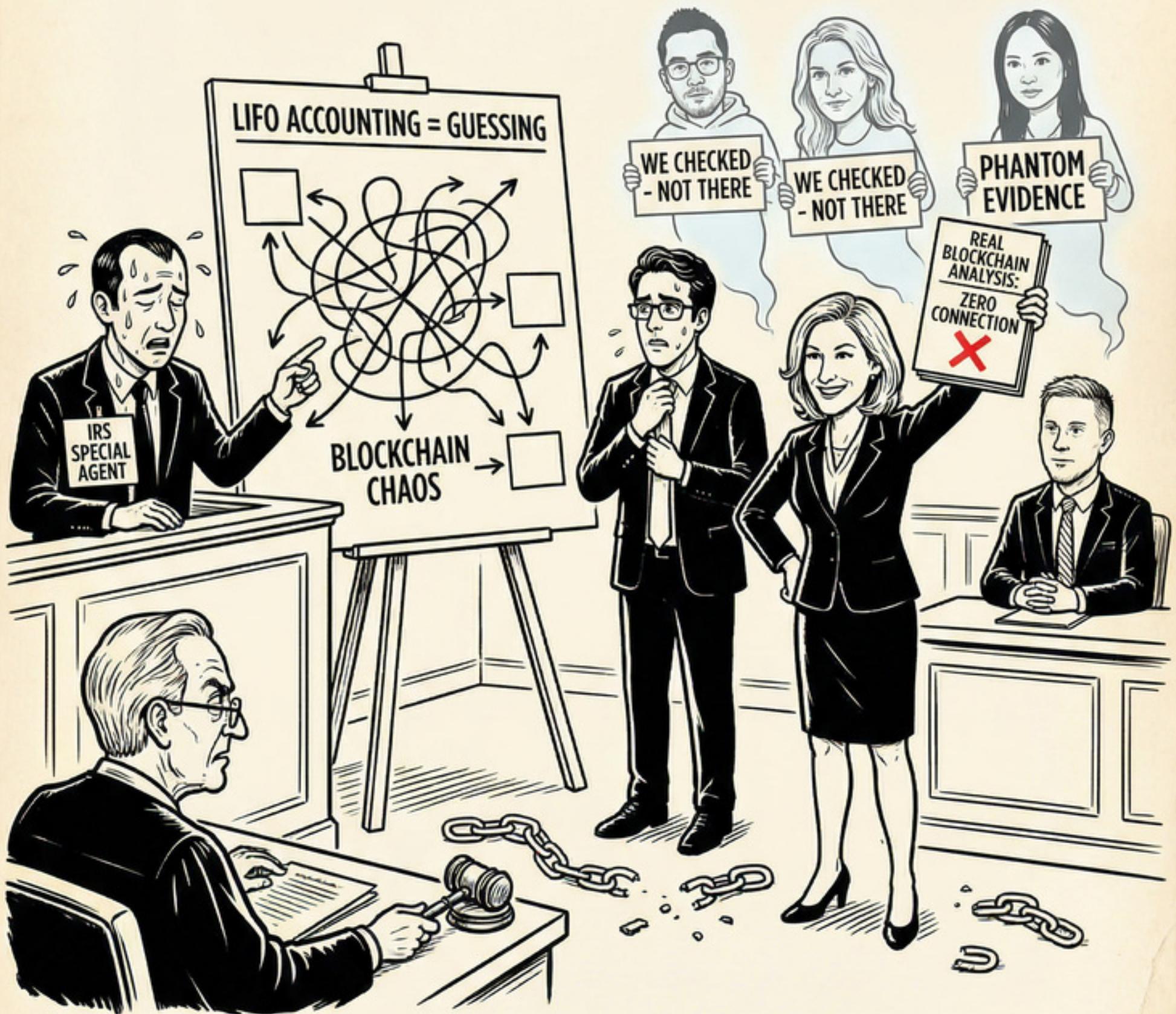
STATUS:
COURTS DISAGREE

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.

CHAPTER 21

THE PHANTOM BLOCKCHAIN TRACE



They made up a methodology
and hoped nobody noticed

CHAPTER 21

THE PHANTOM BLOCKCHAIN TRACE

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

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."

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.



PHANTOM



**ZERO
EVIDENCE**

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.

REALLY NUTS



MUGSHOT

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

PROSECUTION CLAIM:
Funds traced to
Tornado Cash

REALITY:
Zero evidence
(per independent experts)

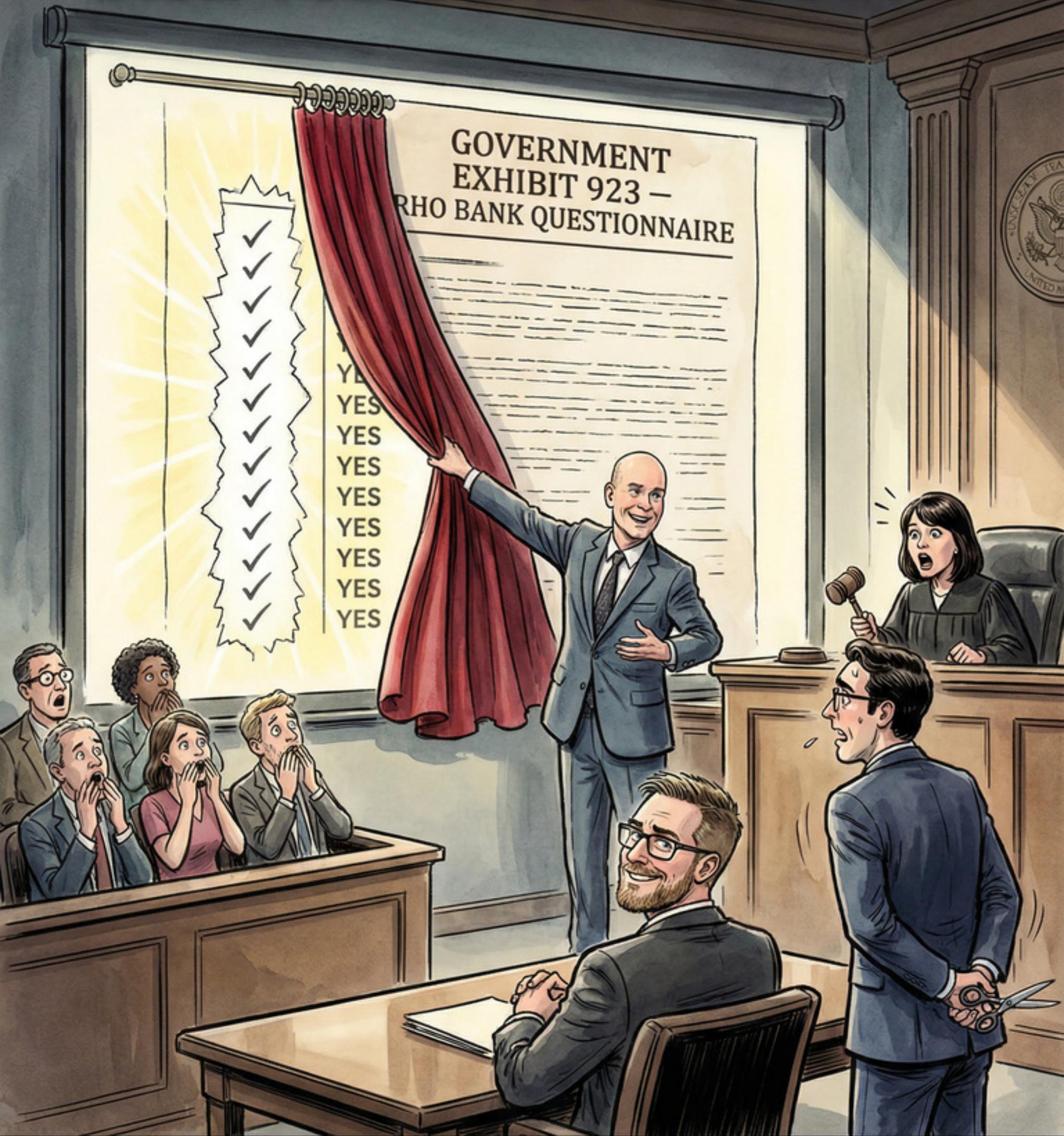
SOLUTION:
Invent LIFO
methodology

RESULT:
"Really nuts"

MADE UP

CHAPTER 22

THE MISSING COLUMN



This isn't spin.
This is hiding evidence.

CHAPTER 22

SMASH!

THE MISSING COLUMN

CRACK!

CRACK!

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

GOVERNMENT'S CLAIM (CLOSING ARGUMENT):

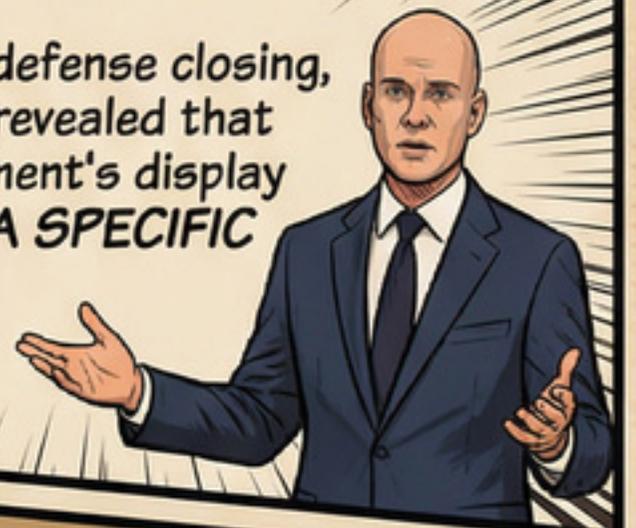
Tornado Cash doesn't appear once in this questionnaire.... look at how he answered no to essentially every crypto-related question.



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

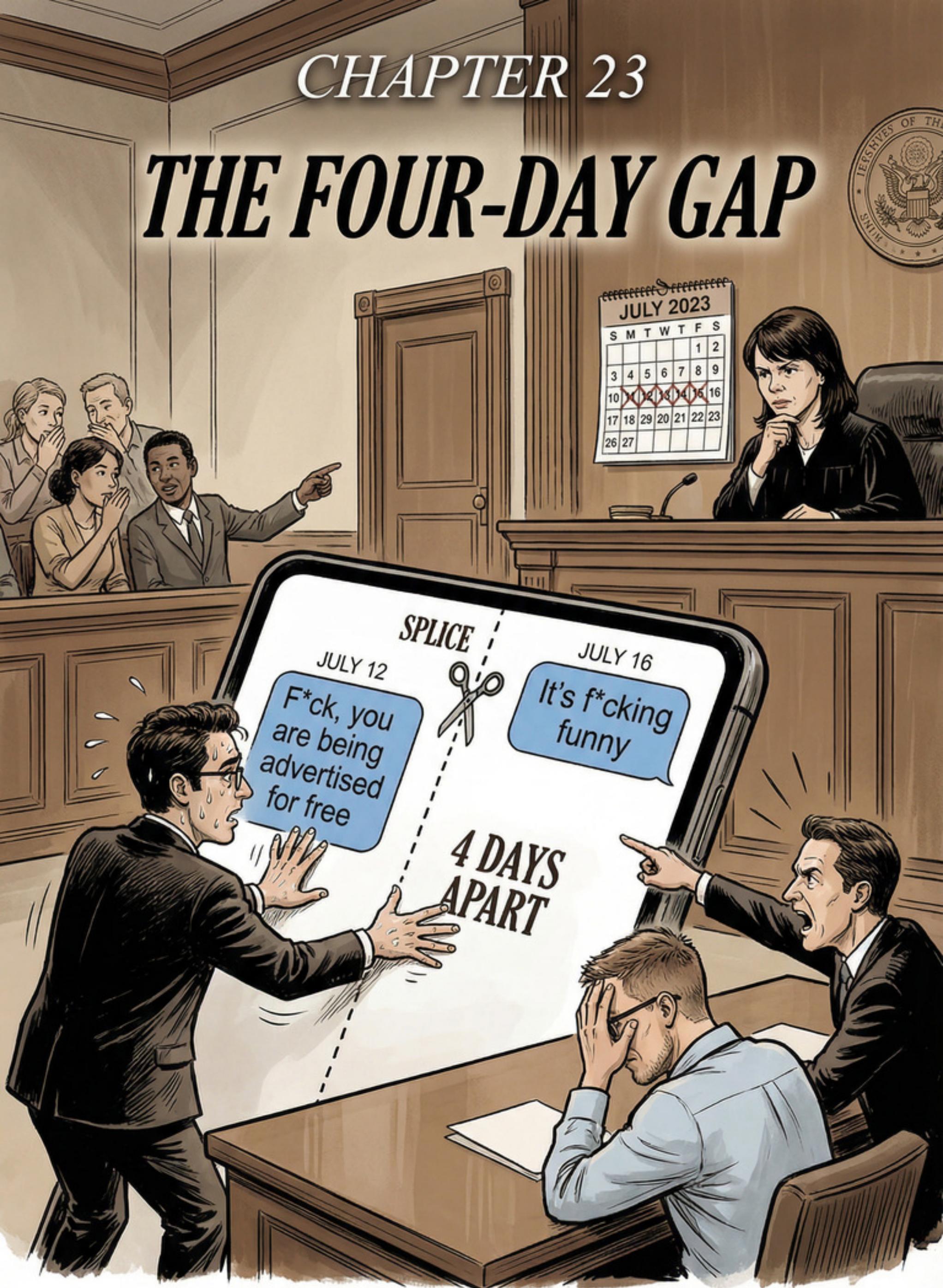


THIS ISN'T SPIN. THIS IS HIDING EXCULPATORY EVIDENCE FROM THE JURY.

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]

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

FABRICATED

4 DAYS

CHAPTER 24

THE TIME-TRAVELING T-SHIRT



Evidence from years before
the alleged crime

CHAPTER 24

THE TIME-TRAVELING T-SHIRT

ETH BOSTON 2019

TIME TRAVEL

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



THE REALITY:

The shirt was worn at ETH Boston in 2019 - years before 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



WORN:
2019

CRIME CHARGED:
2020-2022

TIME TRAVEL
REQUIRED: YES

Case #:
BACK-TO-FUTURE

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 all

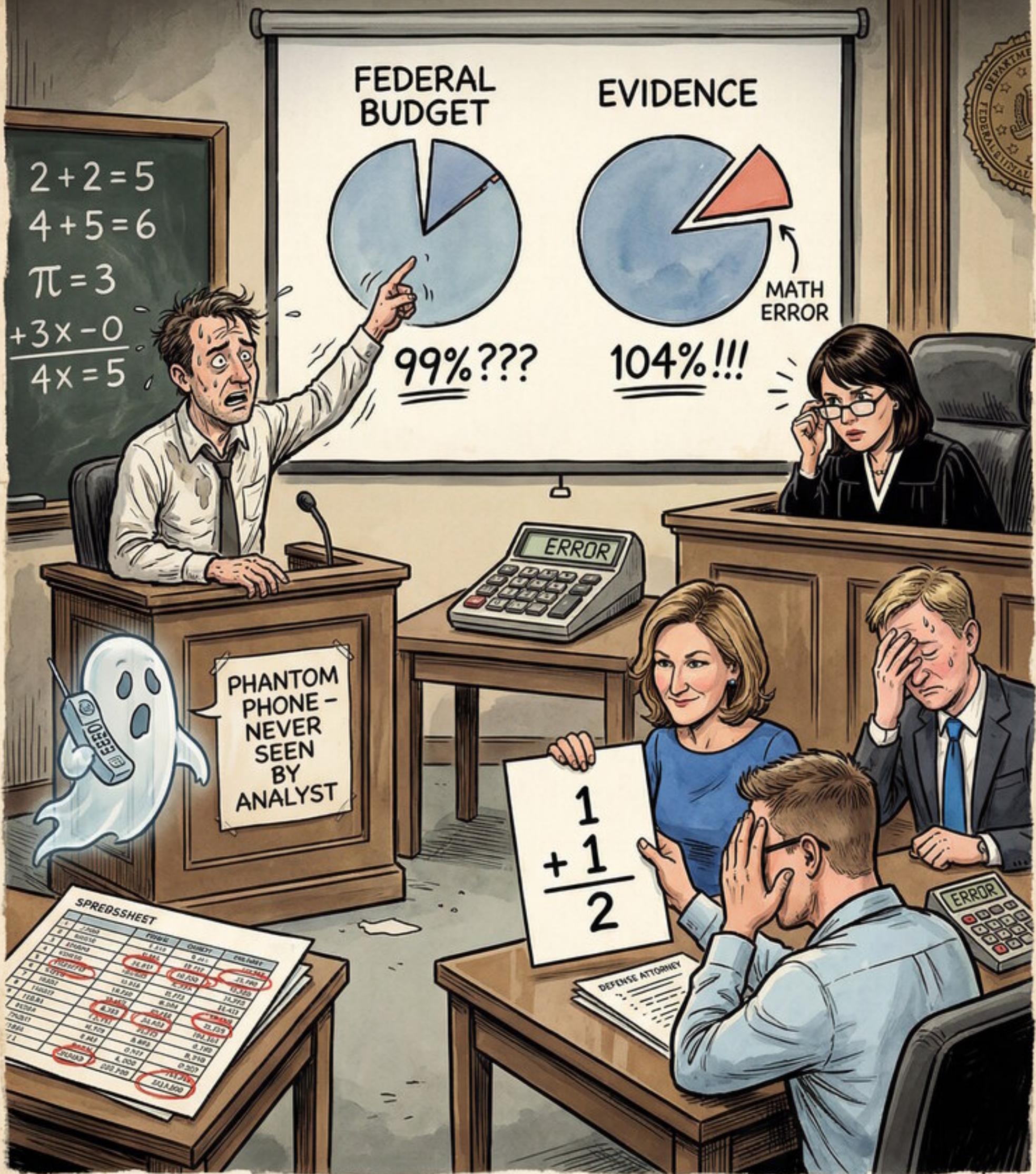
PROSECUTION: "The T-shirt

STIPULATED

2 YEARS EARLY

CHAPTER 25

THE FBI CAN'T DO MATH



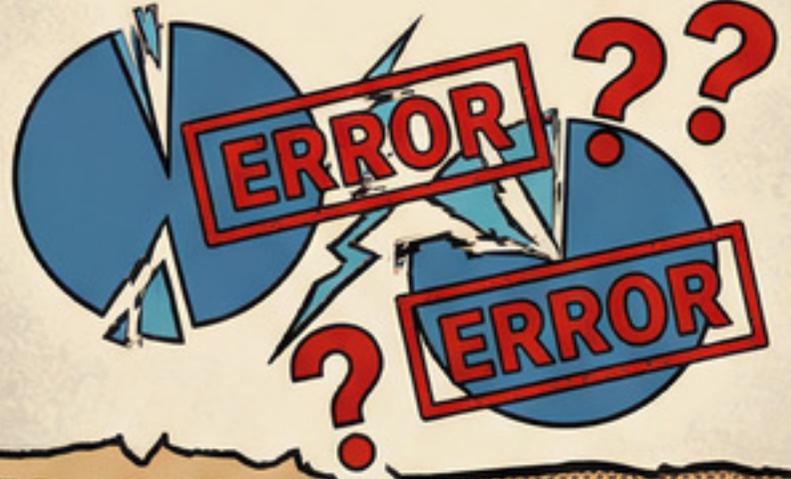
Charts totaling 99% and 104%

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.

GHOST 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

OP 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 nsties noncentre known error rate, no peer review, essentially speculative.

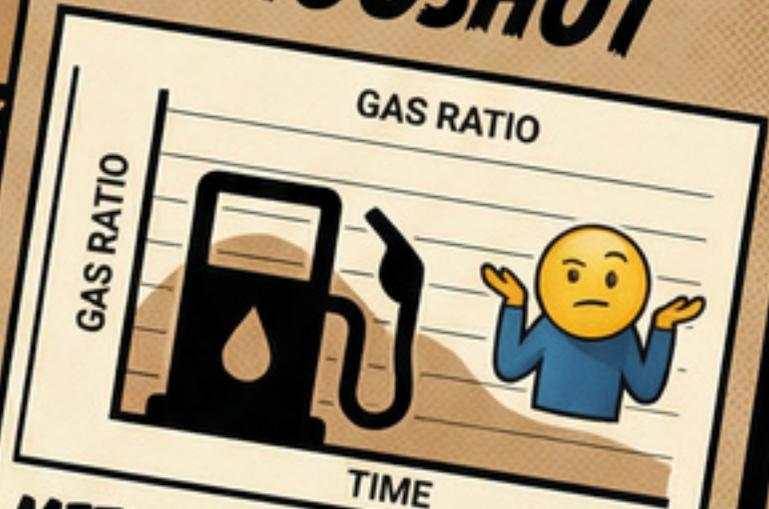
SCIENTIFICALLY UNSOUND

Case #:
TRUST-ME-BRO

SPECULATIVE

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

MUGSHOT



METHODOLOGY: UNIQUE
ERROR RATE: UNKNOWN
PEER REVIEW: NONE
ACCURACY: $_ _ (\text{ツ}) _ _ /$

CHAPTER 27

THE FORWARDED MESSAGE TRAP



REPORTER: Any comment on the laundering story?

FWD → STORM: Can you believe this?

FWD → INTERNAL: We need to address this.

How did you do it?

FWD!

FWD: ←
Any comment on the laundering story? FWD → STORM: Can your comment.

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...



"How do you launder \$600M?"

[FWD]

FORWARDED

"How do we respond?"



MEDIA INQUIRY

CONTINUED...

CHAPTER 27 (CONTINUED)

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

THE ANALOGY:

MUGSHOT



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

SOURCE: REPORTER

CONTEXT: ASKING FOR COMMENT

PROSECUTION CLAIM: CRIMINAL PLANNING

Case #: FWD-TRAP-2025

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

EVIDENCE BOARD



1. Reporter asks question for story



2. Storm forwards to discuss response



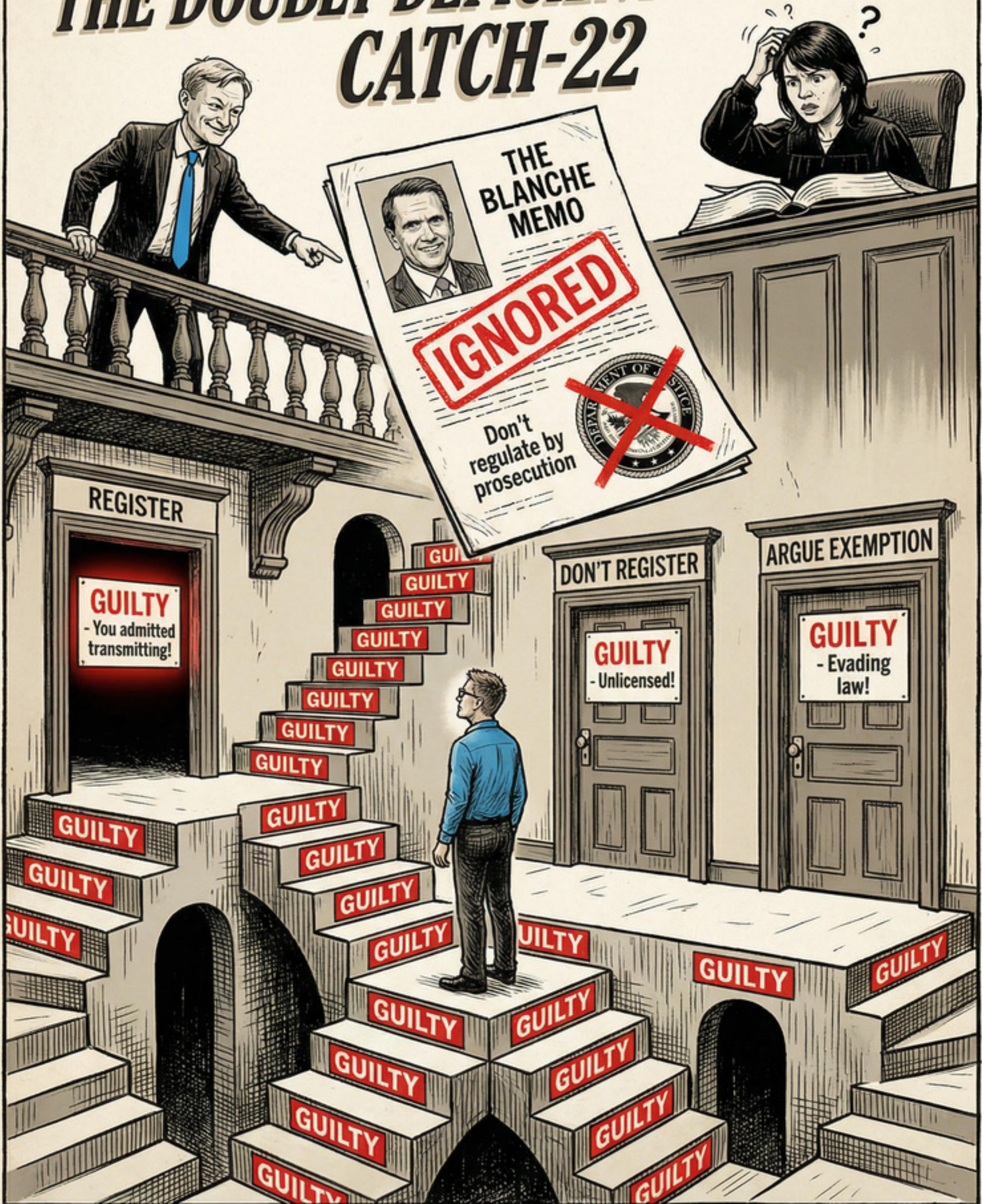
3. Government : "Look! Criminal planning!"

CONTEXT MATTERS

MEDIA INQUIRY

CHAPTER 28

THE DOUBLY DEFICIENT CATCH-22 CATCH-22



Every path leads to GUILTY

CHAPTER 28

THE DOUBLY DEFICIENT CATCH-22

CATCH-22

The DOJ created an impossible legal trap:

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

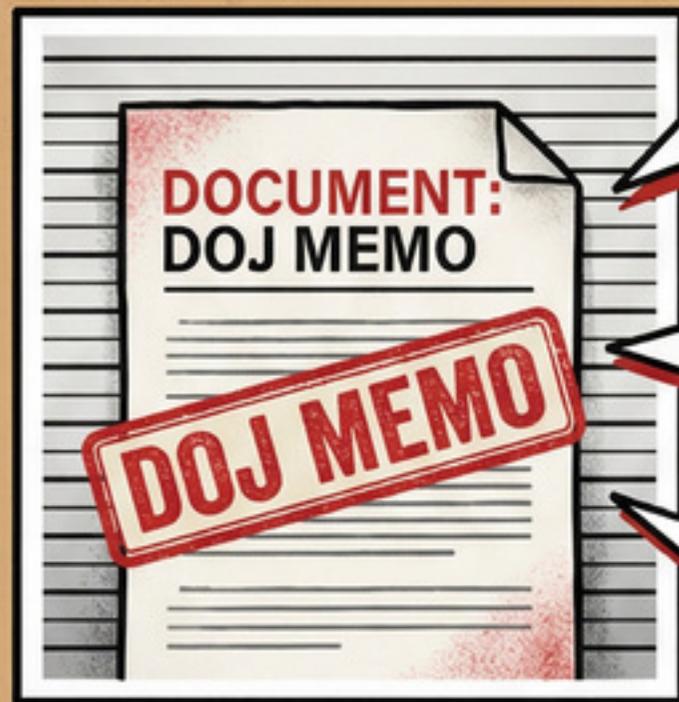
CONTINUED...

**CHAPTER 28
(CONTINUED)**

THE BLANCHE MEMO:

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.

HYPOCRISY



SAYS: No regulation by prosecution

DOJ ACTION: Regulation by prosecution

STATUS: IGNORED

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

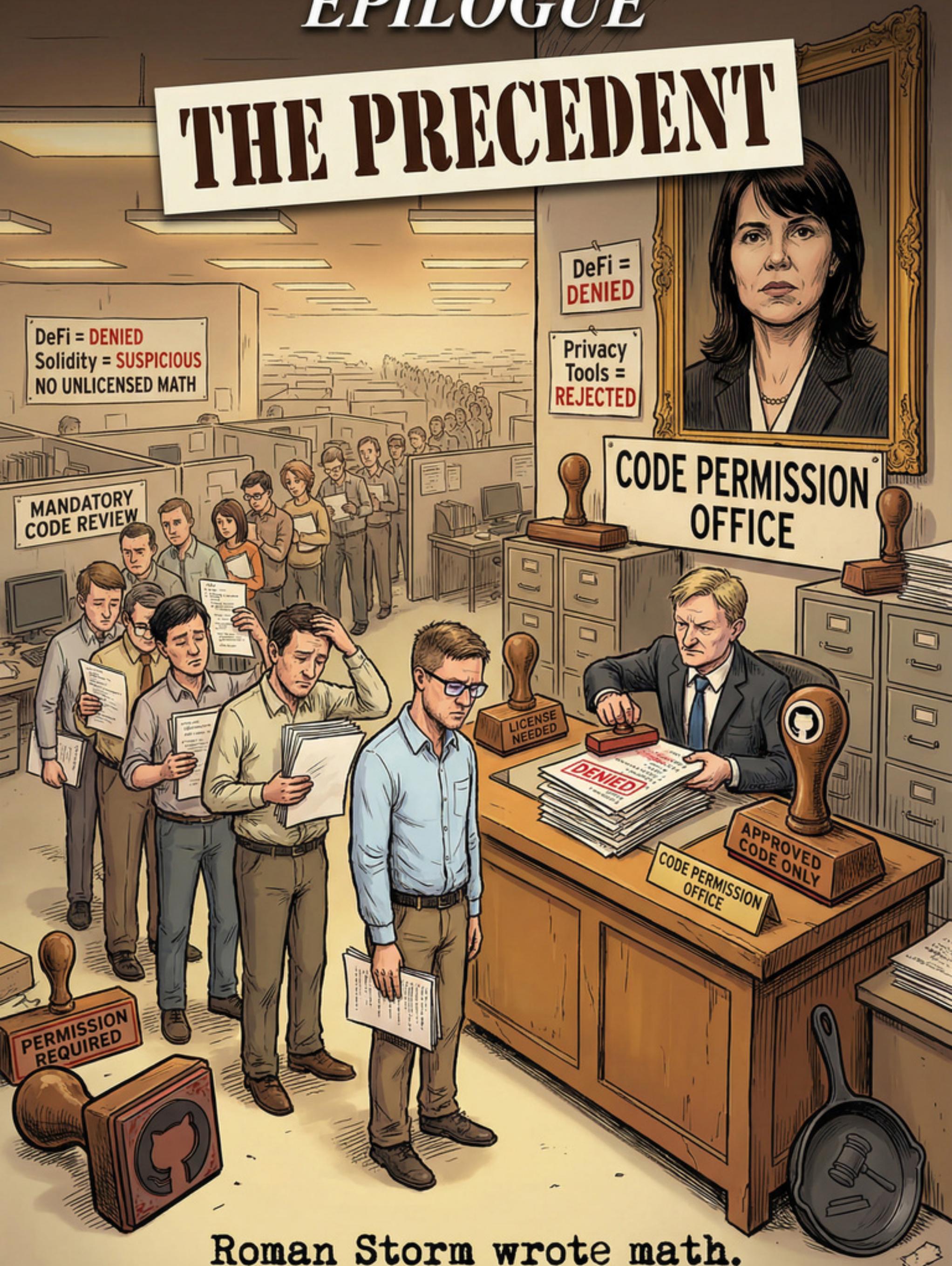
LOGIC:
???

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...

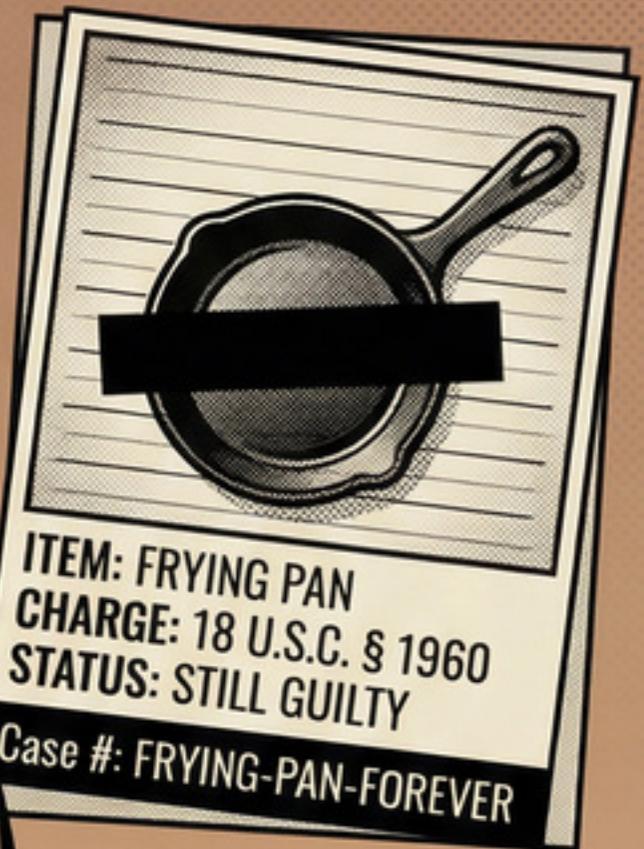


EPILOGUE (CONTINUED)

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.**



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

THE END

UNIT'DERL 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"



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 locat- to cunn move 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

CONTINUED...



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