

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

**COMMODITY FUTURES
TRADING COMMISSION,**

Plaintiff,

v.

**RENE LARRALDE, JUAN PABLO
VALCARCE, BRIAN EARLY,
ALISHA ANN KINGREY, and
FUNDSZ.**

Defendants.

Case No:

**DECLARATION OF DOUGLAS SNODGRASS IN SUPPORT OF CFTC'S
MOTION FOR LEAVE TO FILE CIVIL CASE UNDER SEAL**

I, Douglas G. Snodgrass, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member in good standing of the bar of the State of Illinois. I am employed by Plaintiff Commodity Futures Trading Commission (the "Commission") in the Chicago Regional Office as a Senior Trial Attorney.
2. I make this declaration in support of the Commission's Motion for Leave to File a Civil Case Under Seal, to show that good and sufficient reason exists why this civil action should be sealed.

3. The Commission intends, upon initiation of its civil action, to file an *ex parte* motion for a statutory restraining order and preliminary injunction: (1) freezing the Defendants' assets; (2) providing access to all records relating to Defendants' business activities and finances; and (3) appointing a temporary receiver.

4. The Commission's motion and supporting papers contain allegations that: (1) Defendants have engaged and are engaging in ongoing violations of the Commodity Exchange Act ("Act"), 7 U.S.C. §§ 1 *et seq.*, and Regulations thereunder as alleged in the complaint; and (ii) immediate and irreparable injury, loss, and damage will result if written or oral notice is provided to the Defendants before the entry of a statutory restraining order and an order freezing assets. The Commission believes that there is a substantial risk that Defendants will move assets beyond this Court's jurisdiction or otherwise dissipate them if written or oral notice is provided to Defendants before entry of an order freezing assets and service of the order on Defendants' financial institutions.

5. Accordingly, the Commission seeks leave to file its action under seal, in order to prevent Defendants from moving their assets beyond the Court's jurisdiction or otherwise dissipating them.

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

Date: July 31, 2023

/s/ Douglas Snodgrass

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