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11 Asst. Federal Public Defender
12 Attorneys for Defendant

13 IN THE UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 United States of America,
16
17 Plaintiff,
18
19 vs.
20 Thomas Mario Costanzo,
21
22 Defendant.

No. CR-17-0585-PHX-GMS
**NOTICE OF EXPERT TESTIMONY
FOR THE DEFENSE**

23 Thomas Mario Costanzo, by and through undersigned counsel, hereby files
24 this Notice pursuant to Fe. R. Crim. P. 16(b)(1)(C) that he anticipates introducing expert
25 testimony at trial under Fed. R. Evid. 702, 703, & 705. The defense anticipates calling:

- 26 1. **Todd Kandar**is, a local businessman specializing in blockchain technologies and
27 automation. He is affiliated with Stepwyze of Mesa, Arizona, a leader in providing
28 automation and blockchain technology to developers and organizations who seek
the very best in I.T. systems. He also has extensive experience with and
understanding of the development, use, and potentials for intangible commodities,
including bitcoin.

Mr. Kandar is consulting with the defense on bitcoin and blockchain
issues and will testify as necessary to provide additional information if needed or upon
rebuttal to clarify or correct expert testimony elicited from Special Agent Ellsworth, as
appropriate.

1 The defense will comply with Fed. R. Crim. P. 16(b)(1)(C), providing the
2 government and this court with Mr. Kandarlis' resume and a written summary of the
3 testimony the defense expects may be offered as evidence at trial.

4 Respectfully submitted: March 1, 2018.

5 JON M. SANDS
6 Federal Public Defender

7 s/Maria Teresa Weidner
8 MARIA TERESA WEIDNER
9 ZACHARY CAIN
Asst. Federal Public Defenders

10 Copy of the foregoing transmitted by ECF for filing March 1, 2018, to:

11 CLERK'S OFFICE
12 United States District Court
13 Sandra Day O'Connor Courthouse
14 401 W. Washington
Phoenix, Arizona 85003

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21 Copy mailed to:

22
23 THOMAS MARIO COSTANZO
24 Defendant

25 s/yc
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27
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