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7	Asst. Federal Public Defender		
-	Attorneys for Defendant		
8	IN THE UNITED STATES DISTRICT COURT		
9	DISTRICT OF ARIZONA		
10	United States of America,	No. CR-17-0585-PHX-GMS	
11	Plaintiff,	SUPPLEMENT TO NOTICE OF	
12	VS.	EXPERT TESTIMONY FOR THE DEFENSE	
13	Thomas Mario Costanzo,	DET ET (SE	
14	Defendant.		
15			
16	Thomas Mario Costanzo, by and through undersigned counsel, hereby files		
17	this Supplement to his Notice of Intent to Rely on Expert Testimony of Todd Kandaris:		
18		tion as an expert regarding Bitcoin and	
19	Blockchain technology. The defense provides notice that Mr. Kandaris' resume was provided to the		
20	prosecution via email on March 2, 2018. Mr. Kandaris' resume is also attached		
21	here for the Court's review as Exhibit A (filed under seal). This document details		
22	Mr. Kandaris' knowledge, skill, experience, training, and education in Information		
23	Technology, including Blockchain and "crypto-currency" technologies, including		
24	Bitcoin.		
25	2. Summary of Mr. Kandaris' anticipated testimony at trial.		
26	Mr. Kandaris will provide testimony explaining Blockchain and Bitcoin		
27	_	entralized nature of bitcoin and other	
28		ain technology. He will testify as to the risks	
_0	oryproductioners that utilize blocken	am teemiology. He will teemly as to the lisks	

and benefits of major exchange platforms versus peer-to-peer exchanges, and

explain the purpose and function of bitcoin meetups.

	The defense has complied with Fed. R. Crim. P. 16(b)(1)(C) via production		
1	of Mr. Kandaris' resume and the above summary of testimony the defense expects may		
2			
3	be offered as evidence at trial.		
4	Respectfully submitted: March 8, 2018.		
5	JON M. SANDS		
6	Federal Public Defender		
7	s/Maria Teresa Weidner		
8	MARIA TERESA WEIDNER ZACHARY CAIN		
9	Asst. Federal Public Defenders		
10	Construction for a soling transmitted by ECE for filing Monels 9, 2019, to.		
11	Sandra Day O'Connor Courthouse 401 W. Washington Phoenix, Arizona 85003 MATTHEW BINFORD FERNANDA CAROLINA ESCALANTE-KONTI		
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18	United States Attorney's Office		
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20	Phoenix, Arizona 85004-4408		
21	Copy mailed to:		
22	Copy maned to:		
23	THOMAS MARIO COSTANZO		
24	Defendant		
25	<u>s/yc</u>		
26			
27			
28			