

1 JON M. SANDS
2 Federal Public Defender
3 District of Arizona
4 850 W. Adams, Suite 201
5 Phoenix, Arizona 85007
6 Telephone: 602-382-2700

7 MARIA WEIDNER, #027912
8 maria_weidner@fd.org
9 ZACHARY CAIN, #020396
10 zachary_cain@fd.org
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
**SUPPLEMENT TO NOTICE OF
EXPERT TESTIMONY FOR THE
DEFENSE**

23 Thomas Mario Costanzo, by and through undersigned counsel, hereby files
24 this Supplement to his Notice of Intent to Rely on Expert Testimony of Todd Kandaris:

25 1. **Basis for Mr. Kandaris' qualification as an expert regarding Bitcoin and
26 Blockchain technology.**

27 The defense provides notice that Mr. Kandaris' resume was provided to the
28 prosecution via email on March 2, 2018. Mr. Kandaris' resume is also attached
here for the Court's review as Exhibit A (filed under seal). This document details
Mr. Kandaris' knowledge, skill, experience, training, and education in Information
Technology, including Blockchain and "crypto-currency" technologies, including
Bitcoin.

29 2. **Summary of Mr. Kandaris' anticipated testimony at trial.**

30 Mr. Kandaris will provide testimony explaining Blockchain and Bitcoin
31 technologies, including the decentralized nature of bitcoin and other
32 cryptocurrencies that utilize Blockchain technology. He will testify as to the risks
33 and benefits of major exchange platforms versus peer-to-peer exchanges, and
34 explain the purpose and function of bitcoin meetups.

