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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF ARIZONA
13

14 United States of America,
15 Plaintiff,
16 vs.
17 Thomas Mario Costanzo,
18 Defendant.

CR-17-00585-PHX-GMS

NOTICE OF EXPERT TESTIMONY

19 Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the United
20 States gives notice of its intent to use expert witness testimony under Rules 702, 703, or
21 705 of the Federal Rules of Evidence during its case-in-chief at trial. The United States
22 gives notice of the following expert: Donald Ellsworth, Special Agent, Internal Revenue
23 Service-Criminal Investigation.

24 Special Agent Ellsworth will testify regarding virtual currency, encrypted
25 communications, Bank Secrecy Act requirements, and undercover operations. Special
26 Agent Ellsworth's Curriculum Vitae will be provided to defense counsel prior to trial.
27 Special Agent Ellsworth's opinion will be based on his education, training, and experience
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1 as a Special Agent. This includes the courses and other seminars he has attended and taught
2 through his work with IRS.

3 In particular, Special Agent Ellsworth is expected to testify about decentralized and
4 centralized virtual currencies; the formal exchanges that exist to purchase virtual currency
5 (and the rates charged by the formal exchanges); the informal meetups that offer anonymity
6 (and the higher rates charged during these informal exchanges); the mechanics of
7 transferring virtual currency from wallet to wallet or person to person; the price fluctuation
8 over time of virtual currency; and the identification of origination and destination addresses
9 through analysis of the blockchain code.

10 Special Agent Ellsworth is also familiar with, and will be expected to testify about,
11 the methods and modus operandi of encrypting communications through individual
12 applications or the use of Tor (The Onion Router) on the dark web, as well as the “know
13 your customer” rules that encryption and informal exchanges seek to avoid. Special Agent
14 Ellsworth’s testimony will be consistent with his grand jury testimony in this matter, as
15 disclosed to the defense on December 4, 2017.

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17 Respectfully submitted this 26th day of February, 2018.

18 ELIZABETH A. STRANGE
19 First Assistant United States Attorney
20 District of Arizona

21 *s/Matthew Binford*
22 _____
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically transmitted the attached document
to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of
Electronic Filing to counsel of record in this case.