

MEMORANDUM

To: Crypto Task Force Meeting Log
From: Crypto Task Force Staff
Re: Meeting with Representatives of Blockchain Association, Ava Labs, Inc., Sidley Austin LLP, and The Digital Chamber

On December 9, 2025, Crypto Task Force Staff met with representatives from Blockchain Association, Ava Labs, Inc., Sidley Austin LLP, and The Digital Chamber.

The topic discussed was approaches to addressing issues related to regulation of crypto assets. Blockchain Association, Ava Labs, Inc., Sidley Austin LLP, and The Digital Chamber representatives provided the attached documents, which were discussed during the meeting.

November 17, 2025

**Request for Meeting
Securities and Exchange Commission Crypto Task Force**

Proposed Attendees & Titles:

Lee Schneider - General Counsel, Ava Labs

Ashok Pinto - Executive Vice President of Government Relations and Legal, Blockchain Association

Summer Mersinger - CEO, Blockchain Association

Detailed Agenda:

Proposed Detailed Agenda for SEC–CFTC Meeting Regarding Ava Labs’ Response to Joint Statements

1. Opening Remarks and Meeting Objectives (5 minutes)

Purpose: Establish a collaborative tone and frame the meeting around shared goals of regulatory clarity, responsible innovation, and efficient market structure.

Discussion Plan:

- Begin by acknowledging the Commissions’ recent joint statements committing to harmonized oversight and improved clarity in digital asset regulation.
 - Emphasize Ava Labs’ appreciation of this multi-agency coordination and reiterate the intent of its latest letter: to offer a workable, near-term regulatory path for Protocol Tokens under existing statutory authority.
 - Outline today’s objective: *to discuss how the SEC and CFTC can operationalize frameworks described in Ava Labs’ submissions, including the twopronged jurisdictional approach and transitional exemptive relief.*
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2. Overview of Ava Labs’ Regulatory Framework for Protocol Tokens (5 minutes)

Purpose: Summarize the framework proposed in the letter and connect it explicitly to the agencies’ shared priorities.

Substantive Discussion Plan:

- Present the two categories of Protocol Tokens described:
 - (a) *Pre-Functionality Protocol Tokens*, over which the SEC would retain jurisdiction via investment-contract-based oversight;
 - (b) *Functional Protocol Tokens*, which operate in live systems and fit within the CEA's "commodity" definition.
 - Explain how this distinction aligns with existing case law, the nature-of-activity principles, and the PWG's acknowledgment that protocol-integrated tokens warrant tailored treatment.
 - Highlight that under Ava Labs' proposal, **Protocol Tokens themselves are not securities**, but *sales of Pre-Functionality Tokens can be investment contracts* handled through a registrant-friendly, prescriptive framework.
 - Emphasize that this model **provides clarity without requiring new statutory categories**, aligning with SEC/CFTC priorities for swift regulatory certainty.
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3. Discussion of SEC-side Components: Offers, Sales, and Disclosure Framework (10 minutes)

Purpose: Engage the SEC on how Pre-Functionality activity would be supervised through established concepts, including exemptions.

Substantive Discussion Plan:

- Walk through Ava Labs' proposal for codifying a modernized investment-contract definition and establishing a rebuttable presumption that sales of Pre-Functionality Tokens meet that standard.
 - Present the recommended **Regulation PT exemption**, permitting offers/sales up to \$50 million or 10% of total token value, with mandatory disclosure, AML/KYC controls, sale agreements, and SEC notice filings akin to Form D.
 - Discuss how this creates an **efficient disclosure regime** centered on:
 - protocol design and functionality;
 - token supply & vesting mechanics;
 - governance models;
 - risk factors;
 - relevant technical metrics.
 - Invite SEC staff to suggest (i) required adjustments to existing filing mechanisms, (ii) integration with exemptions like Reg D or Reg S, and (iii) resource or supervisory considerations.
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4. Discussion of CFTC- and SEC-side Intermediary Oversight (10 minutes)

Purpose: Address the letter’s proposal to use *existing intermediary categories*—rather than invent new digital-asset-specific ones—to regulate functional Protocol Token activity.

Substantive Discussion Plan:

- Explain the principle: *once a Protocol Token is functional, existing SEC and CFTC intermediaries should be permitted to support trading, custody, clearing, and settlement in that token.*
 - Examples:
 - Broker-dealers, ATs, clearing agencies (SEC)
 - FCMs, swap dealers, DCOs, introducing brokers, DC markets (CFTC)
 - Discuss how this approach avoids duplicative licensing burdens and supports the “Super-App” concept referenced in the letter—where intermediaries could offer both security and non-security digital assets alongside traditional finance products under one regulatory umbrella.
 - Request feedback from each Commission:
 - Which aspects of existing rules can be amended or tailored quickly?
 - Where is targeted guidance preferable to formal rulemaking?
 - Are there specific supervisory concerns (custody, settlement finality, margin, risk management) where the agencies seek deeper technical input?
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5. Tailored Guidance for Intermediaries (10 minutes)

Purpose: Explore specific guidance the Commissions could issue in the interim.

Substantive Discussion Plan:

Based on the letter’s recommendations, outline needed guidance for:

- recordkeeping and reporting;
- capital adequacy and margin rules;
- customer protections and segregation standards;
- internal controls and risk-management expectations;
- execution, clearing, and settlement processes;
- conduct standards and policies/procedures.

Invite discussion on:

- Areas where joint SEC-CFTC guidance would be most valuable;
- Places where each Commission anticipates the most immediate industry confusion;

- Coordination with SROs (FINRA, NFA) during the transition period.
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6. Transitional Grace Period / Exemptive Relief “On -Ramp” Proposal (10 minutes)

Purpose: Present the transitional exemptive relief plan as an actionable, immediate path for bringing digital-asset trading activity onshore.

Substantive Discussion Plan:

- Walk through the proposed **transitional grace period** , which would allow SEG or CFTC-registered intermediaries to begin supporting Protocol Token activities consistent with their existing authority.
 - Discuss required filings:
 - (a) *Notice of intent* describing intended Protocol Token activities;
 - (b) *CEO/CFO attestation* confirming appropriate risk controls, compliance procedures, and internal policies.
 - Explain the envisioned supervisory model:
 - quarterly renewal of the notice;
 - active monitoring by Commissions;
 - power to impose conditions, limitations, or suspensions as needed;
 - maintenance of customer protections throughout.
 - Solicit Commission perspectives:
 - What concerns need to be resolved before exemptive relief can be issued?
 - What metrics should the agencies monitor during the grace period?
 - How should SROs participate in oversight?
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7. Harmonization and Alignment with the PWG Report (5 minutes)

Purpose: Connect the meeting’s proposals to broader federal policy goals.

Substantive Discussion Plan:

- Highlight that the PWG Report calls for:
 - harmonized regulatory oversight;
 - improved clarity for market participants;
 - support for U.S. leadership in digital financial technology;
 - integration of services in a unified regulatory model;
 - consistent disclosure and token-economics transparency.

- Discuss how Ava Labs' framework directly advances these priorities using existing authority—reducing the need for near-term legislative intervention.
 - Ask both Commissions where additional industry input is desired to operationalize PWG recommendations.
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8. Next Steps, Technical Workshops, and Ongoing Engagement (5 minutes)

Purpose: Set a forward-looking plan with clear deliverables.

Substantive Discussion Plan:

- Propose forming joint working sessions with SEC and CFTC staff on:
 - intermediary rule tailoring;
 - disclosures and exemption mechanics;
 - conditions for grace-period participation;
 - eventual criteria for transitioning from interim to final rules.
- Offer to provide technical documentation, protocol analyses, and engineering expertise on settlement, validation, and decentralization mechanics.
- Identify targeted timelines for:
 - feedback on the grace period proposal;
 - potential rulemaking calendars;
 - follow-up meetings.



SIDLEY AUSTIN LLP
2021 MCKINNEY AVENUE
SUITE 2000
DALLAS, TX 75201
+1 214 981 3300

1001 BRICKELL BAY DRIVE
SUITE 900
MIAMI, FL 33131
+1 305 391 5100

787 SEVENTH AVENUE
NEW YORK, NY 10019
+1 212 839 5300

+1 214 969 3510 – DALLAS
+1 305 391 5215 – MIAMI
LTESSLER@SIDLEY.COM

+1 305 391 5203 – MIAMI
+1 212 839 5435 – NEW YORK
KLASHLEY@SIDLEY.COM

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September 16, 2025

By Email

Chairman Paul S. Atkins
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-0213

Chairman Caroline D. Pham
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581-3308

RE: Ava Labs' Response to SEC and CFTC Joint Statements

Dear Chairman Atkins and Chairman Pham:

Our client, Ava Labs, Inc., together with its Owl Explains project (collectively, “Ava Labs”),¹ submits this comment letter to the Securities and Exchange Commission (“SEC”) and the Commodity Futures Trading Commission (“CFTC”) (collectively, the “Commissions”) in response to the recent SEC and CFTC joint statements (the “Joint Statements”).² This letter supplements and is a companion to Ava Labs’ prior submissions to the Commissions (collectively, the “Submissions”).³

¹ [Ava Labs](#) is a Brooklyn-based technology company formed in 2018, with the aim of advancing blockchain and related technologies in order to foster greater adoption of this new database layer of the internet. Ava Labs focuses its efforts on the [Avalanche](#) blockchain technology. Ava Labs’ prior Submissions (defined below) provide further information about Ava Labs and the Avalanche network. Owl Explains is a project created by the legal team at Ava Labs with the goal of becoming a trusted resource for regulators, policymakers, and other stakeholders.

² See SEC & CFTC Staff, *SEC-CFTC Joint Staff Statement (Project Crypto-Crypto Sprint)* (Sept. 2, 2025), <https://www.sec.gov/newsroom/speeches-statements/sec-cftc-project-crypto-090225>; *Joint Statement from the Chairman of the SEC and Acting Chairman of the CFTC*, (Sept. 5, 2025), <https://www.sec.gov/newsroom/speeches-statements/joint-statement-atkins-pham-090525>.

³ The Submissions, filed by Sidley Austin LLP, on behalf of Ava Labs, are as follows:

- (i) *RE: Asset-Based Classification; Decentralization; Regulatory Status of Technology Functions; Treatment of Infrastructure Providers*, U.S. Sec. and Exch. Comm’n (Apr. 23, 2025), <https://www.sec.gov/files/ctf-written-sidley-austin-ava-labs-04232025.pdf> [hereinafter, “April Submission”];

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Ava Labs commends the release of the Joint Statements, which acknowledge the need to move beyond fragmented oversight and commit to a path of harmonization grounded in regulatory clarity. Such clarity is essential to ensuring that novel products—particularly those involving digital assets and associated protocols—can develop within the United States under frameworks that are both robust and flexible. These themes have been central to the Submissions as well as in Ava Labs’ comments to both houses of Congress.

This letter outlines how the frameworks advanced in the Submissions align with the priorities identified in the Joint Statements and in the report by the President’s Working Group on Digital Asset Markets (“PWG”) on “Strengthening American Leadership in Digital Financial Technology” (the “PWG Report”).⁴ Ava Labs’ proposals focus on the regulation of activities in protocol tokens, as referenced in the PWG Report—i.e., those tokens that are integral to the functioning of protocols, whether blockchain, smart contract, or otherwise (referred to herein as “Protocol Tokens”).⁵

Ava Labs encourages the Commissions to use their existing authorities and regulatory structures to create vibrant markets for Protocol Tokens through a two-pronged approach whereby (i) the SEC has jurisdiction over offers and sales of Protocol Tokens prior to functionality, including disclosure obligations;⁶ and (ii) the CFTC and the SEC each regulate the Protocol Token activities of their respective intermediaries, including spot market trading and custody.⁷ To facilitate immediate permissibility for intermediaries, Ava Labs urges the Commissions to utilize their exemptive authority to adopt a transitional grace period during which these activities would

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- (ii) *RE: Supplemental Submission Proposing a Nature of the Activity Test to Determine Whether Infrastructure Providers Need to Register as Securities Intermediaries*, U.S. Sec. and Exch. Comm’n (May 27, 2025), <https://www.sec.gov/files/sidley-austin-behalf-ava-labs-052725.pdf> [hereinafter, “May Submission”];
 - (iii) *RE: Ava Labs Proposal Concerning a Regulatory Framework for Protocol Tokens*, U.S. Sec. and Exch. Comm’n (Sept. 3, 2025), <https://www.sec.gov/files/ctf-written-sidley-austin-ava-labs-09-03-2025.pdf> [hereinafter, “September Submission”]; and
 - (iv) *RE: Ava Labs Comment on CFTC Request for Input on Listing of Spot Crypto Asset Contracts*, Commodity Futures Trading Comm’n (Aug. 21, 2025), <https://comments.cftc.gov/Handlers/PdfHandler.ashx?id=35717> [hereinafter, “August Comment Letter”].

⁴ See President’s Working Group on Digital Asset Markets, *Strengthening American Leadership in Digital Financial Technology* (July 30, 2025), available at <https://www.whitehouse.gov/wp-content/uploads/2025/07/Digital-Assets-Report-EO14178.pdf>.

⁵ *Id.* at 50 (“A network token, sometimes called a protocol token, refers to a token that is intrinsically connected to the functioning of a decentralized network or protocol.”).

⁶ See September Submission at 7–11.

⁷ See *id.* at 12–14 (regarding SEC-regulated intermediaries); August Comment Letter at 6–10 (regarding CFTC-regulated intermediaries).

be permitted for existing SEC- and CFTC-registered intermediaries, thereby bridging the gap between existing guidance and the finalization of tailored regulations for Protocol Tokens.⁸

Because Ava Labs has provided details of its proposal in the Submissions, this letter simply summarizes and highlights key aspects of its framework, with footnotes to reference where more information can be found in the Submissions. As evidenced by the Joint Statements and the PWG Report, the time is ripe to act and Ava Labs' framework is the straightest path to achieving the goals laid out in those important documents.

I. Ava Labs' Proposals Address Priorities Identified in the Joint Statements and Recommendations from the PWG Report

Ava Labs' proposals directly advance the priorities set out in the Joint Statements and the PWG Report: harmonization of oversight, regulatory clarity, market integrity, and support for responsible innovation. The framework Ava Labs proposes reflects a pragmatic approach that leverages existing regulations while addressing the unique features of blockchain technology and Protocol Tokens—ensuring that investors are protected, innovators have clarity, and U.S. markets remain competitive.⁹ Here is the framework for fulfilling these objectives and solving the challenges identified by the Commissions and the PWG.

- **Clarifying Jurisdiction over Protocol Tokens and Intermediaries:** The Submissions emphasize that Protocol Tokens should be regulated in a manner consistent with their nature¹⁰ and propose a framework that distinguishes between two categories of Protocol Tokens: (i) those Protocol Tokens not yet integral to a live protocol (referred to herein and in the Submissions as “Pre-Functionality Protocol Tokens”); and (ii) functional Protocol Tokens.¹¹ As explained in the Submissions, offers and sales of Pre-Functionality Protocol Tokens, which have often been called “capital raisings” and “investment contracts,” are properly subject to SEC jurisdiction.¹² By contrast, “functional” Protocol Tokens—which refers to the state when both the tokens and the

⁸ See August Comment Letter at 11–12; September Submission at 14–15.

⁹ It is worth noting that nothing in the Senate Banking Committee's latest discussion draft of the Responsible Financial Innovation Act or in the Digital Asset Market Clarity (CLARITY) Act awaiting action in the Senate prevent your respective agencies from implementing the proposals that follow. See Senate Comm. On Banking, Hous. and Urban Affs., *Responsible Financial Innovation Act of 2025*, S. Discussion Draft, 119th Cong. (Sept. 5, 2025), available at https://fm.cnb.com/applications/cnb.com/resources/editorialfiles/2025/09/05/Market_Structure-Discussion-Draft-9-5-25.pdf; Digital Asset Market Clarity Act of 2025, H.R. 3633, 119th Cong. (2025).

¹⁰ See April Submission at 3–5.

¹¹ As explained in the August Comment Letter and September Submission, any regulatory action taken by the Commissions should recognize this distinction. See August Comment Letter at 3–6; September Submission at 3–7.

¹² As explained in the September Submission, Protocol Tokens themselves, whether functional or Pre-Functionality, should not be deemed securities. See September Submission at 6.

protocol are live and functioning in accordance with their design, such that the tokens can be used as an integral part of the protocol—fall more comfortably within the definition of “commodity” under the Commodity Exchange Act (the “CEA”).¹³

- **The SEC Regulates Offers and Sales of Pre-Functionality Protocol Tokens:** Because distributions of Pre-Functionality Protocol Tokens may be investment contracts, the SEC would engage in rulemaking to (i) codify a straightforward definition of “investment contract” based on existing case law and practice; (ii) create a rebuttable presumption that offers and sales of Pre-Functionality Protocol Tokens meet the definition of investment contract; and (iii) confirm that offers and sales of Pre-Functionality Protocol Tokens may rely on existing exemptions from registration,¹⁴ as well as a proposed new exemption, described in detail in the September Submission.¹⁵
- **Both Commissions Leverage Existing Intermediary Frameworks:** The Submissions propose that, rather than create entirely new categories of registrants, the SEC and the CFTC should use their existing authority to allow registered intermediaries to engage in Protocol Token activities when functionality is achieved.¹⁶ By amending and tailoring existing rules, the intermediaries regulated by the Commissions (e.g., broker-dealers, alternative trading systems, national securities exchanges, clearing agencies, in the case of the SEC; and designated contract markets, futures commission merchants, introducing brokers, swap dealers, and derivatives clearing organizations, in the case of the CFTC) would become able to lawfully and effectively support activities in functional Protocol Token. Several concepts from the PWG Report, while not directly addressed in the Submissions, are resolved by this proposal, such as integrating multiple financial services in one business model and vertically integrated business models in the digital asset space.¹⁷ This proposal also has the benefit of bringing the financial markets one step closer to the “Super-App” envisioned by Chairman Atkins by allowing SEC-registered intermediaries to offer trading in “non-security crypto assets, alongside crypto-asset securities, traditional

¹³ See August Comment Letter at 3–6; September Submission at 3–7.

¹⁴ The Securities Act of 1933, 15 U.S.C. § 77a et seq.

¹⁵ See September Submission at 7–11 (proposing new Regulation PT to create an exemption from registration for any offer or sale of Pre-Functionality Protocol Tokens not exceeding the greater of \$50 million or 10% of the total dollar value of the outstanding tokens as of the date of the offer or sale if the distributor meets disclosures requirements, signs sale and purchase agreements with each buyer, conducts AML/KYC/sanctions checks, and files notice (similar to Form D) with the SEC).

¹⁶ See August Comment Letter at 9–11; September Submission at 12–16.

¹⁷ See PWG Report at 144.

securities, and other services without requiring . . . multiple federal licenses.”¹⁸ It also extends that concept to CFTC-registered intermediaries.

- **Tailored Guidance for Registered Intermediaries Supporting Protocol Token Activities:** The Commissions should couple the extension and amendment of rules applicable to their respective registered intermediaries with targeted guidance to clarify how longstanding regulatory obligations would apply in the context of Protocol Tokens. Key areas for such guidance would include: recordkeeping and reporting; capital adequacy and margin standards; customer protection, margin trading, and segregation; risk management and internal controls; execution, clearing, and settlement processes; registration and conduct standards; and policies and procedures.¹⁹ To be clear, the focus of this regulation and guidance should be intermediaries—not infrastructure providers—who provide the passive infrastructure layer that facilitates the functioning of a network, including through the use of Protocol Tokens in accordance with their design.²⁰
- **Disclosure Requirements:**²¹ Ava Labs’ proposals also contemplate various disclosure obligations, both for distributors of Pre-Functionality Protocol Tokens seeking to rely on the new exemption from registration, and for SEC and CFTC-registered entities engaged in Protocol Token activities.²² Among other things, these disclosure obligations would require entities to provide clear and accessible materials detailing information such as the risk factors, network information, token information, token supply and vesting, governance, and other key metrics.

II. Exemptive Relief Creating a Transitional Grace Period

The Joint Statements invite market participants to meet with the Commissions’ staff to discuss how they might bring trading activity onshore and innovate. Ava Labs proposes a direct path to jumpstart that activity today—implement a transitional grace period through exemptive

¹⁸ See U.S. Sec. and Exch. Comm’n, *How Super-Apps Can Revolutionize Finance*, YOUTUBE (Aug. 22, 2025), <https://www.youtube.com/watch?v=wiXNMXJ60As>.

¹⁹ See August Comment Letter at 10–11; September Submission at 13–14.

²⁰ See April Submission at 8–12 (noting that Web 2 infrastructure providers “and their functions have never been regulated under the federal securities laws. For the same reasons, [blockchain] Technology Functions, and the persons who perform them, should not be regulated under the securities laws, merely by dint of the fact that they are part of a protocol” because they “do not engage in archetypal intermediary activities like custodial customer funds or securities, recommending or soliciting trades or portfolio allocations, or executing, clearing, and settling transactions,” whether they are engaged in activities that utilize Protocol Tokens or not).

²¹ See the PWG Report at 56 (“In addition, digital asset trading platforms, and other intermediaries as appropriate, should consider prominently disclosing features that may be unique to digital assets, such as token economics (i.e., allocation percentages and rationales) and source code, if applicable.”).

²² See August Comment Letter at 12–13; September Submission at 9–11.

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relief that could serve as a regulatory “on-ramp,” allowing intermediaries registered with the Commissions to engage in Protocol Token activities without delay, while ensuring ongoing oversight until rules and guidance are finalized. The grace period would also allow the Commissions and their associated self-regulatory organizations to gain direct experience with regulating these markets while conducting the relevant rulemakings.

During this grace period, a registrant would be able to engage in Protocol Token activities to the extent they are consistent with the activities for which it is already authorized to engage by the SEC or the CFTC, respectively. Registrants who wish to rely on the grace period would be required to submit to the SEC or CFTC, as applicable, (i) a notice of intent detailing the activities it intends to conduct; and (ii) an attestation signed by the registrant’s chief executive officer (or president) and chief financial officer, confirming that appropriate policies and procedures are in place with respect to the proposed Protocol Token activities. This notice and attestation would be renewed quarterly until the registrant is formally authorized to conduct Protocol Token activities.²³

The grace period would remain in effect until final rulemaking and/or exemptive relief or guidance is finalized. Both Commissions and the relevant self-regulatory organizations would actively monitor activities during the interim phase, with the authority to impose conditions, limitations, or suspensions to safeguard investors and markets.

III. Conclusion

Ava Labs applauds your efforts to work collaboratively to seize this opportunity to provide clarity, foster innovation, and safeguard U.S. leadership in blockchain technology. By implementing a transitional grace period, leveraging existing statutory authority, providing clarity through targeted rulemaking, and recognizing reasonable exclusions and exemptions from regulation, your agencies can ensure that the regulation of Protocol Tokens develops quickly and in a manner that protects investors, fosters market integrity, and enhances U.S. competitiveness in digital financial technology, all goals expressed by the Joint Statements and the PWG Report. Ava Labs stands ready to engage in the development of durable, workable regulations that both protect the public and enable responsible innovation.

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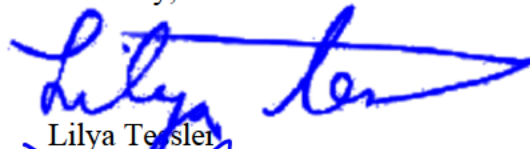
²³ See August Comment Letter at 11–12; September Submission at 14–15.

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Ava Labs appreciates the opportunity to provide comments on these important issues. We look forward to discussing these topics with you further and answering any questions you may have. Please use Lilya Tessler, Partner, Sidley Austin LLP (ltessler@sidley.com or 214-969-3510); Kate Lashley, Partner, Sidley Austin LLP (klashley@sidley.com or 305-391-5203); and Lee A. Schneider, General Counsel, Ava Labs, Inc. (lee@avalabs.org) as your contacts with regard to this letter. Thank you for your attention to this matter.

Sincerely,



Lilya Tessler



Kate Lashley

cc:

Hon. Hester M. Peirce, Commissioner, Securities and Exchange Commission

Hon. Mark Uyeda, Commissioner, Securities and Exchange Commission

Hon. Caroline Crenshaw, Commissioner, Securities and Exchange Commission

[Crypto Task Force](#), Securities and Exchange Commission

Patrick Witt, Executive Director of the President's Council of Advisers on Digital Assets of the White House

Scott Bessent, United States Secretary of the Treasury

Tyler Williams, Counselor to the Secretary of the Treasury

Andrew Rittenhouse, Senior Advisor, Department of the Treasury

Thomas Weidner, Senior Advisor, Department of the Treasury

Jonathan Hurowitz, Special Advisor, Department of the Treasury

Frank Sensenbrenner, Senior Specialized Examiner on detail to the Department of the Treasury

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[CFTC Division of Clearing and Risk](#)

Lee A. Schneider, General Counsel, Ava Labs, Inc.