

I. Preliminary Injunction and Temporary Restraining Order

The SEC moves the Court for a preliminary injunction and a temporary restraining order preventing each Defendant from violating the relevant provisions of the federal securities laws—specifically: Sections 5(a), 5(c), and 17(a)(2) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. §§ 77e(5)(a), 77e(5)(c), and 77q(a)(2)]; and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. § 78j(b)] and Rule 10b-5(b) thereunder [17 C.F.R. § 240.10b-5(b)].

II. Asset Freeze over AriseBank, Rice, and Ford

For the protection of defrauded investors, the SEC further moves the Court for an asset freeze covering Defendants Rice, Ford, and AriseBank and its affiliates. The asset freeze would prevent Defendants—along with Defendants Rice and Ford, and AriseBank's officers, agents, and other relevant individuals—from disposing of assets. This is necessary to preserve the status quo and protect the assets so that they can be returned to investor victims.

To give effect to the requested asset freeze, the SEC also moves the Court for an order: (1) preventing certain financial, depository, and other institutions holding accounts or assets for or on behalf of any of the Defendants, in whatever form they exist, from engaging in any transactions in assets, securities, investments, funds, digital currencies, virtual currencies, cryptocurrencies, or any other tangible or intangible assets (excepting liquidating necessary as to wasting assets) and no disbursement of assets, securities, investments, funds, digital currencies, virtual currencies, cryptocurrencies, or any other tangible or intangible assets (including extensions of credit, or advances on existing lines of credit), including the honor of any negotiable instrument (including, specifically, any check, draft, or cashier's check) purchased by or for the Defendants, unless otherwise ordered by this Court.; and (b) directing such institutions to identify for SEC

counsel and any Receiver appointed in this case all such accounts or assets identified in (a) above, including account number, and the nature and amount of all assets held in them.

III. Appointment of a Receiver Over AriseBank

To ensure the eventual return of the assets to defrauded investors, the SEC also moves the Court to appoint a Receiver over AriseBank and its affiliates. The proposed Order Appointing Receiver gives the Receiver the powers necessary to marshal, preserve, and manage AriseBank's assets pending further order of the Court.

IV. Document-Preservation Order

The SEC further moves the Court for an order prohibiting the Defendants, their officers, and other relevant persons and entities from destroying, removing, mutilating, altering, concealing, secreting, or disposing of, in any manner, any of their books, records, documents, accounts, account passwords, encryption passwords, computer passwords, device PINs and passwords, cryptographic keys, or any instruments, data, and papers relating in any manner to the matters set forth in the SEC's Complaint and the underlying motion and brief, unless otherwise ordered by this Court.

V. Sworn Accounting

The SEC further moves the Court for an order requiring the Defendants to provide an interim accounting, under oath, detailing: (a) all investor monies, assets, digital currencies, virtual currencies, cryptocurrencies, securities, and other benefits received by each, directly and indirectly, as a result of the activities alleged in the SEC's Complaint and the underlying motion and brief, (b) all assets (tangible and intangible) wherever they may be located and by whomever they may be held, and (c) all accounts, virtual currency accounts, and virtual currency wallets held during the period from January 1, 2017 through the date of the accounting.

VI. Expedited Discovery

The SEC further moves the Court for an order authorizing expedited discovery to permit a prompt and fair hearing on the SEC's motion for preliminary injunction.

VII. Alternative Service of Pleadings and Other Papers

The SEC further moves the Court for an order authorizing service of all pleadings and other papers by facsimile, email, overnight courier, or mail upon the Defendants, their agents, or attorneys. The order would further allow that service be made by: (1) representatives of the SEC; (2) representatives of the Receiver; or (3) the U.S. Marshals Service in any district in which a Defendant resides, transacts business, or may be found; or (4) by any alternative provision for service permitted by Rule 4 of the Federal Rules of Civil Procedure, or as this Court may direct by further order.

The SEC further moves the Court for an order authorizing service of the orders on financial institutions by mail, email, or facsimile, as if such service were personal service on those institutions.

VIII. Surrender of Passports

To prevent Defendants from absconding with investor funds, the SEC requests the Court to order Defendants Rice and Ford to surrender their passports to the Clerk of the Court and to bar them from traveling outside the United States, until further Order of this Court.

IX. Repatriation of Assets

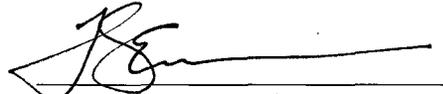
To the extent that Defendants have taken outside of the United States any funds, assets, securities, investments, digital currencies, virtual currencies, and cryptocurrencies described in the SEC's Complaint, the SEC requests the Court to order Defendants to repatriate them.

CONCLUSION

Based on the foregoing facts and for the reasons set forth in its accompanying memorandum of law and evidentiary appendix submitted in support hereof, the SEC respectfully requests that the Court enter orders providing the relief requested.

January 25, 2018

Respectfully submitted,



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