

EXHIBIT A-38

Certification of Translation Accuracy

Chien(wen) Lee hereby certifies that the attached document(s), interpreted part of the following MP4 file into English between 13:20 to 15:43 time stamp, spoken in Mandarin by Changpeng Zhao (judging from the speaker's ID), to the best of my knowledge as a native Chinese speaker, a true, accurate, and complete interpretation of the following document:

2019_06_25_BHL-SEC-BUSD-0235662.mp4

13:20 to 15:43 Changpeng Zhao stated – "Our goal is to reduce our own losses, but at the same time to prevent the US regulatory entities from troubling us, that's our biggest goal. I have started doing it already. I stopped all the new registrations, which we already announced in all the social media, so far, our risk is low, we don't have to over-correct ourselves. We have showed them the gestures, but don't cut off our own hands and feet before others come after us with axe [metaphorically speaking]." We are not going to pick 1 way over the other 3, He Yi is right, we have to support all 3, whichever users pick they decide for themselves. How do we slowly spread the news to the users? We don't sent 3000 emails all at once, maybe try 100 emails to begin with, and see what's the results will be. Also, we are flexible on the 9.12 deadline, we just tell them we did our best, but there are more orders that we do not have a chance to review, it will be our risk. The [US] regulatory authorities did not give us that deadline, we volunteered that deadline, it is not set in stone. No matter what the deadline is, our goal is for these American users to slowly switch to other kind of users, of course, we are not going to publically announce this, this is too sensitive, we can ignore the new IP addresses, they will open new accounts through other countries, come up with new KYC, it will be easier for us to process. For those who want to switch to new KYC, this is a solution for them. The most difficult part is that some users, they do not have foreign companies contact, nor do they have non-American KYC information.



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