

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

No. 1-23-cv-01599-ABJ

BINANCE HOLDINGS LIMITED,
BAM TRADING SERVICES INC.,
BAM MANAGEMENT US HOLDINGS
INC., AND CHANGPENG ZHAO,

Defendants.

**PLAINTIFF SECURITIES AND EXCHANGE
COMMISSION'S MOTION FOR LEAVE TO AMEND THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local Rules 7(i) and 15.1, Plaintiff Securities and Exchange Commission (“SEC”) respectfully moves this Court for leave to amend its original Complaint, Dkt. No. 1. Accompanying this Motion are the SEC’s Memorandum of Law in Support of Motion For Leave to Amend the Complaint that sets forth the grounds for the SEC’s Motion, the proposed Amended Complaint (“PAC”) (Exhibit A), a redline comparing the PAC to the original Complaint (Exhibit B), and, for the Court’s reference because it is not yet published on widely available legal databases, the order denying defendants’ motion to dismiss in *SEC v. Payward, Inc.*, No. 3:23-cv-06003-WHO (N.D. Cal. Aug. 23, 2024) (Exhibit C). Pursuant to Local Rule 7(m), the parties previously met and conferred and, as set forth in the Court’s August 13, 2024 Scheduling Order, Defendants must file either an opposition or notice of their consent to the SEC’s Motion to Amend by October 11, 2024.

Dated: September 12, 2024

Respectfully submitted,

s/ Matthew Scarlato

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