

Exhibit 6

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah

**DECLARATION OF GURBIR S.
GREWAL IN SUPPORT OF PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION’S RESPONSE TO THE
COURT’S NOVEMBER 30, 2023 ORDER
TO SHOW CAUSE**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFritz HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

I, Gurbir S. Grewal, make the following declaration, in accordance with the provisions of 28 U.S.C. § 1746:

1. I am currently employed by the U.S. Securities and Exchange Commission (“SEC”), Division of Enforcement, as its Director, a position I have held since July 2021. As Director of the Division of Enforcement, I am a Senior Officer of the SEC and am responsible for overseeing the work of the Division, which includes investigating and litigating securities actions on behalf of the SEC in federal court. I report directly to Gary Gensler, the SEC Chair.

2. Prior to serving as Director of the Division of Enforcement, I served in several prosecutorial positions. Immediately prior to coming to the SEC, I was the Attorney General for the State of New Jersey from January 2018 through July 2021. Before that, I served as the

Prosecutor for Bergen County, New Jersey, which has a population of nearly one million people. Earlier in my career, I served as an Assistant United States Attorney for the District of New Jersey, where I was Chief of the Economic Crimes Unit, and as an Assistant United States Attorney for the Eastern District of New York.

3. Given my prior prosecutorial experience, I fully appreciate the extraordinary responsibility entrusted to the SEC when enforcing federal securities laws, especially when seeking *ex parte* relief, and take the Court's concerns seriously. It is my expectation that all attorneys in the Division accurately present to the courts the evidence in a particular case and the applicable law, at all times avoiding either misrepresentations or misleading representations to tribunals. It is also my expectation that if a Division attorney makes a mistake, it is quickly and appropriately addressed and corrected. I have consistently emphasized these expectations and the importance of maintaining trust and credibility in the work we do. I understand that the Division fell short of these standards in this case, and I apologize for that shortfall.

4. To that end, when the Court issued its November 30, 2023, Order to Show Cause, I directed senior Division personnel to immediately contact the SEC's Office of the General Counsel to request that they assist the Division in reviewing this matter and preparing a response to the Court.

5. In addition, I appointed Nicholas Heinke, Associate Regional Director for the Division of Enforcement in the SEC's Denver Regional Office, a Senior Officer on my staff, to supervise this matter. While Mr. Heinke has been in his current role as a supervisor for less than one year, he has 10 years of experience as a trial attorney at the SEC and prior government experience, including as an Assistant Attorney General with the Office of the Colorado Attorney General. He will be supported by Gregory Kasper, the Regional Trial Counsel in the Denver

Regional Office who has nine years of experience supervising Commission litigation. Mr. Heinke will also appoint an experienced trial counsel from the Denver Regional Office to lead the litigation of this matter. These attorneys will work with and supervise the Salt Lake Regional Office trial team on this case going forward to ensure that all statements and representations made by the SEC are fully supported by the record.

6. At my direction, the Division is also taking several steps to ensure the errors that occurred in this case are not repeated in this action or any other proceeding. In January 2024, the Division will conduct mandatory training for all Division staff involved in investigating and litigating enforcement matters — including investigative and trial attorneys, accountants, and supervisory personnel — on our professional responsibilities, the high standards to which we must adhere as government attorneys and employees, and the unique considerations that apply when seeking emergency relief, in particular on an *ex parte* basis. This training will be led by experienced supervisory trial counsel.

7. Finally, I will continue to review the Division's processes to ensure that the issues raised in this matter are addressed and do not come up again. It is my privilege as the Director of the Division of Enforcement to represent the Commission. It is also my responsibility to ensure that our attorneys execute their duties with skill and professionalism. On behalf of the Division of Enforcement, I deeply regret that Division staff fell short of this standard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20th day of December 2023 in Glen Rock, New Jersey.



Gurbir S. Grewal