

MEMORANDUM

To: Crypto Task Force Meeting Log
From: Crypto Task Force Staff
Re: Meeting with Representatives of Sidley Austin LLP and Ava Labs

On April 29, 2025, Crypto Task Force Staff met with representatives from Sidley Austin LLP and Ava Labs.

The topic discussed was approaches to addressing issues related to regulation of crypto assets. Sidley Austin LLP and Ava Labs representatives provided the attached document, which was discussed during the meeting.



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March 18, 2025

Re: Ava Labs Request for Meeting with the Crypto Task Force

Ladies and Gentlemen:

On behalf of our client, Ava Labs, Inc. (“Ava Labs”), we respectfully request a meeting with the Crypto Task Force in response to Commissioner Hester M. Peirce’s February 21, 2025, statement soliciting public input on regulatory issues related to blockchain technology and crypto assets (the “Statement”). We would propose that the meeting take place on the afternoon of April 29 or any time on April 30.

The purpose of the meeting is to discuss the following topics: (1) creating a workable framework for token classification or taxonomy that would address approaches for evaluating the security status of crypto assets; (2) defining technology functions inherent to the operation of blockchains generally and the Avalanche network in particular (the “Technology Functions”) such that they do not involve the offer and sale of a “security” within the federal securities laws; (3) explaining why infrastructure providers on blockchain networks engaged in Technology Functions are not intermediaries under the federal securities laws; and (4) discussing a technology neutral standard for decentralization and when such might apply under the federal securities laws.

We anticipate submitting a written response on these points to the Crypto Task Force in advance of the meeting. Below please find a list of proposed attendees and a brief agenda for said meeting.

A. Proposed Attendees

- [Lee A. Schneider](#), General Counsel – Ava Labs
- [Lilya Tessler](#), Partner – Sidley Austin LLP
- [Nicole K. Chipi](#), Senior Managing Associate – Sidley Austin LLP

B. Draft Agenda

- Introductions
- Brief Background on Ava Labs and the Avalanche Network
- Proposed Framework for Token Classification, Including Security Status of Crypto Assets
- Technology Functions Inherent to Blockchains and the Avalanche Network
- Infrastructure Providers on Blockchain Networks Are Not Financial Intermediaries
- Defining Decentralization

* * *

If you have any comments or questions relating to the request, please do not hesitate to contact the undersigned at 214-969-3510.

Regards,



Lilya Tessler