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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
San Francisco Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

PAYWARD, INC. and PAYWARD
VENTURES, INC.,

Defendants.

Case No. 3:23-cv-06003-WHO

**JOINT STIPULATION TO DISMISS AND
RELEASES**

1 Plaintiff Securities and Exchange Commission (the “Commission” or the “SEC”) and
2 Payward, Inc. and Payward Ventures, Inc. (collectively, the “Defendants”) respectfully submit this
3 joint stipulation.

4 **WHEREAS**, the Commission filed its complaint in this civil enforcement action (the
5 “Litigation”) on November 20, 2023.

6 **WHEREAS**, on August 23, 2024, the Court denied Defendants’ motion to dismiss. (ECF
7 No. 90.)

8 **WHEREAS**, on January 21, 2025, the Commission’s Acting Chairman Mark T. Uyeda
9 launched a crypto task force dedicated to helping the Commission further develop the regulatory
10 framework for crypto assets.

11 **WHEREAS**, in light of the foregoing, and in the exercise of its discretion and as a policy
12 matter, the Commission believes the dismissal of this case is appropriate.

13 **WHEREAS**, the Commission’s decision to seek dismissal of this Litigation does not
14 necessarily reflect the Commission’s position on any other case.

15 **WHEREAS**, by this stipulation, the Commission and the Defendants agree to have this
16 Litigation dismissed.

17 **NOW, THEREFORE,**

18 1. Pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii), the Commission and the Defendants
19 stipulate that this Litigation be dismissed with prejudice as to the conduct alleged in the Complaint
20 through the date of the filing of this Stipulation, and without costs or fees to either party.

21 2. Defendants, for themselves and any of their agents, attorneys, employees, or
22 representatives, hereby waive and release:


- 23 a. Any and all rights under the Equal Access to Justice Act, the Small Business
24 Regulatory Enforcement Fairness Act of 1996, or any other provision of law to
25 seek from the United States, or any agency, or any official of the United States
26 acting in his or her official capacity, directly or indirectly, reimbursement of
27 attorney’s fees or other fees, expenses, or costs expended by Defendants that in any
28 way relate to the Litigation, including but not limited to investigative steps taken
prior to commencing the Litigation.
- b. Any and all claims, demands, rights, and causes of action of every kind and nature,
asserted or unasserted, against the Commission and its present and former officers

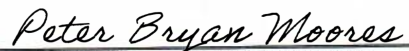
or employees that arise from or in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.

3. Each of the undersigned represents that they have the authority to execute this stipulation on behalf of the party so indicated.


4. Pursuant to L.R. 5-1(i)(3), Peter Moores attests that each of the other signatories have concurred in the filing of the document.

STIPULATED AND AGREED:


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 Acting Director
 ANTONIA M. APPS
 Acting Deputy Director
 Enforcement Division
 SECURITIES AND EXCHANGE
 COMMISSION


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 Payward Ventures, Inc.*

Stipulations

[3:23-cv-06003-WHO Securities and Exchange Commission v. Payward, Inc. et al](#)

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U.S. District Court

California Northern District

Notice of Electronic Filing

The following transaction was entered by Moores, Peter on 3/27/2025 at 1:57 PM and filed on 3/27/2025

Case Name: Securities and Exchange Commission v. Payward, Inc. et al

Case Number: [3:23-cv-06003-WHO](#)

Filer: Securities and Exchange Commission

Document Number: [127](#)

Docket Text:

[STIPULATION to Dismiss and Releases filed by Securities and Exchange Commission. \(Moores, Peter\) \(Filed on 3/27/2025\)](#)

3:23-cv-06003-WHO Notice has been electronically mailed to:

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3:23-cv-06003-WHO Please see [Local Rule 5-5](#); Notice has NOT been electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\Joint Stipulation of Dismissal (SEC v. Payward Inc.) - FINAL Executed.pdf

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