

Transfer Guidelines

The below guidelines have been prepared by Kroll Restructuring Administration LLC (“Kroll”) in its capacity as the court-approved claims and noticing agent in these chapter 11 cases, and are intended solely as guidance for parties seeking to have transfers of filed proofs of claim or scheduled claims processed and reflected as transferred on the official claims register in a timely manner. These guidelines are not legal advice and parties should consult their own attorney. Verification of the validity of a transferred claim is an obligation of the transferee and/or transferor and not the obligation of Kroll or the Debtors.

- All notices of transfers must be publicly filed on the chapter 11 case docket — notices of transfer only submitted directly to Kroll **will not** be processed.
- The Notice of Transfer and/or Evidence of Transfer should be signed by both the claim’s seller (“Transferor”) and buyer (“Transferee”).
- If a party wishes to transfer multiple proofs of claim and/or scheduled claims, a Notice of Transfer and/or Evidence of Transfer should be filed for each filed transferred proof of claim or scheduled claim.
- All information contained in the Notice of Transfer and/or Evidence of Transfer should be consistent and must contain at a minimum:
 - Transferee Name/Address
 - Transferor Name/Address
 - Identification numbers sufficient to identify the proof of claim and/or scheduled claim:
 - For proofs of claim, the claim number (preferred) and/or the Confirmation ID.
 - For schedule claims, the schedule number (preferred), Confirmation ID, or Unique Customer Code.
 - A transfer of a scheduled claim that has been matched/superseded by a filed proof of claim cannot be processed solely as a transfer of the schedule — the notice of transfer must reference the filed proof of claim number.
 - Applicable Debtor.
 - An indication as to whether the transfer is an entire transfer or partial transfer.
 - Partial transfers must be expressed as a percentage of the claim being transferred.
 - Partial transfers by type of digital asset (*e.g.*, only BTC but not ETH) will not be accepted or processed—this is to ensure that negative claims are not created by the transfer process. In other words, parties may only transfer percentages of claims and not specific tokens or digital assets of a customer claim.
 - For unaccepted scheduled claims **ONLY**, the Notice of Transfer must include current details of the specific coins/digital assets that are being transferred.
- Additional information (*e.g.*, estimated value of the claim as stated in USD) may be included but is not preferred:
 - Including this additional information increases the likelihood of an internal inconsistency within the Notice of Transfer, resulting in a transfer that may be marked defective.
 - Parties may leave the amount field blank on the Notice of Transfer Form or state the amount as unliquidated.

- If a transfer includes a USD value that is not included on the filed proof of claim, the transfer will be rejected unless the USD value is within 1% or \$25 (whichever is greater) of the estimated value of the proof of claim as determined by the scheduled digital assets quantities for such claim multiplied by the valuation of such digital asset as set forth in the *Order Granting Motion of Debtors to Estimate Claims Based on Digital Assets* [Docket No. 7090].
- Coin detail is **not** required for accepted scheduled claims or filed proofs of claim.
- Unique Customer Codes are least preferred in identifying claims/schedules. If the claim/schedule number (preferred) and/or Confirmation ID is provided, there is no need to list a Unique Customer Code.
- Customers received an email at the end of March 2023 indicating the scheduled digital assets and quantities. This email may differ from what is currently scheduled. Current scheduled values may be obtained via the FTX Claims Portal: <https://claims.ftx.com>.
- Transfers of withdrawn, satisfied, or expunged claims will not be processed.
- Unredacted notices can be provided prior to being requested by using the following link. Parties should submit a separate form for each docket entry and correctly list the docket number.
 - [Notice of Transfer Document Request Form](#)

Transfer Defective Reasons

A transfer can be made defective for one or more reasons:

- Neither the Notice of Transfer nor the Evidence of Transfer is signed by the parties.
- Transferor does not hold a filed proof of claim/scheduled liability as indicated in the Notice of Transfer.
For example:
 - Amount listed in the Notice of Transfer does not match the amount on proof of claim form or scheduled claim.
 - Transferor name does not match scheduled claim and/or proof of claim.
- Transfer does not match original or amended scheduled claims.
- Insufficient information provided to effectuate transfers. For example,
 - Did not provide coin list for unaccepted scheduled claims.
 - Transfer documents are internally inconsistent (e.g., different Transferor names on page 1 and 3; mismatch between customer code and schedule number; unclear if transfer is a full or partial transfer, etc.)
- Debtor indicated in Notice of Transfer does not match to scheduled claim or asserted debtor in filed proof of claim.
- Scheduled claim and/or proof of claim was previously transferred.
- Scheduled claim and/or proof of claim was previously withdrawn/expunged by court order.
- Scheduled claim superseded by filed proof of claim.
 - Schedule is matched/superseded by a filed proof of claim, and the claim number and/or Confirmation ID is not included in the Notice of Transfer.
- Unredacted transfer notice not provided following request.