

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

**UNITED STATES OF AMERICA**

**CRIM. NO. 5:15-cr-00240-01-02**

**18 U.S.C §§ 1960, 1956(a)(3)(B)-(C)**

**18 U.S.C. §§ 1343, 2**

**31 U.S.C. §§ 5313, 5322**

**21 U.S.C. §§ 846**

**18 U.S.C. 982**

**VERSUS**

**MICHAEL A. LORD  
RANDALL B. LORD**

**JUDGE S. MAURICE HICKS, JR.  
MAGISTRATE JUDGE HORNSBY**

**DEFENDANT'S REPOSE TO GOVERNMENT'S  
OPPOSITION TO MOTION TO WITHDRAW GUILTY PLEA**

NOW COMES, Defendants Randall Lord and Michael Lord , through undersigned counsel, who respectfully files their answer to the Government's Opposition to their Motion to Withdraw their Guilty Pleas as follows:

The defendants always believed that they did not need a license to buy and sell bitcoins and if they were required to have a license the State of Louisiana simply does not have license available for citizens to purchase and sell Bitcoins.

The Government now concedes that bitcoin exchangers in Louisiana do not need an MSB license. The charge in Count 1 is that the defendants conspired to operate an unlicensed money services business (MSB). If Louisiana where the defendant's live and work and bought and sold bitcoins, has no license available, then Michael and Randall

Lord are not in violation of operating an unlicensed MSB.

As to the Government's argument's that the Lords may have done business in Texas without a Texas license, the defendants say that they are not sure that Texas has a license which is available under the facts of this case.

Michael and Randall Lord contend that the balance of the Government's opposition herein deals with the other counts in the indictment. The Defendants only plead guilty to Count 1 and that count fails because Louisiana has no license available.

The defendants contend that it is clear that buying and selling bitcoin is a relatively new business that is not generally understood by most people. The Government's efforts to regulate the business is still evolving, but at this time the defendants submit that they believed that their conduct was not criminal. They read the statutes and believed that Louisiana did not have a license that they could obtain. We now know that they were correct on this point.

WHEREFORE, Defendants contend that this Honorable Court should grant their Motion to Withdraw their guilty plea.

This 17<sup>th</sup> day of March, 2017.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANTS,**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing has this day been sent via electronic mail to counsel of record, this the 17<sup>th</sup> day of March, 2017.

s/Paul J. Carmouche  
Of Counsel