

**ESTUDIO MOYANO Y ASOCIADOS**  
**ABOGADOS**  
**WWW.ESTUDIOMOYANO.COM**

Buenos Aires  
Asuncion

U.S. Department of Justice  
960 Pennsylvania Avenue NW  
Washington DC 20530

Ref: KELSEN VENTURES

Dear Sir/ Madam:

1.1. My name is Mariano Adalberto Moyano Rodriguez, Attorney at Law at the Buenos Aires Bar Association, and also recognized as an attorney at law before the Supreme Court of the State of Paraguay. I am Senior Partner of Estudio Moyano & Associates, a Law Firm specialized in International Insolvency cases, focused on financial frauds ( [www.estudiomoyano.com](http://www.estudiomoyano.com)). In this regard, Our firm has an extensive history of cooperation with US Law Enforcement agencies, such as ICE ( Immigration and Custom Enforcement, FBI ( Federal Bureau of Investigations) and other USDOJ agencies.

1.1.2. Our firm represents investors , mostly citizens of the Argentine Republic, who invested in a failed crypto currency called \$LIBRA.

1.1.3. Although We represent a number of individuals, We are aware that there are thousands of more investors of \$Libra from different countries.

1.2. We are aware that some of the victims and investors are US citizens and US residents and were introduced in the business by individuals that are US residents or US citizens who were promoting \$Libra.

2.1. Initially, all the investors sent their funds, via cryptocurrency ( USDT or Bitcoin) to a platform called Kip Protocol, to be credited in the [www.vivalalibertadproject.com](http://www.vivalalibertadproject.com) . This platform was based in the internet in the United States of America, and the supposed owner of this platform is KIP NETWORK INC. The Company is registered before the Department of State of Missouri. The declared address is 1520 Clay Street, Suite B4, Kansas City, MO 64116. The company seems to be as not running today.

2.2. The platform was promoted as an investment management service provider, focused on advising in investments in cryptocurrencies and other investments in trading for the purpose of backing and financing projects in “real economy” within the Argentine Republic. According to their declaration in the webpage [www.vivalalibertadproject.com](http://www.vivalalibertadproject.com), the money gathered through the Offering of the \$Libra Crypto Currency, would be used to finance education and small and medium size companies projects in Argentina.

2.2.1. As far as our investigation has determined, neither Kip Network Inc, Kelsen Ventures, nor the

vivalalibertadproject.com, are companies registered before the Securities and Exchange Commission in the US jurisdiction and has not been authorized to act as a financial vehicle or agent for investments from the Public.

2.3. None of the described companies were authorized to act as brokers, financial advisors or agents in behalf of the investors neither in the Argentine Republic jurisdiction.

2.4. The platform informed publicly that the funds gathered from the Initial Public Offering of the \$Libra cryptocurrency would be used in the following way: 50% for the purpose of “Argentina Growth” (not describing what projects would be), a 20% for “treasury”, and 30% for “liquidity”.

3.1. The [www.vivalalibertadproject.com](http://www.vivalalibertadproject.com) platform, through Kip Network Inc, was promoted initially in a meeting that took place in Buenos Aires in October of 2023. That meeting took place in a Buenos Aires downtown hotel, and participated the actual President of Argentina, Mr. Javier Milei with Julian Peh (owner and shareholder of Kip Protocol), Hayden Mark Davis, owner of Kelsen Ventures, Mauricio Novelli (an Argentine citizen, in charge of the link between the Presidency of Argentina and Kip Network, and Manuel Terrones Godoy (an Argentine citizen, owner of several digital platforms, partner of Francisco Novelli).

3.2. Special interest must be brought to the Local Partners, Francisco Novelli and Manuel Terrones Godoy. In the case of Francisco Novelli, He was also linked with another offering of a cryptocurrency called NFT Vulcano. It was also promoted by Mr. Javier Milei jointly, while He was a Congress man in 2020. The NFT Vulcano was also a complete failure and there were legal problems in relation to this IPO. Our firm could not determine if criminal actions were filed in relation to this scam.

3.3. In relation to Mr. Manuel Terrones Godoy, He is related to several digital platforms such as Kmanu88, and NO Filti Media. Also He is linked to a platform called T2LATAM in Mexico. We are in the process of gathering information of this platform. There are internet warnings about possible frauds committed by Mr. Terrones Godoy. He is a former employee of Aerolineas Argentinas (Traffic Controller).

3.4. All the individuals described acted as “digital experts”, although None of them have registers of being related to cryptocurrencies enlisted in major exchanges globally.

4.1. Special interest must also be brought to Hayden Mark Davis from Kelsen Ventures. According to our records, there is no Kelsen Ventures, and we could not find any relevant information regarding Mr. Davis. We have the strong suspicion that He is handling a fake identity.

4.2. In the case of Julian Peh, He is introduced as the Chairman of Kip Protocol, in charge of creating the webpage to run the \$Libra cryptocurrency. He is originally from Singapore. We think that his companies are also related to the Singapore jurisdiction

4.3. In the case of Francisco Novelli, He is related to Mr. Javier Milei since several years, as described above.

## **5.1. The problems with \$Libra Cryptocurrency:**

5.2. In February 14th. 2025, The President of Argentina, Javier Milei published a Public message through the X platform ( see attached document. ), saying “The Liberal Argentina grows”!. This private project will be dedicated to incentive the growth of the Argentinean Economy, funding small companies and argentine enterprises...”. The He wrote the website [www.vivalalibertadproject.com](http://www.vivalalibertadproject.com) and copied and pasted the digital contract link to join to the platform.

5.3. After two hours of publishing this X message, He deleted. And then the Presidency Speaker Office issued a message that the President was not aware of the nature of the project, and He has no link with the IPO.

5.4. In the meantime, that is between the initial X message of the President up to the declaration of the President Speaker, the Crypto \$Libra went from a Price of 4,9 USD to 0,25 USD. That is, in almost three hours.

5.5. We are aware that thousands of investors lost millions in a couple of hours due to this situation. According to the Blockchain, there were USD 76 millions invested. Up to the filling of this Complaint, there are significant and massive losses among the Public Investor.

5.6. Both Mr. Hayden Mark Davis and Julian Peh has made public announcements. In the case of Mr. Hayden Davis, He stated that the “business went wrong” and He will put “up to USD 100 Millions to solve the problem”. In the case of Mr. Julian Peh, He declared that his company was only involved in giving technological and digital advising to the viva la Libertad project.

5.7. We have been reported that several criminal claims will be filed before the Criminal Courts at the opening of the Courts on Monday February 17th. 2025.

5.8. No auditing, no finance nor financial statements were ever disclosed to the potential investors of this scam.

5.9. Up today, neither Hayden Davis, nor Julian Peh, Francisco Novelli nor Manuel Terrones Godoy , has offered any restructuring plan, any plan of repayment. In fact, None of these individuals or entities has given any explanation for the actual situation of the Companies and the investors’ funds.

7.1 **The process of investing in vivalalibertadproject.com**. Public was invited to the project business through consenting to the digital contract, and then buying the crypto via sending USDT ( stablecoins) to the announced digital wallet of the perpetrators of the scam.

7.2. No “Know your customer” policy, no analysis of “risk exposure” was made to the potential investors. There was no condition to get into \$Libra. rather than their funds. No credit or fiscal record, even no documents ( ID) were requested to open an account in Kip. pro.

8.1. **US jurisdiction**. Our request to the USDOJ on this case is based in the following facts:

7.3. Hayden Mark Davis and “Kelsen Ventures” were disclosed as US entities and individuals.

7.4. There are victims with US residence and US citizens.

7.5. The fraudsters created a legal corporation in the US to hide the proceeds of their scam.

7.6. A significant number of investors in the \$Libra, are US residents, and sent their investments from the United States of America.

**18. Summary:** Our firm is representing a group of investors who trusted in a Group of individuals who committed a massive fraud, creating a Rug Pull, through out several jurisdictions, including the US. The accused individuals are not interested in bringing a solution to the problem caused by Them, but personally benefit from the loss caused to their victims. No restructuring plan, no repayment. Nothing has been offered to creditors. We are facing a massive fraud scheme committed not only against our clients, but against thousands of individuals from different jurisdictions.

19.1. **Request to the U.S. Department of Justice:** In view of the facts described in this complaint, and in behalf of the Forty (40) investors our Firm represents, We request to the United States Department of Justice an investigation in regard of KIP NETWORK INC., KELSEN VENTURES, ANIMOCA VENTURES, T2LATAM Group shareholders' and Directors conduct, in violation of several US Law provisions, and proceed to protect investors rights in relation to the assets belonging to the victims. In this regard, We kindly request to the USDOJ the seizure of the funds identified belonging to HAYDEN MARK DAVIS, JULIAN PEH, FRANCISCO NOVELLI, MANUEL TERRONES GODOY, Since our firm strongly believes that those funds comes from the \$Libra cryptocurrency, and belongs to the victims we represent. We also request to the USDOJ to investigate the role of the President of the Argentine Republic JAVIER MILEI in this scam, since He has promoted it, and has, in the past, promoted several business that turned into scams.

February 17<sup>th</sup>. 2025.

Sincerely

Dr. Mariano A. Moyano Rodriguez  
Senior Partner  
Estudio Moyano & Associates

In Behalf of the victims of the \$Libra/ the vivalalibertadproject.com .