



U.S. Securities and
Exchange Commission

Tips, Complaints, and Referrals

Summary Page - After Submission

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The Complaint Form questions that you responded to, the answers you entered for those questions, and any documents that you have uploaded to this TCR are listed below.

Submission Number: 17780-976-067-126

Thank you for contacting the United States Securities and Exchange Commission. This automated response with your Submission Number confirms that your submission has been received successfully. Please write down your Submission Number or print/save a copy of your submission for future reference. Once you navigate away from this page you will not be able to get back to your submission.

We are always interested in hearing from the public, and your submission will be given careful consideration in view of the Commission's overall responsibilities under the federal securities laws. Please note, however, that it is the Commission's policy to conduct its investigations on a non-public basis in order to preserve the integrity of its investigative process. Subject to the provisions of the Freedom of Information Act, we cannot disclose to you any information which we may gather, nor can we confirm the existence or nonexistence of an investigation, unless such information is made a matter of public record in proceedings brought before the Commission or the courts. Therefore, this may be the only response that you receive. If you want to learn more about how the Commission handles inquiries or complaints, please visit http://www.sec.gov/complaint/info_tipscomplaint.shtml.

Please note that if you selected an answer of "Yes" to the question indicating that you want to file this information under the SEC's Whistleblower program, you are agreeing to the following statement:

- I declare under penalty of perjury under the laws of the United States that the

information contained herein is true, correct and complete to the best of my knowledge, information, and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the SEC, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement or entry.

If you are an attorney completing this form on behalf of your client, by selecting an answer of “Yes” to the question indicating that you want to file this information under the SEC’s Whistleblower program, you are agreeing to the following statement:

- I certify that I have reviewed this form for completeness and accuracy and that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I further certify that I have verified the identity of the whistleblower on whose behalf this form is being submitted by viewing the whistleblower’s valid, unexpired government issued identification (e.g., driver’s license, passport) and will retain an original, signed copy of this form, with Section F signed by the whistleblower, in my records. I further certify that I have obtained the whistleblower’s nonwaivable consent to provide the Commission with his or her original signed Form TCR upon request in the event that the Commission requests it due to concerns that the whistleblower may have knowingly and willfully made false, fictitious, or fraudulent statements or representations, or used any false writing or document knowing that the writing or document contains any false fictitious or fraudulent statement or entry; and that I consent to be legally obligated to do so within 7 calendar days of receiving such a request from the Commission.

PRINT SUBMISSION

What is your complaint about?

Please select the option that best describes your complaint.

Other

Is this supplemental information to a previous complaint?

No

In your own words, describe the conduct or situation you are complaining about.

This complaint concerns alleged violations of the Investment Advisers Act of 1940 §206 (fiduciary duty to disclose material conflicts and related-party relationships to limited partners) by Joichi (Joi) Ito, who served as General Partner / fund principal of Neoteny (venture capital fund) and as the investment-channel GP / allocator for additional venture and crypto-asset positions including the Kyara family of funds (Kyara II, Kyara III, Kyara IV) and a Coinbase position, during the period 2013-2019.

The alleged violation is Mr. Ito's failure to disclose to other Limited Partners (LPs) of these vehicles that Jeffrey Epstein — a registered sex offender (State of Florida, 2008 conviction; subject of federal investigations 2007-2008 and 2018-2019; arrested July 6, 2019; died in federal custody August 10, 2019) — was a material LP / co-investor in these vehicles, holding aggregate positions of approximately \$5,001,000.

DOCUMENTARY BASIS:

(1) Bates EFTA02505570 in the U.S. Department of Justice public-release Epstein document corpus is an email dated April 13, 2015, 11:15 AM, from Richard Kahn (HBRK Associates Inc., Mr. Epstein's accountant) to Mr. Epstein. The email enumerates Mr. Epstein's "investments outstanding with Joi at cost" as follows: Kyara II \$250,000; Kyara III \$500,000; Kyara IV \$250,000; Coinbase \$3,001,000; Neoteny \$1,000,000; total Joi investments \$5,001,000. The email also references a December 2014 conversation in which Mr. Epstein "would allocate 5-10mm per person" across a four-person investment cohort: "Linda Stone, George Church, Boris and Joi." Mr. Epstein clarified separately that the Coinbase position was direct rather than Joi-channeled.

(2) Bates EFTA00027019 + EFTA00080250 in the same corpus include Deutsche Bank wire-ledger entries documenting an August 5, 2015 wire of \$483,915 from Joichi Ito to Southern Financial LLC (an Epstein-controlled entity), with bank reference DB-SDNY-0004815. Bates EFTA00599617 confirms this wire represented Kyara III repayment to Mr. Epstein.

(3) The relationship was substantial, ongoing, and structured across multiple vehicles over multiple years. Neoteny is publicly identified as Mr. Ito's GP-controlled venture fund.

§206 QUESTION FOR THE COMMISSION:

Under Investment Advisers Act §206, an investment adviser owes fiduciary duties including the duty to disclose material facts that a reasonable investor would consider important. For a private fund, this includes disclosure of (a) the identity of material co-LPs where their identity creates a reputational or regulatory concern that could affect other investors' interests; (b) material conflicts of interest; (c) related-party transactions.

Mr. Epstein's status as a registered sex offender and as the subject of widely-reported federal investigations was material non-public information about the LP base of these funds. The questions for SEC review are: (a) whether Form ADV / Form D filings by Mr. Ito's adviser entities disclosed material related-party / control-person relationships consistent with the actual LP base; (b) whether other LPs of Neoteny, the Kyara funds, and any related vehicles were informed of Mr. Epstein's LP position; (c) whether Mr. Ito's representations to other LPs concerning the LP base of these vehicles were materially complete; (d) whether the structure of the per-person "5-10mm allocation" cohort (Stone / Church / Nikolic / Ito) constituted an undisclosed pooled-vehicle or syndication arrangement.

ADDITIONAL CONTEXT (parallel-filed):

(4) Bates EFTA01620998 (May 21, 2018) records Mr. Ito proposing to Mr. Epstein, in iMessage, a "tenants in common 1031 structure" for bitcoin holdings to be held jointly with a co-conspirator named "Madars" (likely Madars Virza, MIT cryptography researcher). Mr. Epstein had just identified the structure as "very problematic for gov." This conduct is filed in parallel to IRS Whistleblower Office under IRC §7623(b), Form 211.

(5) Bates EFTA01754963 (November 14, 2013) records Mr. Ito notifying Mr. Epstein that he had "MIT set up a special account for you as an anonymous donor so we don't have to go through an intermediary non-profit." This is filed in parallel to IRS Form 13909 (§501(c)(3) compliance) and Massachusetts Attorney General Public Charities Division (charitable-trust standards).

The SEC complaint is the Investment Advisers Act §206 leg of the same documentary chain.

VERIFICATION BASIS:

All cited Bates numbers are part of the U.S. Department of Justice public-release Epstein

document corpus and are independently verifiable through DOJ's public-release distribution channels. Bank reference DB-SDNY-0004815 is verifiable through Deutsche Bank's SDNY production set. No claim depends on third-party web-preservation services, web archives, or non-public records.

I am not a party to litigation involving Mr. Ito or related parties. I am acting as an independent investigator. Bates-anchored exhibit set is available to the Commission on request.

Are you having or have you had difficulty getting access to your funds or securities?

No

Did you suffer a loss?

No

When did you become aware of the conduct? (mm/dd/yyyy)

05/05/2026

When did the conduct begin? (mm/dd/yyyy)

08/15/2013

Is the conduct ongoing?

Unknown

Has the individual or firm acknowledged the conduct?

Unknown

How did you learn about the conduct? You may select more than one answer.

Internal business documents, Publicly available information

Have you taken any action regarding your complaint? You may select more than one answer.

None

Provide details.

I am filing parallel submissions concerning the same documentary chain to the following regulators: (1) IRS Whistleblower Office, Form 211, under IRC §7623(b) — federal tax-evasion conspiracy concerning the tenants-in-common 1031 bitcoin structure proposed by Mr. Ito to Mr. Epstein in May 2018 (Bates EFTA01620998), with a named co-conspirator. (2) Internal Revenue Service Form 13909, Tax-Exempt Organization Complaint — concerning Mr. Ito's documented engineering of an anonymous-donor account at the Massachusetts Institute of Technology (Bates EFTA01754963) to circumvent §501(c)(3) public-disclosure routing. (3) Massachusetts Attorney General, Non-Profit Organizations / Public Charities Division — concerning the institutional-fiduciary conduct described in (2) above, under Massachusetts charitable-trust standards (M.G.L. c. 12 §§ 8-8M). The SEC TCR is the Investment Advisers Act §206 leg of the documentary chain. Each of the four submissions addresses a distinct statutory question arising from the same Bates-anchored evidentiary record. No prior contact has been made with Mr. Ito or his representatives regarding this complaint. No litigation is pending. Bates-anchored exhibit set available to any reviewing agency on request.

Who are you complaining about?

Person or Firm 1**Are you complaining about a person or a firm?**

Person

Select the title that best describes the person the complaint is about.

Unknown

Where is the person that you are complaining about employed?

Chiba Institute of Technology

First Name

Joichi

Last Name

Ito

Street Address

Chiba Institute of Technology, 2-17-1 Tsudanuma

Country

Japan

Zip / Postal Code

275-0016

City

Narashino

State / Province

Chiba

Website

joi.ito.com

If the complaint is about an entity or person that has custody or control of your investments, have you had difficulty contacting that entity or person?

No

Which investment products are involved?

Select the type of product involved in your complaint.

Funds (e.g., ETFs, mutual funds, private equity funds, hedge funds)

Please select the category that best describes the security product.

Mutual funds

Enter the product name(s), if known.

Neoteny; Kyara II; Kyara III; Kyar

About you

Are you filing this tip under the SEC's whistleblower program?

Yes

Are you an attorney filling out this form on behalf of an anonymous whistleblower client who is seeking an award?

No

Title

Mr

First Name

Joseph

Middle Name

Raymond

Last Name

Goydish II

Street Address

n/a

City

Atlanta

State / Province

GA

Mobile Telephone

404-690-3952

Email Address

esq.jg.legal@proton.me

What is the best way to reach you?

Phone

Are you represented by an attorney in connection with this matter, or would you like to provide your attorney's contact information?

No

Select the profession that best represents you.

Auditor

Have you reported the matter at issue in this submission to your supervisor, compliance office, whistleblower hotline, ombudsman, or any other available mechanism for reporting possible violations at any entity you are complaining about?

No

Were you retaliated against for reporting the matter at issue in this submission either internally at the entity or to a regulator?

No

Has anyone taken steps to prevent you from reporting this violation to the SEC?

No

Are documents or other information being submitted that could potentially identify the whistleblower?

No

Does the whistleblower want to be eligible to apply for a whistleblower award?

Yes

1. Are you, or were you at the time you acquired the original information you are submitting to us, a member, officer or employee of the Department of Justice; the Securities and Exchange Commission; the Comptroller of the Currency; the Board of Governors of the Federal Reserve System; the Federal Deposit Insurance Corporation; the Office of Thrift Supervision; the Public Company Accounting Oversight Board; any law enforcement organization; or any national securities exchange, registered securities association, registered clearing agency, or the Municipal Securities Rulemaking Board?

No

2. Are you, or were you at the time you acquired the original information you are submitting to us, a member, officer, or employee of a foreign government, any political subdivision, department, agency, or instrumentality of a foreign government, or any other foreign financial regulatory authority as that term is defined in Section 3(a)(52) of the Securities Exchange Act of 1934 (15 U.S.C. Section §78c(a)(52))?

No

3. Did you acquire the information being submitted to us through the performance of an engagement required under the federal securities laws by an independent public accountant?

No

4. Are you providing this information pursuant to a cooperation agreement with the SEC or another agency or organization?

No

5. Are you a spouse, parent, child, or sibling of a member or employee of the SEC, or do you reside in the same household as a member or employee of the SEC?

No

6. Have you or anyone representing you received any request, inquiry or demand that relates to the subject matter of your submission (i) from the SEC; (ii) in connection with an investigation, inspection or examination by the Public Company Accounting Oversight Board, or any self-regulatory organization; or (iii) in connection with an investigation by Congress, any other authority of the federal government, or a state Attorney General or securities regulatory authority?

No

7. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information you are submitting to the SEC?

No

8. Did you acquire the information being provided to us from any person described in Questions 1 through 7?

No

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information, and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the SEC, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement or entry.

Agree

Attach Files

Upload Document(s)

- *SEC_TCR_Bates_Evidence_Packet.pdf* (17.51 KB)