



June 5, 2026
Via Electronic Email

Co-Chairman, Senator Chris Rothfuss, Chris.Rothfuss@wyoleg.gov
Co-Chairman, Representative Daniel Singh, Daniel.Singh@wyoleg.gov
All Members of Wyoming Legislature Select Committee on Blockchain, Financial Technology
and Digital Innovation Technology

CC:

Secretary of State, Chuck Gray, chuck.gray@wyo.gov
Deputy Secretary of State, Colin Crossman, colin.crossman@wyo.gov
Compliance Division Director, Kelly Janes, kelly.janes@wyo.gov
Chief Policy Officer/General Counsel, Joe Rubino, joe.rubino1@wyo.gov

Re: Due Process Violations by the Wyoming Secretary of State's Office

Dear Chairman Rothfuss, Chairman Singh, and Members of the Select Committee:

Thank you for the opportunity for American CryptoFed DAO (“CryptoFed”) to provide public testimony at the session of the Wyoming Secretary of State's Office scheduled at 3:45 PM during the Select Committee’s June 15, 2026 meeting. Scott Moeller and Xiaomeng Zhou will attend the session in person to provide oral public comments, based on this written testimony.

This is the second (2nd) written testimony we provide for the June 15, 2026 meeting.

In the Brief of Appellant¹ at pages 48 to 54 which was filed with the Wyoming Supreme Court on June 4, 2026 which was based on the record organized by the Wyoming Laramie County District Court, CryptoFed has identified the following five (5) due process violations by the Wyoming Secretary of State’s Office.

- i. Abuse of discretion
- ii. Lack of fair notice and void for vagueness doctrine
- iii. Violation of Wyoming Administrative Procedure Act

¹ Available at <https://ctefiling.wyocourts.gov/portal/court/cd2875bd-3280-4b05-ac69-030ce5faac20/case/ce352612-d147-40f6-8779-5804fd3b0e5e>



- iv. Doctrine of equitable estoppel and the relevant factors determining arbitrary or capricious enforcement.
- v. Doctrine of laches.

These due process violations are constitutional violations. Due process serves as the cornerstone of the rule of law by preventing arbitrary state power and ensuring that no one is deprived of life, liberty, or property without a fair legal process. Due process is so important for the rule of law that it appears exactly twice in the U.S. Constitution: once in the Fifth Amendment and once in the Fourteenth Amendment. To the extent that any due process violation inevitably and ultimately leads to arbitrary state power, the Wyoming Constitution specifically provides two sections: the Due Process of Law (Art. 1, § 6) and No Absolute, Arbitrary Power (Art. 1, § 7).

CryptoFed's experience in the past years has proved that due process is essential to the existence and growth of Wyoming DAOs and DUNAs. Therefore, in addition to requesting that the Wyoming Supreme Court review *de novo* the five (5) due process violations above, CryptoFed respectfully requests that this Select Committee also review them and consider new legislation to prevent the Wyoming Secretary of State's Office from further due process violations. As always, CryptoFed deeply appreciates the pioneering efforts of this Select Committee to explore the frontier of decentralized autonomous entities.

Sincerely,

/s/ Scott Moeller

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Scott Moeller

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/s/ Xiaomeng Zhou

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