Date: 12-16-19
Received from: Nelson DiGregorio ██████████████

To Whom it may concern,

   First I would like to thank you for the opportunity to share my comments on the proposed changes. I feel as though this is a step in the right direction.

  As a New York resident I have been severely limited by the current regulations in place. They have forced me from legitimate exchanges like Bittrex and ABRA and onto illegitimate exchanges like Cryptopia and Binance in order to acquire assets. Luckily when Cryptopia was hacked and subsequently shutdown I was not effected. But the undue risk of using that exchange is a direct result of the current regulations limiting asset availability.

  A great comparison that shows an integrity comparison between these exchanges would be to compare Bittrex and Binance. Both Bittrex and Binance have been advised to not conduct business in New York. Bittrex has locked my account to where I am unable to conduct any trading whereas Binance hasn't.

  I strongly support the proposal of a DFS web-page that will clearly show assets that are available for New York residents.

 I would also like to request the addition of DigiByte to the list of coins permitted for the Virtual Currency Businesses. Out of the eight coins listed, five are Proof of Work assets with three of those five being UTXO based blockchains (Bitcoin, Bitcoin Cash, and Litecoin).

DigiByte is also a UTXO asset with it's issuance following the same rules of distribution as these coins. The biggest difference is that the distribution is more decentralized than all of the other assets listed. As of the time of writing (morning of 16 December 2019) the current distribution from the previous one thousand blocks show:

Bitcoin - 21 unique block producers
Bitcoin Cash - 20 unique block producers Litecoin - 15 unique block producers DigiByte - 47 unique block producers

  I'd also like to add that out of the eight coins listed that three of those coins (Ethereum, Ethereum Classic, and Bitcoin Cash) are using advances pioneered by the DigiByte blockchain with it's DigiShield difficulty adjustment implementation. Both Ethereum and Ethereum Classic's difficulty adjustment is loosely based on it and Bitcoin Cash directly uses it. It has also been submitted to be added to the Litecoin code base by a member of the DigiByte community.

  The current regulations have only limited my options and forced me away from the exchanges that not only follow the rules, but also pay their fair share of taxes.

Thank You for your time,
Nelson DiGregorio