

FILED  
IN CLERK'S OFFICEUNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2025 MAY -9 PM12:21

SECURITIES AND EXCHANGE  
COMMISSION

Plaintiff,

v.

EAMMA SAFI and ZHI GE a/k/a JOSH GE,

Defendants.

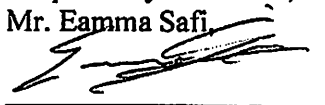
DKT NO. 1:25-cv-10516

**MOTION TO STAY PROCEEDINGS AS TO EAMMA SAFI**

The defendant, Eamma Safi, hereby respectfully requests that this Honorable Court enter a stay order with respect to the above-captioned proceedings to extend through the conclusion of the related criminal case currently pending against Mr. Safi. As grounds therefor, Mr. Safi has been charged in a six-count Indictment in *United States v. Safi, et al.*, Docket No. 1:24-cr-10200-RGS-1. The charges in that case include charges of conspiracy to commit securities fraud, aiding and abetting securities fraud, money laundering conspiracy, and aiding and abetting money laundering, and are based on the same alleged acts described in the complaint filed in this case. Mr. Safi was arraigned on the criminal case on February 27, 2025 and is currently incarcerated pretrial on the criminal matter at the Donald J. Wyatt Detention Facility. Mr. Safi is indigent, represented by the Federal Defender Office in the criminal matter, and is without means to afford counsel in this case. Among other things, Mr. Safi could not realistically participate in discovery in the above-captioned action nor can he comply with the Court's most recent order [Dkt. Entry 5] and the pending deadline to file an answer by 5/12/2025 without having to invoke his 5th Amendment right against self-incrimination. Thus, his ability to defend himself in this action and comply with the Court's order is severely compromised, and an order staying any further

proceedings, as to Mr. Safi, should enter until the resolution of the related criminal case in *United States v. Safi, et al.*, Docket No. 1:24-cr-10200-RGS-1.

Respectfully submitted,  
Mr. Eamma Safi



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**CERTIFICATE OF SERVICE**

I, Eamma Safi, hereby certify a copy of this document has been sent by mail to opposing counsel, Attorneys Rua M. Kelly and Michael D. Foster, US Securities and Exchange Commission, 33 Arch Street, 23<sup>rd</sup> Floor, Boston, MA 02110, on this date.



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Eamma Safi

Dated: