

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

_____	)	
COMMODITY FUTURES TRADING	)	
COMMISSION,	)	
	)	
Plaintiff,	)	Case No.: 20-Civ-21887-GAYLES
	)	
vs.	)	
	)	
DANIEL FINGERHUT, DIGITAL	)	
PLATINUM, INC., DIGITAL	)	
PLATINUM, LTD, HUF MEDIYA, LTD	)	
(A.K.A. HOOF MEDIA LTD.), TAL	)	
VALARIOLA & ITAY BARAK,	)	
	)	
Defendants.	)	
	)	
And	)	
	)	
AICEL CARBONERO,	)	
	)	
Relief Defendant.	)	
_____	)	

**PLAINTIFF’S MOTION FOR ENTRY OF PROPOSED CONSENT ORDERS FOR  
PERMANENT INJUNCTION AGAINST DEFENDANTS DANIEL FINGERHUT,  
DIGITAL PLATINUM, LTD, TAL VALARIOLA & ITAY BARAK**

Plaintiff Commodity Futures Trading Commission (the “Commission”) respectfully requests that the Court enter the attached proposed Consent Order for Permanent Injunction and Other Equitable Relief Against Defendants Daniel Fingerhut (attached hereto as Exhibit A) and the attached proposed Consent Order for Permanent Injunction and Other Equitable Relief Against Digital Platinum, Ltd., Tal Valariola, and Itay Barak (attached hereto as Exhibit B) (collectively, “proposed Consent Orders”). Entry of the attached proposed Consent Orders will end this case against Defendants Daniel Fingerhut, Digital Platinum, Ltd., Tal Valariola and Itay Barak. The case will remain pending against relief defendant Aicel Carbonero and defaulted defendants Huf Mediya and Digital Platinum, Inc.

WHEREFORE, the Commission respectfully requests that the Court enter the attached proposed Consent Orders.

Pursuant to Local Rule 7.1(a)(3), undersigned counsel hereby certifies that co-counsel conferred with counsel for Defendant Fingerhut, Digital Platinum, Ltd., Tal Valariola, and Itay Barak who have no objection to the instant motion.

Date: October 6, 2021

Respectfully submitted,

/s/ Allison V. Passman

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a true and correct copy of the foregoing Motion for Entry Of proposed Consent Orders For Permanent Injunction Against Defendants Daniel Fingerhut, Digital Platinum, Ltd., Tal Valariola, and Itay Barak to be served via the CM/ECF system on all counsel of record, each of whom is eligible to receive transmission of the Notice of Filing generated by the CM/ECF system.

Dated: October 6, 2021

Respectfully submitted,

ATTORNEYS FOR PLAINTIFF  
COMMODITY FUTURES TRADING COMMISSION

/s/ Allison Passman