

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

TAYLAN MCRAE-YU

Plaintiff

- and -

**PROFITLY INCORPORATED, DMCB HOLDINGS INC., IVAN AVRAMENKO,
ALEXANDRA STINSON, and JOHN DOE**

Defendants

Proceeding under the *Class Proceedings Act*, 1992

MOTION RECORD

June 7, 2023

**DELAWYER PROFESSIONAL
CORPORATION**

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**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

TAYLAN MCRAE-YU

Plaintiff/Moving Party

- and -

**PROFITLY INCORPORATED, DMCB HOLDINGS INC., IVAN AVRAMENKO,
ALEXANDRA STINSON, and JOHN DOE**

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act*, 1992

**NOTICE OF MOTION
(MAREVA INJUNCTION)**

The Plaintiff will make Motion, without notice, to the Honourable Justice Gomery of the Ontario Superior Court of Justice on June 15, 2023 at 2:00 p.m. or as soon after that time as the Motion can be heard.

PROPOSED METHOD OF HEARING: The Motion is to be heard in person at the Ottawa Courthouse.

THE MOTION IS FOR

- (a) An interim and interlocutory Order prohibiting the Defendants, non-party Custodians, and anyone with notice of the Order from dissipating, alienating, transferring, assigning, encumbering or in any way dealing with Boneheads team Assets;
- (b) An Order providing that service of the Order granted pursuant to this Notice of Motion and the related materials, may be served by way of email, social media, or

by way of a non-fungible token (NFT) airdrop, on certain parties bound by the Order; and

- (c) Such further and other relief as counsel may request and this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE

Background

Non-Fungible Tokens (NFTs)

1. Non-fungible tokens (NFTs) are blockchain-based digital assets growing in popularity as a novel medium to showcase art.
2. The purchase of an NFT has historically followed a standard sales agreement whereby title to an NFT is transferred as follows:
 - (a) A consumer purchases an NFT on a blockchain by making a payment in cryptocurrency; and
 - (b) The NFT in question is immediately transferred from the seller's cryptocurrency wallet to the buyer's cryptocurrency wallet.
3. Over the past several years, there has been a market shift to a "utility" model whereby NFTs are not only purchased for the artwork displayed on them, but because they serve as membership to a community granting exclusive members-only benefits.
4. In the utility model, the sales agreement is modified as follows:
 - (a) A team launching an NFT collection comprising hundreds or thousands of NFTs will promise a number of deliverables (future considerations) to consumers in exchange for their purchase of an NFT. These promises or "members-only" benefits include things such as access to exclusive merchandise, members-only

events, giveaways, or future cryptocurrency or token “airdrops” (whereby cryptocurrency tokens or NFTs are sent for free to cryptocurrency wallets that have purchased a given NFT);

- (b) Consumers, relying on the promises of future utility, purchase an NFT from the NFT collection by making the requisite payment in cryptocurrency;
 - (c) The NFT in question is immediately transferred to the consumer’s cryptocurrency wallet;
 - (d) As long as the consumer holds the NFT in their cryptocurrency wallet, they will receive the members-only benefits promised to them by the team launching the NFT collection; and
 - (e) Utility follows the NFT. If a consumer sells an NFT, they lose the utility associated with the purchase and downstream buyers instead gain access to the utility, similar to the transfer of a physical membership to another buyer.
5. The utility model gained popularity in 2021 when NFTs experienced a large influx of consumer capital. Projects launching NFT collections realized that, in an extremely competitive environment, they had to offer consumers greater utility in order to sell their NFT and garner sales.
6. Given the anonymity afforded by the blockchain, a number of individuals began to use the utility model to launch NFT collections in order to defraud consumers, namely, by not providing any of the utility promised to purchasers.

Boneheads NFT Collection

7. The Defendants, referred to collectively as the “Boneheads team”, began marketing and promotional activity for the Boneheads NFT collection, comprising 10,000 Boneheads

NFTs, in or around July 2021 through Twitter, Discord (a popular chat platform accessible to any member of the public who join via a publicly available invite link), and on their website (Boneheads.io).

8. In exchange for purchasing a Boneheads NFT, consumers were told they would get access to a host of membership benefits, including the following:
 - (a) On July 17, 2021, the Boneheads team told Discord members that everyone who purchased a Boneheads NFT would get the opportunity to win \$1 million dollars;
 - (b) On July 19, 2021, the Boneheads team stated on Twitter that immediately proceeding the initial sale (“mint”) of the Boneheads NFT, one purchaser would receive a monetary mystery box valued at a quarter million dollars;
 - (c) On August 12, 2021, the Boneheads team stated that they would be opening and making an interactive marketplace allowing Boneheads NFT holders to create physical merchandise, in fall of 2021; and
 - (d) Prospective purchasers were told that they would get access to future NFT airdrops, tokens, physical collectibles, physical merchandise, an innovative application allowing them to “forge” collectibles, voting rights, and numerous other membership benefits outlined across the Boneheads website and social media channels.
9. On August 20, 2021, the Boneheads NFT was launched, generating 950.05 Ether (approximately \$4,005,047.38 CAD) in sales, in under 40 minutes.
10. As of May 2023, the Boneheads team has not delivered a single item of utility to NFT holders.

11. The Boneheads team have been publicly accused of fraud by several prominent individuals within the cryptocurrency and NFT space. In each instance, the Boneheads team has responded to allegations of fraud with a future date for delivery of utility including:
 - (a) Stating that they would be opening a flag ship store in Los Angeles in early 2022 in response to a blog post by a United States Attorney which mentioned the Boneheads NFT project in a blog post about class actions. No such flagship store was ever opened; and
 - (b) Stating that they would be airdropping a new NFT collection to Boneheads NFT holders in August 2022 and monthly starting in November 2022, following an investigation by a blockchain sleuth accusing the Boneheads team of fraud. No such airdrop has ever occurred.

Class Action

12. Taylan McRae-Yu, a resident of Ottawa, Ontario, is the representative Plaintiff in this matter and has been involved in the cryptocurrency space for nearly a decade.
13. Taylan, relying on the extensive promises of utility made by the Boneheads team, purchased a total of 36 Boneheads NFTs during the initial sale of the Boneheads NFT collection at a total cost of 3.6 ETH (approximately \$15,169.03 CAD) on August 20, 2021.
14. To date, Taylan has not received any of the promised utility, despite holding all 36 Boneheads NFTs in his cryptocurrency wallet. In fact, Taylan has been blocked on Twitter and banned from the Boneheads Discord for voicing his concern with the conduct of the Boneheads team.
15. The Statement of Claim, which has not yet been filed, alleges that the Boneheads team defrauded thousands of consumers around the world, based on a contract that originated

in Ontario and is claiming special damages in the amount of \$4,118,385.43 CAD, punitive damages in the amount of \$1,000,000 CAD, as well as injunctive relief preventing the Boneheads team from marketing or promoting sale of the Boneheads NFT to consumers.

Mareva Injunction

16. A *Mareva* injunction is warranted and necessary in this case:

- (a) The Plaintiff and proposed Class Members have a strong *prime facie* case of fraudulent misrepresentation, based on contract, comprised of four elements: (1) a false representation made by Defendants; (2) some knowledge of the falsehood of the representation on the part of the Defendants (whether knowingly or recklessly); (3) the false representation caused the Plaintiff to act; and (4) the Plaintiff's actions resulted in a loss;
- (b) The Defendants include two Canadian corporations with registered offices in Belleville, Ontario. The named Defendants, Ivan Avramenko and Alexandra Stinson, both have their personal addresses listed in Belleville, Ontario. This supports the requirement that the Defendants have assets in the jurisdiction;
- (c) There is a real risk of dissipation of assets in this case. The Statement of Claim alleges that the Boneheads team has already withdrawn at least \$943,678.20 CAD in cryptocurrency funds into centralized cryptocurrency exchanges. In addition, the Boneheads team has spent a total of at least \$1,786,169.95 CAD on extravagant NFT purchases for personal use. In addition to already dissipating a significant portion of assets, the Defendants can immediately dissipate any remaining cryptocurrency assets, within seconds, through various means on the blockchain. The Plaintiff and Class Members would suffer irreparable harm if the *Mareva*

injunction were not granted and the balance of convenience further favors its granting; and

- (d) Social media and public marketplace listings show that the Defendants are moving or have already moved, and possibly attempting to leave the Canadian jurisdiction.

Substituted Service

17. Given a strong *prima facie* case of fraud in this case and the fact that cryptocurrency and related digital assets are the subject of the Order sought, there is a heightened risk of dissipation of assets, necessitating service of the Order to all of the Defendants simultaneously.
18. The registered address for Profitly Incorporated and DMCB Holdings Inc. is 12 Amber Place, Belleville, ON, K8P 0B5. This is a residential property which was sold to a third, unrelated party, in June 2021. The Defendants do not live here and the business does not operate here.
19. The Defendant, Alexandra Stinson, has posted items on Facebook marketplace as part of a “moving” sale. Over the past month, Alexandra Stinson has put out a series of posts on the social media platforms, Instagram and Tiktok, showing that she is currently in Spain with Ivan Avramenko.
20. The Plaintiff has proposed a plan to ensure service of the Order sought to all five Defendants in or around the same time which will come to their attention:
- Service to Ivan Avramenko and Alexandra Stinson, directors of the Defendant corporations, will satisfy the requirement of service on the Defendant corporations;

- Alexandra Stinson will be served via substituted service involving social media (Facebook, TikTok, and Instagram);
- Ivan Avramenko will be served directly via two email addresses; and
- The fifth unknown Defendant, John Doe, is known only by a Twitter handle “@nikkibonee” and Ethereum Cryptocurrency Wallet Address 0xca5a943044d32fc18c4487195A2Bf9D60918cD55 (“nikkibone.eth”). John Doe will be served through two means of substituted service, involving a direct message on Twitter and an NFT airdrop to their cryptocurrency wallet containing a “grappling hook” which will signify whether the service materials have been viewed. NFT airdrops have been accepted as a means of substituted service in cryptocurrency fraud cases involving unknown Defendants in both the United States and United Kingdom.

21. The Plaintiff relies on the following authorities in support of this motion:

- (a) Rules 1.04, 1.05, 2.01, 2.03, 3.02, 16.04, 37.07(2), 37.17, 40 of the *Rules of Civil Procedure*;
- (b) Section 101 of the *Courts of Justice Act*;
- (c) Such further and other grounds as counsel may advise.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

- (a) The affidavit of Taylan McRae-Yu, to be sworn, and all attached exhibits; and
- (b) Such other evidence as counsel may advise and this Honourable Court may permit.

June 6, 2023

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Taylan McRae-Yu
Plaintiff

and

Profitly Incorporated, et. al.,
Defendants

Court File No.: CV-23-00092340-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at OTTAWA

Proceeding under the *Class Proceedings Act, 1992*

NOTICE OF MOTION
(*MAREVA* INJUNCTION)

**DELAWYER PROFESSIONAL
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Plaintiff

- and -

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Defendants

Proceeding under the *Class Proceedings Act*, 1992

AFFIDAVIT OF TAYLAN MCRAE-YU

I, Taylan McRae-Yu, of the City of Ottawa, in the Province of Ontario, MAKE OATH AND SAY:

1. I am the Plaintiff and prospective class representative in this prospective class proceeding, and, as such, I have personal knowledge of the matters sworn herein. Where I have made statements based on information and belief, I have stated the source of the information and believe it to be true.

Background

2. I have been involved in the blockchain and cryptocurrency space as a consumer and investor for nearly a decade.

3. One major misconception about cryptocurrency that I often come across is that cryptocurrencies are payment systems. In my experience, this actually represents one of the use cases of cryptocurrency. For example, Ethereum, currently the second largest cryptocurrency by

market capitalization after Bitcoin, is a “smart contract” protocol that launched in 2015. The Ethereum “Whitepaper” explaining the proposal for Ethereum is attached as **Exhibit “A”**.

4. Smart contract protocols, like Ethereum, allow for self-executing agreements between two or more parties to occur on the blockchain through decentralized applications (“DApps”). These DApps allow end users to interact directly with a smart contract in question through the use of Ether (“ETH”), the native cryptocurrency token for the Ethereum network.

5. Transactions that occur on Ethereum are “transparent” in the sense that they are public. For example, Ethereum has a public blockchain explorer known as Etherscan (etherscan.io), an image of which is attached as **Exhibit “B”**. By plugging in an Ethereum cryptocurrency wallet address into the search bar of the Etherscan website, all transactions that a cryptocurrency wallet in question has conducted become visible. However, the identity of the individual(s) who have ownership over a specific Ethereum cryptocurrency wallet is unknown unless discovered through some other means.

6. Ethereum Name Service (ENS) (ens.domains) is an Ethereum smart contract protocol which allows individuals to connecting Ethereum domain names to their cryptocurrency wallet for the purpose of attaching identity to a cryptocurrency wallet. Attached as **Exhibit “C”** is the landing page for the ENS website.

7. For example, the founder of Ethereum, Vitalik Buterin, is known by his ENS domain “vitalik.eth”. We can see that the Ethereum cryptocurrency address connected to “vitalik.eth” is 0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045 by entering “vitalik.eth” directly into the Etherscan website, an example of which is attached as **Exhibit “D”**. All transactions that Vitalik Buterin has ever conducted through this wallet are visible to the public.

8. Transactions viewed on the Etherscan website will provide a transaction value in ETH and its equivalent United States Dollar (USD) value on the day of the transaction. Conversions from USD to Canadian dollars (CAD), as outlined below, were arrived at by converting the USD value of a transaction to the CAD equivalent on the day of the transaction as provided on the [exchangerates.org.uk](https://www.exchangerates.org.uk) website. For example, see the attached **Exhibit “E”** for August 2021 exchange rates from this website for USD to CAD.

Non-Fungible Tokens (NFTs)

9. I first learned about Non-Fungible Tokens (NFTs) around the end of 2020. Since then, I have purchased hundreds of NFTs on the Ethereum network. An NFT is a token that has unique identifiers or metadata tied to it, allowing one NFT to be distinguished from another. NFTs are especially popular for showcasing art.

10. For example, Cryptopunks are one of the most popular NFT art collections. In this case, the creators “Larva Labs”, launched a smart contract “housing” 10,000 unique Cryptopunk tokens. Users could interact directly with the smart contract at the initial point of sale, using their Ethereum cryptocurrency wallet, and receive a Cryptopunk token (with a token identification number between 0 and 9,999). Each of the tokens 0 to 9,999 are connected to unique “Cryptopunk” art. Attached as **Exhibit “F”** is the landing page for the Cryptopunks website (cryptopunks.app).

11. The initial interaction with the smart contract is a process known as “minting”. Once all tokens in a collection have been “minted”, the collection is deemed to be sold out. Purchasers of the tokens in question can then use NFT marketplaces, such as OpenSea, to sell their tokens on the secondary market. Attached as **Exhibit “G”** is a screenshot showing the Cryptopunk NFT collection on OpenSea, where secondary market purchases of Cryptopunks can be made.

12. Collections like Cryptopunks are popular for a number of reasons. Firstly, Cryptopunks represent one of the first “profile picture” (PFP) collections on the Ethereum network and have become popular as a marker of digital identity. For example, a Cryptopunk owner can connect their Ethereum cryptocurrency wallet to a social media platform like Twitter, and have their authenticated and verified Cryptopunk serve as their PFP. Secondly, because they are limited to only 10,000 pieces, Cryptopunks fetch a premium price, generally around \$100,000 USD per piece, with more desirable pieces having sold for millions of dollars. As such, there is a certain prestige associated with ownership of a Cryptopunk.

13. Historically, the purchase of NFTs like Cryptopunks gave the purchaser only an ownership right in the digital asset housing art and nothing more.

Utility

14. Before deciding to purchase an NFT, I research the project, primarily by reviewing its website, Twitter, and by partaking in the community Discord (a “live” chat platform where members of the public can join a specific community channel through an invite link). The Twitter and Discord channel allow me to determine how active the project founders are and how they interact with community members, including answering their questions or responding to criticism.

15. Most NFT collections I have come across also contain a specific section on their website pertaining to terms associated with ownership, which I will also review.

16. In May 2021, I came across an NFT collection known as Bored Ape Yacht Club (BAYC).

17. The BAYC website (boredapeyachtclub.com), the landing page for which is attached as **Exhibit “H”**, contained a number of items that I viewed as being both relatively novel and exciting. Firstly, the BAYC website explicitly stated “Your Bored Ape doubles as your Yacht Club membership card, and grants access to members-only benefits”. In addition, the BAYC website

used a term which I had not previously seen called a “roadmap”. The roadmap in question included a number of “goalposts” that the BAYC team would work towards after a certain percentage of NFT sales occurred. This included: exclusive BAYC merch store featuring limited edition tees, hoodies, and other goods; a “mutant ape (NFT Breeding)”; and a Bored Ape liquidity pool.

18. Following a review of the BAYC website, Twitter, and Discord, I purchased BAYC #5256 on May 3, 2021 for 0.490 ETH (1,681.78 USD or approximately \$2,065.05 CAD). Attached as **Exhibit “I”** is an Etherscan confirmation showing this purchase.

19. The BAYC team has since not only delivered on their roadmap, but has continued to reward BAYC holders with exclusive members-only perks as follows:

- i. On July 2021, the BAYC team announced that for each BAYC NFT one held in their cryptocurrency wallet, they could “mint” a new collection known as the “Bored Ape Kennel Club”. Attached as **Exhibit “J”** attached is information on the BAYC website pertaining to the Bored Ape Kennel Club NFT;
- ii. In August 2021, for each BAYC NFT they held in their cryptocurrency wallet, BAYC NFT holders were airdropped a free “mutant serum” from the “Bored Ape Chemistry Club” collection. This serum could be used to “mutate” a BAYC into an entirely new NFT collection known as the “Mutant Ape Yacht Club”. **Exhibit “K”** attached is a screenshot of the Opensea for the “Bored Ape Chemistry Club” and **Exhibit “L”** attached is a screenshot of the Opensea page for the “Mutant Ape Yacht Club”;
- iii. In March 2022, the BAYC team released a cryptocurrency token known as “ApeCoin”. **Exhibit “M”** attached is the “about” page from the ApeCoin website (apecoin.com);
and

- iv. In April 2022, BAYC holders were given free “land” in a blockchain “metaverse” named “The Otherside” that the BAYC team is building. **Exhibit “N”** attached is the whitepaper, referred to as the “Otherside Litepaper”, taken from the Otherside website (otherside.xyz).
20. The BAYC collection is the first NFT collections to successfully execute on the idea of some sort of “membership benefit” or “utility”, specifically in the form of a roadmap, to ownership of an NFT.
 21. Towards the summer of 2021, more and more NFT collections were launching daily, with dozens if not hundreds of NFT collections launching on any given day. Given BAYC’s success, nearly every collection I came across on the Ethereum blockchain was touting an extensive “roadmap” and “utility” associated with the purchase of their NFT comprising some combination of physical merchandise, future NFT airdrops, and a metaverse or blockchain game that the team would be building.
 22. Projects were essentially competing in terms of marketing/promotion and promises of utility, in the hopes that their project would mint out. In addition, projects further gain revenue from secondary marketplace royalties for every secondary marketplace sale which are set by the NFT project itself. For example, the BAYC collection carries a 2.5% royalty, Attached as **Exhibit “O”** is the Opensea page for BAYC, showing the “creator earnings” (royalties) of 2.5%.
 23. Unfortunately, a number of projects that fully minted out turned out to be an outright scam. Within the NFT community, a “rug pull” became a fairly common term to refer to instances where an NFT team “ran off” with the proceeds of a mint without delivering the actual utility they promised holders. In most cases, the anonymity of the blockchain makes it difficult, if not impossible, to identify the individuals behind a particular project. Additionally, an individual may

have spent only a few hundred dollars on an NFT, making it unlikely they would pursue legal action.

24. In other cases, projects turned out to be what was termed a “slow rug” in the NFT community. For example, projects delivered only a portion of the utility they had promised holders or simply stated that they were “building” and developing the utility they had promised to purchasers, but never delivered anything.

Boneheads (Pre-Mint)

25. In or around July 2021, I came across an NFT project on Twitter known as “Boneheads”. I began to follow the Twitter page for the Boneheads NFT project and joined the community Discord. Attached as **Exhibit “P”** is a screenshot of the Twitter page for the Boneheads NFT project.

26. There are a number of things that attracted me to the Boneheads NFT project. Firstly, I found the NFT art to be distinctive and visually appealing. A screenshot of the Opensea page for the Boneheads NFT which shows the Boneheads NFT art is attached as **Exhibit “Q”**. Secondly, it was clear that the team had put significant effort into marketing and promotion of the Boneheads NFT project, as evidenced by the tens of thousands of active Discord members at the time and the fact that each “tweet” the team put out on Twitter received dozens, if not hundreds of likes and/or re-tweets. Additionally, the development team was extremely active in the Discord and was essentially available around the clock to engage with the community and answer questions, including responding to criticism and concerns of prospective purchasers.

27. The Boneheads team represented themselves as a team with significant experience in technology and start-ups, with the expertise/background to deliver on their ambitious roadmap.

For example, the Boneheads website (boneheads.io) contains an “About” page, a copy of which is attached as **Exhibit “R”** states the following:

- i. “Seven brilliant collaborators spent over 1,500+ hours developing over 500+ attributes across 8 categories, in 8K high-resolution...”;
- ii. “This is a real business, with experienced investors, and a clearly defined objective...”;
- iii. “Our core team has spent the better part of our adult lives building startups and helping others achieve their goals in a collaborative way”;
- iv. “Together, we’ve cultivated over 40 years of experience in design, product management, manufacturing, and marketing, to bring you our brainchild – Boneheads.”; and
- v. “From inception, #Boneheads has been a collaborative effort spanning more than 6 countries and 14 talented individuals”.

28. The “About” page and of the Boneheads website also makes it clear that what the proceeds from the mint would be used towards:

- i. “#Boneheads are priced in accordance to the level of effort, quality, funding spent to date, and to the funding that is required for us to deliver on our vision and roadmap”;
- and
- ii. “By pricing our #Boneheads a little bit higher than what the community is used to, we believe this will give more individuals an opportunity to participate and join our burgeoning community, and it will give us the necessary runway for attracting talent and building our platform.”.

29. The Boneheads NFT team promised holders that purchase of their NFT would be accompanied by relatively novel utility and an ambitious roadmap and that funds from the sale of

Boneheads would be used to deliver on this roadmap. In addition to the “About” page, the Boneheads website contained a “Roadmap” page, a “Benefits” page, and an “FAQ” page which are respectively attached as **Exhibit “S”**, **Exhibit “T”**, and **Exhibit “U”**, which outlined, in detail, the utility that would flow with ownership of the Boneheads NFT. This included:

- i. “There will be a 10% royalty on secondary sales, this will go towards establishing a community-powered creator fund” (Exhibit “R”);
- ii. “Our goal is to create a multimedia franchise spanning the rapidly evolving physical and digital design + fashion + gaming + art spectrum and iterate until we’ve developed something that is truly unique and imaginative” (Exhibit “R”);
- iii. “We will be putting relentless focus into developing the backbone of our business, which will be a physical + digital identity fashion gaming wearables NFT platform from which you will be able to mint and forge digital + physical collectibles” (Exhibit “R”);
- iv. “We plan on making and developing physical + digital products and representations of anything that we think is cool in the world, life life-size 5FT Boneheads sculptures, toys, fuzzy zebra print mini backpacks, studded boxing gloves, and more” (Exhibit “R”);
- v. “Our business model is mint + forge. You will be able to forge physical collectibles (grails, clothing, accessories, and more) of the digital representations that we release through NFTs through the Cabana.” (Exhibit “R”);
- vi. “Only token holders will be able to participate in the exclusive drops that we release” (Exhibit “R”);

- vii. "...every single item will come with a numbered verifiable scannable QR code/NFC tag that will be verifiable on-chain" (Exhibit "R");
- viii. "Code-based digitals" including 5% community wallet; 3D boneheads, boning = breeding, the spa = liquidity pool; and consumer facing avatar app (Exhibit "S");
- ix. "NFT post-sale physicals" including mouse-pads; area rugs; and paintings (Exhibit "S");
- x. "Physical collectibles" including 5FT lifesize sculptures; 2.4 FT sculptures; 4FT area rugs; boxing gloves; trucker hats; mini backpacks; puffer jackets; biker jackets; t-shirts; hoodies; slides; and socks (Exhibit "S");
- xi. "Owning a #BONEHEAD grants you a lifetime membership (as long as you hold it in your wallet) to the Cabana, the forging HQ, where you will be able to forge physical and digital collectibles" (Exhibit "T");
- xii. "The more #BONEHEAD that you own, the more items you will be able to forge" (Exhibit "T");
- xiii. "Token holders will have access to several claimables that we currently have on the roadmap" (Exhibit "T");
- xiv. "Token holders will be the first to have an opportunity to access and test our consumer-facing avatar creation app during the beta release. This app will allow you to create a personal avatar for yourself using an expansive catalog of clothing and accessories to suit your unique style" (Exhibit "T"); and
- xv. "Owning a #BONEHEAD will grant you exclusive access to special roadmap perks, such as access to the Cabana – which will be a physical + digital identity fashion-

gaming wearables platform from which you can mint and forge digital + physical collectibles” (Exhibit “U”).

30. In addition to these specific promises about the utility/benefits/roadmap, the Boneheads team promised token holders the following giveaways:

- i. On July 17, 2021, the Boneheads team stated on their Discord, “little unofficial leak...everyone that buys a Bonehead will get an opportunity to participate in a secondary credit sale for a chance to win \$1M”. A screenshot of this is attached as **Exhibit “V”**; and
- ii. On July 19, 2021, the Boneheads team tweeted on their Twitter “wait so...and one lucky randomized holder gets a monetary mystery box valued at a quarter million dollars, revealed instantly at the end of the mint....\$250K??????....”. A screenshot of this Tweet is attached as **Exhibit “W”**.

31. Because of the significant utility/benefit that was being promised to purchasers/holders of the Boneheads NFT for which specific and intentional detail was provided as I have outlined above, I made the decision to participate in the mint for the Boneheads NFT on August 20, 2021. I would not have made this purchase had there not been these extensive promises of utility tied to NFT ownership.

Boneheads (Mint)

32. The smart contract for the Boneheads NFT was opened for public minting on August 20, 2021 at approximately 7:58PM +UTC. **Exhibit “X”** attached is the Etherscan page corresponding to the first successful public mint for the Boneheads NFT.

33. The “mint” was officially sold out on August 20, 2021 at 8:34:52 PM +UTC, less than 40 minutes after launch. **Exhibit “Y”** attached is the Etherscan page for the final set of mints of the Boneheads NFT.

34. I purchased a total of 36 Boneheads NFTs during the mint on August 20, 2021. The total cost for this purchase was 3.6 ETH (0.1 ETH per mint), valued at \$11,831.40 USD (or \$15,169.03 CAD approximately on the day of the transaction). **Exhibit “Z”** attached are the Etherscan pages for these transactions.

35. The Boneheads NFT mint generated 950.5 ETH (approximately \$3,123,818.25 USD or \$4,005,047.38 CAD). Attached as **Exhibit “AA”** is the Etherscan showing the transfer of 950.5 ETH from the “BONEHEADS: BONE Token” Contract with Ethereum Address 0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2 into a contract with Ethereum Address 0xb1FA950B59eE7e228e5f666Bf33d64E8158aC1A3 (“**C1A3**”)

36. As **Exhibit “AB”** attached shows, the 950.5 ETH were distributed from “**C1A3**” wallet among three Ethereum Addresses:

- i. 47.525 ETH was sent to Ethereum Address 0x6351a222B024165abE0ab3008fbB2Aa18C986878 (shown as “*no-op.eth”). This individual appears to be a software engineer paid for work on the project;
- ii. 95.05 ETH was sent to Ethereum Address 0x6027B4c9Ad98ad5Dc9Ee984Ed699a2079d401416 (shown as “westcoastnft.eth”). West Coast NFT is a smart contract developer that was paid for their work on the Boneheads smart contract; and
- iii. 807.925 ETH was sent to “BONEHEADS: Deployer” (Ethereum Address: 0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F).

37. In addition to the 950.5 ETH (\$3,123,818.25 USD (approximately \$4,005,047.38 CAD)), the “BONEHEADS: Deployer” address received and continues to receive a royalty from every secondary market sale of the Boneheads NFT. The Boneheads team has received at least 27.0958 ETH ((\$87,811.97 USD (\$112,072.43 CAD)) in royalty payments to date. **Exhibit “AC”** shows Etherscan transactions to the “Boneheads: Deployer” from the “Opensea: Royalties Distributor” wallet.

38. Immediately after the mint sold out, the Boneheads Discord chat was put to “slow” mode, meaning community members were limited to sending a message once every few minutes. Within the NFT community, this behavior is seen as problematic because it is an initial red flag that the project is about to be rug pulled. In the past, I have been part of rug pulls where shortly after the completion of the mint, the Discord channel for the NFT project has been muted and then deleted, leaving almost no way for community members who have been defrauded by a project to communicate with one other. Members of the community, including myself, who expressed concern on the Discord channel were immediately, and without any warning, banned/booted from the channel, which was a complete “180” with how the team had been interacting with the community members just moments earlier.

39. At approximately 5:02 pm EST on August 20, 2021, just an hour after the mint for the Boneheads NFT had sold out, and during a period where significant secondary volume had taken place, the Boneheads team abruptly announced on the Discord channel that they would be back on Monday (August 23, 2021). This announcement is attached as **Exhibit “AD”**. The Discord moderators for Boneheads also expressed concern about this behavior.

Boneheads (Months Following The Mint)

40. In the weeks and months following the Boneheads mint, the Boneheads team became less and less active on Discord and social media. Whenever they were questioned about when utility would be delivered to NFT holders, the Boneheads team would either ban members from Discord or block them on Twitter. The Boneheads team also periodically made promises of utility to keep the ruse going. Not only did this lead to consumers who purchased the Boneheads NFT holding out hope, it led to new waves of consumers purchasing the NFT on the secondary market.

41. As of June 2023, 22 months after the sale of the Boneheads NFT, not a single roadmap or utility item has been delivered to consumers. Even the simplest roadmap items, like t-shirts and pants, have not been delivered. None of the promised giveaways have actually taken place.

42. Following the sale of the mint, the Boneheads team stated on their website that a flagship store for the Boneheads brand would be opening in Los Angeles in Early 2022. A screenshot of this is attached as **Exhibit “AE”**. This was reinforced from the Boneheads teams Twitter account on December 31, 2022 , a screenshot of which is attached as **Exhibit “AF”**. No such flagship store has ever been opened.

43. The Boneheads team provided almost no updates from January to June 2022. It was around this time that I connected with @zachxbt (“Zach XBT”) on Twitter, an independent blockchain investigator dedicated to investigating blockchain fraud. Zach XBT has nearly 400,000 followers on Twitter and is highly respected in the cryptocurrency/blockchain space, having helped authorities in various jurisdictions with his investigations. Attached as **Exhibit “AG”** is a screenshot of Zach XBT’s Twitter profile page.

44. On July 14, 2022, Zach XBT released the results of his independent investigation on the Boneheads NFT project on his Twitter, stating that the project was a \$3.1 million rug pull.

Screenshots of ZachXBT's Twitter thread corresponding to this investigation are attached as **Exhibit "AH"**.

45. Despite months of inactivity, the Boneheads team responded in under an hour to Zach XBT's tweets. The Boneheads team stated that they were not a "rug" but a "deliberately slow creative process" and then teased an image of a new collection, hinting that its release would happen in August 2022, marking the anniversary of the Boneheads mint. No such collection was released. Screenshots from this Twitter post is attached hereto as **Exhibit "AI"**.

46. On August 27, 2022, Zach XBT released another tweet on his Twitter account. The tweet showed direct messages that were sent to him by the Boneheads team at the time he released his July 14, 2022 investigation results. The messages state "our brand activations are officially launching the week of the 24th of August, lots of fun stuff, please feel free to check back then and if you're willing: provide an update to your thread". Screenshots of ZachXBT's tweet are attached as **Exhibit "AJ"**.

47. In response to this tweet, the Boneheads team turned around and stated that as of November 1, 2022, "drops" would be releasing on the first of every month for Boneheads NFT holders to claim for a limited time of 24 hours. No such drops have ever been released. A corresponding screenshot from the Boneheads website is attached as **Exhibit "AK"**.

48. The Boneheads team deleted dozens of social media posts in order to obscure promises and statements made to consumers. Many tweets from can be found using the Internet Archive "Way Back Machine". For example, an August 25, 2021 Twitter thread from the account of one of the Boneheads founders, following a rant, provides a date of October 1, 2021 for a "3D Convergence Event" which never took place. A screenshot of this tweet is attached as **Exhibit "AL"**.

49. As it is abundantly clear, not only has the Boneheads team not delivered any of the promised utility they stated they would deliver to holders, they have repeatedly misled, lied to, and further induced consumers to purchase the Boneheads NFT. At every instance where an accusation of fraud or rug pull has been levied against them, the Boneheads team has simply provided a future date where an item of utility will be delivered, with no actual delivery taking place.

Identity of Boneheads Team

50. I believe that the reason the Boneheads team has simply not disappeared following the mint is because they made a few critical mistakes which has allowed their identities to be known.

51. I previously worked as a licensed collections agent in Quebec for iQor Canada, with clients including major telecommunications companies, such as Bell and Rogers. As such, I have first-hand experience with locating people, especially as it relates to social media.

52. On August 6, 2021, the Boneheads Twitter account introduced three individuals, @ivybonee, @nikkibonee, and @lexibone, as the creators of the project. Based on my interactions on Twitter and Discord, I believe these three are individuals behind the Boneheads NFT project. A screenshot of this tweet is attached as **Exhibit “AM”**.

53. On August 20, 2021, subscribers to the Boneheads “newsletter” received an email reminder about the Boneheads mint. Included in the footer of the email was an address “1034 County Road 3, Belleville, ON, K8N 4Z1”. A screenshot of this newsletter including the address is attached as **Exhibit “AN”**.

54. After conducting searches into the address, I was able to find two connected corporations and two named individuals who I believe are part of the Boneheads team. The corporate documents for these corporations show the following:

- i. **DMCB Holdings Inc.** is a federal corporation registered at 12 Amber Place, Belleville, ON, K8P 0B5 with **Ivan Avramenko** serving as director, with a listed personal addresses at 12 Amber Place, Belleville, ON, K8P 0B5 and 1034 County Road 3, Belleville, ON, K8N 4Z1 and a Phone Number of 416-995-7010. The corporate documents for this corporation are attached as **Exhibit “AO”**; and
- ii. **Profitly Incorporated** is a federal corporation registered at 12 Amber Place, Belleville, ON, K8P 0B5. **Ivan Avramenko** (12 Amber Place, Belleville, ON, K8P 0B5) and **Alexandra Stinson** (1034 County Road 3, Belleville, ON, K8N 4Z1) at the current directors of this corporation. The corporate documents for this corporation are attached as **Exhibit “AP”**. Attached as **Exhibit “AQ”** is the result of a corporate search conducted on June 5, 2023 which show that Profitly Incorporated is currently undergoing dissolution.

55. On July 28 2021, in advanced of the project mint, the Discord user “BONESTAR”, who is listed as a co-founder of the Boneheads project, shared the phone number +1-416-995-7010 with a freelance developer (“LazyFrank”) contracted to configure the Boneheads Discord server. I have attached a screenshot of this conversation as **Exhibit “AR”**. This corresponds to Ivan Avramenko’s phone number as shown in Exhibit “AO” and leads to a voicemail under the same name.

56. Alexandra Stinson operated the Twitter handle @lexibone and the “TikTok” social media accounts under “lexiistinson” and “alexandrasilver”. I was able to “screenshot” some of the social media content on Alexandra’s TikTok before it was deleted which shows images the Boneheads mint, attached hereto as **Exhibit “AS”**, and images of a Boneheads Carpet, attached hereto as **Exhibit “AT”**.

57. The Twitter handle @Ivybonee is the former Twitter handle of Ivan Avramenko and 0xA1e43fcB51656354931D47458EceaDBC6545df57 is one of his cryptocurrency wallet addresses (it is represented as “ivybone.eth” in ENS form). Alexandra shared images of Ivan on her TikTok account, a screenshot of which is attached hereto as “**Exhibit AU**” where he is also seen wearing a set of Boneheads pants, a screenshot of which is attached hereto as **Exhibit “AV”**.

58. The third individual, @nikkibonee is the active Twitter handle of the third unknown Boneheads creators who controls, at minimum, the Ethereum Address 0xca5a943044d32fc18c4487195A2Bf9D60918cD55 (given the short-hand name “nikkibone.eth”). I have attached a screenshot of the still active Twitter profile page of this individual as **Exhibit “AW”**, and a screenshot of the Opensea profile page corresponding to their cryptocurrency wallet as **Exhibit “AX”**. I have been unable to tie an identity to this individual.

59. Given that thousands of individuals including myself had been victims of the rug pull perpetuated by the Boneheads team, I began to seek legal advice in the summer of 2022 to see if any lawyers in Ontario would be willing to take on this case. After a series of unsuccessful consultations, I was eventually advised that I should just pursue the matter in Small Claims Court. This was generally because the counsel I consulted did not have a deep understanding of NFTs.

60. As such, on July 11, 2022, I filed a “Plaintiff’s Claim” with the Small Claims Court in Belleville against Profitly Incorporated, a copy of which is attached hereto as **Exhibit “AY”**. The process server who served the Plaintiff’s Claim was met with extreme hostility during his service, and stated that it was the most difficult personal service attempt in his 20 years of being a process server. The process server refused to provide me with an Affidavit of Service evidencing the service.

61. To my surprise, on August 4, 2022, Ivan Avramenko, on behalf of Profitly Incorporated responded with a Defence which is attached hereto as **Exhibit “AZ”**.

62. In or around the fall of 2022, I came across my current counsel who had only recently launched a sole practice focused primarily on cryptocurrency, blockchain and NFTs. I subsequently entered into an agreement with my counsel to pursue this matter as a class action.

63. I understand the seriousness of an allegation of fraud and do not make it lightly. However, I believe the Boneheads team defrauded thousands of consumers, including myself, into purchasing their NFT through extensive promises of utility as I have outlined.

Assets At A Risk of Dissipation

64. The “Breadcrumbs” application (breadcrumbs.app), is an investigation tool that is helpful to visualize blockchain data such as the movement of cryptocurrency funds. Attached hereto as **Exhibit “BA”** is the landing page for the Breadcrumbs website.

65. The “BONEHEADS: Deployer” address, which received 807.925 ETH (\$2,655,245.51 USD (approximately \$3,404,290.27 CAD)) from the mint proceeds and has received a royalty on every secondary market sale of Boneheads NFTs, as of June 5, 2023, currently holds just 1.128 ETH (\$2,036.79 USD or approximately \$1,738.26 CAD worth) and approximately \$1,755 USD (approximately \$2,359.42 CAD) in “Token holdings”. Attached as **Exhibit “BB”** is a copy of the Etherscan page for the BONEHEADS: Deployer wallet.

66. Over the past 22 months, the Boneheads team has slowly and meticulously removed/dissipated funds from the “BONEHEADS: Deployer” address into and between other Ethereum addresses they control, and either directly or between multiple accounts and into centralized exchanges.

67. Centralized exchanges are the “off-ramps” through which cryptocurrency funds can be converted into fiat currency, such as Canadian dollars, and transferred into bank accounts. Transactions that take place once cryptocurrency funds are in centralized exchanges are not transactions that occur on / are viewable on the blockchain.

68. **Exhibit “BC”** attached is a visualization using the Breadcrumbs applications of some of the transactions involving a transfer of funds, to, from, and between cryptocurrency wallets that appear to be controlled by the Boneheads team. Exhibit “BC” also shows transactions from wallets that appears to be controlled by the Boneheads team into centralized exchanges.

69. **Exhibit “BD”** (“Table 1”), attached hereto, is a table outlining most of these transactions. Values shown in Table 1 correspond with the actual value in USD and CAD, on the day of the transaction. Each of the rows of transactions in Table 1 are supported by blockchain data on Etherscan, corresponding to attached Exhibits “BE” – “BS”.

70. Table 1 outlines transactions involving 11 cryptocurrency wallets that appear to be under the control of the Boneheads team:

- i. **“BONEHEADS: Deployer” / “Boneheads.eth”** -
0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F;
- ii. **“BNHDZVAULT”** - 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317;
- iii. **“ivybone.eth”** - 0xa1e43fcb51656354931d47458eceedbc6545df57;
- iv. **“AF4A”** - 0x3acef2d359f430cee5e205262a884d6087dda4fa;
- v. **“3C85”** - 0xbaf331f090320502380ea975562c0c72e2da3c85;
- vi. **“blockbone.eth”** - 0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518;
- vii. **“ticasso.eth”** - 0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147;
- viii. **“58B8”** - 0x82ef36b1c710e4384eb20d70074bc972972d58b8;

- ix. **“praisegod.eth”** - 0xd697255b298cf5d90f3f0c9a0e525ba8e829c952;
- x. **“bonestar.eth”** - 0x0bc42633195913892c48a224a846ddae067898ed; and
- xi. **“bonestars.eth”** - 0xea415b3b5e02b2259019763e2e81c48668b80f0e.

71. Funds totaling approximately **\$943,678.20 CAD** have been moved from these accounts into a number of centralized exchanges as shown in Table 1 and summarized as follows:

- i. **31 ETH (\$99,984.30 USD (\$126,120.19 CAD))** in funds were moved from the “BONEHEADS: Deployer” into “Coinbase Exchange 1” on August 29, 2021;
- ii. **28 ETH (\$110,314.12 USD (\$138,179.47 CAD))** in funds were moved from the “BONEHEADS: Deployer” into “Kraken Exchange 1” on September 3, 2021;
- iii. **25.358 ETH (\$98,567.28 USD (\$123,475.23 CAD))** in funds were moved from “BNHDZVAULT” into “Kraken Exchange 2” on September 4, 2021;
- iv. **94.45 ETH (\$160,008.35 USD (\$212,734.08 CAD))** have been moved to “Kraken Exchange 3” from “BNHDZVAULT” across a series of transactions spanning May 23, 2022 to April 3, 2023;
- v. **15.25 ETH (\$23,880.13 USD (\$31,510.41 CAD))** were been moved to “Kraken Exchange 3” from “ivybone.eth” on March 6, 2023;
- vi. **72.877 ETH (\$220,516.21 USD (\$277,308.80 CAD))** were moved from “3C85” to “Robinhood Exchange” between March 20, 2022 to April 1, 2022;
- vii. **3 ETH (\$12,870.30 USD (\$15,937.29 CAD))** were moved from “ticasso.eth” into “Kucoin 4” on October 31, 2021; and
- viii. **4.78 ETH (\$14,608.64 USD (\$18,412.73 CAD))** were moved from “BNHDZVAULT” to “Robinhood Exchange” on April 18, 2022.

72. Blockchain data on Etherscan shows one final account with the cryptocurrency wallet address 0x7D7e14Fd2b185d9A0ADA62Ae4b59A5Ea8Ab7Ec05 (“EC05”) which may be under the control of the Boneheads team. The address received 0.5 ETH directly to the BONEHEADS: Deployer address on January 27, 2022 and sent 30 ETH directly to the BONEHEADS: Deployer address on March 23, 2022. **Exhibit “BT”** attached is the Etherscan page outlining all the transactions for this cryptocurrency wallet.

73. Attached as **Exhibit “BU”** is Table 2 which shows how the funds received by the Boneheads team were used on extravagant NFT purchases. Each of the rows in Table 2 are supported by attached **Exhibits “BV” – “CH”** which show Opensea or Etherscan transactions for these purchases. Table 2 only looks at some of the larger purchases made by the Boneheads team:

- i. **“BONEHEADS: Deployer”** – Currently holds over 1,800 NFTs. Table 2 looks at 11 NFT collections purchased by this wallet totaling 188 individual NFTs. The total cost for just these 188 NFTs was approximately **\$1,235,928.14 CAD**;
- ii. **“BNHDZVAULT”** – This account purchased 2 NFTs on January 28, 2022 at a total cost of approximately **\$103,758.21 CAD**; and
- iii. **“ivybone.eth”** – This account made a total of 14 NFT purchases on May 1, 2022 for a total of approximately **\$446,483.60 CAD**.

74. In total, across these the “BONEHEADS: Deployer”, “BNHDZVAULT” and “ivybone.eth” accounts, 204 NFTs purchases totaling **\$1,786,169.95 CAD** are shown in Table 2.

75. Zapper (zapper.xyz) is a tool which estimates the value of cryptocurrency wallets, based on current market price of their NFT and cryptocurrency holdings.

76. Attached as **Exhibits “CI” – “CK”** are Zapper results showing the current value, as of June 5 2023, of the Boneheads teams main wallet holdings are as follows:

- i. “BONEHEADS: Deployer” - \$149,009.08 USD (\$200,101.31 CAD) (Exhibit “CI”);
- ii. “BNHDZVAULT” - \$37,225.36 USD (\$49,989.19 CAD) (Exhibit “CJ”); and
- iii. “ivybone.eth” - \$13,648.12 USD (\$18,327.78 CAD) (Exhibit “CK”).

77. Based on Exhibit “BT” attached, as of June 5, 2023, the “EC05” wallet currently has a balance of 71.69 ETH (\$130,034.47 USD (\$174,620.68 CAD)) and holds \$87,302.02 in USDC stablecoin (a cryptocurrency pegged in value to USD) which is worth approximately \$117,236.13 CAD.

Irreparable Harm

78. The “BONEHEADS: Deployer” received 807.925 ETH (\$2,655,245.51 USD (approximately \$3,404,290.27 CAD)) and 27.0958 ETH ((\$87,811.97 USD (\$112,072.43 CAD)) in royalty payments. The total amount received by the BONEHEADS: Deployer wallet alone, is thus, in excess of \$3,500,000 CAD.

79. As outlined above, nearly \$1,000,000 CAD worth of cryptocurrency token has been moved to centralized exchanges and at least \$1.78 million CAD has been used to fund extravagant NFT purchases. The total value of assets that are trackable on the Ethereum blockchain are worth approximately \$500,000 CAD.

80. Without a *Mareva* injunction, consumers like myself face the real possibility of non-recovery of funds, a significant percentage of which have already been dissipated by the Boneheads team.

Undertaking As To Damages

81. I am requesting that I be relieved of my obligation to pay an undertaking as to damages.

82. I am bringing this injunction on behalf of a Class of representatives. I also believe this class action is of public interest, given the rise of blockchain related fraud and the effect it has on every

day consumers like myself. Attached as **Exhibit “CL”** is the Canadian Anti-Fraud Centre Bulletin relating to cryptocurrency investments showing the growing concern around cryptocurrency scam.

83. If the Court were to require an undertaking as to damages, it would defeat my ability to seek this *Mareva* injunction on behalf of my Class.

Substituted Service

84. I have been advised by my counsel that the *Rules of Civil Procedure* require personal service of court documents on the Defendants unless it is impractical to do so.

85. Unless service of the *Mareva* Order is effected to all defendants at once or around the same time, any of the Defendants with control over the remaining assets may be able to dissipate the cryptocurrency or NFT assets listed above within minutes, if not seconds, through various means on the blockchain.

86. I have spoken to my counsel about a strategy to effect service to all the Defendant’s in this case which will ensure the relevant materials come to the attention of all Defendants in and around the same time.

87. The registered corporate addresses of both Profitly Incorporated and DMCB Holdings Inc. is listed as 12 Amber Place, Belleville, ON, K8P 0B5 which is a residential property. However, this property was sold and is currently owned by a Mr. and Mrs. Nurse. I do not believe that any of the Defendants actually live on this property and do not believe that service would be successful by attempting delivery to this address. I have attached a screenshot as **Exhibit “CM”** which shows that ownership for this property changed on June 9, 2021.

88. Additionally, the 1034 County Road 3, Belleville, ON, K8N 4Z1 is a residential address which I believe is the home address of one the parents or relatives Alexandra Stinson. I base this belief on my interaction with the process server who attempted service here.

89. I was able to locate a Kijiji listings relating to a moving sale for a Belleville townhouse by Alexandra Stinson posted some time in or around April 2023. I have attached screenshots of this as **Exhibit “CN”**. The Kijiji listing has since been removed.

90. Alexandra Stinson also posted some items as part of her moving sale on Facebook marketplace, some of which are currently still listed. Attached as **Exhibit “CO”** is a screenshot of Alexandra Stinson’s Facebook marketplace listings.

91. Attached as **Exhibit “CP”** are a series of posts from Alexandra Stinson’s Instagram account, which show she has been in Marabella, Spain since April 2023. The latest such post was posted on June 4, 2023. I believe Alexandra is still in Marabella, Spain based on Google searching of locations that have been tagged in Alexandra’s photos.

92. Attached as **Exhibit “CQ”** is an Instagram post which shows Ivan Avramaneko was in Spain with Alexandra Stinson as of May 2023.

93. Given that none of the named individual Defendants appear to be in Canada, I believe service can be effected to them as follows:

94. I believe service can successfully be effected as follows:

- i. Because of the Plaintiff’s claim, Ivan Avramenko’s and Profitly Incorporated’s email addresses have been provided to me (ivan@profitly.app and legal@profitly.app). I believe that if I were to contact Ivan through both of these email addresses, the service materials would come to his attention. Additionally, I can serve Ivan with the service materials for both Profitly Incorporated and DMCB Holdings Inc., for which he is a co-director and sole director, respectively.
- ii. I believe Alexandra Stinson can be served directly on the social media platforms including Facebook, and Instagram. My plan for Facebook is to message Alexandra

pretending to be a buyer of an item and then serve her with the documents. If for any reasons, Alexandra Stinson states that she can meet me in person, I will instead hire a process server to serve her personally. Alexandra, as a director of Profitly Incorporated, will also be served with the materials for Profitly Incorporated.

95. The fifth unnamed and unknown “John Doe” Defendant would not be captured by this service. This Defendant is known only by their Twitter handle @nikkibonee and Ethereum Address 0xca5a943044d32fc18c4487195A2Bf9D60918cD55 (“nikkibone.eth”).

96. I believe combining service through Twitter and by airdropping an NFT into their cryptocurrency wallet, the court documents in question would come to the attention of this Defendant.

97. Exhibit “**AX**” shows the Opensea account (an NFT marketplace) for John Doe. NFTs in this individual’s cryptocurrency wallet are visible to the public (there are currently 4 NFTs in this wallet). We would know the materials have come to the attention of John Doe through several means:

- i. The NFT itself will display the pages of the court documents like a digital book. If John Doe takes any positive steps, including transferring the NFT out of their cryptocurrency wallet to another wallet or moving the NFT from the front of their Opensea profile page to their “hidden” items tab, it will mean they have interacted with the NFT. No one other than the Ethereum cryptocurrency wallet holder / controller can take these steps; and
- ii. The NFT will contain a link (“grappling hook”). If John Doe click on the link, the webpage displaying the service materials will register that the materials have been viewed. Only John Doe will be able to click this link.

98. Service on Twitter will be done via both a direct message and a public tweet to John Doe's Twitter account. We would know the materials have come to the attention of John Doe through several means:

- i. John Doe takes positive steps following the delivery of the service materials including blocking me from their Twitter account or deleting their Twitter account;
- ii. The service materials will contain a grappling hook link. If John Doe clicks on the link, the webpage displaying the service materials will register that the materials have been viewed. Only John Doe will be able to click this link.

99. I believe the combination of substituted service through Twitter and an NFT airdrop will bring the service materials to the attention of John Doe.

Full and Frank Disclosure of Material Facts

100. I have been advised by counsel that I must fully and frankly disclose all material facts known as this motion is to be heard without the Defendants present.

101. I am fully disclosing that I made some unscrupulous remarks to the Boneheads team via Twitter. I am not trying to justify this behavior but these remarks were made after the Boneheads team had made a series of promises that they did not fulfill, making it evident to me that the project was operating fraudulently.

103. I swear this affidavit in support of this motion for and for no other improper purpose.

DECLARED BEFORE ME remotely at the City of Toronto, Ontario and the affiant stated as being located at the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely



Commissioner of Oaths in and for the
Province of Ontario
Abbas Ali Kassam (LSO: 66326T)



Taylan McRae-Yu

This is **Exhibit "A"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



**Ethereum: A Next-Generation Smart Contract and Decentralized Application Platform.
By Vitalik Buterin (2014).**

When Satoshi Nakamoto first set the Bitcoin blockchain into motion in January 2009, he was simultaneously introducing two radical and untested concepts. The first is the "bitcoin", a decentralized peer-to-peer online currency that maintains a value without any backing, intrinsic value or central issuer. So far, the "bitcoin" as a currency unit has taken up the bulk of the public attention, both in terms of the political aspects of a currency without a central bank and its extreme upward and downward volatility in price. However, there is also another, equally important, part to Satoshi's grand experiment: the concept of a proof of work-based blockchain to allow for public agreement on the order of transactions. Bitcoin as an application can be described as a first-to-file system: if one entity has 50 BTC, and simultaneously sends the same 50 BTC to A and to B, only the transaction that gets confirmed first will process. There is no intrinsic way of determining from two transactions which came earlier, and for decades this stymied the development of decentralized digital currency. Satoshi's blockchain was the first credible decentralized solution. And now, attention is rapidly starting to shift toward this second part of Bitcoin's technology, and how the blockchain concept can be used for more than just money.

Commonly cited applications include using on-blockchain digital assets to represent custom currencies and financial instruments ("colored coins"), the ownership of an underlying physical device ("smart property"), non-fungible assets such as domain names ("Namecoin") as well as more advanced applications such as decentralized exchange, financial derivatives, peer-to-peer gambling and on-blockchain identity and reputation systems. Another important area of inquiry is "smart contracts" - systems which automatically move digital assets according to arbitrary pre-specified rules. For example, one might have a treasury contract of the form "A can withdraw up to X currency units per day, B can withdraw up to Y per day, A and B together can withdraw anything, and A can shut off B's ability to withdraw". The logical extension of this is decentralized autonomous organizations (DAOs) - long-term smart contracts that contain the assets and encode the bylaws of an entire organization. What Ethereum intends to provide is a blockchain with a built-in fully fledged Turing-complete programming language that can be used to create "contracts" that can be used to encode arbitrary state transition functions, allowing users to create any of the systems described above, as well as many others that we have not yet imagined, simply by writing up the logic in a few lines of code.



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History

The concept of decentralized digital currency, as well as alternative applications like property registries, has been around for decades. The anonymous e-cash protocols of the 1980s and the 1990s, mostly reliant on a cryptographic primitive known as Chaumian blinding, provided a currency with a high degree of privacy, but the protocols largely failed to gain traction because of their reliance on a centralized intermediary. In 1998, Wei Dai's b-money became the first proposal to introduce the idea of creating money through solving computational puzzles as well as decentralized consensus, but the proposal was scant on details as to how decentralized consensus could actually be implemented. In 2005, Hal Finney introduced a concept of "reusable proofs of work", a system which uses ideas from b-money together with Adam Back's computationally difficult Hashcash puzzles to create a concept for a cryptocurrency, but once again fell short of the ideal by relying on trusted computing as a backend.

Because currency is a first-to-file application, where the order of transactions is often of critical importance, decentralized currencies require a solution to decentralized consensus. The main roadblock that all pre-Bitcoin currency protocols faced is the fact that, while there had been plenty of research on creating secure Byzantine-fault-tolerant multiparty consensus systems for many years, all of the protocols described were solving only half of the problem. The protocols assumed that all participants in the system were known, and produced security margins of the form "if N parties participate, then the system can tolerate up to $N/4$ malicious actors". The problem is, however, that in an anonymous setting such security margins are vulnerable to sybil attacks, where a single attacker creates thousands of simulated nodes on a server or botnet and uses these nodes to unilaterally secure a majority share.

The innovation provided by Satoshi is the idea of combining a very simple decentralized consensus protocol, based on nodes combining transactions into a "block" every ten minutes creating an ever-growing blockchain, with proof of work as a mechanism through which nodes gain the right to participate in the system. While nodes with a large amount of computational power do have proportionately greater influence, coming up with more computational power than the entire network combined is much harder than simulating a million nodes. Despite the Bitcoin blockchain model's crudeness and simplicity, it has proven to be good enough, and would over the next five years become the bedrock of over two hundred currencies and protocols around the world.



Bitcoin As A State Transition System



From a technical standpoint, the Bitcoin ledger can be thought of as a state transition system, where there is a "state" consisting of the ownership status of all existing bitcoins and a "state transition function" that takes a state and a transaction and outputs a new state which is the result. In a standard banking system, for example, the state is a balance sheet, a transaction is a request to move \$X from A to B, and the state transition function reduces the value in A's account by \$X and increases the value in B's account by \$X. If A's account has less than \$X in the first place, the state transition function returns an error. Hence, one can formally define:

```
APPLY(S, TX) -> S' or ERROR
```

In the banking system defined above:

```
APPLY({ Alice: $50, Bob: $50 }, "send $20 from Alice to Bob") = { Alice: $30, Bob: $70 }
```

But:

```
APPLY({ Alice: $50, Bob: $50 }, "send $70 from Alice to Bob") = ERROR
```

The "state" in Bitcoin is the collection of all coins (technically, "unspent transaction outputs" or UTXO) that have been minted and not yet spent, with each UTXO having a denomination and an owner (defined by a 20-byte address which is essentially a cryptographic public key^[1]). A transaction contains one or more inputs, with each input containing a reference to an existing UTXO and a cryptographic signature produced by the private key associated with the owner's address, and one or more outputs, with each output containing a new UTXO to be added to the state.



The state transition function $\text{APPLY}(S, \text{TX}) \rightarrow S'$ can be defined roughly as follows:

1. For each input in TX:
 - i. If the referenced UTXO is not in S , return an error.
 - ii. If the provided signature does not match the owner of the UTXO, return an error.
2. If the sum of the denominations of all input UTXO is less than the sum of the denominations of all output UTXO, return an error.
3. Return S with all input UTXO removed and all output UTXO added.

The first half of the first step prevents transaction senders from spending coins that do not exist, the second half of the first step prevents transaction senders from spending other people's coins, and the second step enforces conservation of value. In order to use this for payment, the protocol is as follows. Suppose Alice wants to send 11.7 BTC to Bob. First, Alice will look for a set of available UTXO that she owns that totals up to at least 11.7 BTC. Realistically, Alice will not be able to get exactly 11.7 BTC; say that the smallest she can get is $6+4+2=12$. She then creates a transaction with those three inputs and two outputs. The first output will be 11.7 BTC with Bob's address as its owner, and the second output will be the remaining 0.3 BTC "change", with the owner being Alice herself.

Mining



If we had access to a trustworthy centralized service, this system would be trivial to implement; it could simply be coded exactly as described. However, with Bitcoin we are trying to build a decentralized currency system, so we will need to combine the state transition system with a consensus system in order to ensure that everyone agrees on the order of transactions. Bitcoin's decentralized consensus process requires nodes in the network to continuously attempt to produce packages of transactions called "blocks". The network is intended to produce roughly one block every ten minutes, with each block containing a timestamp, a nonce, a reference to (ie. hash of) the



previous block and a list of all of the transactions that have taken place since the previous block. Over time, this creates a persistent, ever-growing, "blockchain" that constantly updates to represent the latest state of the Bitcoin ledger.

The algorithm for checking if a block is valid, expressed in this paradigm, is as follows:

1. Check if the previous block referenced by the block exists and is valid
2. Check that the timestamp of the block is greater than that of the previous block^[2] and less than 2 hours into the future.
3. Check that the proof of work on the block is valid.
4. Let $S[0]$ be the state at the end of the previous block.
5. Suppose TX is the block's transaction list with n transactions. For all i in $0 \dots n-1$, set $S[i+1] = \text{APPLY}(S[i], TX[i])$. If any application returns an error, exit and return false.
6. Return true, and register $S[n]$ as the state at the end of this block

Essentially, each transaction in the block must provide a state transition that is valid. Note that the state is not encoded in the block in any way; it is purely an abstraction to be remembered by the validating node and can only be (securely) computed for any block by starting from the genesis state and sequentially applying every transaction in every block. Additionally, note that the order in which the miner includes transactions into the block matters; if there are two transactions A and B in a block such that B spends a UTXO created by A, then the block will be valid if A comes before B but not otherwise.

The interesting part of the block validation algorithm is the concept of "proof of work": the condition is that the SHA256 hash of every block, treated as a 256-bit number, must be less than a dynamically adjusted target, which as of the time of this writing is approximately 2^{90} . The purpose of this is to make block creation computationally "hard", thereby preventing sybil attackers from remaking the entire blockchain in their favor. Because SHA256 is designed to be a completely unpredictable pseudorandom function, the only way to create a valid block is simply trial and error, repeatedly incrementing the nonce and seeing if the new hash matches. At the current target of 2192, this means an average of 264 tries; in general, the target is recalibrated by the network every 2016 blocks so that on average a new block is produced by some node in the network every ten minutes. In order to compensate miners for this computational work, the miner of every block is entitled to include a transaction giving themselves 25 BTC out of nowhere. Additionally, if any transaction has a higher total denomination in its inputs than in its outputs, the difference also goes to the miner as a "transaction fee". Incidentally, this is also the only mechanism by which BTC are issued; the genesis state contained no coins at all.



In order to better understand the purpose of mining, let us examine what happens in the event of a malicious attacker. Since Bitcoin's underlying cryptography is known to be secure, the attacker will target the one part of the Bitcoin system that is not protected by cryptography directly: the order of transactions. The attacker's strategy is simple:

1. Send 100 BTC to a merchant in exchange for some product (preferably a rapid-delivery digital good)
2. Wait for the delivery of the product
3. Produce another transaction sending the same 100 BTC to himself
4. Try to convince the network that his transaction to himself was the one that came first.

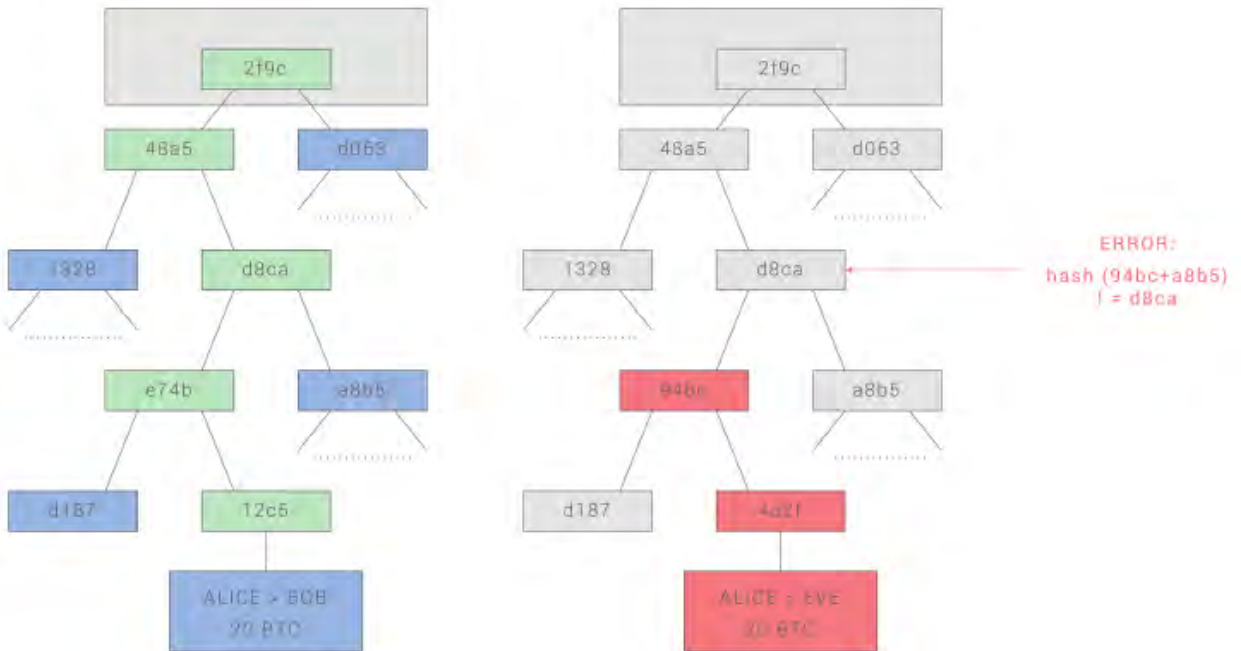
Once step (1) has taken place, after a few minutes some miner will include the transaction in a block, say block number 270000. After about one hour, five more blocks will have been added to the chain after that block, with each of those blocks indirectly pointing to the transaction and thus "confirming" it. At this point, the merchant will accept the payment as finalized and deliver the product; since we are assuming this is a digital good, delivery is instant. Now, the attacker creates another transaction sending the 100 BTC to himself. If the attacker simply releases it into the wild, the transaction will not be processed; miners will attempt to run `APPLY(S,TX)` and notice that TX consumes a UTXO which is no longer in the state. So instead, the attacker creates a "fork" of the blockchain, starting by mining another version of block 270000 pointing to the same block 269999 as a parent but with the new transaction in place of the old one. Because the block data is different, this requires redoing the proof of work. Furthermore, the attacker's new version of block 270000 has a different hash, so the original blocks 270001 to 270005 do not "point" to it; thus, the original chain and the attacker's new chain are completely separate. The rule is that in a fork the longest blockchain (ie. the one backed by the largest quantity of proof of work) is taken to be the truth, and so legitimate miners will work on the 270005 chain while the attacker alone is working on the 270000 chain. In order for the attacker to make his blockchain the longest, he would need to have more computational power than the rest of the network combined in order to catch up (hence, "51% attack").



Merkle Trees

Left: it suffices to present only a small number of nodes in a Merkle tree to give a proof of the validity of a branch.

Right: any attempt to change any part of the Merkle tree will eventually lead to an inconsistency somewhere up the chain.



An important scalability feature of Bitcoin is that the block is stored in a multi-level data structure. The "hash" of a block is actually only the hash of the block header, a roughly 200-byte piece of data that contains the timestamp, nonce, previous block hash and the root hash of a data structure called the Merkle tree storing all transactions in the block.

A Merkle tree is a type of binary tree, composed of a set of nodes with a large number of leaf nodes at the bottom of the tree containing the underlying data, a set of intermediate nodes where each node is the hash of its two children, and finally a single root node, also formed from the hash of its two children, representing the "top" of the tree. The purpose of the Merkle tree is to allow the data in a block to be delivered piecemeal: a node can download only the header of a block from one source, the small part of the tree relevant to them from

another source, and still be assured that all of the data is correct. The reason why this works is that hashes propagate upward: if a malicious user attempts to swap in a fake transaction into the bottom of a Merkle tree, this change will cause a change in the node above, and then a change in the node above that, finally changing the root of the tree and therefore the hash of the block, causing the protocol to register it as a completely different block (almost certainly with an invalid proof of work).

The Merkle tree protocol is arguably essential to long-term sustainability. A "full node" in the Bitcoin network, one that stores and processes the entirety of every block, takes up about 15 GB of disk space in the Bitcoin network as of April 2014, and is growing by over a gigabyte per month. Currently, this is viable for some desktop computers and not phones, and later on in the future only businesses and hobbyists will be able to participate. A protocol known as "simplified payment verification" (SPV) allows for another class of nodes to exist, called "light nodes", which download the block headers, verify the proof of work on the block headers, and then download only the "branches" associated with transactions that are relevant to them. This allows light nodes to determine with a strong guarantee of security what the status of any Bitcoin transaction, and their current balance, is while downloading only a very small portion of the entire blockchain.

Alternative Blockchain Applications

The idea of taking the underlying blockchain idea and applying it to other concepts also has a long history. In 2005, Nick Szabo came out with the concept of "secure property titles with owner authority", a document describing how "new advances in replicated database technology" will allow for a blockchain-based system for storing a registry of who owns what land, creating an elaborate framework including concepts such as homesteading, adverse possession and Georgian land tax. However, there was unfortunately no effective replicated database system available at the time, and so the protocol was never implemented in practice. After 2009, however, once Bitcoin's decentralized consensus was developed a number of alternative applications rapidly began to emerge:

- **Namecoin** - created in 2010, Namecoin is best described as a decentralized name registration database. In decentralized protocols like Tor, Bitcoin and BitMessage, there needs to be some way of identifying accounts so that other people can interact with them, but in all existing solutions the only kind of identifier available is a pseudorandom hash like `1LW79wp5ZBqaHW1jL5TCiBCrhQYtHagUWy`. Ideally, one would like to be able to have an account with a name like "george". However, the problem is that if one person can create an account named "george" then someone else can use the same process to register "george" for themselves as well and impersonate them. The only solution is a first-to-file paradigm, where the first registrant succeeds and the second fails - a problem perfectly suited for the Bitcoin consensus protocol. Namecoin is the oldest, and most successful, implementation of a name registration system using such an idea.
- **Colored coins** - the purpose of colored coins is to serve as a protocol to allow people to create their own digital currencies - or, in the important trivial case of a currency with one unit, digital tokens,



on the Bitcoin blockchain. In the colored coins protocol, one "issues" a new currency by publicly assigning a color to a specific Bitcoin UTXO, and the protocol recursively defines the color of other UTXO to be the same as the color of the inputs that the transaction creating them spent (some special rules apply in the case of mixed-color inputs). This allows users to maintain wallets containing only UTXO of a specific color and send them around much like regular bitcoins, backtracking through the blockchain to determine the color of any UTXO that they receive.

- **Metacoins** - the idea behind a metacoin is to have a protocol that lives on top of Bitcoin, using Bitcoin transactions to store metacoin transactions but having a different state transition function, `APPLY'`. Because the metacoin protocol cannot prevent invalid metacoin transactions from appearing in the Bitcoin blockchain, a rule is added that if `APPLY'(S,TX)` returns an error, the protocol defaults to `APPLY'(S,TX) = S`. This provides an easy mechanism for creating an arbitrary cryptocurrency protocol, potentially with advanced features that cannot be implemented inside of Bitcoin itself, but with a very low development cost since the complexities of mining and networking are already handled by the Bitcoin protocol.

Thus, in general, there are two approaches toward building a consensus protocol: building an independent network, and building a protocol on top of Bitcoin. The former approach, while reasonably successful in the case of applications like Namecoin, is difficult to implement; each individual implementation needs to bootstrap an independent blockchain, as well as building and testing all of the necessary state transition and networking code. Additionally, we predict that the set of applications for decentralized consensus technology will follow a power law distribution where the vast majority of applications would be too small to warrant their own blockchain, and we note that there exist large classes of decentralized applications, particularly decentralized autonomous organizations, that need to interact with each other.

The Bitcoin-based approach, on the other hand, has the flaw that it does not inherit the simplified payment verification features of Bitcoin. SPV works for Bitcoin because it can use blockchain depth as a proxy for validity; at some point, once the ancestors of a transaction go far enough back, it is safe to say that they were legitimately part of the state. Blockchain-based meta-protocols, on the other hand, cannot force the blockchain not to include transactions that are not valid within the context of their own protocols. Hence, a fully secure SPV meta-protocol implementation would need to backward scan all the way to the beginning of the Bitcoin blockchain to determine whether or not certain transactions are valid. Currently, all "light" implementations of Bitcoin-based meta-protocols rely on a trusted server to provide the data, arguably a highly suboptimal result especially when one of the primary purposes of a cryptocurrency is to eliminate the need for trust.

Scripting

Even without any extensions, the Bitcoin protocol actually does facilitate a weak version of a concept of "smart contracts". UTXO in Bitcoin can be owned not just by a public key, but also by a more complicated script expressed in a simple stack-based programming language. In this paradigm, a transaction spending that UTXO must provide data that satisfies the script. Indeed, even the basic public key ownership mechanism is



implemented via a script: the script takes an elliptic curve signature as input, verifies it against the transaction and the address that owns the UTXO, and returns 1 if the verification is successful and 0 otherwise. Other, more complicated, scripts exist for various additional use cases. For example, one can construct a script that requires signatures from two out of a given three private keys to validate ("multisig"), a setup useful for corporate accounts, secure savings accounts and some merchant escrow situations. Scripts can also be used to pay bounties for solutions to computational problems, and one can even construct a script that says something like "this Bitcoin UTXO is yours if you can provide an SPV proof that you sent a Dogecoin transaction of this denomination to me", essentially allowing decentralized cross-cryptocurrency exchange.

However, the scripting language as implemented in Bitcoin has several important limitations:

- **Lack of Turing-completeness** - that is to say, while there is a large subset of computation that the Bitcoin scripting language supports, it does not nearly support everything. The main category that is missing is loops. This is done to avoid infinite loops during transaction verification; theoretically it is a surmountable obstacle for script programmers, since any loop can be simulated by simply repeating the underlying code many times with an if statement, but it does lead to scripts that are very space-inefficient. For example, implementing an alternative elliptic curve signature algorithm would likely require 256 repeated multiplication rounds all individually included in the code.
- **Value-blindness** - there is no way for a UTXO script to provide fine-grained control over the amount that can be withdrawn. For example, one powerful use case of an oracle contract would be a hedging contract, where A and B put in \$1000 worth of BTC and after 30 days the script sends \$1000 worth of BTC to A and the rest to B. This would require an oracle to determine the value of 1 BTC in USD, but even then it is a massive improvement in terms of trust and infrastructure requirement over the fully centralized solutions that are available now. However, because UTXO are all-or-nothing, the only way to achieve this is through the very inefficient hack of having many UTXO of varying denominations (eg. one UTXO of 2^k for every k up to 30) and having the oracle pick which UTXO to send to A and which to B.
- **Lack of state** - UTXO can either be spent or unspent; there is no opportunity for multi-stage contracts or scripts which keep any other internal state beyond that. This makes it hard to make multi-stage options contracts, decentralized exchange offers or two-stage cryptographic commitment protocols (necessary for secure computational bounties). It also means that UTXO can only be used to build simple, one-off contracts and not more complex "stateful" contracts such as decentralized organizations, and makes meta-protocols difficult to implement. Binary state combined with value-blindness also mean that another important application, withdrawal limits, is impossible.
- **Blockchain-blindness** - UTXO are blind to blockchain data such as the nonce and previous hash. This severely limits applications in gambling, and several other categories, by depriving the scripting language of a potentially valuable source of randomness.



Thus, we see three approaches to building advanced applications on top of cryptocurrency: building a new blockchain, using scripting on top of Bitcoin, and building a meta-protocol on top of Bitcoin. Building a new blockchain allows for unlimited freedom in building a feature set, but at the cost of development time and bootstrapping effort. Using scripting is easy to implement and standardize, but is very limited in its capabilities, and meta-protocols, while easy, suffer from faults in scalability. With Ethereum, we intend to build a generalized framework that can provide the advantages of all three paradigms at the same time.

Ethereum

The intent of Ethereum is to merge together and improve upon the concepts of scripting, altcoins and on-chain meta-protocols, and allow developers to create arbitrary consensus-based applications that have the scalability, standardization, feature-completeness, ease of development and interoperability offered by these different paradigms all at the same time. Ethereum does this by building what is essentially the ultimate abstract foundational layer: a blockchain with a built-in Turing-complete programming language, allowing anyone to write smart contracts and decentralized applications where they can create their own arbitrary rules for ownership, transaction formats and state transition functions. A bare-bones version of Namecoin can be written in two lines of code, and other protocols like currencies and reputation systems can be built in under twenty. Smart contracts, cryptographic "boxes" that contain value and only unlock it if certain conditions are met, can also be built on top of our platform, with vastly more power than that offered by Bitcoin scripting because of the added powers of Turing-completeness, value-awareness, blockchain-awareness and state.

Ethereum Accounts

In Ethereum, the state is made up of objects called "accounts", with each account having a 20-byte address and state transitions being direct transfers of value and information between accounts. An Ethereum account contains four fields:

- The **nonce**, a counter used to make sure each transaction can only be processed once
- The account's current **ether balance**
- The account's **contract code**, if present
- The account's **storage** (empty by default)

"Ether" is the main internal crypto-fuel of Ethereum, and is used to pay transaction fees. In general, there are two types of accounts: externally owned accounts, controlled by private keys, and contract accounts, controlled by their contract code. An externally owned account has no code, and one can send messages from an externally owned account by creating and signing a transaction; in a contract account, every time the



contract account receives a message its code activates, allowing it to read and write to internal storage and send other messages or create contracts in turn.

Messages and Transactions

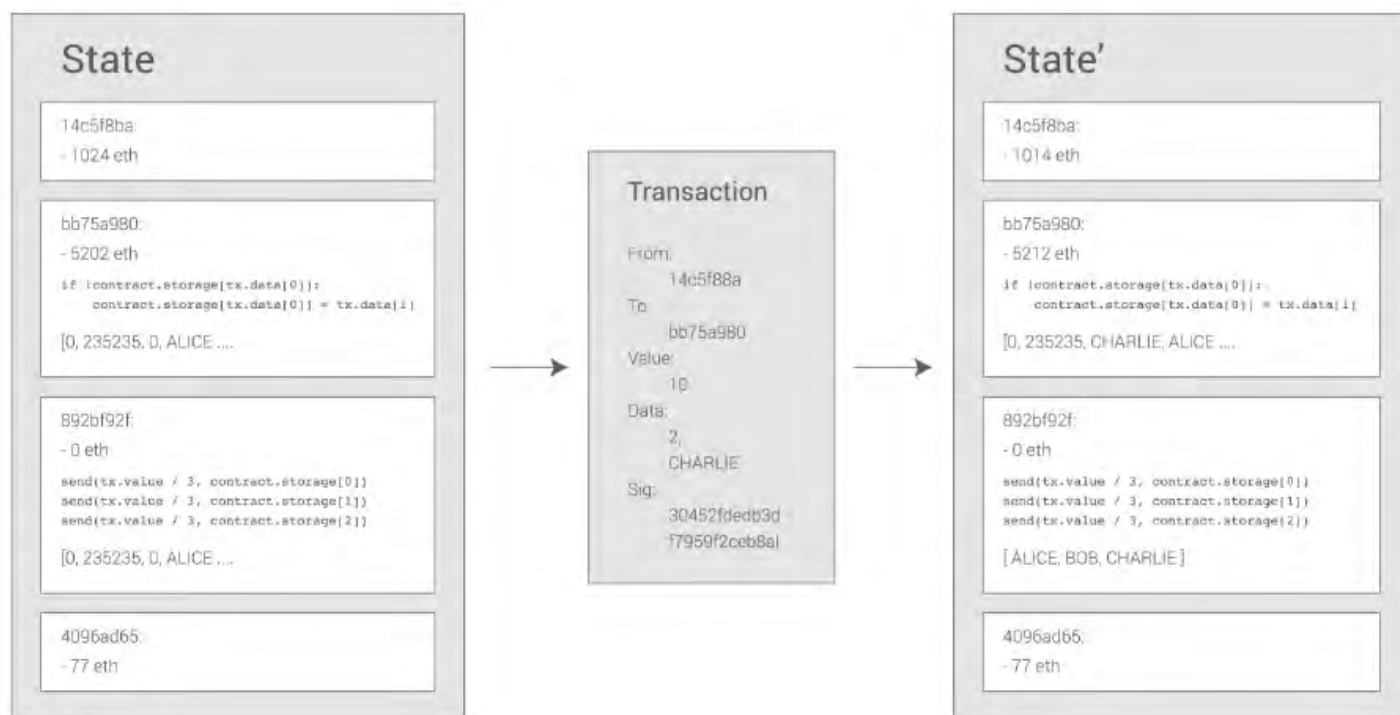
"Messages" in Ethereum are somewhat similar to "transactions" in Bitcoin, but with three important differences. First, an Ethereum message can be created either by an external entity or a contract, whereas a Bitcoin transaction can only be created externally. Second, there is an explicit option for Ethereum messages to contain data. Finally, the recipient of an Ethereum message, if it is a contract account, has the option to return a response; this means that Ethereum messages also encompass the concept of functions.

The term "transaction" is used in Ethereum to refer to the signed data package that stores a message to be sent from an externally owned account. Transactions contain the recipient of the message, a signature identifying the sender, the amount of ether and the data to send, as well as two values called `STARTGAS` and `GASPRICE`. In order to prevent exponential blowup and infinite loops in code, each transaction is required to set a limit to how many computational steps of code execution it can spawn, including both the initial message and any additional messages that get spawned during execution. `STARTGAS` is this limit, and `GASPRICE` is the fee to pay to the miner per computational step. If transaction execution "runs out of gas", all state changes revert - except for the payment of the fees, and if transaction execution halts with some gas remaining then the remaining portion of the fees is refunded to the sender. There is also a separate transaction type, and corresponding message type, for creating a contract; the address of a contract is calculated based on the hash of the account nonce and transaction data.

An important consequence of the message mechanism is the "first class citizen" property of Ethereum - the idea that contracts have equivalent powers to external accounts, including the ability to send message and create other contracts. This allows contracts to simultaneously serve many different roles: for example, one might have a member of a decentralized organization (a contract) be an escrow account (another contract) between an paranoid individual employing custom quantum-proof Lamport signatures (a third contract) and a co-signing entity which itself uses an account with five keys for security (a fourth contract). The strength of the Ethereum platform is that the decentralized organization and the escrow contract do not need to care about what kind of account each party to the contract is.



Ethereum State Transition Function



The Ethereum state transition function, $APPLY(S, TX) \rightarrow S'$ can be defined as follows:

1. Check if the transaction is well-formed (ie. has the right number of values), the signature is valid, and the nonce matches the nonce in the sender's account. If not, return an error.
2. Calculate the transaction fee as $STARTGAS * GASPRICE$, and determine the sending address from the signature. Subtract the fee from the sender's account balance and increment the sender's nonce. If there is not enough balance to spend, return an error.
3. Initialize $GAS = STARTGAS$, and take off a certain quantity of gas per byte to pay for the bytes in the transaction.
4. Transfer the transaction value from the sender's account to the receiving account. If the receiving account does not yet exist, create it. If the receiving account is a contract, run the contract's code either to completion or until the execution runs out of gas.
5. If the value transfer failed because the sender did not have enough money, or the code execution ran out of gas, revert all state changes except the payment of the fees, and add the fees to the miner's account.
6. Otherwise, refund the fees for all remaining gas to the sender, and send the fees paid for gas consumed to the miner.



For example, suppose that the contract's code is:

```
if !contract.storage[msg.data[0]]:  
    contract.storage[msg.data[0]] = msg.data[1]
```

Note that in reality the contract code is written in the low-level EVM code; this example is written in Serpent, our high-level language, for clarity, and can be compiled down to EVM code. Suppose that the contract's storage starts off empty, and a transaction is sent with 10 ether value, 2000 gas, 0.001 ether gasprice, and two data fields: [2, 'CHARLIE']^[3]. The process for the state transition function in this case is as follows:

1. Check that the transaction is valid and well formed.
2. Check that the transaction sender has at least $2000 * 0.001 = 2$ ether. If it is, then subtract 2 ether from the sender's account.
3. Initialize gas = 2000; assuming the transaction is 170 bytes long and the byte-fee is 5, subtract 850 so that there is 1150 gas left.
4. Subtract 10 more ether from the sender's account, and add it to the contract's account.
5. Run the code. In this case, this is simple: it checks if the contract's storage at index 2 is used, notices that it is not, and so it sets the storage at index 2 to the value CHARLIE. Suppose this takes 187 gas, so the remaining amount of gas is $1150 - 187 = 963$
6. Add $963 * 0.001 = 0.963$ ether back to the sender's account, and return the resulting state.

If there was no contract at the receiving end of the transaction, then the total transaction fee would simply be equal to the provided GASPRICE multiplied by the length of the transaction in bytes, and the data sent alongside the transaction would be irrelevant. Additionally, note that contract-initiated messages can assign a gas limit to the computation that they spawn, and if the sub-computation runs out of gas it gets reverted only to the point of the message call. Hence, just like transactions, contracts can secure their limited computational resources by setting strict limits on the sub-computations that they spawn.



Code Execution

The code in Ethereum contracts is written in a low-level, stack-based bytecode language, referred to as "Ethereum virtual machine code" or "EVM code". The code consists of a series of bytes, where each byte represents an operation. In general, code execution is an infinite loop that consists of repeatedly carrying out the operation at the current program counter (which begins at zero) and then incrementing the program counter by one, until the end of the code is reached or an error or STOP or RETURN instruction is detected. The operations have access to three types of space in which to store data:

- The **stack**, a last-in-first-out container to which 32-byte values can be pushed and popped
- **Memory**, an infinitely expandable byte array
- The contract's long-term **storage**, a key/value store where keys and values are both 32 bytes. Unlike stack and memory, which reset after computation ends, storage persists for the long term.

The code can also access the value, sender and data of the incoming message, as well as block header data, and the code can also return a byte array of data as an output.

The formal execution model of EVM code is surprisingly simple. While the Ethereum virtual machine is running, its full computational state can be defined by the tuple (block_state, transaction, message, code, memory, stack, pc, gas), where block_state is the global state containing all accounts and includes balances and storage. Every round of execution, the current instruction is found by taking the pc-th byte of code, and each instruction has its own definition in terms of how it affects the tuple. For example, ADD pops two items off the stack and pushes their sum, reduces gas by 1 and increments pc by 1, and SSTORE pushes the top two items off the stack and inserts the second item into the contract's storage at the index specified by the first item, as well as reducing gas by up to 200 and incrementing pc by 1. Although there are many ways to optimize Ethereum via just-in-time compilation, a basic implementation of Ethereum can be done in a few hundred lines of code.



Blockchain and Mining



The Ethereum blockchain is in many ways similar to the Bitcoin blockchain, although it does have some differences. The main difference between Ethereum and Bitcoin with regard to the blockchain architecture is that, unlike Bitcoin, Ethereum blocks contain a copy of both the transaction list and the most recent state. Aside from that, two other values, the block number and the difficulty, are also stored in the block. The block validation algorithm in Ethereum is as follows:

1. Check if the previous block referenced exists and is valid.
2. Check that the timestamp of the block is greater than that of the referenced previous block and less than 15 minutes into the future
3. Check that the block number, difficulty, transaction root, uncle root and gas limit (various low-level Ethereum-specific concepts) are valid.
4. Check that the proof of work on the block is valid.
5. Let $S[0]$ be the STATE_ROOT of the previous block.
6. Let TX be the block's transaction list, with n transactions. For all i in $0..n-1$, set $S[i+1] = \text{APPLY}(S[i], TX[i])$. If any application returns an error, or if the total gas consumed in the block up until this point exceeds the GASLIMIT, return an error.
7. Let S_FINAL be $S[n]$, but adding the block reward paid to the miner.
8. Check if S_FINAL is the same as the STATE_ROOT. If it is, the block is valid; otherwise, it is not valid.



The approach may seem highly inefficient at first glance, because it needs to store the entire state with each block, but in reality efficiency should be comparable to that of Bitcoin. The reason is that the state is stored in the tree structure, and after every block only a small part of the tree needs to be changed. Thus, in general, between two adjacent blocks the vast majority of the tree should be the same, and therefore the data can be stored once and referenced twice using pointers (ie. hashes of subtrees). A special kind of tree known as a "Patricia tree" is used to accomplish this, including a modification to the Merkle tree concept that allows for nodes to be inserted and deleted, and not just changed, efficiently. Additionally, because all of the state information is part of the last block, there is no need to store the entire blockchain history - a strategy which, if it could be applied to Bitcoin, can be calculated to provide 5-20x savings in space.

Applications

In general, there are three types of applications on top of Ethereum. The first category is financial applications, providing users with more powerful ways of managing and entering into contracts using their money. This includes sub-currencies, financial derivatives, hedging contracts, savings wallets, wills, and ultimately even some classes of full-scale employment contracts. The second category is semi-financial applications, where money is involved but there is also a heavy non-monetary side to what is being done; a perfect example is self-enforcing bounties for solutions to computational problems. Finally, there are applications such as online voting and decentralized governance that are not financial at all.

Token Systems

On-blockchain token systems have many applications ranging from sub-currencies representing assets such as USD or gold to company stocks, individual tokens representing smart property, secure unforgeable coupons, and even token systems with no ties to conventional value at all, used as point systems for incentivization. Token systems are surprisingly easy to implement in Ethereum. The key point to understand is that all a currency, or token system, fundamentally is is a database with one operation: subtract X units from A and give X units to B, with the proviso that (1) X had at least X units before the transaction and (2) the transaction is approved by A. All that it takes to implement a token system is to implement this logic into a contract.



The basic code for implementing a token system in Serpent looks as follows:

```
from = msg.sender
to = msg.data[0]
value = msg.data[1]

if contract.storage[from] >= value:
    contract.storage[from] = contract.storage[from] - value
    contract.storage[to] = contract.storage[to] + value
```

This is essentially a literal implementation of the "banking system" state transition function described further above in this document. A few extra lines of code need to be added to provide for the initial step of distributing the currency units in the first place and a few other edge cases, and ideally a function would be added to let other contracts query for the balance of an address. But that's all there is to it. Theoretically, Ethereum-based token systems acting as sub-currencies can potentially include another important feature that on-chain Bitcoin-based meta-currencies lack: the ability to pay transaction fees directly in that currency. The way this would be implemented is that the contract would maintain an ether balance with which it would refund ether used to pay fees to the sender, and it would refill this balance by collecting the internal currency units that it takes in fees and reselling them in a constant running auction. Users would thus need to "activate" their accounts with ether, but once the ether is there it would be reusable because the contract would refund it each time.

Financial derivatives and Stable-Value Currencies

Financial derivatives are the most common application of a "smart contract", and one of the simplest to implement in code. The main challenge in implementing financial contracts is that the majority of them require reference to an external price ticker; for example, a very desirable application is a smart contract that hedges against the volatility of ether (or another cryptocurrency) with respect to the US dollar, but doing this requires the contract to know what the value of ETH/USD is. The simplest way to do this is through a "data feed" contract maintained by a specific party (eg. NASDAQ) designed so that that party has the ability to update the contract as needed, and providing an interface that allows other contracts to send a message to that contract and get back a response that provides the price.

Given that critical ingredient, the hedging contract would look as follows:

1. Wait for party A to input 1000 ether.
2. Wait for party B to input 1000 ether.
3. Record the USD value of 1000 ether, calculated by querying the data feed contract, in storage, say this is \$x.
4. After 30 days, allow A or B to "ping" the contract in order to send \$x worth of ether (calculated by querying the data feed contract again to get the new price) to A and the rest to B.



Such a contract would have significant potential in crypto-commerce. One of the main problems cited about cryptocurrency is the fact that it's volatile; although many users and merchants may want the security and convenience of dealing with cryptographic assets, they many not wish to face that prospect of losing 23% of the value of their funds in a single day. Up until now, the most commonly proposed solution has been issuer-backed assets; the idea is that an issuer creates a sub-currency in which they have the right to issue and revoke units, and provide one unit of the currency to anyone who provides them (offline) with one unit of a specified underlying asset (eg. gold, USD). The issuer then promises to provide one unit of the underlying asset to anyone who sends back one unit of the crypto-asset. This mechanism allows any non-cryptographic asset to be "uplifted" into a cryptographic asset, provided that the issuer can be trusted.

In practice, however, issuers are not always trustworthy, and in some cases the banking infrastructure is too weak, or too hostile, for such services to exist. Financial derivatives provide an alternative. Here, instead of a single issuer providing the funds to back up an asset, a decentralized market of speculators, betting that the price of a cryptographic reference asset will go up, plays that role. Unlike issuers, speculators have no option to default on their side of the bargain because the hedging contract holds their funds in escrow. Note that this approach is not fully decentralized, because a trusted source is still needed to provide the price ticker, although arguably even still this is a massive improvement in terms of reducing infrastructure requirements (unlike being an issuer, issuing a price feed requires no licenses and can likely be categorized as free speech) and reducing the potential for fraud.



Identity and Reputation Systems

The earliest alternative cryptocurrency of all, Namecoin, attempted to use a Bitcoin-like blockchain to provide a name registration system, where users can register their names in a public database alongside other data. The major cited use case is for a DNS system, mapping domain names like "bitcoin.org" (or, in Namecoin's case, "bitcoin.bit") to an IP address. Other use cases include email authentication and potentially more advanced reputation systems. Here is the basic contract to provide a Namecoin-like name registration system on Ethereum:

```
if !contract.storage[tx.data[0]]:  
    contract.storage[tx.data[0]] = tx.data[1]
```

The contract is very simple; all it is is a database inside the Ethereum network that can be added to, but not modified or removed from. Anyone can register a name with some value, and that registration then sticks forever. A more sophisticated name registration contract will also have a "function clause" allowing other contracts to query it, as well as a mechanism for the "owner" (ie. the first registerer) of a name to change the data or transfer ownership. One can even add reputation and web-of-trust functionality on top.

Decentralized File Storage

Over the past few years, there have emerged a number of popular online file storage startups, the most prominent being Dropbox, seeking to allow users to upload a backup of their hard drive and have the service store the backup and allow the user to access it in exchange for a monthly fee. However, at this point the file storage market is at times relatively inefficient; a cursory look at various existing solutions shows that, particularly at the "uncanny valley" 20-200 GB level at which neither free quotas nor enterprise-level discounts kick in, monthly prices for mainstream file storage costs are such that you are paying for more than the cost of the entire hard drive in a single month. Ethereum contracts can allow for the development of a decentralized file storage ecosystem, where individual users can earn small quantities of money by renting out their own hard drives and unused space can be used to further drive down the costs of file storage.

The key underpinning piece of such a device would be what we have termed the "decentralized Dropbox contract". This contract works as follows. First, one splits the desired data up into blocks, encrypting each block for privacy, and builds a Merkle tree out of it. One then makes a contract with the rule that, every N blocks, the contract would pick a random index in the Merkle tree (using the previous block hash, accessible from contract code, as a source of randomness), and give X ether to the first entity to supply a transaction with a



simplified payment verification-like proof of ownership of the block at that particular index in the tree. When a user wants to re-download their file, they can use a micropayment channel protocol (eg. pay 1 szabo per 32 kilobytes) to recover the file; the most fee-efficient approach is for the payer not to publish the transaction until the end, instead replacing the transaction with a slightly more lucrative one with the same nonce after every 32 kilobytes.

An important feature of the protocol is that, although it may seem like one is trusting many random nodes not to decide to forget the file, one can reduce that risk down to near-zero by splitting the file into many pieces via secret sharing, and watching the contracts to see each piece is still in some node's possession. If a contract is still paying out money, that provides a cryptographic proof that someone out there is still storing the file.

Decentralized Autonomous Organizations

The general concept of a "decentralized organization" is that of a virtual entity that has a certain set of members or shareholders which, perhaps with a 67% majority, have the right to spend the entity's funds and modify its code. The members would collectively decide on how the organization should allocate its funds. Methods for allocating a DAO's funds could range from bounties, salaries to even more exotic mechanisms such as an internal currency to reward work. This essentially replicates the legal trappings of a traditional company or nonprofit but using only cryptographic blockchain technology for enforcement. So far much of the talk around DAOs has been around the "capitalist" model of a "decentralized autonomous corporation" (DAC) with dividend-receiving shareholders and tradable shares; an alternative, perhaps described as a "decentralized autonomous community", would have all members have an equal share in the decision making and require 67% of existing members to agree to add or remove a member. The requirement that one person can only have one membership would then need to be enforced collectively by the group.

A general outline for how to code a DO is as follows. The simplest design is simply a piece of self-modifying code that changes if two thirds of members agree on a change. Although code is theoretically immutable, one can easily get around this and have de-facto mutability by having chunks of the code in separate contracts, and having the address of which contracts to call stored in the modifiable storage. In a simple implementation of such a DAO contract, there would be three transaction types, distinguished by the data provided in the transaction:

- `[0, i, K, V]` to register a proposal with index `i` to change the address at storage index `K` to value `V`
- `[0, i]` to register a vote in favor of proposal `i`
- `[2, i]` to finalize proposal `i` if enough votes have been made

The contract would then have clauses for each of these. It would maintain a record of all open storage changes, along with a list of who voted for them. It would also have a list of all members. When any storage



change gets to two thirds of members voting for it, a finalizing transaction could execute the change. A more sophisticated skeleton would also have built-in voting ability for features like sending a transaction, adding members and removing members, and may even provide for Liquid Democracy-style vote delegation (ie. anyone can assign someone to vote for them, and assignment is transitive so if A assigns B and B assigns C then C determines A's vote). This design would allow the DO to grow organically as a decentralized community, allowing people to eventually delegate the task of filtering out who is a member to specialists, although unlike in the "current system" specialists can easily pop in and out of existence over time as individual community members change their alignments.

An alternative model is for a decentralized corporation, where any account can have zero or more shares, and two thirds of the shares are required to make a decision. A complete skeleton would involve asset management functionality, the ability to make an offer to buy or sell shares, and the ability to accept offers (preferably with an order-matching mechanism inside the contract). Delegation would also exist Liquid Democracy-style, generalizing the concept of a "board of directors".

In the future, more advanced mechanisms for organizational governance may be implemented; it is at this point that a decentralized organization (DO) can start to be described as a decentralized autonomous organization (DAO). The difference between a DO and a DAO is fuzzy, but the general dividing line is whether the governance is generally carried out via a political-like process or an "automatic" process; a good intuitive test is the "no common language" criterion: can the organization still function if no two members spoke the same language? Clearly, a simple traditional shareholder-style corporation would fail, whereas something like the Bitcoin protocol would be much more likely to succeed. Robin Hanson's futarchy, a mechanism for organizational governance via prediction markets, is a good example of what truly "autonomous" governance might look like. Note that one should not necessarily assume that all DAOs are superior to all DOs; automation is simply a paradigm that is likely to have very large benefits in certain particular places and may not be practical in others, and many semi-DAOs are also likely to exist.

Further Applications

1. Savings wallets. Suppose that Alice wants to keep her funds safe, but is worried that she will lose or someone will hack her private key. She puts ether into a contract with Bob, a bank, as follows:

- Alice alone can withdraw a maximum of 1% of the funds per day.
- Bob alone can withdraw a maximum of 1% of the funds per day, but Alice has the ability to make a transaction with her key shutting off this ability.
- Alice and Bob together can withdraw anything.

Normally, 1% per day is enough for Alice, and if Alice wants to withdraw more she can contact Bob for help. If Alice's key gets hacked, she runs to Bob to move the funds to a new contract. If she loses her key, Bob will get the funds out eventually. If Bob turns out to be malicious, then she can turn off his ability to withdraw.



2. Crop insurance. One can easily make a financial derivatives contract but using a data feed of the weather instead of any price index. If a farmer in Iowa purchases a derivative that pays out inversely based on the precipitation in Iowa, then if there is a drought, the farmer will automatically receive money and if there is enough rain the farmer will be happy because their crops would do well.

3. A decentralized data feed. For financial contracts for difference, it may actually be possible to decentralize the data feed via a protocol called "SchellingCoin". SchellingCoin basically works as follows: N parties all put into the system the value of a given datum (eg. the ETH/USD price), the values are sorted, and everyone between the 25th and 75th percentile gets one token as a reward. Everyone has the incentive to provide the answer that everyone else will provide, and the only value that a large number of players can realistically agree on is the obvious default: the truth. This creates a decentralized protocol that can theoretically provide any number of values, including the ETH/USD price, the temperature in Berlin or even the result of a particular hard computation.

4. Smart multi-signature escrow. Bitcoin allows multisignature transaction contracts where, for example, three out of a given five keys can spend the funds. Ethereum allows for more granularity; for example, four out of five can spend everything, three out of five can spend up to 10% per day, and two out of five can spend up to 0.5% per day. Additionally, Ethereum multisig is asynchronous - two parties can register their signatures on the blockchain at different times and the last signature will automatically send the transaction.

5. Cloud computing. The EVM technology can also be used to create a verifiable computing environment, allowing users to ask others to carry out computations and then optionally ask for proofs that computations at certain randomly selected checkpoints were done correctly. This allows for the creation of a cloud computing market where any user can participate with their desktop, laptop or specialized server, and spot-checking together with security deposits can be used to ensure that the system is trustworthy (ie. nodes cannot profitably cheat). Although such a system may not be suitable for all tasks; tasks that require a high level of inter-process communication, for example, cannot easily be done on a large cloud of nodes. Other tasks, however, are much easier to parallelize; projects like SETI@home, folding@home and genetic algorithms can easily be implemented on top of such a platform.

6. Peer-to-peer gambling. Any number of peer-to-peer gambling protocols, such as Frank Stajano and Richard Clayton's Cyberdice, can be implemented on the Ethereum blockchain. The simplest gambling protocol is actually simply a contract for difference on the next block hash, and more advanced protocols can be built up from there, creating gambling services with near-zero fees that have no ability to cheat.

7. Prediction markets. Provided an oracle or SchellingCoin, prediction markets are also easy to implement, and prediction markets together with SchellingCoin may prove to be the first mainstream application of futarchy as a governance protocol for decentralized organizations.

8. On-chain decentralized marketplaces, using the identity and reputation system as a base.



Miscellanea And Concerns

Modified GHOST Implementation

The "Greedy Heaviest Observed Subtree" (GHOST) protocol is an innovation first introduced by Yonatan Sompolinsky and Aviv Zohar in December 2013. The motivation behind GHOST is that blockchains with fast confirmation times currently suffer from reduced security due to a high stale rate - because blocks take a certain time to propagate through the network, if miner A mines a block and then miner B happens to mine another block before miner A's block propagates to B, miner B's block will end up wasted and will not contribute to network security. Furthermore, there is a centralization issue: if miner A is a mining pool with 30% hashpower and B has 10% hashpower, A will have a risk of producing a stale block 70% of the time (since the other 30% of the time A produced the last block and so will get mining data immediately) whereas B will have a risk of producing a stale block 90% of the time. Thus, if the block interval is short enough for the stale rate to be high, A will be substantially more efficient simply by virtue of its size. With these two effects combined, blockchains which produce blocks quickly are very likely to lead to one mining pool having a large enough percentage of the network hashpower to have de facto control over the mining process.

As described by Sompolinsky and Zohar, GHOST solves the first issue of network security loss by including stale blocks in the calculation of which chain is the "longest"; that is to say, not just the parent and further ancestors of a block, but also the stale children of the block's ancestors (in Ethereum jargon, "uncles") are added to the calculation of which block has the largest total proof of work backing it. To solve the second issue of centralization bias, we go beyond the protocol described by Sompolinsky and Zohar, and also allow stales to be registered into the main chain to receive a block reward: a stale block receives 93.75% of its base reward, and the nephew that includes the stale block receives the remaining 6.25%. Transaction fees, however, are not awarded to uncles.

Ethereum implements a simplified version of GHOST which only goes down five levels. Specifically, a stale block can only be included as an uncle by the 2nd to 5th generation child of its parent, and not any block with a more distant relation (eg. 6th generation child of a parent, or 3rd generation child of a grandparent). This was done for several reasons. First, unlimited GHOST would include too many complications into the calculation of which uncles for a given block are valid. Second, unlimited GHOST with compensation as used in Ethereum removes the incentive for a miner to mine on the main chain and not the chain of a public attacker. Finally, calculations show that five-level GHOST with incentivization is over 95% efficient even with a 15s block time, and miners with 25% hashpower show centralization gains of less than 3%.



Fees

Because every transaction published into the blockchain imposes on the network the cost of needing to download and verify it, there is a need for some regulatory mechanism, typically involving transaction fees, to prevent abuse. The default approach, used in Bitcoin, is to have purely voluntary fees, relying on miners to act as the gatekeepers and set dynamic minimums. This approach has been received very favorably in the Bitcoin community particularly because it is "market-based", allowing supply and demand between miners and transaction senders determine the price. The problem with this line of reasoning is, however, that transaction processing is not a market; although it is intuitively attractive to construe transaction processing as a service that the miner is offering to the sender, in reality every transaction that a miner includes will need to be processed by every node in the network, so the vast majority of the cost of transaction processing is borne by third parties and not the miner that is making the decision of whether or not to include it. Hence, tragedy-of-the-commons problems are very likely to occur.

However, as it turns out this flaw in the market-based mechanism, when given a particular inaccurate simplifying assumption, magically cancels itself out. The argument is as follows. Suppose that:

1. A transaction leads to k operations, offering the reward kR to any miner that includes it where R is set by the sender and k and R are (roughly) visible to the miner beforehand.
2. An operation has a processing cost of C to any node (ie. all nodes have equal efficiency)
3. There are N mining nodes, each with exactly equal processing power (ie. $1/N$ of total)
4. No non-mining full nodes exist.

A miner would be willing to process a transaction if the expected reward is greater than the cost. Thus, the expected reward is kR/N since the miner has a $1/N$ chance of processing the next block, and the processing cost for the miner is simply kC . Hence, miners will include transactions where $kR/N > kC$, or $R > NC$. Note that R is the per-operation fee provided by the sender, and is thus a lower bound on the benefit that the sender derives from the transaction, and NC is the cost to the entire network together of processing an operation. Hence, miners have the incentive to include only those transactions for which the total utilitarian benefit exceeds the cost.

However, there are several important deviations from those assumptions in reality:

1. The miner does pay a higher cost to process the transaction than the other verifying nodes, since the extra verification time delays block propagation and thus increases the chance the block will become a stale.
2. There do exist non-mining full nodes.



3. The mining power distribution may end up radically inegalitarian in practice.
4. Speculators, political enemies and crazies whose utility function includes causing harm to the network do exist, and they can cleverly set up contracts whose cost is much lower than the cost paid by other verifying nodes.

Point 1 above provides a tendency for the miner to include fewer transactions, and point 2 increases NC; hence, these two effects at least partially cancel each other out. Points 3 and 4 are the major issue; to solve them we simply institute a floating cap: no block can have more operations than `BLK_LIMIT_FACTOR` times the long-term exponential moving average. Specifically:

```
blk.oplimit = floor((blk.parent.oplimit * (EMAFCTOR - 1) + floor(parent.opcount * BLK_LIMIT_FACTOR)) / EMA_FACTOR)
```

`BLK_LIMIT_FACTOR` and `EMA_FACTOR` are constants that will be set to 65536 and 1.5 for the time being, but will likely be changed after further analysis.

Computation And Turing-Completeness

An important note is that the Ethereum virtual machine is Turing-complete; this means that EVM code can encode any computation that can be conceivably carried out, including infinite loops. EVM code allows looping in two ways. First, there is a `JUMP` instruction that allows the program to jump back to a previous spot in the code, and a `JUMPI` instruction to do conditional jumping, allowing for statements like `while x < 27: x = x * 2`. Second, contracts can call other contracts, potentially allowing for looping through recursion. This naturally leads to a problem: can malicious users essentially shut miners and full nodes down by forcing them to enter into an infinite loop? The issue arises because of a problem in computer science known as the halting problem: there is no way to tell, in the general case, whether or not a given program will ever halt.

As described in the state transition section, our solution works by requiring a transaction to set a maximum number of computational steps that it is allowed to take, and if execution takes longer computation is reverted but fees are still paid. Messages work in the same way. To show the motivation behind our solution, consider the following examples:

- An attacker creates a contract which runs an infinite loop, and then sends a transaction activating that loop to the miner. The miner will process the transaction, running the infinite loop, and wait for it to run out of gas. Even though the execution runs out of gas and stops halfway through, the transaction is still valid and the miner still claims the fee from the attacker for each computational step.
- An attacker creates a very long infinite loop with the intent of forcing the miner to keep computing for such a long time that by the time computation finishes a few more blocks will have come out and it will not be possible for the miner to include the transaction to claim the fee. However,



the attacker will be required to submit a value for STARTGAS limiting the number of computational steps that execution can take, so the miner will know ahead of time that the computation will take an excessively large number of steps.

- An attacker sees a contract with code of some form like `send(A,contract.storage[A]); contract.storage[A] = 0`, and sends a transaction with just enough gas to run the first step but not the second (ie. making a withdrawal but not letting the balance go down). The contract author does not need to worry about protecting against such attacks, because if execution stops halfway through the changes get reverted.
- A financial contract works by taking the median of nine proprietary data feeds in order to minimize risk. An attacker takes over one of the data feeds, which is designed to be modifiable via the variable-address-call mechanism described in the section on DAOs, and converts it to run an infinite loop, thereby attempting to force any attempts to claim funds from the financial contract to run out of gas. However, the financial contract can set a gas limit on the message to prevent this problem.

The alternative to Turing-completeness is Turing-incompleteness, where JUMP and JUMPI do not exist and only one copy of each contract is allowed to exist in the call stack at any given time. With this system, the fee system described and the uncertainties around the effectiveness of our solution might not be necessary, as the cost of executing a contract would be bounded above by its size. Additionally, Turing-incompleteness is not even that big a limitation; out of all the contract examples we have conceived internally, so far only one required a loop, and even that loop could be removed by making 26 repetitions of a one-line piece of code. Given the serious implications of Turing-completeness, and the limited benefit, why not simply have a Turing-incomplete language? In reality, however, Turing-incompleteness is far from a neat solution to the problem. To see why, consider the following contracts:

```
C0: call(C1); call(C1);
C1: call(C2); call(C2);
C2: call(C3); call(C3);
...
C49: call(C50); call(C50);
C50: (run one step of a program and record the change in storage)
```

Now, send a transaction to A. Thus, in 51 transactions, we have a contract that takes up 2^{50} computational steps. Miners could try to detect such logic bombs ahead of time by maintaining a value alongside each contract specifying the maximum number of computational steps that it can take, and calculating this for contracts calling other contracts recursively, but that would require miners to forbid contracts that create other contracts (since the creation and execution of all 50 contracts above could easily be rolled into a single contract). Another problematic point is that the address field of a message is a variable, so in general it may not even be possible to tell which other contracts a given contract will call ahead of time. Hence, all in all, we have a surprising conclusion: Turing-completeness is surprisingly easy to manage, and the lack of



Turing-completeness is equally surprisingly difficult to manage unless the exact same controls are in place - but in that case why not just let the protocol be Turing-complete?

Currency And Issuance

The Ethereum network includes its own built-in currency, ether, which serves the dual purpose of providing a primary liquidity layer to allow for efficient exchange between various types of digital assets and, more importantly, of providing a mechanism for paying transaction fees. For convenience and to avoid future argument (see the current mBTC/uBTC/satoshi debate in Bitcoin), the denominations will be pre-labelled:

- 1: wei
- 10^{12} : szabo
- 10^{15} : finney
- 10^{18} : ether

This should be taken as an expanded version of the concept of "dollars" and "cents" or "BTC" and "satoshi". In the near future, we expect "ether" to be used for ordinary transactions, "finney" for microtransactions and "szabo" and "wei" for technical discussions around fees and protocol implementation.

The issuance model will be as follows:

- Ether will be released in a currency sale at the price of 1337-2000 ether per BTC, a mechanism intended to fund the Ethereum organization and pay for development that has been used with success by a number of other cryptographic platforms. Earlier buyers will benefit from larger discounts. The BTC received from the sale will be used entirely to pay salaries and bounties to developers, researchers and projects in the cryptocurrency ecosystem.
- 0.099x the total amount sold will be allocated to early contributors who participated in development before BTC funding or certainty of funding was available, and another 0.099x will be allocated to long-term research projects.
- 0.26x the total amount sold will be allocated to miners per year forever after that point.

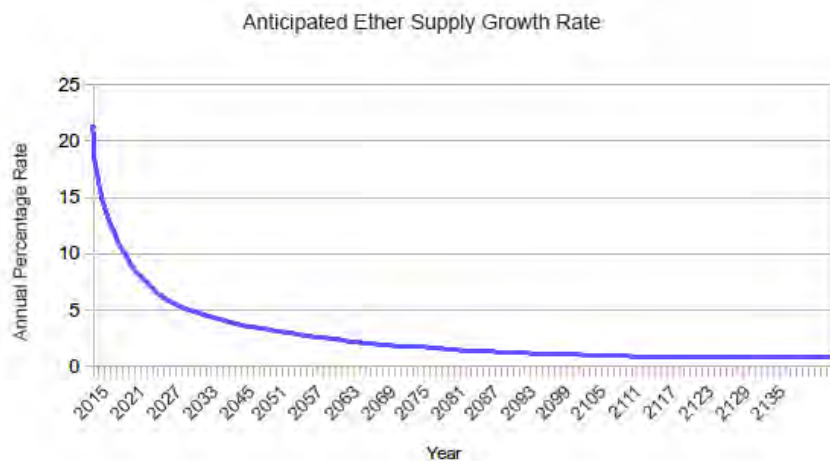


Issuance Breakdown

The permanent linear supply growth model reduces the risk of what some see as excessive wealth concentration in Bitcoin, and gives individuals living in present and future eras a fair chance to acquire currency units, while at the same time discouraging depreciation of ether because the "supply growth rate" as a percentage still tends to zero over time. We also theorize that because coins are always lost over time due to carelessness, death, etc, and coin loss can be modeled as a percentage of the total supply per year, that the total currency supply in circulation will in fact eventually stabilize at a value equal to the annual issuance divided by the loss rate (eg. at a loss rate of 1%, once the supply reaches 26X then 0.26X will be mined and 0.26X lost every year, creating an equilibrium).

Group	At launch	After 1 year	After 5 years
Currency units	1.198X	1.458X	2.498X
Purchasers	83.5%	68.6%	40.0%
Early contributor distribution	8.26%	6.79%	3.96%
Long-term endowment	8.26%	6.79%	3.96%
Miners	0%	17.8%	52.0%

Despite the linear currency issuance, just like with Bitcoin over time the supply growth rate nevertheless tends to zero.



Mining Centralization

The Bitcoin mining algorithm basically works by having miners compute SHA256 on slightly modified versions of the block header millions of times over and over again, until eventually one node comes up with a version whose hash is less than the target (currently around 2^{190}). However, this mining algorithm is vulnerable to two forms of centralization. First, the mining ecosystem has come to be dominated by ASICs (application-specific integrated circuits), computer chips designed for, and therefore thousands of times more efficient at, the specific task of Bitcoin mining. This means that Bitcoin mining is no longer a highly decentralized and egalitarian pursuit, requiring millions of dollars of capital to effectively participate in. Second, most Bitcoin miners do not actually perform block validation locally; instead, they rely on a centralized mining pool to provide the block headers. This problem is arguably worse: as of the time of this writing, the top two mining pools indirectly control roughly 50% of processing power in the Bitcoin network, although this is mitigated by the fact that miners can switch to other mining pools if a pool or coalition attempts a 51% attack.

The current intent at Ethereum is to use a mining algorithm based on randomly generating a unique hash function for every 1000 nonces, using a sufficiently broad range of computation to remove the benefit of specialized hardware. Such a strategy will certainly not reduce the gain of centralization to zero, but it does not need to. Note that each individual user, on their private laptop or desktop, can perform a certain quantity of mining activity almost for free, paying only electricity costs, but after the point of 100% CPU utilization of their computer additional mining will require them to pay for both electricity and hardware. ASIC mining companies need to pay for electricity and hardware starting from the first hash. Hence, if the centralization gain can be kept to below this ratio, $(E + H) / E$, then even if ASICs are made there will still be room for ordinary miners.

Additionally, we intend to design the mining algorithm so that mining requires access to the entire blockchain, forcing miners to store the entire blockchain and at least be capable of verifying every transaction. This removes the need for centralized mining pools; although mining pools can still serve the legitimate role of evening out the randomness of reward distribution, this function can be served equally well by peer-to-peer pools with no central control. It additionally helps fight centralization, by increasing the number of full nodes in the network so that the network remains reasonably decentralized even if most ordinary users prefer light clients.



Scalability

One common concern about Ethereum is the issue of scalability. Like Bitcoin, Ethereum suffers from the flaw that every transaction needs to be processed by every node in the network. With Bitcoin, the size of the current blockchain rests at about 20 GB, growing by about 1 MB per hour. If the Bitcoin network were to process Visa's 2000 transactions per second, it would grow by 1 MB per three seconds (1 GB per hour, 8 TB per year). Ethereum is likely to suffer a similar growth pattern, worsened by the fact that there will be many applications on top of the Ethereum blockchain instead of just a currency as is the case with Bitcoin, but ameliorated by the fact that Ethereum full nodes need to store just the state instead of the entire blockchain history.

The problem with such a large blockchain size is centralization risk. If the blockchain size increases to, say, 100 TB, then the likely scenario would be that only a very small number of large businesses would run full nodes, with all regular users using light SPV nodes. In such a situation, there arises the potential concern that the full nodes could band together and all agree to cheat in some profitable fashion (eg. change the block reward, give themselves BTC). Light nodes would have no way of detecting this immediately. Of course, at least one honest full node would likely exist, and after a few hours information about the fraud would trickle out through channels like Reddit, but at that point it would be too late: it would be up to the ordinary users to organize an effort to blacklist the given blocks, a massive and likely infeasible coordination problem on a similar scale as that of pulling off a successful 51% attack. In the case of Bitcoin, this is currently a problem, but there exists a blockchain modification suggested by Peter Todd which will alleviate this issue.

In the near term, Ethereum will use two additional strategies to cope with this problem. First, because of the blockchain-based mining algorithms, at least every miner will be forced to be a full node, creating a lower bound on the number of full nodes. Second and more importantly, however, we will include an intermediate state tree root in the blockchain after processing each transaction. Even if block validation is centralized, as long as one honest verifying node exists, the centralization problem can be circumvented via a verification protocol. If a miner publishes an invalid block, that block must either be badly formatted, or the state $S[n]$ is incorrect. Since $S[0]$ is known to be correct, there must be some first state $S[i]$ that is incorrect where $S[i-1]$ is correct. The verifying node would provide the index i , along with a "proof of invalidity" consisting of the subset of Patricia tree nodes needed to process $\text{APPLY}(S[i-1], \text{TX}[i]) \rightarrow S[i]$. Nodes would be able to use those nodes to run that part of the computation, and see that the $S[i]$ generated does not match the $S[i]$ provided.

Another, more sophisticated, attack would involve the malicious miners publishing incomplete blocks, so the full information does not even exist to determine whether or not blocks are valid. The solution to this is a challenge-response protocol: verification nodes issue "challenges" in the form of target transaction indices, and upon receiving a node a light node treats the block as untrusted until another node, whether the miner or another verifier, provides a subset of Patricia nodes as a proof of validity.



Putting It All Together: Decentralized Applications

The contract mechanism described above allows anyone to build what is essentially a command line application run on a virtual machine that is executed by consensus across the entire network, allowing it to modify a globally accessible state as its “hard drive”. However, for most people, the command line interface that is the transaction sending mechanism is not sufficiently user-friendly to make decentralization an attractive mainstream alternative. To this end, a complete “decentralized application” should consist of both low-level business-logic components, whether implemented entirely on Ethereum, using a combination of Ethereum and other systems (eg. a P2P messaging layer, one of which is currently planned to be put into the Ethereum clients) or other systems entirely, and high-level graphical user interface components. The Ethereum client’s design is to serve as a web browser, but include support for a “eth” Javascript API object, which specialized web pages viewed in the client will be able to use to interact with the Ethereum blockchain. From the point of view of the “traditional” web, these web pages are entirely static content, since the blockchain and other decentralized protocols will serve as a complete replacement for the server for the purpose of handling user-initiated requests. Eventually, decentralized protocols, hopefully themselves in some fashion using Ethereum, may be used to store the web pages themselves.

Conclusion

The Ethereum protocol was originally conceived as an upgraded version of a cryptocurrency, providing advanced features such as on-blockchain escrow, withdrawal limits and financial contracts, gambling markets and the like via a highly generalized programming language. The Ethereum protocol would not “support” any of the applications directly, but the existence of a Turing-complete programming language means that arbitrary contracts can theoretically be created for any transaction type or application. What is more interesting about Ethereum, however, is that the Ethereum protocol moves far beyond just currency. Protocols and decentralized applications around decentralized file storage, decentralized computation and decentralized prediction markets, among dozens of other such concepts, have the potential to substantially increase the efficiency of the computational industry, and provide a massive boost to other peer-to-peer protocols by adding for the first time an economic layer. Finally, there is also a substantial array of applications that have nothing to do with money at all.

The concept of an arbitrary state transition function as implemented by the Ethereum protocol provides for a platform with unique potential; rather than being a closed-ended, single-purpose protocol intended for a specific array of applications in data storage, gambling or finance, Ethereum is open-ended by design, and we believe that it is extremely well-suited to serving as a foundational layer for a very large number of both financial and non-financial protocols in the years to come.



Notes and Further Reading

Notes

1. A sophisticated reader may notice that in fact a Bitcoin address is the hash of the elliptic curve public key, and not the public key itself. However, it is in fact perfectly legitimate cryptographic terminology to refer to the pubkey hash as a public key itself. This is because Bitcoin's cryptography can be considered to be a custom digital signature algorithm, where the public key consists of the hash of the ECC pubkey, the signature consists of the ECC pubkey concatenated with the ECC signature, and the verification algorithm involves checking the ECC pubkey in the signature against the ECC pubkey hash provided as a public key and then verifying the ECC signature against the ECC pubkey.
2. Technically, the median of the 11 previous blocks.
3. Internally, 2 and "CHARLIE" are both numbers, with the latter being in big-endian base 256 representation. Numbers can be at least 0 and at most $2^{256}-1$.

Further Reading

1. Intrinsic value: <https://tinyurl.com/BitcoinMag-IntrinsicValue>
2. Smart property: https://en.bitcoin.it/wiki/Smart_Property
3. Smart contracts: <https://en.bitcoin.it/wiki/Contracts>
4. B-money: <http://www.weidai.com/bmoney.txt>
5. Reusable proofs of work: <http://www.finney.org/~hal/rpow/>
6. Secure property titles with owner authority: <http://szabo.best.vwh.net/securetitle.html>
7. Bitcoin whitepaper: <http://bitcoin.org/bitcoin.pdf>
8. Namecoin: <https://namecoin.org/>
9. Zooko's triangle: http://en.wikipedia.org/wiki/Zooko's_triangle
10. Colored coins whitepaper: <https://tinyurl.com/coloredcoin-whitepaper>
11. Mastercoin whitepaper: <https://github.com/mastercoin-MSC/spec>
12. Decentralized autonomous corporations, Bitcoin Magazine: <https://tinyurl.com/Bootstrapping-DACs>
13. Simplified payment verification: <https://en.bitcoin.it/wiki/Scalability#Simplifiedpaymentverification>
14. Merkle trees: http://en.wikipedia.org/wiki/Merkle_tree
15. Patricia trees: http://en.wikipedia.org/wiki/Patricia_tree
16. GHOST: http://www.cs.huji.ac.il/~avivz/pubs/13/btc_scalability_full.pdf
17. StorJ and Autonomous Agents, Jeff Garzik: <https://tinyurl.com/storj-agents>
18. Mike Hearn on Smart Property at Turing Festival: <http://www.youtube.com/watch?v=Pu4PAMFPo5Y>



19. Ethereum RLP: <https://github.com/ethereum/wiki/wiki/%5BEnglish%5D-RLP>
20. Ethereum Merkle Patricia trees: <https://github.com/ethereum/wiki/wiki/%5BEnglish%5D-Patricia-Tree>
21. Peter Todd on Merkle sum trees: <http://sourceforge.net/p/bitcoin/mailman/message/31709140/>



This is **Exhibit “B”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

The Ethereum Blockchain Explorer

Search by Address / Txn Hash / Block / Token / Domain Name



ETHER PRICE

\$1,864.78 @ 0.06983 BTC (-2.11%)



MARKET CAP

\$224,213,125,023.00



TRANSACTIONS

1,990.03 M (13.2 TPS)

MED GAS PRICE

41 Gwei (\$1.61)



LAST FINALIZED BLOCK

17414341

LAST SAFE BLOCK

17414404

TRANSACTION HISTORY IN 14 DAYS



Ad

Latest Blocks

Block [17414425](#) 12 secs ago

Fee Recipient [Fee Recipient: Oxe...](#)

[205 txns](#) in 24 secs 0.02881 Eth

Block [17414424](#) 36 secs ago

Fee Recipient [beaverbuild](#)

143 txns in 12 secs 0.05801 Eth

Block [17414423](#) 48 secs ago

Fee Recipient [builder0x69](#)

128 txns in 12 secs 0.07102 Eth

Block [17414422](#) 1 min ago

Fee Recipient [Fee Recipient: 0xF...](#)

150 txns in 12 secs 0.0754 Eth

Block [17414421](#) 1 min ago

Fee Recipient [MEV Builder: 0xb4...](#)

123 txns in 12 secs 0.04139 Eth

Block [17414420](#) 1 min ago

Fee Recipient [rsync-builder](#)

116 txns in 12 secs 0.02835 Eth

[VIEW ALL BLOCKS](#) →

Latest Transactions

TX# [0x3d6486d35993...](#) 12 secs ago

From [0x17d3c3...a3F3D563](#)

To [0x18CE21...cE11dF65](#) 0.00298 Eth

TX# [0x0601024932da...](#) 12 secs ago

From [0x6f1603...01885B0e](#)

To [0xF5c80c...BF522AbD](#) 0 Eth

TX# [0x9295a016e25d...](#) 12 secs ago

From [0x0292ae...AB6B299E](#)

To [0x1c76B8...D8f76d9c](#) 0 Eth

TX# [0xae5ffa60d25ad...](#) 12 secs ago

From [0xeca5A1...5E5b277D](#)

To [0xC02aaA...3C756Cc2](#) 1.281 Eth

TX# [0xe1c6140963e8...](#) 12 secs ago

From [0xf396Cd...Fa465CDC](#)

To [0xC2c862...05246Fd8](#) 0.00262 Eth

TX# [0x523e02a538b7...](#) 12 secs ago

From [0xeE0e3e...54Afe1A9](#)

To [0x111111...3A960582](#) 0.054 Eth

[VIEW ALL TRANSACTIONS](#) →

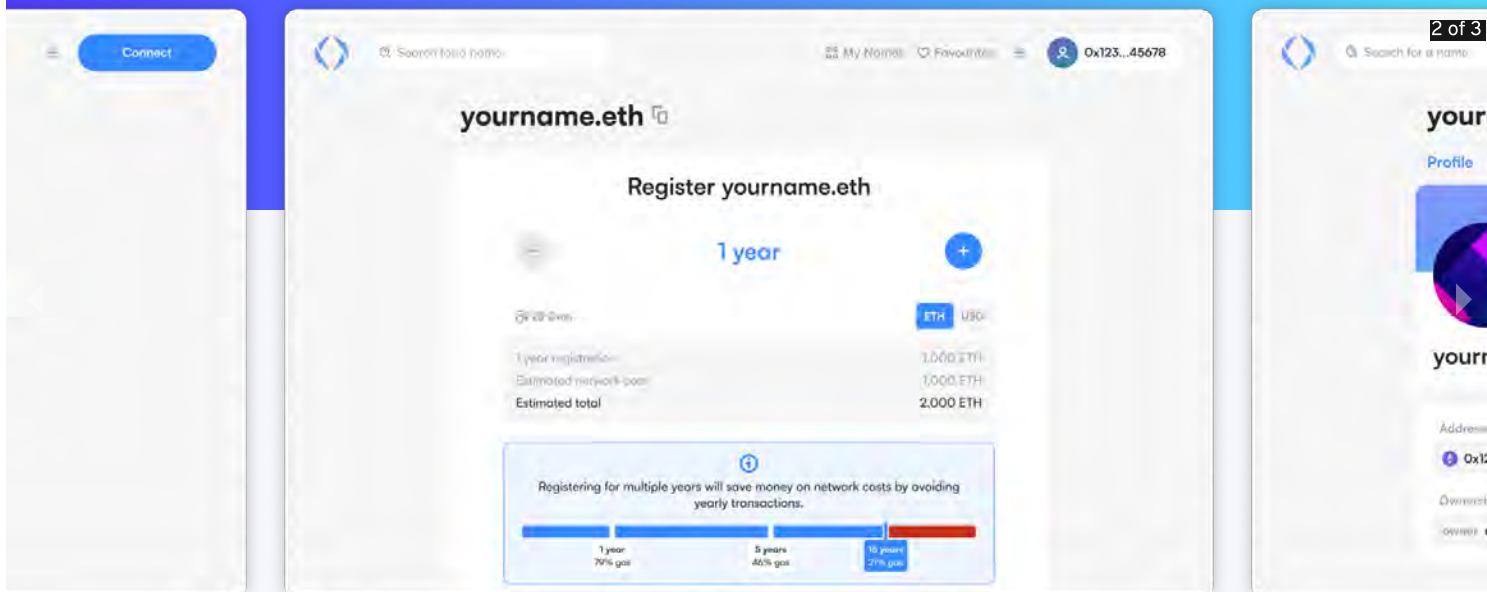
This is **Exhibit “C”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

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Decentralised naming for wallets, websites, & more.



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Your web3 username [↗](#)

No more sandboxed usernames. Own your username, store an avatar and other profile data, and use it across services.



ENS is the most widely integrated blockchain naming standard. [↗](#)

2.73m

Names

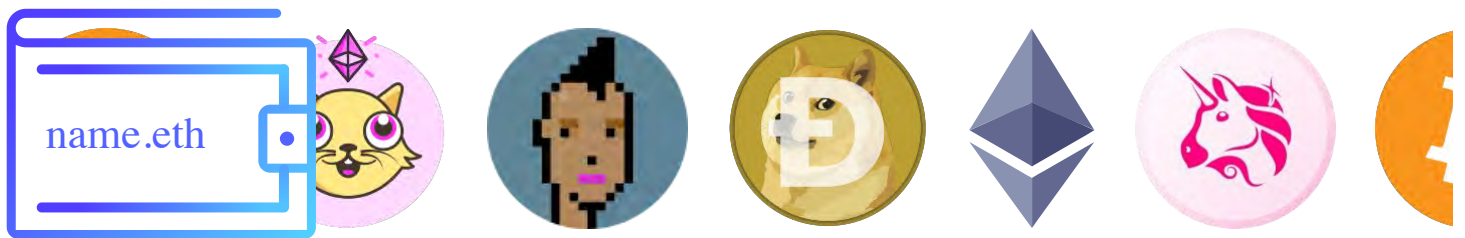
570

Integrations

697k

One Name For All of Your Addresses [↗](#)

No more copying and pasting long addresses. Use your ENS name to store all of your addresses and receive any cryptocurrency, token, or NFT.



Decentralised Websites [↗](#)

Launch censorship-resistant decentralised websites with ENS. Upload your website to IPFS and access it with your ENS name.



mysite.com



vitalik.eth



domain.org

[Learn more](#)

Use Traditional Domains [↗](#)

The native name suffix for ENS is .ETH, which has the full security benefits of being blockchain-native.

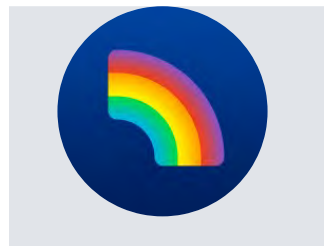
You can also use ENS with DNS names you already own. ENS supports most DNS names, including:

.com .org .io .app
.xyz .art

[Learn more](#)

ENS Ecosystem [↗](#)

Wallets



Coinbase

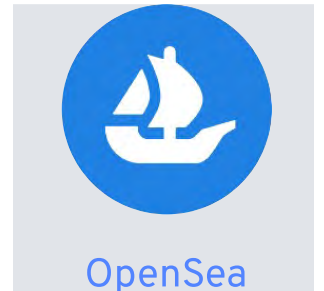
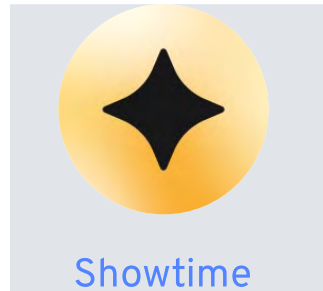
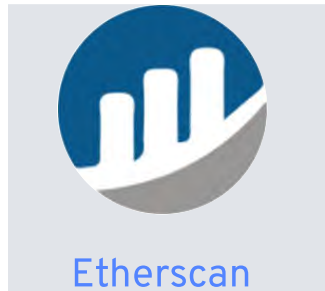
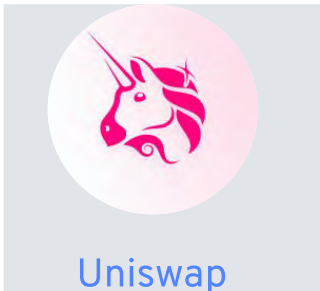
Coinbase Wallet

Rainbow

Trust Wallet

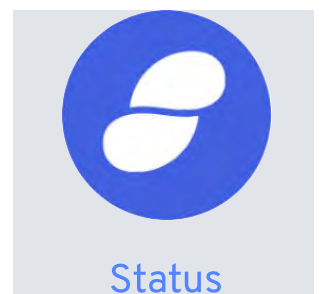
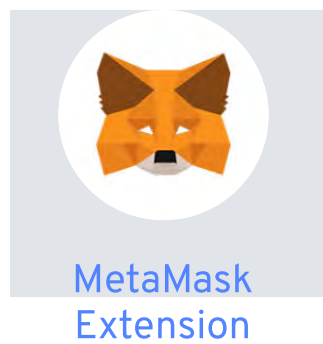
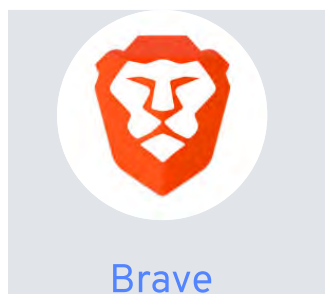
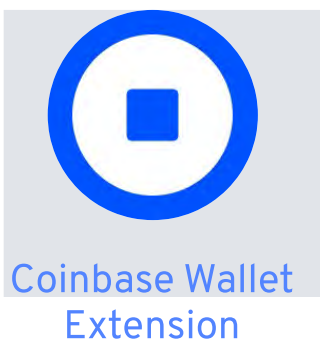
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This is **Exhibit “D”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

A handwritten signature in black ink, consisting of the letters 'A.K.' followed by a horizontal line.

Commissioner of Oaths in and for Ontario

Domain Name Lookup

Search by Address or Domain Name



Domain names allow users to interact with other addresses on-chain using human-readable names instead of long and complicated address hashes.

[Learn more >](#)

Domain Name Lookup / Search Results

Result for: `vitalik.eth`

Overview of ENS

Resolved Address:


 `0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045` 

Expiration Date:

 2034.06.03 at 19:57


Registrant:

`0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045` 

[Lookup names](#) 



Controller:


















`0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045` 






















[Lookup names](#) 

















[+ Click to show more](#)

Related Transactions

Transactions	Age	From	Action
0x6d90347f92d30aee0...	13 hrs 5 mins ago	0x6A75aC...2e5f1E6D 	purchaseDomains
0xd5d554f2757ce4dc0...	3 days 18 hrs ago	0x26fA93...A506d751 	ownerMintSubdomains

Transactions	Age	From	Action
0xc78814a2c4b07f9f0...	23 days 4 hrs ago	0xd8dA6B...7aA96045 	setSubnodeRecord
0x6e09164805b5e873...	29 days 7 hrs ago	0x62F470...c1E004a5 	proveAndClaimWithRes
0x52763530978d3bfc9...	40 days 16 hrs ago	0x946BB9...9a94fA3F 	setSubnodeOwner
0x2447736349ecd710...	50 days 2 hrs ago	0x917698...39f44b42 	setSubnodeRecord
0xacc9a009bc27e253...	68 days 19 hrs ago	0x39c4B3...12F4b6c4 	grabSubdomain
0x3858d89285a1bc9e...	71 days 15 hrs ago	0xDAB330...93eeA9a4 	setSubnodeRecord
0x0ea3c743cef393c84...	89 days 6 hrs ago	0x05bB8D...d86746E4 	buySubnode
0x733224f17e0672692...	100 days 18 hrs ago	0x8953cD...56cB38A7 	setSubnodeRecord
0xcfb42c399286d6a26...	113 days 21 hrs ago	0xB38565...2f745b8A 	setSubnodeRecord
0xdc96677be8a4e6a4...	116 days 6 hrs ago	0x95586B...9fBf4652 	registerSubnode
0xde4bfa5078c9c35f8...	116 days 16 hrs ago	0x70Fd9e...d716F86e 	register
0xf744dc0d9fa52824f...	145 days 22 hrs ago	0x7bF925...55AD36be 	{Unknown Function}
0x7c99f393efaa72466...	160 days 8 hrs ago	0xa1bc85...b537DF73 	setSubnodeRecord
0x1d50169e1bc1d4a5f...	160 days 8 hrs ago	0xa1bc85...b537DF73 	setSubnodeRecord
0x5d7b96e8b298bff60...	160 days 8 hrs ago	0xa1bc85...b537DF73 	setSubnodeRecord
0x78fd2633eb39f67d6...	163 days 14 hrs ago	0x0490e3...a6324656 	registerSubdomain
0x77ba345c6eb1b280...	187 days 19 hrs ago	0xB2551F...5ebEb40e 	setSubnodeRecord
0x53033d2d50b44016...	197 days 2 hrs ago	0x60203B...11D2A407 	setSubnodeRecord
0x9f6d53fd60b4dd574...	197 days 9 hrs ago	0xDDd396...BF076364 	claimSubdomain
0x7453ac87a2d7c54d...	212 days 20 hrs ago	0x5A1336...14792b65 	setDomain
0x7e959dec923808f98...	215 days 5 hrs ago	0xD6dD42...200D03c0 	setSubnodeRecord
0xdf19748655ab899ae...	215 days 5 hrs ago	0xD6dD42...200D03c0 	setSubnodeRecord

Transactions	Age	From	Action
0xa1f3e0da9a36a4797...	217 days 6 hrs ago	0xb9f424...D8275374 	claimSubdomain
0x8ed83ef866895981e...	226 days 23 hrs ago	0x384973...e897f234 	registerSubdomain
0x478f6421afa3e5e17...	227 days 6 hrs ago	0xfAB225...0a6ac1a9 	setSubnodeOwner
0xb189b23c4283be8d...	227 days 6 hrs ago	0xfAB225...0a6ac1a9 	setSubnodeRecord
0xcc55204b78686088...	251 days 17 hrs ago	0x93a86f...957fc647 	setSubnodeRecord
0x5352611b2ecd8b96...	252 days 23 hrs ago	0xE0Def7...a9a9A496 	setSubnodeRecord
0x988f35612df2b05c8...	253 days 21 hrs ago	0xC60Bc5...e92db490 	setSubnodeRecord
0xa0c5a2df8fa4f8d69...	256 days 16 hrs ago	0xcB3577...33D46eC6 	register
0x6050db79f0f574e93...	259 days 17 hrs ago	0x8574e3...13BCd156 	mint
0x3eb1db026b10a072...	264 days 7 hrs ago	0x16CAc4...31dC865D 	setSubnodeRecord
0x2422b070aa5d79dc...	273 days 11 hrs ago	0x0c2364...30FB928e 	renew
0x1cb822811348639e...	283 days 7 hrs ago	0x438D45...edD399AB 	renew
0xf54e43b7ea6ae82ed...	300 days 11 hrs ago	0x754632...c2431320 	renew
0x0e93f22406c0a62b1...	317 days 8 hrs ago	0xb96846...e9714473 	registerSubdomain
0x033605d543a9eca0...	345 days 11 hrs ago	0x4b44F8...2C94107e 	registerSubdomain
0xca38961269750041...	351 days 2 hrs ago	0x06AD1D...3E1581C9 	setSubnodeRecord
0x04d6f8636feb742be...	356 days 5 hrs ago	0x2a704f...0F9C67a2 	register
0xe4add275ed6d9c2b...	382 days 11 hrs ago	0x005f77...4C49069F 	setSubnodeRecord
0x37dcf80ab8e26f367...	406 days 15 hrs ago	0xedC549...133fE8d8 	setSubnodeRecord
0xd486930cfc1b16206...	443 days 1 hr ago	0x7c49Af...e038363d 	setSubnodeRecord
0x127a7c7e34e0f0a4a...	555 days 1 hr ago	0xF27696...59342fA6 	execute
0x7a0eeacf5aeab976d...	561 days 52 mins ago	0x016E8E...8De72b8b 	inviteInstallToken_q31n

Transactions	Age	From	Action
0xe00522bcc7c2bc53f...	626 days 22 hrs ago	0xC8Fa92...93F3a096 	register
0xc0ff895e97eafd30e7...	647 days 14 hrs ago	0x618629...fC539cfE 	claimGlyph
0x793e079fbc427cba0...	728 days 4 hrs ago	0x3243Ed...cF0F68f2 	executeMetaTx
0xe8085d999e1084f97...	750 days 17 hrs ago	0xDE0f33...ccFBB46d 	setSubnodeRecord
0x9362caa3b26f40a8f...	759 days 12 hrs ago	0x0f1C01...3d8b412e 	setSubnodeRecord
0xbb13efab7f1f798f63...	839 days 19 hrs ago	0xd8dA6B...7aA96045 	setResolver
0x2b36da5e623b152b...	926 days 23 hrs ago	0x5247cb...6cf57cBa 	register
0x818d94225b89d66a...	971 days 5 hrs ago	0x412410...8b0A1257 	executeMetaTx
0xab2cc289b49a5ccc...	1038 days 4 hrs ago	0xd8dA6B...7aA96045 	renew
0xc3625d14c03f7512d...	1075 days 2 hrs ago	0x310e21...faddDAF6 	create
0xa46b9c76d9ba86abf...	1087 days 10 hrs ago	0x0103a4...fdEF5A4F 	setSubnodeRecord
0xe35c14eb31991dc3...	1099 days 3 hrs ago	0x29709b...0F1C5D68 	createProxyWithNonce
0x356677feb564659fc...	1208 days 19 hrs ago	0xA80000...d1952d1c 	createProxy
0x9734339fcb68fb566...	1210 days 13 hrs ago	0x0904Da...a3b99859 	migrateSubdomain
0xc3f86218c67bee825...	1214 days 18 hrs ago	0x0904Da...a3b99859 	migrateAll
0x230ed470cd563dce...	1215 days 20 hrs ago	0xe74Ab7...30be29b6 	migrateNames

This is **Exhibit “E”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

August 2021

Date	US Dollar to Canadian Dollar Monthly Exchange Rates	
Sunday 1 August 2021	\$1 USD = \$1.2471	US Dollar Canadian Dollar rate for 01/08/2021
Monday 2 August 2021	\$1 USD = \$1.2501	US Dollar Canadian Dollar rate for 02/08/2021
Tuesday 3 August 2021	\$1 USD = \$1.2533	US Dollar Canadian Dollar rate for 03/08/2021
Wednesday 4 August 2021	\$1 USD = \$1.2546	US Dollar Canadian Dollar rate for 04/08/2021
Thursday 5 August 2021	\$1 USD = \$1.2498	US Dollar Canadian Dollar rate for 05/08/2021
Friday 6 August 2021	\$1 USD = \$1.2555	US Dollar Canadian Dollar rate for 06/08/2021
Saturday 7 August 2021	\$1 USD = \$1.2555	US Dollar Canadian Dollar rate for 07/08/2021
Sunday 8 August 2021	\$1 USD = \$1.2574	US Dollar Canadian Dollar rate for 08/08/2021
Monday 9 August 2021	\$1 USD = \$1.2575	US Dollar Canadian Dollar rate for 09/08/2021
Tuesday 10 August 2021	\$1 USD = \$1.252	US Dollar Canadian Dollar rate for 10/08/2021
Wednesday 11 August 2021	\$1 USD = \$1.2505	US Dollar Canadian Dollar rate for 11/08/2021
Thursday 12 August 2021	\$1 USD = \$1.2522	US Dollar Canadian Dollar rate for 12/08/2021
Friday 13 August 2021	\$1 USD = \$1.2515	US Dollar Canadian Dollar rate for 13/08/2021
Saturday 14 August 2021	\$1 USD = \$1.2512	US Dollar Canadian Dollar rate for 14/08/2021
Sunday 15 August 2021	\$1 USD = \$1.2515	US Dollar Canadian Dollar rate for 15/08/2021
Monday 16 August 2021	\$1 USD = \$1.2571	US Dollar Canadian Dollar rate for 16/08/2021
Tuesday 17 August 2021	\$1 USD = \$1.263	US Dollar Canadian Dollar rate for 17/08/2021
Wednesday 18 August 2021	\$1 USD = \$1.2651	US Dollar Canadian Dollar rate for 18/08/2021
Thursday 19 August 2021	\$1 USD = \$1.2827	US Dollar Canadian Dollar rate for 19/08/2021
Friday 20 August 2021	\$1 USD = \$1.2821	US Dollar Canadian Dollar rate for 20/08/2021
Saturday 21 August 2021	\$1 USD = \$1.2821	US Dollar Canadian Dollar rate for 21/08/2021
Sunday 22 August 2021	\$1 USD = \$1.2828	US Dollar Canadian Dollar rate for 22/08/2021
Monday 23 August 2021	\$1 USD = \$1.2651	US Dollar Canadian Dollar rate for 23/08/2021
Tuesday 24 August 2021	\$1 USD = \$1.2591	US Dollar Canadian Dollar rate for 24/08/2021
Wednesday 25 August 2021	\$1 USD = \$1.2593	US Dollar Canadian Dollar rate for 25/08/2021
Thursday 26 August 2021	\$1 USD = \$1.2684	US Dollar Canadian Dollar rate for 26/08/2021
Friday 27 August 2021	\$1 USD = \$1.2624	US Dollar Canadian Dollar rate for 27/08/2021
Saturday 28 August 2021	\$1 USD = \$1.2622	US Dollar Canadian Dollar rate for 28/08/2021
Sunday 29 August 2021	\$1 USD = \$1.2614	US Dollar Canadian Dollar rate for 29/08/2021
Monday 30 August 2021	\$1 USD = \$1.2606	US Dollar Canadian Dollar rate for 30/08/2021
Tuesday 31 August 2021	\$1 USD = \$1.2617	US Dollar Canadian Dollar rate for 31/08/2021

Worst exchange rate of August 2021: **1.2471**, Best exchange rate of August 2021: **1.2828**, Average exchange rate in August 2021: **1.2602**

This is **Exhibit “F”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Learn the latest about Punks Legacy Project [here \(https://news.yuga.com/punks-legacy-project-continues-at-centre-pompidou\)](https://news.yuga.com/punks-legacy-project-continues-at-centre-pompidou), and the novel IP rights granted to collectors [here \(https://licenseterms.cryptopunks.app/\)](https://licenseterms.cryptopunks.app/).

CryptoPunks()

10,000 unique collectible characters with proof of ownership stored on the Ethereum blockchain. The project that inspired the modern CryptoArt movement. CryptoPunks are one of the earliest and most iconic examples of "Non-Fungible Tokens" minted on Ethereum, and were the inspiration for the **ERC-721 standard (https://eips.ethereum.org/EIPS/eip-721)** standard which powers most digital art and collectibles on-chain. Since their release on June 23, 2017, CryptoPunks have been featured in numerous international publications, headlined prestigious international auctions at both Christie's and Sotheby's, and even entered the permanent collections of important art museums such as the ICA Miami, the Centre Pompidou, and the LACMA.



CryptoPunks are 10,000 uniquely generated characters. No two are exactly alike, and each one can be trustlessly collected by anyone interacting with the **Ethereum (https://en.wikipedia.org/wiki/Ethereum)** blockchain. Originally, Punks could be claimed for free using any Ethereum wallet with enough \$ETH to cover gas fees. Now, they can be purchased from their present owners using the bespoke CryptoPunks marketplace, which is also embedded in the blockchain. Via this frictionless market you can buy, bid on, and offer Punks for sale. Below, you'll find information about the availability of each Punk. Punks with a blue background are not for sale and have no current bids. Punks with a red background are available for sale by their owner. Finally, Punks with a purple background have an active bid on them.



See the **marketplace instructions** below to acquire your very own Punk. You should also join the **Discord Chat** (<https://discord.gg/tQp4pSE>), which includes a bot that announces all bids, offers and sales in realtime.

Overall Stats

Current Lowest Price Punk Available

52.99 ETH (\$99,064.27 USD)

Number of Sales (Last 12 Months)

2,536

Total Value of All Sales (Lifetime)

212.4KΞ (\$300.39M)

Value of Sales (24 Hours)

56.96Ξ (\$106.47K)

Value of Sales (Week)

841.50Ξ (\$1.59M)

Value of Sales (4 Weeks)

4.83KΞ (\$8.84M)

 [Top Punk Owners \(/cryptopunks/leaderboard\)](/cryptopunks/leaderboard)

 [All Punk Types and Attributes \(/cryptopunks/attributes\)](/cryptopunks/attributes)

Largest Sales

See all top sales (</cryptopunks/topsales>)

1



[\(/cryptopunks/details/5822\)](/cryptopunks/details/5822)

#5822 (/cryptopunks/details/5822)

8KΞ (\$23.7M)

Feb 12, 2022

2



[\(/cryptopunks/details/7804\)](/cryptopunks/details/7804)

#7804 (/cryptopunks/details/7804)

4.2KΞ (\$7.57M)

Mar 11, 2021

3



[\(/cryptopunks/details/3100\)](/cryptopunks/details/3100)

#3100 (/cryptopunks/details/3100)

4.2KΞ (\$7.58M)

4



[\(/cryptopunks/details/2924\)](/cryptopunks/details/2924)

#2924 (/cryptopunks/details/2924)

3.3KΞ (\$4.45M)



Mar 11, 2021

Sep 28, 2022

5



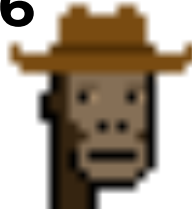
(/cryptopunks/details/4156)

#4156 (/cryptopunks/details/4156)

2.69KΞ (\$3.31M)

Jul 15, 2022

6



(/cryptopunks/details/5577)

#5577 (/cryptopunks/details/5577)

2.5KΞ (\$7.7M)

Feb 09, 2022

7



(/cryptopunks/details/4464)

#4464 (/cryptopunks/details/4464)

2.5KΞ (\$2.62M)

Jul 12, 2022

8



(/cryptopunks/details/4156)

#4156 (/cryptopunks/details/4156)

2.5KΞ (\$10.26M)

Dec 09, 2021

9



(/cryptopunks/details/5217)

#5217 (/cryptopunks/details/5217)

2.25KΞ (\$5.45M)

Jul 30, 2021

10



(/cryptopunks/details/8857)

#8857 (/cryptopunks/details/8857)

2KΞ (\$6.63M)

Sep 11, 2021

11



(/cryptopunks/details/2140)

#2140 (/cryptopunks/details/2140)

1.6KΞ (\$3.76M)

Jul 30, 2021

12



(/cryptopunks/details/7252)

#7252 (/cryptopunks/details/7252)

1.6KΞ (\$5.33M)

Aug 24, 2021



Recent Transactions

Updated 5 seconds ago



(/cryptopunks/details/8188)

#8188 (/cryptopunks/details/8188)

Offered for
108.95Ξ
(\$203,681)



(/cryptopunks/details/1663)

#1663 (/cryptopunks/details/1663)

Transferred to
0xb7f7f6



(/cryptopunks/details/1663)

#1663 (/cryptopunks/details/1663)

Transferred to
0xc385e9



(/cryptopunks/details/1663)

#1663 (/cryptopunks/details/1663)

Transferred to
0xed01f8



(/cryptopunks/details/1663)

#1663 (/cryptopunks/details/1663)

Transferred to
0x00eb96



(/cryptopunks/details/9718)

#9718 (/cryptopunks/details/9718)

Transferred to
0xd2f9cf



(/cryptopunks/details/1864)

#1864 (/cryptopunks/details/1864)

Transferred to
0xd2f9cf



(/cryptopunks/details/4478)

#4478 (/cryptopunks/details/4478)

Transferred to
0x2be665





(/cryptopunks/details/4478)

#4478 (/cryptopunks/details/4478)

Transferred to
0x7ed875



(/cryptopunks/details/4478)

#4478 (/cryptopunks/details/4478)

Transferred to
0x4db132



(/cryptopunks/details/4478)

#4478 (/cryptopunks/details/4478)

Bought for
56.96Ξ
(\$106,486)



(/cryptopunks/details/2276)

#2276 (/cryptopunks/details/2276)

Offered for
94.95Ξ
(\$177,507)

For Sale

The lowest price Punk currently for sale is **52.99 ETH (\$99,064.27 USD)**.

Showing most recent offers, [click here to see all 1,052 \(/cryptopunks/forsale\)](#).



(/cryptopunks/details/9714)



(/cryptopunks/details/6121)



(/cryptopunks/details/8611)



(/cryptopunks/details/5433)



(/cryptopunks/details/3485)



(/cryptopunks/details/2309)



(/cryptopunks/details/1322)



(/cryptopunks/details/6561)



(/cryptopunks/details/2834)



(/cryptopunks/details/4065)



(/cryptopunks/details/9127)



(/cryptopunks/details/5728)



(/cryptopunks/details/6828)



(/cryptopunks/details/1096)



(/cryptopunks/details/5174)



(/cryptopunks/details/5817)



(/cryptopunks/details/5100)



(/cryptopunks/details/4467)



(/cryptopunks/details/6948)



(/cryptopunks/details/1347)



(/cryptopunks/details/2450)



(/cryptopunks/details/4338)



(/cryptopunks/details/4420)


















































(/cryptopunks/details/7264)




(/cryptopunks/details/8924)



(/cryptopunks/details/3718)  (/cryptopunks/details/1283)  (/cryptopunks/details/1840) 
 (/cryptopunks/details/3624)  (/cryptopunks/details/8615) 
(/cryptopunks/details/2876)  (/cryptopunks/details/3607) 
(/cryptopunks/details/5426)  (/cryptopunks/details/6584) 
(/cryptopunks/details/7789)  (/cryptopunks/details/1400) 
(/cryptopunks/details/3580)  (/cryptopunks/details/9362) 
(/cryptopunks/details/3228)  (/cryptopunks/details/7003) 
(/cryptopunks/details/1900)  (/cryptopunks/details/3121)  (/cryptopunks/details/6920) 
 (/cryptopunks/details/9567)  (/cryptopunks/details/4317) 
(/cryptopunks/details/5152)  (/cryptopunks/details/1589)  (/cryptopunks/details/3193) 
 (/cryptopunks/details/7341)  (/cryptopunks/details/8635) 
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 (/cryptopunks/details/3865)  (/cryptopunks/details/8154) 
(/cryptopunks/details/2266)  (/cryptopunks/details/2296) 
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(/cryptopunks/details/1500)  (/cryptopunks/details/3305) 
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(/cryptopunks/details/4969)  (/cryptopunks/details/5739) 
(/cryptopunks/details/6679)  (/cryptopunks/details/7029) 
(/cryptopunks/details/7552)  (/cryptopunks/details/7840) 
(/cryptopunks/details/8624)  (/cryptopunks/details/447)  (/cryptopunks/details/3400) 
 (/cryptopunks/details/9499)  (/cryptopunks/details/1533) 
(/cryptopunks/details/5278)  (/cryptopunks/details/5831) 



(/cryptopunks/details/5460)  (/cryptopunks/details/8705) 
 (/cryptopunks/details/9390)  (/cryptopunks/details/2689) 
 (/cryptopunks/details/4480)  (/cryptopunks/details/1753)  (/cryptopunks/details/1360)
 (/cryptopunks/details/570)  (/cryptopunks/details/3005) 
 (/cryptopunks/details/3492)  (/cryptopunks/details/5580) 
 (/cryptopunks/details/9255)  (/cryptopunks/details/9293)  (/cryptopunks/details/5151)
 (/cryptopunks/details/8320)  (/cryptopunks/details/2154) 
 (/cryptopunks/details/2608)  (/cryptopunks/details/4191)  (/cryptopunks/details/4871)
 (/cryptopunks/details/692)  (/cryptopunks/details/9197) 
 (/cryptopunks/details/7763)  (/cryptopunks/details/3138)  (/cryptopunks/details/3351)
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 (/cryptopunks/details/1370)  (/cryptopunks/details/5084) 
 (/cryptopunks/details/6425)  (/cryptopunks/details/5270)





















Bids

The average bid over the last year was **91.37 ETH (\$170,813.94 USD)**.






























































The average currently open bid is **1.05 ETH (\$1,957.66 USD)**.

Total value of all current bids is **610.5 ETH (\$1,141,314.38 USD)**.

Showing most recent bids, [click here to see all 583 \(/cryptopunks/bids\)](#).

 (/cryptopunks/details/9893)  (/cryptopunks/details/9109) 
 (/cryptopunks/details/776)  (/cryptopunks/details/1981)  (/cryptopunks/details/3794)
 (/cryptopunks/details/4949)  (/cryptopunks/details/88) 
 (/cryptopunks/details/3348)  (/cryptopunks/details/4156)  (/cryptopunks/details/5578)
 (/cryptopunks/details/5)  (/cryptopunks/details/1290) 
 (/cryptopunks/details/4932)  (/cryptopunks/details/2216)  (/cryptopunks/details/165)
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 (/cryptopunks/details/7822)  (/cryptopunks/details/2482) 



(/cryptopunks/details/3900)  (/cryptopunks/details/6437) 
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(/cryptopunks/details/6963)  (/cryptopunks/details/8780)  (/cryptopunks/details/14)
 (/cryptopunks/details/4577)  (/cryptopunks/details/4677) 
(/cryptopunks/details/5524)  (/cryptopunks/details/3176)  (/cryptopunks/details/5719)
 (/cryptopunks/details/9832)  (/cryptopunks/details/635) 
(/cryptopunks/details/1257)  (/cryptopunks/details/1492)  (/cryptopunks/details/3556)
 (/cryptopunks/details/3758)  (/cryptopunks/details/8364) 
(/cryptopunks/details/8425)  (/cryptopunks/details/9553)  (/cryptopunks/details/1055)
 (/cryptopunks/details/9803)  (/cryptopunks/details/105) 
(/cryptopunks/details/738)  (/cryptopunks/details/789)  (/cryptopunks/details/7010)
 (/cryptopunks/details/122)  (/cryptopunks/details/798) 
(/cryptopunks/details/6663)  (/cryptopunks/details/9454) 
(/cryptopunks/details/1998)  (/cryptopunks/details/860)  (/cryptopunks/details/5277)
 (/cryptopunks/details/5454)  (/cryptopunks/details/187) 
(/cryptopunks/details/4314)  (/cryptopunks/details/2644)  (/cryptopunks/details/48)
 (/cryptopunks/details/76)  (/cryptopunks/details/414) 
(/cryptopunks/details/795)  (/cryptopunks/details/1170)  (/cryptopunks/details/1293)
 (/cryptopunks/details/3343)  (/cryptopunks/details/4759) 
(/cryptopunks/details/4967)  (/cryptopunks/details/7395) 
(/cryptopunks/details/7441)  (/cryptopunks/details/9047)  (/cryptopunks/details/1380)
 (/cryptopunks/details/6348)  (/cryptopunks/details/6796) 
(/cryptopunks/details/110)  (/cryptopunks/details/1132)  (/cryptopunks/details/3135) 























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(</cryptopunks/details/8390>)  (</cryptopunks/details/1228>)  (</cryptopunks/details/1694>)
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 (</cryptopunks/details/6653>)  (</cryptopunks/details/7227>) 
(</cryptopunks/details/7667>)

Sales






































































The average sale price of a Punk over the last year is **398.85 ETH (\$745,638.06 USD)**.

The total value of Punks sold over the last year is **212,395.92 ETH (\$397,072,051.59 USD)**.

Showing most recent sales, [click here to see all 23,909 \(/cryptopunks/sales\)](/cryptopunks/sales).

 (</cryptopunks/details/4478>)  (</cryptopunks/details/8849>) 
(</cryptopunks/details/3841>)  (</cryptopunks/details/1663>)  (</cryptopunks/details/1741>)
 (</cryptopunks/details/7513>)  (</cryptopunks/details/4624>) 
(</cryptopunks/details/8535>)  (</cryptopunks/details/4108>)  (</cryptopunks/details/8539>)
 (</cryptopunks/details/1462>)  (</cryptopunks/details/7335>) 
(</cryptopunks/details/2769>)  (</cryptopunks/details/7209>) 
(</cryptopunks/details/6658>)  (</cryptopunks/details/6447>) 
(</cryptopunks/details/7354>)  (</cryptopunks/details/5271>)  (</cryptopunks/details/3913>)
 (</cryptopunks/details/8419>)  (</cryptopunks/details/7100>) 
























(/cryptopunks/details/9609)  (/cryptopunks/details/6106) 
(/cryptopunks/details/2946)  (/cryptopunks/details/3913)  (/cryptopunks/details/5311) 
 (/cryptopunks/details/2905)  (/cryptopunks/details/4651) 
(/cryptopunks/details/4651)  (/cryptopunks/details/6263)  (/cryptopunks/details/1101) 
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(/cryptopunks/details/4841)  (/cryptopunks/details/4000) 
(/cryptopunks/details/1693)  (/cryptopunks/details/7751)  (/cryptopunks/details/2381) 
 (/cryptopunks/details/1424)  (/cryptopunks/details/845) 
(/cryptopunks/details/7770)  (/cryptopunks/details/5661)  (/cryptopunks/details/7912) 
 (/cryptopunks/details/2927)  (/cryptopunks/details/3091) 
(/cryptopunks/details/7100)  (/cryptopunks/details/8019)  (/cryptopunks/details/1424) 
 (/cryptopunks/details/1398)  (/cryptopunks/details/7702) 
(/cryptopunks/details/8188)  (/cryptopunks/details/8511)  (/cryptopunks/details/7672) 
 (/cryptopunks/details/8043)  (/cryptopunks/details/2978) 
(/cryptopunks/details/1232)  (/cryptopunks/details/9026)  (/cryptopunks/details/5969) 
 (/cryptopunks/details/2409)  (/cryptopunks/details/4480) 
(/cryptopunks/details/1112)  (/cryptopunks/details/6051)  (/cryptopunks/details/6121) 
 (/cryptopunks/details/1630)  (/cryptopunks/details/2300) 
(/cryptopunks/details/9491)  (/cryptopunks/details/235)  (/cryptopunks/details/9550) 
 (/cryptopunks/details/2650)  (/cryptopunks/details/7400) 
(/cryptopunks/details/8955)  (/cryptopunks/details/4223)  (/cryptopunks/details/376) 
































































 (/cryptopunks/details/2535)  (/cryptopunks/details/7207) 
 (/cryptopunks/details/8457)  (/cryptopunks/details/9284) 
 (/cryptopunks/details/6435)  (/cryptopunks/details/4797)  (/cryptopunks/details/1112)
 (/cryptopunks/details/7526)  (/cryptopunks/details/9981) 
 (/cryptopunks/details/4658)  (/cryptopunks/details/4666) 
 (/cryptopunks/details/5270)  (/cryptopunks/details/6920) 
 (/cryptopunks/details/4448)  (/cryptopunks/details/1833)  (/cryptopunks/details/5166)
 (/cryptopunks/details/9475)  (/cryptopunks/details/2233) 
 (/cryptopunks/details/235)  (/cryptopunks/details/3083)  (/cryptopunks/details/6039)
 (/cryptopunks/details/7718)  (/cryptopunks/details/3737) 
 (/cryptopunks/details/1928)  (/cryptopunks/details/5202) 
 (/cryptopunks/details/3200)  (/cryptopunks/details/2309) 
 (/cryptopunks/details/4754)  (/cryptopunks/details/2356)

Wrapped

798 Punks are "wrapped" for sale on ERC-721 markets, see wrappedpunks.com (<https://wrappedpunks.com/>) for more details.

Showing by Punk number, [click here to see all wrapped Punks \(/cryptopunks/wrapped\)](#) or [view them on OpenSea](https://opensea.io/assets/wrapped-cryptopunks) (<https://opensea.io/assets/wrapped-cryptopunks>).

 (/cryptopunks/details/173)  (/cryptopunks/details/239) 
 (/cryptopunks/details/318)  (/cryptopunks/details/342)  (/cryptopunks/details/349)
 (/cryptopunks/details/352)  (/cryptopunks/details/402) 
 (/cryptopunks/details/431)  (/cryptopunks/details/488)  (/cryptopunks/details/489)
 (/cryptopunks/details/547)  (/cryptopunks/details/628) 
 (/cryptopunks/details/644)  (/cryptopunks/details/669)  (/cryptopunks/details/675)
 (/cryptopunks/details/680)  (/cryptopunks/details/717) 
 (/cryptopunks/details/729)  (/cryptopunks/details/750)  (/cryptopunks/details/880) 

 (/cryptopunks/details/927)  (/cryptopunks/details/940) 
(/cryptopunks/details/952)  (/cryptopunks/details/974)  (/cryptopunks/details/983)
 (/cryptopunks/details/1012)  (/cryptopunks/details/1035) 
(/cryptopunks/details/1048)  (/cryptopunks/details/1054)  (/cryptopunks/details/1068)
 (/cryptopunks/details/1071)  (/cryptopunks/details/1103) 
(/cryptopunks/details/1110)  (/cryptopunks/details/1117)  (/cryptopunks/details/1140)
 (/cryptopunks/details/1141)  (/cryptopunks/details/1149) 
(/cryptopunks/details/1165)  (/cryptopunks/details/1166)  (/cryptopunks/details/1167)
 (/cryptopunks/details/1209)  (/cryptopunks/details/1223) 
(/cryptopunks/details/1228)  (/cryptopunks/details/1235)  (/cryptopunks/details/1246)
 (/cryptopunks/details/1247)  (/cryptopunks/details/1278) 
(/cryptopunks/details/1288)  (/cryptopunks/details/1306)  (/cryptopunks/details/1313)
 (/cryptopunks/details/1342)  (/cryptopunks/details/1358) 
(/cryptopunks/details/1364)  (/cryptopunks/details/1366)  (/cryptopunks/details/1372)
 (/cryptopunks/details/1384)  (/cryptopunks/details/1393) 
(/cryptopunks/details/1405)  (/cryptopunks/details/1417)  (/cryptopunks/details/1426)
 (/cryptopunks/details/1441)  (/cryptopunks/details/1442) 
(/cryptopunks/details/1470)  (/cryptopunks/details/1471)  (/cryptopunks/details/1473)
 (/cryptopunks/details/1482)  (/cryptopunks/details/1512) 
(/cryptopunks/details/1514)  (/cryptopunks/details/1561)  (/cryptopunks/details/1563)
 (/cryptopunks/details/1567)  (/cryptopunks/details/1595) 
(/cryptopunks/details/1596)  (/cryptopunks/details/1607)  (/cryptopunks/details/1612)
 (/cryptopunks/details/1616)  (/cryptopunks/details/1620) 
(/cryptopunks/details/1628)  (/cryptopunks/details/1645)  (/cryptopunks/details/1663)
 (/cryptopunks/details/1672)  (/cryptopunks/details/1678)  (/cryptopunks/details/1678)





What is a CryptoPunk?

CryptoPunks are 24x24 pixel art images, generated algorithmically. Most are punky-looking guys and girls, but there are a few rarer types mixed in: Apes, Zombies and even the odd Alien. Every Punk has their own profile page that shows their attributes as well as their ownership/for-sale status ([here's \(/cryptopunks/details/4553\)](/cryptopunks/details/4553) an example).

What exactly is going on here?

Cryptocurrency (<https://en.wikipedia.org/wiki/Cryptocurrency>) was made famous by **Bitcoin** (<https://en.wikipedia.org/wiki/Bitcoin>), but Bitcoin is designed just to transact and record ownership of Bitcoin itself. CryptoPunks were minted on a successor to Bitcoin called **Ethereum** (<https://en.wikipedia.org/wiki/Ethereum>) which allows for arbitrary computer code to be executed on the blockchain and the results of the execution to be stored forever. This is pretty cool! Normally, code is run on a server somewhere and you basically need to trust the person running the server. Ethereum lets everyone execute the code, show each other what result they got, and agree that the code was executed properly and fairly. The written code of the CryptoPunks smart contract lives on Ethereum, which allows any user to buy and sell Punks with anyone else in the world.

How do I get a Punk?



1. Download and install a Web3 browser plugin for Chrome, such as **MetaMask** (<https://metamask.io/>). This will allow websites (that you authorize) to connect to your Ethereum wallet.
2. If you made a new account, buy some \$ETH. The MetaMask plugin has functionality which allows you to buy \$ETH from Coinbase.
3. Once you have the plugin installed, this website will recognize it and add buttons that allow you to bid on, buy and sell Punks directly in the interface.
4. For example, you can buy **Punk #9714** (</cryptopunks/details/9714>) for 52.99 ETH (\$99,064.27 USD).

Details and FAQ

Where are the images for the Punks stored?

Originally, the digital images of the Punks were too large to store on the blockchain, so we took a hash of the **composite image** (</public/images/cryptopunks/punks.png>) of all the Punks and **embedded it into the contract**

(<https://github.com/larvalabs/cryptopunks/blob/master/contracts/CryptoPunksMarket.sol#L5>).

You can verify that the punks being managed by the Ethereum contract are the True Official Genuine CryptoPunks™ by calculating an SHA256 hash on the CryptoPunks image and comparing it to the hash stored in the contract.

Since then, due to some clever compression ideas and some help from friends of the Punks, each PNG image in the collection and its corresponding attribute data are recorded fully on chain. You can read more about the mechanisms and details of the process in the original Larva Labs **announcement blog post** (<https://larvalabs.com/blog/2021-8-18-18-0/on-chain-cryptopunks>).

Are the Punks an ERC-721 token?

No. CryptoPunks predate the ERC-721 standard and are a custom contract, meaning it doesn't comply with any standards. They are *almost* an **ERC20 token**

(https://theethereum.wiki/w/index.php/ERC20_Token_Standard).

Where does the market data on this site come from?

The prices, bids and sales you see on this site are loaded from the CryptoPunks contract on the Ethereum blockchain.

Do you charge any fees for transactions?



No. We charge no fees for CryptoPunks sales executed via the built-in marketplace (notwithstanding the gas fees required to interact with Ethereum).

The contract source and more technical details are available **on Github** (<https://github.com/larvalabs/cryptopunks>).

For inquiries, email punks@yugalabs.io (<mailto:punks@yugalabs.io>)

Search Punks

Try things like 'zombie' or 'zombie and beard'

Search

[Login \(/login/login\)](/login/login)

[Terms \(/cryptopunks/terms\)](/cryptopunks/terms)

[License Terms \(https://licenseterms.cryptopunks.app\)](https://licenseterms.cryptopunks.app)

[Privacy Policy \(https://www.yuga.com/privacy/\)](https://www.yuga.com/privacy/)



This is **Exhibit "G"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

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CryptoPunks

By C352B5

Items 9,996 · Created Jun 2017 · Creator earnings 0% · Chain Ethereum · Category PFPs

CryptoPunks launched as a fixed set of 10,000 items in mid-2017 and became one of the inspirations for the ERC-721...

See more



1,146,256 ETH total volume **--** floor price **0%** listed **3,686** owners **37%** unique owners

Items Analytics Activity

Items Analytics Activity

Filter Live 9,997 results Search by name or trait

Price low to high [Grid View] [List View]

Filter	Item	Last Sale
Status		
Price		
Quantity		
Currency		
Traits		
accessory		95

This is **Exhibit “H”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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WELCOME TO THE BORED APE YACHT CLUB

BAYC is a collection of 10,000 Bored Ape NFTs—unique digital collectibles living on the Ethereum blockchain. Your Bored Ape doubles as your Yacht Club membership card, and grants access to members-only benefits, the first of which is access to THE BATHROOM, a collaborative graffiti board. Future areas and perks can be unlocked by the community through roadmap activation.





FAIR DISTRIBUTION

(BONDING CURVES ARE A PONZI)

There are no bonding curves here. Buying a Bored Ape costs 0.08 ETH. There are no price tiers; BAYC membership costs the same for everyone.

Note: Thirty apes are being withheld from the sale. These will be used for giveaways, puzzle rewards—and for the creators' BAYC memberships.

BUY AN APE

The initial sale has sold out. To get your Bored Ape, check out the collection on OpenSea.

[BUY AN APE ON OPENSEA](#)

THE SPECS

Each Bored Ape is unique and programmatically generated from over 170 possible traits, including expression, headwear, clothing, and more. All apes are dope, but some are rarer than others.

The apes are stored as ERC-721 tokens on the Ethereum blockchain and hosted on IPFS. ([See Record and Proof.](#)) Purchasing an ape costs 0.08 ETH.

To access members-only areas such as [THE BATHROOM](#), Apeholders will need to be signed into their Metamask Wallet.



WELCOME TO THE CLUB

When you buy a Bored Ape, you're not simply buying an avatar or a provably-rare piece of art. You are gaining membership access to a club whose benefits and offerings will increase over time. Your Bored Ape can serve as your digital identity, and open digital doors for you.



10,000 Provably-rare
Bored Ape tokens



Fair Launch, fair
distribution: All apes
cost 0.08 ETH



Ownership and
commercial usage
rights given to the
consumer over their
NFT



The Bathroom: A
member's-only
graffiti board



Gain additional
benefits through
roadmap activations

THE BATHROOM

The BAYC Bathroom will become operational once the presale period is over. It contains a canvas accessible only to wallets containing at least one ape. Like any good dive bar bathroom, this is the place to draw, scrawl, or write expletives.

Each ape-holder will be able to paint a pixel on the bathroom wall every fifteen minutes. Think of it as a collaborative art experiment for the cryptosphere. A members-only canvas for the discerning minds of crypto twitter.

We're pretty sure it's going to be full of dicks.



ROADMAP ACTIVATIONS

We're in this for the long haul.

We've set up some goalposts for ourselves. Once we hit a target sell through percentage, we will begin to work on realizing the stated goal.

10%

~~We pay back our moms.~~

20%

~~We release the Caged Apes. 5 Caged Apes (tokens held back from the sale) are airdropped to random Apeholders.~~

40%

~~BAYC gets its own YouTube channel, BAYC LoFi Radio - Beats to Ape into Shitcoins To.~~

60%

~~Member-Exclusive BAYC Merch Store gets unlocked, featuring Limited Edition tees, hoodies, and other goodies.~~

80%

~~The clubhouse image becomes interactive and the Mysterious Note becomes legible, beginning a treasure hunt. The first to solve the mystery will be rewarded 5 ETH and a Bored Ape.~~

90%

~~The Bored Ape liquidity pool is initiated.~~

100%

~~The Mutant Ape (NFT Breeding) Arcade Machine gets fixed. And we cook up new ways to ape with our friends.~~



COMMUNITY TOOLS

Here are some helpful tools created by the Bored Ape Yacht Club community. Please note that these are unofficial in nature. Every assignment of an ape's overall value or rarity is inherently subjective.

[NFTEXP.IO](#)

[RARITY.TOOLS](#)

THE TEAM

BAYC was created by four friends who set out to make some dope apes, test our skills, and try to build something (ridiculous).

GARGAMEL. STARCRAFT OBSESSED. EATS SMURFS.

GORDON GONER. REFORMED LEVERAGE ADDICT.

EMPEROR TOMATO KETCHUP. SPENT ALL THEIR MONEY ON FIRST PRESSES AND PET-NAT.

NO SASS. HERE FOR THE APES. NOT FOR THE SASS.



VERIFIED SMART CONTRACT ADDRESS

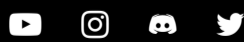
BORED APE

[0xA7647A8aB7C2061c2E118A18a936f13D](#)



GET ON THE LIST

Email Address →



This is **Exhibit "I"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

Overview

Internal Txns

Logs (3)

State

Comments

More ▾

Transaction Hash:

0x2806de6646e8a196adfd28b95e7f9d487a5333d7de3a80a414a1dca3364f8ae

Status:

Success

Block:

12359213 5055747 Block Confirmations

Timestamp:

763 days 9 hrs ago (May-03-2021 05:06:41 AM +UTC)

Transaction Action:

► Sale: 1 NFT On OpenSea

Sponsored:

From:

[Oxtay.eth](#)

Interacted With (To):

[0x7Be8076f4EA4A4AD08075C2508e481d6C946D12b](#) (OpenSea: Wyvern Exchange v1)

↳ Transfer 0.0245 ETH From [OpenSea: Wyvern Exchang...](#) To [OpenSea: Wallet](#)

↳ Transfer 0.4655 ETH From [OpenSea: Wyvern Exchang...](#) To [0xdF36E5...5986fbBF](#)

ERC-721 Tokens Transferred:



ERC-721 Token ID [5256] BoredApeYach... (BAYC)

From [0xdF36E5...5986fbBF](#) To [0xe241be...690ae924](#)

Value:

0.49 ETH \$1,681.78

Transaction Fee:

0.009188205 ETH **\$17.16**

Gas Price:

39 Gwei (0.000000039 ETH)

Ether Price:

\$3,432.21 / ETH

Gas Limit & Usage by Txn:

273,242 | 235,595 (86.22%)

Other Attributes:

Nonce: 25

Position In Block: 97

Input Data:

```
Function: atomicMatch_(address[14] addrs, uint256[18] uints, uint8[8] feeMethodsSidesKindsHowToCalls, bytes calldataBuy, bytes calldataSell, bytes replacementPatternBuy, bytes replacementPatternSell, bytes staticExtradataBuy, bytes staticExtradataSell, uint8[2] vs, bytes32[5] rssMetadata)
```

MethodID: 0xab834bab

```
[0]: 00000000000000000000000000000000000000000007be8076f4ea4a4ad08075c2508e481d6c946d12b
```

View Input As ▾


 Decode Input Data

More Details:

[— Click to show less](#)

Private Note:

To access the Private Note feature, you must be [Logged In](#)

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “J”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario



BORED APE KENNEL CLUB ADOPTION DRIVE

It gets lonely in the swamp sometimes. That's why every ape should have a four-legged companion. To curl up at your feet. To bring you a beer. To fire a missile launcher at that fucking monkey Jimmy.

That's why we've started the Bored Ape Kennel Club, and why we're offering up a dog for adoption to every single member of the BAYC – for free (you only pay gas).



LIMITED-TIME ONLY

For one week, each and every club member will be able to adopt a Club Dog NFT from the Bored Ape Kennel Club. Claiming the token is free; you'll only have to pay gas.

These pups are not for sale. The only way to adopt one is to claim it by having a Bored Ape in your wallet. You can claim one random Club Dog for each Bored Ape you own. Once a dog has been claimed by a Bored Ape, that token cannot be used to claim another canine again.

At the time of minting, the dogs will be unrevealed. After one week, at 6pm EST on June 25th, the adoption drive will come to a close. A randomized starting index will be set, and everyone will be able to meet their companion.

The unclaimed dogs? They'll be released into the swamp, never to be seen again.



CHARITABLE CONTRIBUTIONS

The BAKC collection currently has a 2.5% royalty fee associated with secondary sales on OpenSea.

BAKC launched on 6/18/22; all royalties for the first 6 weeks were donated to animal charities, allowing us to donate over \$1M to [Organgutan Outreach](#), [Friends of Bonobos](#), [Wright Way Rescue](#), and [Wolf Conservation Center](#).

After the initial six weeks, the royalty fee was removed. It was reinstated on 12/21/22 to support the creation of "more cool shit," because dogs need to have some fun too.

SPECS

There are 10,000 total Bored Ape Kennel Club NFTs. Each BAKC dog is stored as an ERC-721 token on the Ethereum blockchain and hosted on IPFS. Every dog in the kennel club is unique and programmatically-generated from over 170 possible traits. Some traits are rarer than others.



JOIN THE CLUB

The adoption drive has come to a close. To get your Club Dog, check out the collection on OpenSea.

[BUY A DOG ON
OPENSEA](#)

FAQ

What was the inspiration behind the Bored Ape Kennel Club? ▼

Will you be releasing more dogs after this? ▼

Why didn't you make these profile pictures? ▼

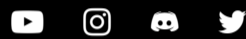
VERIFIED SMART CONTRACT ADDRESS



[0xb24caa003E9f2f0497Ad287FDF95623](#)

GET ON THE LIST

Email Address



© 2021 Yuga Labs LLC

[BAYC Terms & Conditions](#)

[MAYC Terms & Conditions](#)

This is **Exhibit “K”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____ *A.K.* _____

Commissioner of Oaths in and for Ontario



B A C C

Bored Ape Chemistry Club 🔒



By [YugaLabs](#) 🔒

Unique items **3** · Total items **535** · Created **Aug 2021** · Creator earnings **2.5%** · Chain **Ethereum** · Category **Art**

Bored Ape Chemistry Club consists of 10,000 Mutant Serums, to be airdropped to all Bored Apes. Handle with...

[See more](#) ▾

58,119 ETH total volume	17.25 ETH floor price	3.1337 WETH best offer	67% listed	273 owners	51% unique owners
-----------------------------------	---------------------------------	----------------------------------	----------------------	----------------------	-----------------------------

[Items](#) [Analytics](#) [Activity](#)

☰ Price low to high ▾ ☰

- Status ▾
- Owner ▾
- Price ▾
- Quantity ▾
- Currency ▾
- Attributes ▾
- Serum Type ▾

🔄 3 items

 <p>M1 Mutant Serum 17.25 ETH Last sale: 17,170 ETH</p>	 <p>M2 Mutant Serum 27.8969 ETH Last sale: 30 WETH</p>	 <p>Mega Mutant Serum Last sale: 1,542.069 ETH</p>
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This is **Exhibit “L”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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OpenSea

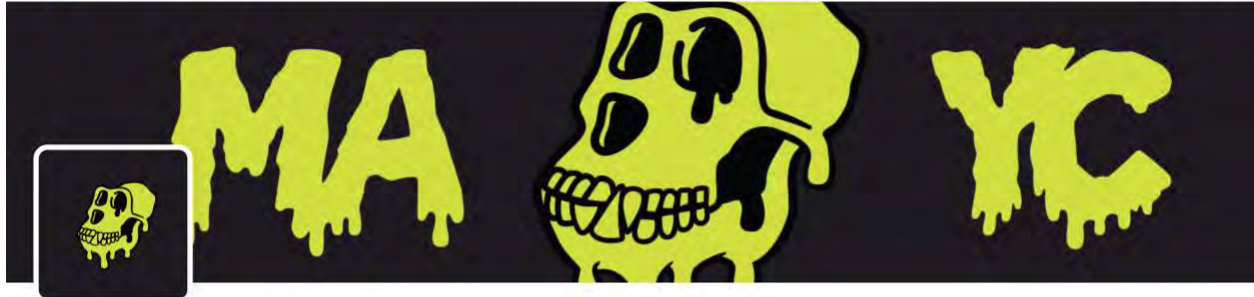
Drops

Stats

Search items, collections, and accounts



Connect wallet



Mutant Ape Yacht Club

By YugaLabs

Items 19.5K · Created Aug 2021 · Creator earnings 2.5% · Chain Ethereum · Category PFPs

The MUTANT APE YACHT CLUB is a collection of up to 20,000 Mutant Apes that can only be created by exposing a...

See more

775,541 ETH
total volume

13,222 ETH
floor price

12,9124 WETH
best offer

2%
listed

11,330
owners

58%
unique owners

Items Offers BETA Analytics Activity

Live BETA 19,462 results

Search by name or trait

Price low to high

- Status
- Price
- Quantity
- Currency
- Traits
- Background 16
- Clothes 86
- Earring 12
- Eyes 46

2888	7984	19570	22836	24154
13,222 ETH Last sale: 12,9601 WETH	13,29 ETH Last sale: 23,600 WETH	13.3 ETH Last sale: 13,010 WETH	13.39 ETH Last sale: 12,789 ETH	13,395 ETH Last sale: 12,969 ETH

This is **Exhibit “M”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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Commissioner of Oaths in and for Ontario

APECOIN IS FOR THE WEB3 ECONOMY.

Culture has found new expression in web3 through art, gaming, entertainment, and events. The possibilities for blockchain's impact on culture are so endless that they can't possibly all be predicted yet. APE is a token made to support what's next, controlled and built on by the community. It will serve as a decentralized protocol layer for community-led initiatives that drive culture forward into the metaverse.

THE APE FOUNDATION

The APE Foundation is the steward of ApeCoin. It is not an overseer, but the base layer on which ApeCoin holders in the ApeCoin DAO can build.

The Foundation facilitates decentralized and community-led governance and is designed to become more decentralized over time. It is tasked with administering the decisions of the ApeCoin DAO, and is responsible for day-to-day administration, bookkeeping, project management, and other tasks that ensure the DAO community's ideas have the support they need to become a reality.

The goal of the APE Foundation is to steward the growth and development of the APE ecosystem in a fair and inclusive way. It utilizes the Ecosystem Fund, which is controlled by a multisig wallet, to pay its expenses as directed by the ApeCoin DAO and provides an infrastructure for ApeCoin holders to collaborate through open and permissionless governance processes.

THE DAO

ApeCoin DAO exists because decentralized governance is critical to building and managing a globally dispersed community—and therefore critical to the success of the APE ecosystem.

The APE Improvement Proposal Process (see [Governance](#)) will allow ApeCoin DAO members to make decisions regarding Ecosystem Fund allocations, governance rules, projects, partnerships, and beyond. ApeCoin DAO membership is open to all ApeCoin holders.

THE BOARD

A special council on the APE Foundation (the DAO's "Board") provides, at the behest of the ApeCoin DAO members, oversight of the Foundation administrators. The purpose of the Board is to administer DAO proposals and serve the vision of the community. It meets on proposals requiring administrative review under ApeCoin DAO rules. The initial Board serves a term of six months, after which DAO members will vote annually on Board members.



alexis ohanian



bored ape g



gerry



vera li



yat siu

APECOIN PROTOCOL

ApeCoin is an ERC-20 governance and utility token used within the APE ecosystem to empower a decentralized community building at the forefront of web3.

As the open-source protocol layer of the ecosystem, ApeCoin serves several purposes:

Governance

ApeCoin is the ecosystem's governance token, allowing ApeCoin holders to participate in ApeCoin DAO.

Unification of Spend

ApeCoin is the ecosystem's utility token, giving all its participants a shared and open currency that can be used without centralized intermediaries.

Access

ApeCoin provides access to certain parts of the ecosystem that are otherwise unavailable, such as exclusive games, merch, events, and services.

Incentivization

ApeCoin is a tool for third-party developers to participate in the ecosystem by incorporating APE into services, games, and other projects.

APECOIN ALLOCATION

The total supply of ApeCoin is permanently fixed at 1 billion tokens. No minting capability is exposed through the contract interface, thus the total supply will never increase. Similarly, the contract interface does not expose any token burning capability, so the total supply will never decrease.

In line with the standard practice, a portion of the tokens for contributors to the project will be initially locked. Locked tokens will be unlocked over a period of 48 months, in accordance with the predetermined unlock schedule in the chart below, starting on launch day, March 17, 2022.

ApeCoin will be distributed among four main groups, as detailed in the chart below. Wallets holding tokens allotted to the DAO treasury and resources can be viewed [here](#).



62%

ECOSYSTEM FUND

BAYC/MAYC NFT holders and treasury/resources

150,000,000 tokens to BAYC/MAYC

All unlocked for claim at launch

470,000,000 tokens to DAO treasury and resources

117,500,000 unlocked at launch, then 7,343,750 unlocked per month for 48 months

16%*

YUGA LABS + CHARITY

The company behind BAYC and continuing contributor

**6.25% worth of Yuga Labs holdings are being donated to the Jane Goodall Legacy Foundation.*

150,000,000 tokens to Yuga Labs

Initial lock-up 12 months, then 4,166,666.67 unlocked per month for 36 months

10,000,000 tokens or equal value donated to the Jane Goodall Legacy Foundation

Initial lock-up 12 months, then 277,777.78 tokens unlocked per month for 36 months

14%

LAUNCH CONTRIBUTORS

The companies and people that helped make this project a reality

140,000,000 tokens to launch contributors. Lockup schedules vary by contributor but fall into one of the following:

- 10,000,000 tokens upfront, 25,000,000 after 6 months, 25,000,000 after 12 months, and 25,000,000 after 18 months
 - Initial lock-up for 12 months, then 757,575.76 unlocked per month for 33 months
 - Initial lock-up for 12 months, then 833,333.33 unlocked per month for 36 months
-

8%

BAYC FOUNDERS

The ones who put the Ape in ApeCoin, the four founders of Yuga Labs and BAYC

80,000,000 tokens to founders of Yuga Labs

Initial lock-up for 12 months, then 2,222,222.22 unlocked per month for 36 months

APECOIN CLAIMING FOR BAYC AND MAYC HOLDERS

Tokens will be allocated to BAYC/MAYC members via the [claim page](#) starting on March 17, 2022 at 8:30AM ET.

To ensure a fair launch of ApeCoin to BAYC and MAYC NFT holders, the allocation is informed by the difference in floor price between each collection of NFTs, roughly the month prior to the token claim launch (02/07/22 to 03/08/22). Each Bored Ape or Mutant Ape NFT that has a companion Bored Ape Kennel Club NFT will be able to claim the amount of ApeCoin specified below.

NFT

APECOIN ALLOCATED PER NFT OR NFT PAIR

Bored Ape only	10,094 tokens
----------------	---------------

Mutant Ape only	2,042 tokens
-----------------	--------------

Bored Ape + Kennel Club (token IDs do not need to match)	10,950 tokens
---	---------------

Mutant Ape + Kennel Club (token IDs do not need to match)	2,898 tokens
--	--------------

- *There is no distinction between Mutant Ape types for the claim.*
- *Ape + Kennel token IDs do not need to match to claim, nor does having the original pairing entitle any extra tokens.*
- *This is a one-time claim that will identify all eligible NFTs in your wallet, in the order that they appear. There will not be an option to deselect an eligible NFT if it is present in your wallet. If you wish to claim for one of your NFTs but not another, you will need to move them to separate wallets.*
- *A Bored Ape or Mutant Ape that has claimed its tokens cannot be used later to claim tokens for an accompanying Kennel Club. All paired NFTs must be claimed together at the same time.*
- *Unused Bored Ape Chemistry Club serums do not qualify for token claim.*
- *The airdrop claim tokens associated with any NFT can only be claimed once. In order to check whether a certain BAYC, MAYC (or companion BAKC) has claimed its tokens, use the below checker.*
- *There will be Ethereum network gas fees incurred to claim ApeCoin.*

HOW IT WORKS

15% of the total ApeCoin token supply allocated to BAYC/MAYC holders for claim will be transferred to a smart contract. Ownership of the contract will be transferred to a multisig wallet, which will be responsible for:

- initiating the BAYC/MAYC/BAKC claim period
- ending the claim period 90 days after launch
- taking ownership of all unclaimed APE tokens at the end of the claim period

- transferring these unclaimed tokens to the Coinbase Custody wallets that constitute the Ecosystem Fund

The airdrop claim tokens associated with any NFT can only be claimed once. In order to check whether a certain BAYC, MAYC (or BAYC or MAYC with a companion BAKC) has claimed its tokens, use the NFT checker:

USE THE NFT CHECKER

APE FOUNDATION IP

The APE Foundation was gifted a 1 of 1 NFT by Yuga Labs, the creators of Bored Ape Yacht Club. You can see it [here](#). Yuga Labs has conveyed all rights and privileges to this NFT and its underlying artwork to the APE Foundation. The ApeCoin DAO can decide how this intellectual property is used.

FAQ

WHO/WHAT ARE THE DIFFERENT ENTITIES AND NAMES, AND HOW DO THEY RELATE TO EACH OTHER?

- **Yuga Labs** - Yuga Labs is a web3 company best known for the creation of the Bored Ape Yacht Club. It will be a community member in the ApeCoin DAO and will adopt APE as the primary token across new projects.
- **BAYC** - The Bored Ape Yacht Club is a collection of digital art crafted into NFTs where the token itself doubles as a membership to a swamp club for apes.
- **APE Foundation** - The APE Foundation is the steward of ApeCoin, a legal entity that exists to administer the decisions of the ApeCoin DAO.
- **ApeCoin DAO** - A decentralized governance organization that will make decisions regarding Ecosystem Fund allocations, governance

rules, projects, partnerships, and more. ApeCoin DAO membership is open to all ApeCoin holders.

- **APE** - The symbol for ApeCoin token.

DOES THE FOUNDATION CONTROL APECOIN AND/OR THE APECOIN DAO? IF NOT, WHAT ROLE DO THEY PLAY?

The Foundation does not control ApeCoin or the ApeCoin DAO. The Foundation consists of an administrative Board, which exists solely to oversee the decisions of the ApeCoin DAO, as well as a third party project management team in charge of ensuring ApeCoin DAO decisions are implemented.

A decentralized autonomous organization (DAO) is the best way to give every member of the community a vote on important decisions whether it's a technical upgrade or a decision to fund a new idea. However, the reality is that today a DAO cannot sign a lease or hire people or make merch or whatever the community decides to do on its own. The Foundation is responsible for the day-to-day administration, bookkeeping, project management, and other tasks that ensure the ApeCoin DAO community's ideas have the support they need to become a reality.

HOW WAS THE FOUNDATION BOARD SELECTED?

Certain members of the community that have strong operational experience were consulted on how to best structure the ApeCoin DAO. Several of these members voiced their willingness to join the Board to oversee the decisions of the community and are committed to upholding and furthering the decentralization of the ApeCoin DAO. The initial Board will serve 6 months.

WILL THERE BE A CHANCE FOR OTHER INDIVIDUALS TO JOIN THE BOARD?

Yes. After the initial 6-month term, DAO members will vote annually to keep existing or appoint new Board members. ApeCoin token holders (the

DAO members) can also remove or replace a Board member at any time with a majority “In favor” vote.

WHAT ROLE DOES YUGA LABS PLAY IN ALL OF THIS?

Yuga Labs is a contributor to the APE Ecosystem and will assist in the creation of products and experiences for the ecosystem as a whole.

WHAT WILL THE CHARITABLE DONATION TO THE JANE GOODALL LEGACY FOUNDATION BE USED FOR?

The donation will help secure an invested endowment for the JGLF, helping to fund projects including:

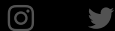
- Long-term research at the Gombe Stream Research Center in Western Tanzania (which been conducted continuously for more than six decades)
- Lake Tanganyika Catchment Reforestation and Education (TACARE), community-centered conservation that preserves chimp habitats in six African countries
- Conservation science that explores, innovates, and discovers new solutions, technologies and tools to protect the environment and wildlife
- Roots & Shoots, a program active in 60+ countries that empowers young people (kindergarten through university) to become involved in hands-on projects for people, animals, and the environment

HOW WERE THE TOKEN ALLOTMENTS FOR BAYC, MAYC, AND BAKC NFT HOLDERS CALCULATED?

The allotment of ApeCoin to NFT holders was a ratio based on the average floor price of BAYC and MAYC from roughly the month prior to launch (02/07/22 to 03/08/22).

WHY DON'T THOSE WITH ONLY BAKC NFTS GET A TOKEN ALLOTMENT?

BAKC NFTs are companion NFTs to BAYC and MAYC, meaning they don't have utility on their own, only when paired with a BAYC or MAYC.



© 2023 APE FOUNDATION

ApeCoin Smart Contract Address: `0x4d224452801aced8b2f0aeb155379bb5d594381`

This is **Exhibit “N”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

A handwritten signature in black ink, consisting of the initials "A.K." followed by a horizontal line.

Commissioner of Oaths in and for Ontario

THE OTHERSIDE LITEPAPER



INTRODUCTION

WHAT IS THIS LITEPAPER?



LITEPAPER



CODEX U1



CODEX U2



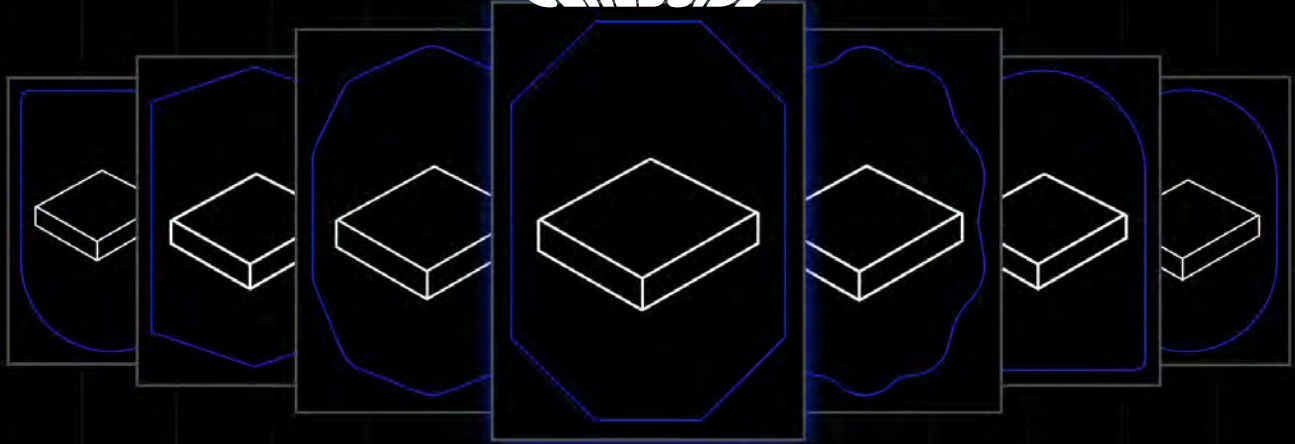
This document is the litepaper for the world-building metaverse platform known as Otherside. It is designed to communicate and explain principles of the platform, capabilities of its developers, and possibilities for community co-creation.

Consider this litepaper a stepping stone. It will eventually be replaced by a Codex that will continually evolve with Voyager input to share the most up-to-date information, announcements, and decisions that shape Otherside.

It has already been immensely inspiring to receive your support thus far and we cannot wait to continue this journey as we discover novel ways to collaborate and forge our unique path.

WHAT IS OTHERSIDE?

OTHERSIDE



Otherside is a world-building platform that provides an exciting environment to play, create, compete, connect, and explore together. Initially, users will experience Otherside through a narrative gameplay experience (aka **The Voyager's Journey**) co-developed by Yuga Labs and Improbable and based on the technology from M². In the future, we look forward to seeing what new experiences and games our community can create to expand the possibilities of the metaverse. The tools and utility of Otherside will be continually and iteratively shaped by the participation and needs of our community. In Phase 1, only Otherdeed holders (aka **Voyagers**) and selected third-party developers will be able to participate and contribute to the first stages of the platform's features and uses.

WHAT IS PHASE 1?



PHASE 1



PHASE 2



PHASE 3

Phase 1 marks the beginning of development for the Otherside platform. All Voyagers are invited to take part in Voyager's Journey, an 11-part storyline surrounding a mysterious Obelisk that has appeared in the Otherside universe. Team up with other Voyagers, develop your own experiences on your slice of the Otherside, and discover and shape what can be harvested, crafted, traded, bought, and sold. Voyagers will play a large role in shaping the core capabilities of the platform through exclusive events, playtesting opportunities, and as co-developers of our Otherside Development Kits (ODKs).

PRINCIPLES

1. BUILT FOR AND BY THE COMMUNITY



We believe in the extraordinary power of community and have seen firsthand how it can be a significant force for good in this industry. We aim to incentivize, empower, and recognize the expression, creativity, and ingenuity of Otherside's community of contributors. This deep connection to our most passionate supporters and creatives will be key to understanding what functionalities, moderation, tools, and support our community needs as we grow this bottom-up ecosystem together.

We are committed to an open and transparent approach where Voyagers can directly participate in important events that will shape the future of the platform. Large scale playtests will allow the community to try out new systems, content, and mechanics while pushing the limits of Otherside's technology. Developers and Voyagers will be able to get their hands dirty by using and giving feedback on software development kits (SDKs), and more casual players will be able to use in-game building tools to their hearts' delight. As the platform transitions into new phases of development, there will be increasing numbers of exciting ways for the community to have an impact on its future.

2. GENUINE OWNERSHIP AND INTEROPERABILITY

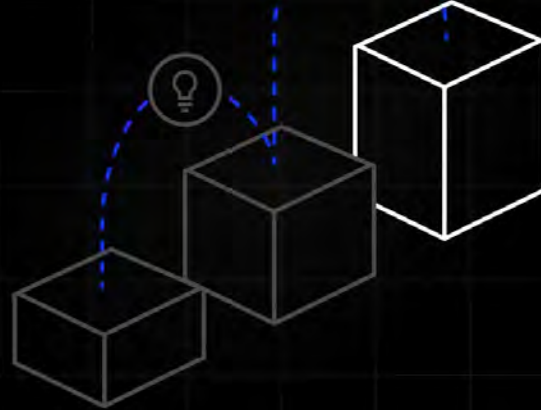


An Otherdeed NFT represents more than a simple picture of land, it's an access token to participate in playtesting and co-creation of Otherside. Additionally, each Otherdeed NFT depicts a plot of land that will be available in Otherside (aka a **Plot**), with a unique composition of natural elements, resources, elemental attributes, and more. As a Voyager, you will have genuine ownership and control over a Plot. What you do on the Plot is your choice (within community informed guidelines). Your actions have the potential to influence the inherent utility of its natural resources, any items you craft, and whatever sweet loot you might stumble across in your adventures.

Otherside will support interoperability in the future, giving Voyagers a chance to bring their own outside collections and NFTs to life within our metaverse. Voyagers will also be able to share experiences and creations between their lands through linking them. This is just the beginning - as this space grows, so will the number of other amazing projects that we want to recognize. Alongside Voyager feedback, we will be working to establish smart and safe industry standards to unite the web3 community.

3. REAL INCENTIVES AND SUPPORT

OTHERSIDE



We are focused on providing real incentives and structure through a collaborative ecosystem and network of contributors and by giving Voyagers and developers the opportunity to network with peers, industry professionals, designers, engineers, and any other piece of the puzzle that they might need to bring their visions to life.

Communities have made incredible contributions to the web2 and web3 space and it is our goal to empower them to build bigger and better than ever before. As a platform, Otherside will seek to connect in deep ways with its userbase and partner with established and respected entities in the industry to provide the education, experience, and leadership necessary to build the metaverse of tomorrow.

VOYAGERS + DEVELOPERS

A COMMUNITY OF VOYAGERS FIRST



In order to plant the seeds for a successful community, we are starting development on Otherside with Voyagers, who are our first adopters and believers. They are a crucial part of Otherside's history and are invited to join the Voyager's Journey. This interactive experience will serve as an important first step to connecting with the Voyagers and understanding their group and individual needs as we work together to develop optimized avenues for maximum fun and entertainment. In Phase 1, only Voyagers and selected developers will have access to the platform and be given unique opportunities to network and collaborate with each other and industry professionals.

OPEN DEVELOPMENT

Unlike traditional development operating in secret, Yuga and Improbable take an open, transparent, and iterative approach to the development of Otherside that leads to results you can see faster. We will use your feedback to course correct, change directions as we discover things good and bad along the way. We're developing Otherside out in the open with you; we're inviting you to come with us on this journey. This requires trust, open communication and shared motive for success.

The sort of experiences we're building have never been done before in the digital space. To ensure the best possible experience, we will frequently playtest at huge scale with Voyagers, trying out new systems, content and mechanics, and pushing Otherside's technology to its limits together.

DEFINED CONTENT MODERATION

With a large potential audience, it is essential to define the correct moderation rules to ensure the best experience for anyone who visits or partakes in Otherside. We are committed to creating governance systems that are built from the bottom-up and truly representative of the evolving community needs. We bring extensive experience to the table from the work we have accomplished with our other communities and look forward to working with you all to build the basis of what's necessary for Otherside. You will hear more in the future about our plans for the community as we begin preparation for Otherside together.

THE VOYAGER'S JOURNEY



We are inviting Otherdeed NFT holders along to participate in the Voyager's Journey, a narrative gameplay experience that will introduce and educate players on the fundamentals of how to participate in Otherside. Each major **Stage** of the Voyager's Journey is marked on [the Obelisk page](#) and will be explained in more detail here.

All Voyagers that complete each Stage of this experience in accordance with the rules will be eligible to receive a variety of incentives related to Otherside in the future. The section below will be continually updated with the official rules and stipulations to qualify completion and will be announced prior to the beginning of each Stage of the Voyager's Journey.

FIRST TRIP

The first stage of the Voyager's Journey will be a series of tech demos, allowing Voyagers to journey into Otherside and participate in an evolving story. Voyagers will also get several chances with playtest sessions to help our developers push the limits of the platform technology.

"First Trip" is the first of several "Trips" that Voyager's will be able to participate in. The inaugural First Trip was held on Saturday, July 16th, 2022 at 12ET. Each subsequent Trip will take place on a different date in order to accommodate as many Voyagers as possible. Specific details on date and time will always be announced on our official social media accounts.

In order for an Otherdeed owner to qualify as completing the First Trip stage, they just need to participate in any of the Trips or watch the Livestreams. More details will be provided on how to verify your participation soon.

THE CODEX

More information will be revealed as we get closer to this stage of the Voyager's Journey.

KODA ORIGINS // THE DECOUPLING

More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE GROWTH

More information will be revealed as we get closer to this stage of the Voyager's Journey.



THE AGORA

More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE DREAM

More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE CHOICE

More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE SETTLING

More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE TOOLKIT

More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE AERONAUTS

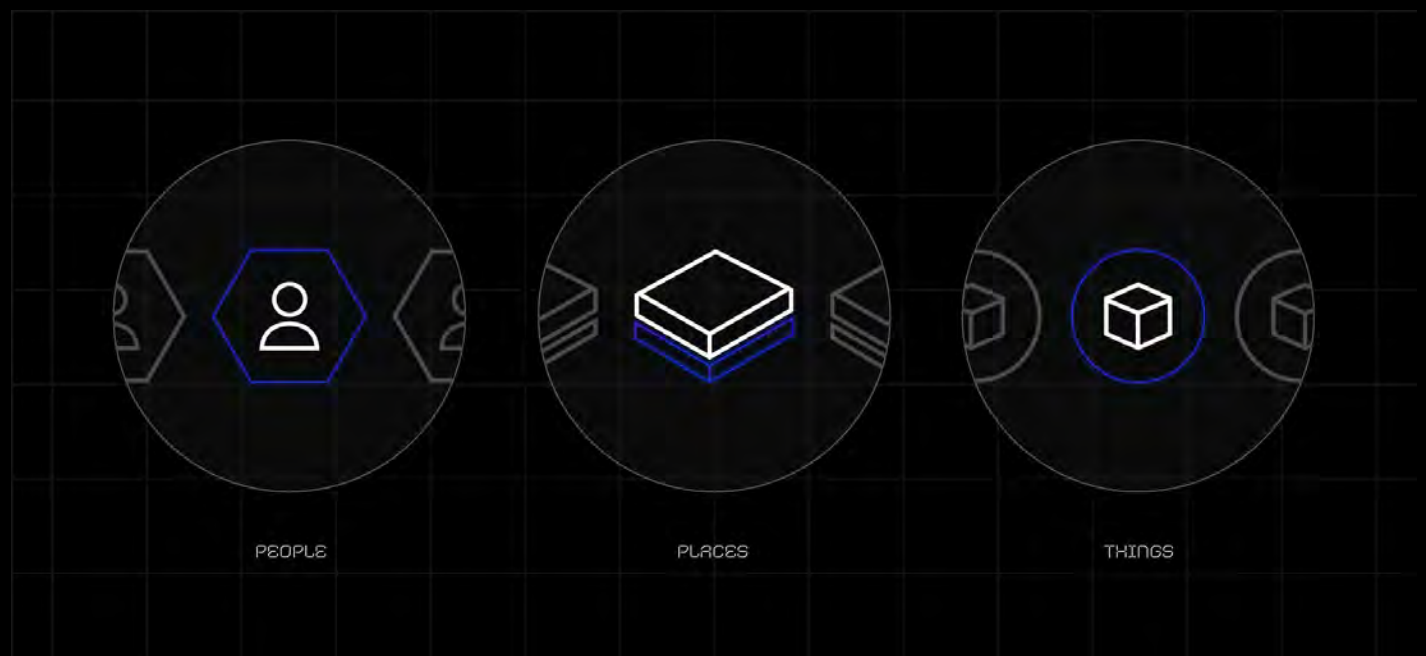
More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE RIFT



More information will be revealed as we get closer to this stage of the Voyager's Journey.

THE ODK



The Otherside Development Kit (ODK) refers to a suite of “Creation Tools” built with Improbable that will allow users to create interoperable content for Otherside that largely falls into three categories:

- **People** - This is your account, your friends list, and your identity across Otherside.
- **Places** - Worlds you can travel between with common game systems.
- **Things** - Interoperable objects, avatars, wearables, items you can take between places - within the Otherside, and beyond.

Otherside is built by developers and Voyagers together, so to make sure everything works properly with each other, we need to be rules we can all follow - Open Object Standards.

OPEN OBJECT STANDARDS

We want things made with our Creation Tools to be interoperable - they can be used anywhere within Otherside - or any other metaverse that conforms to these standards. To achieve this we're working with Improbable's M² Network to create a set of Open Object Standards that describe what objects are, what they look like, and how they behave:

- **Metadata Ontology** - We will allow objects to be tagged using descriptors from the Otherside Metadata Ontology, enabling common gameplay behavior.
 - Examples: tagging an object as a chair allows it to be sat on, tagging an object as a ball allows it to be picked up and thrown.
 - Metadata tags will follow the ERC-721 metadata JSON standard.
- **2D Images** - We support common image formats, starting with PNG, JPG - with more being added as Voyagers request them.
- **3D Objects** - We support 3D models through the popular glTF format (which includes meshes, materials, cameras, textures, animations, and everything you need to make a complete model). These objects can respond to in-engine lighting and physics.
- **Universal Scripting System** - We will support scripts to be attached to objects and worlds to define and extend their behavior.
 - The current prototype uses JavaScript and is undergoing large-scale testing.

Objects built using this open standard will be fully supported within Otherside, any M² metaverse network project, and any outside project that adopts this standard.

In order to create objects within Otherside you need to do two things. First: Author or Obtain a Template of the object you want. Second: Manufacture the object using Resources.

AUTHORING AND MANUFACTURING PROCESSES



There are two types of primary processes that form the basis of the ODK tools:

- **Authoring Tools** - Easy-to-use, in-world tools that let you collaboratively bring assets together and compose them into templates for interoperable objects.
 - Templates can be shared, traded, or sold between Voyagers.
 - Creating a template doesn't cost any Resources.
 - Here are some theoretical examples of templates:
 - A smart 3D object that makes noise when a player walks by
 - A tool to import images into stickers



- Creating the architectural blueprints for your own personal room or structure
- An object that follows people around looking for attention
- We believe Voyagers will come up with a wide variety of useful and fun new Templates that other players will enjoy Manufacturing with.
- **Manufacturing Tools** - For an object to become real and permanent within Otherside it has to be Manufactured. To do this a Voyager collects Resources from around Otherside and combines them with a Template to create as many of that type of object as they'd like - so long as they have enough Resources to do it. When an object has been Manufactured it will be able to be used and interacted with in game.

The Manufacturing process allows Voyagers to use Templates and create objects that work with Otherside's interoperable standards, and with some performance optimizations automatically applied. Here are the current steps involved in Manufacturing:

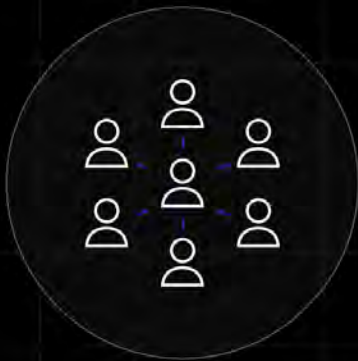
1. **Optimization** - Objects are passed through an automated optimization process that creates Levels of Detail (LODs), optimizes materials and shaders, and tests any script behaviors for performance issues.
2. **Moderation** - Objects are passed through a moderation process using established guidelines.
 - Items must pass community and safety guidelines before moving on
 - Tags are applied to the content accordingly, e.g.: explicit, NSFW, etc.
 - Voyagers will be able to set rules for their worlds on what level of moderated content is allowed.
3. **Resourcing** - All objects require Resources to be Manufactured; Resources can be found on Plots, traded for, or earned through play (more details to come). The bigger and more complex an object is, the more Resources needed to Manufacture it.
4. **Imbuing** - Some types of objects may optionally be imbued with special properties by Imbuing Resources as part of the Manufacturing process. This gives a chance for each object to get a random special property as it is

Manufactured. The better the Resources used for imbuing the better the potential special properties.



The Manufacturing Process is still very early in development and we expect many aspects of it will shift, change, and evolve as it gets used more and tested.

THE ENGINE



CROWD NETWORKING & RENDERING



CROWD & SPATIAL AUDIO



ACCESS FROM ANY DEVICE

Otherside will utilize Improbable's M² technology to allow thousands of Voyagers to gather in the same space at the same time. The goal is to let everyone be able to communicate and play together on any device. The metaverse doesn't work without a crowd - we hope Otherside will be one of the best places around to build and join communities, learn from each other, and explore the metaverse together.

To do this Otherside aims to solve three major technical challenges:

- **Crowd Networking & Rendering** - How to let thousands of people come together into a crowd.
- **Crowd & Spatial Audio** - How to let thousands of people speak to each other in real time.
- **Access from Any Device** - How to let anyone access the Otherside from their device.




CHALLENGE: CROWD NETWORKING AND RENDERING

For technical reasons, other current metaverses cap out at a maximum room size measured in the dozens instead of thousands. No virtual city, concert, or party can be truly epic with only a few dozen people attending. However, there's an exponential increase to client and server requirements which currently aren't achieved by existing game engine tech.

We want to be able to:

- See everybody and interact with a dense crowd, and what they are doing in real time, all with a great frame rate
- Be able to visualize each of their unique characters based upon NFT equipment and clothing, at a quality that makes everyone and everything look great
- Hear everybody around you, cheers and roars just like you would in a festival or a concert, without making it hard to hear the important details

SOLUTION: MORPHEUS

We've partnered with Improbable's M² Platform which, since 2020, has publicly demonstrated their  technology enabling thousands of players to participate in events such as Scavengers ScavLab and the Alexa Concert. By cleverly optimizing network traffic and developing a new kind of rendering system, Morpheus has already blown away records for in-room concurrency while maintaining more than 30 frames per second and high-fidelity graphics.

Specifically, leveraging Morpheus offers...

- A groundbreaking networking solution that allows for thousands of players in the same space to exchange networking information at the same bandwidth of a typical 100-player battle royale game
- A custom character rendering engine that supports thousands of totally unique avatars being rendered at the same time with different animation states

Through the ODKs and content tools we will be able to provide these capabilities to the whole creator community.

CHALLENGE: CROWD AUDIO

It can be difficult to feel heard in the herd as an individual when there are dozens, or indeed thousands of participants all around you. This is even more of a technical challenge in virtual spaces, where text and audio mic chat can be very difficult to manage traffic for. Virtual chat and MMORPG experiences struggle with moderation, hot-mic audio, and other methods of natural communication.

SOLUTION: SPATIAL AUDIO

Built to handle thousands of input audio streams, and thousands of rendered spatial output streams, the M² audio engine supports distance attenuation, air absorption, occlusion, voice projection, head muffling. Specifically:

- A realistic crowd audio solution that can mix thousands of players of live audio into a spatialized mix along with accurate reverb and air absorption.

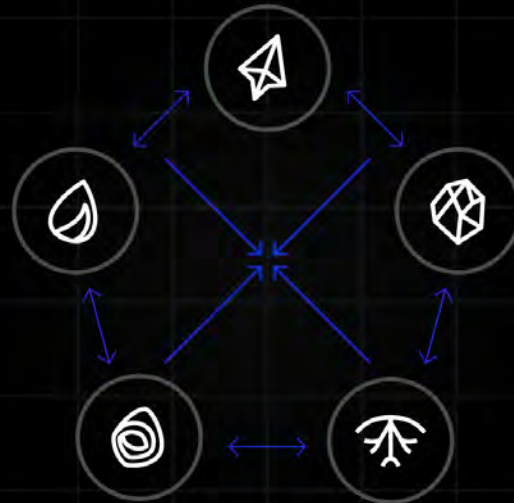
CHALLENGE: ACCESS FROM ANY DEVICE

There are a limited number of potential players that have high-performance gaming PCs. This is at odds with a philosophy that Otherside is for everyone and draws huge crowds of people of all kinds. Any requirement for rare and expensive equipment to access an experience dramatically reduces the playerbase. Furthermore, requiring the installation and configuration of multiple layers of software just to access a metaverse reduces numbers of people that participate even more.

SOLUTION: STREAMING TECHNOLOGY FOR ALL PLATFORMS

The M² Platform includes a complete game video streaming service that gives players access to Otherside from a web browser (in supported regions), including on mobile devices, in seconds. This will enable virtually anyone to jump quickly into Otherside and become connected to the community.

THE AGORA



The Agora is Otherside's planned marketplace for buying, sorting, finding, trading, and selling the huge variety of things that can be created, farmed, harvested, and more. We plan for the Agora to be the fastest, easiest, and most secure place to participate in and enjoy the benefits of Otherside's economy.

As we continue to develop Otherside together, both in our marquee experiences and in the creations of our community of developers and players, there will be a growing and evolving supply and demand for the natural resources of Otherside based on the experiences that are created.

We expect users and developers to use these resources to craft all kinds of amazing creations in our world and their own. The possibilities are limited only by the creativity of everyone who builds in the Otherside. Your actions will shape the inherent utility of the resources you harvest, the items you craft using the ODK, and the loot that you find across the Otherside.

APECOIN



The Otherside ecosystem uses ApeCoin, an ERC-20 governance and utility token controlled by and built on by the ApeCoin DAO community. ApeCoin DAO membership is open to all ApeCoin holders, and the token is available on major exchanges. You can learn more at apecoin.com.

LOOKING FORWARD



In the upcoming stages of The Voyager's Journey, expect continual updates to this document as it evolves from a litepaper to the first version of the Codex. We will explore new ways that Voyagers can help shape the story of Otherside and invite them to take part in more special Trips and events.

We are just getting started with everything Otherside, and cannot wait to continue The Voyager's Journey with you, our incredible community of Voyagers. Let's keep playing together!

APPENDIX

WHO IS YUGA?

Yuga Labs is the web3 platform initially known for the creation of the Bored Ape Yacht Club in April 2021. Today, Yuga is at the helm of Bored Ape Yacht Club, Mutant Ape Yacht Club, Bored Ape Kennel Club, CryptoPunks, and

Meebits, shaping web3 through storytelling, experiences, and community. For more information, visit yuga.com or email frank@yugalabs.io.

WHO IS IMPROBABLE?

IMPROBABLE

Improbable is a British metaverse technology company, which helps brands bring to life rich virtual worlds of unprecedented scale and ambition. Since 2012, Improbable has solved multiplayer problems for the video game industry. It partners with 60 publishers globally, and works with dozens of AAA studios, including 2K, Activision Blizzard and EA. Improbable is now set to play a pivotal role in the next wave of Web3 businesses and massive live interactive events.

MSQUARED (M²)

To bring interconnected virtual worlds like Otherside to life, Improbable established M² (MSquared) and opened the M² Network to help companies create better Metaverse experiences. M² supports over 10,000 live participants with customisable avatars and advanced immersive audio, in real time, in the same space. Otherside will be one of the founding interoperable Metaverses on the M² Network.



[FAQS](#)

[TERMS & CONDITIONS](#)

[PRIVACY](#)

LICENSE

WEK2IDE

© 2023 YUGA LABS INC.

OTHERSIDE

This is **Exhibit “O”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



OpenSea

Drops

Stats

Search bored ape



Connect wallet



Bored Ape Yacht Club



By NullAddress

Items 9,998 · Created Apr 2021 · Creator earnings 2.5% · Chain Ethereum · Category PFPs

The Bored Ape Yacht Club is a collection of 10,000 unique Bored Ape NFTs— unique digital collectibles living on the...
See more

1,093,124 ETH
total volume

47.67 ETH
floor price

46.3147 WETH
best offer

2%
listed

5,643
owners

56%
unique owners

This is **Exhibit "P"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____ *A.K.* _____

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BONEHEADS

168 Tweets



Following

BONEHEADS

@BONEHEADS

PENDING... 🦴 #BONEHEADSFOREVER

opensea.io/collection/bon... 📅 Joined May 2021

0 Following 8,354 Followers

This is **Exhibit “Q”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____ *A.K.* _____

Commissioner of Oaths in and for Ontario



OpenSea

Drops

Stats

boneheads



Connect wallet



BONEHEADS - Origins

By BONEHEADSSTUDIOS

Items 9,954 · Created Aug 2021 · Creator earnings 6.9% · Chain Ethereum · Category Art

PENDING... #BONEHEADSFOREVER



415 ETH
total volume

0.002 ETH
floor price

--
best offer

0.3%
listed

1,711
owners

17%
unique owners

Items Offers BETA Analytics Activity

Status

Price

Quantity

Currency

Traits

Feet

Head

Headwear

Legs

Torso



1803

0.002 ETH

Last sale: 0.035 ETH



3915

0.025 ETH

Last sale: 0.030 ETH



7357

0.025 ETH

Last sale: 0.040 ETH



9334

0.04 ETH

Last sale: 0.089 ETH



5039

0.065 ETH

Last sale: 0.090 ETH



8931



4954



2113



3669



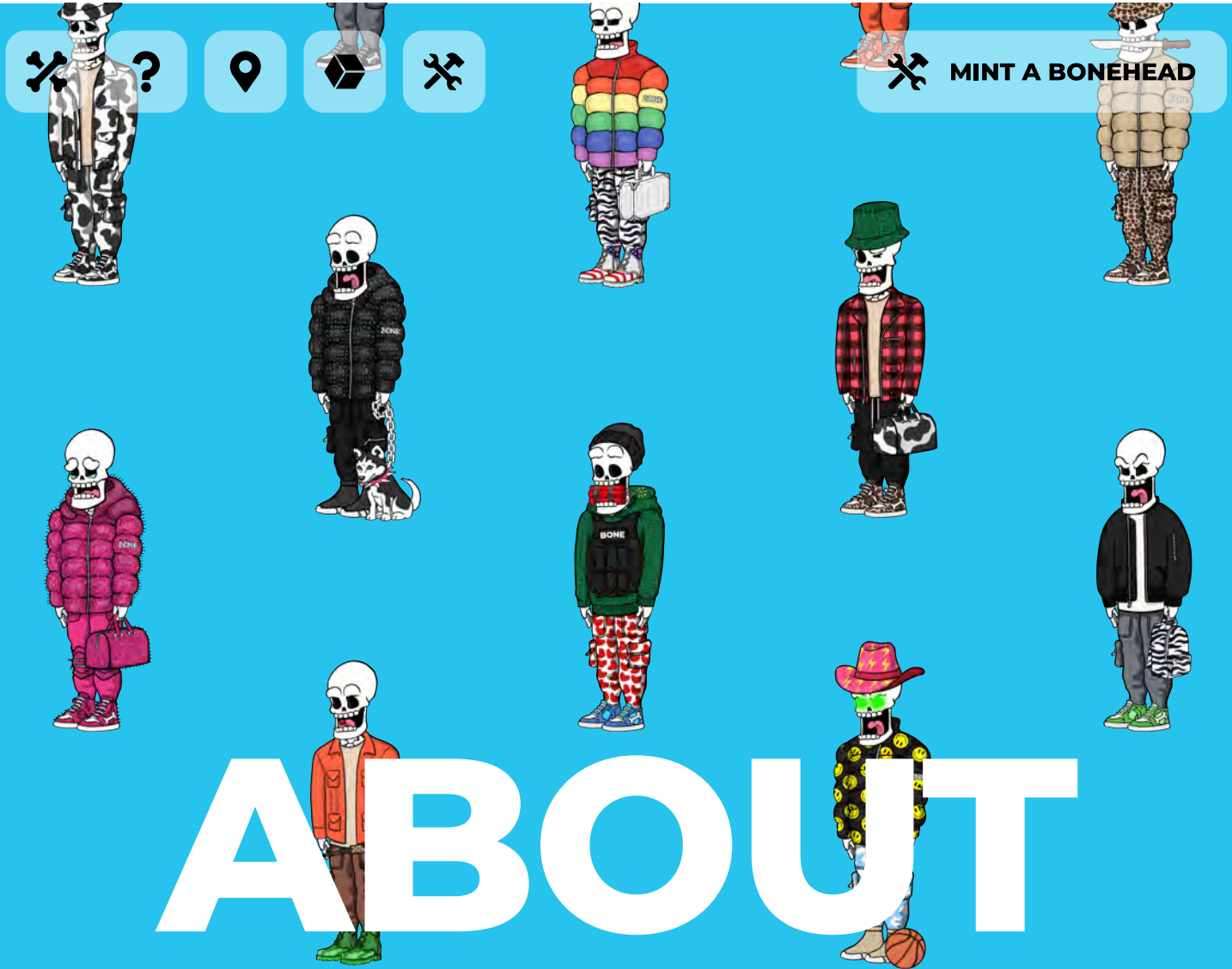
4858

This is **Exhibit “R”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario





MINT A BONEHEAD

WHAT ARE BONEHEADS?

THE COOLEST DIGITAL COMPANIONS THAT YOU'VE EVER SEEN. THEY'RE ERC-721 TOKENS, BUT THEY'RE ALSO MUCH MORE THAN THAT. WHY DO THEY LOOK SO GOOD? BESIDES BEING NATURALLY HANDSOME, SEVEN BRILLIANT COLLABORATORS SPENT OVER 1,500+ HOURS DEVELOPING OVER 500+ ATTRIBUTES ACROSS 8 CATEGORIES, IN 8K HIGH-RESOLUTION, FOR A TOTAL OF 10,000 UNIQUE #BONEHEADS. SINCE THIS IS A SURPRISE DROP, THE PRICING WILL NOT BE REVEALED UNTIL THE DAY OF THE MINT. THERE ARE 9,500 #BONEHEADS AVAILABLE IN THE PRESALE. 200 ARE WITHHELD FOR COMMUNITY ACTIVATIONS, BOUNTIES, AND GIVEAWAYS. 200 ARE WITHHELD FOR THE CURRENT DEVELOPMENT TEAM, THE FOUNDERS, AND OUR INVESTORS - AND 100 ARE RESERVED IN CONSIDERATION FOR FUTURE HIRES, INVESTORS, AND COLLABORATORS. THERE WILL BE A 10% ROYALTY ON SECONDARY SALES, THIS WILL GO TOWARDS ESTABLISHING A COMMUNITY-POWERED CREATOR FUND. THE MAX SUPPLY PER TX IS 30 #BONEHEADS. THIS IS NOT YOUR RUN-OF-THE-MILL HALF-BODIED ANIMAL COLORING-BOOK CATALOG PROJECT (NO OFFENSE, WE LOVE YOU). NOT ALL PROJECTS ARE CREATED EQUAL. THIS IS A REAL BUSINESS, WITH

EXPERIENCED INVESTORS, AND A CLEARLY DEFINED OBJECTIVE. #BONEHEADS ARE PRICED IN ACCORDANCE TO THE LEVEL OF EFFORT, QUALITY, FUNDING SPENT TO DATE, AND TO THE FUNDING THAT IS REQUIRED FOR US TO DELIVER ON OUR VISION AND ROADMAP - WE DO NOT SEE THIS AS A "QUICK" WAY TO MAKE MONEY - OUR GOAL IS NOT TO MERELY BUILD HYPE AND SELL OUT IN 6 HOURS (ALTHOUGH THAT WOULD BE NICE), WHICH IS WHY WE ELECTED TO DO A SURPRISE DROP. MOST ~10K TOKEN PROJECTS HAVE SOLD OUT WITHIN THE FIRST ~6HRS AND ENDED UP IN THE HANDS OF ~1.5K WALLETS. BY PRICING OUR #BONEHEADS A LITTLE BIT HIGHER THAN WHAT THE COMMUNITY IS USED TO, WE BELIEVE THAT THIS WILL GIVE MORE INDIVIDUALS AN OPPORTUNITY TO PARTICIPATE AND JOIN OUR BURGEONING COMMUNITY, AND IT WILL GIVE US THE NECESSARY RUNWAY FOR ATTRACTING TALENT AND BUILDING OUT OUR PLATFORM. WE'RE HERE FOR THE LONG HAUL. OUR GOAL IS TO CREATE A MULTIMEDIA FRANCHISE SPANNING THE RAPIDLY EVOLVING PHYSICAL AND DIGITAL DESIGN + FASHION + GAMING + ART SPECTRUM AND ITERATE UNTIL WE'VE DEVELOPED SOMETHING THAT IS TRULY UNIQUE AND IMAGINATIVE. WE WILL BE PUTTING RELENTLESS FOCUS INTO DEVELOPING THE BACKBONE OF OUR BUSINESS, WHICH WILL BE A PHYSICAL + DIGITAL IDENTITY FASHION AND GAMING WEARABLES NFT PLATFORM FROM WHICH YOU WILL BE ABLE TO MINT AND FORGE DIGITAL + PHYSICAL COLLECTIBLES. CONSIDER THE #BONEHEADS AS THE CURRENT MANNEQUINS. INTEROPERABILITY

**ACROSS CHAINS IS SOMETHING THAT WE WILL WORK
TOWARDS, STEADILY. SDK DEVELOPMENT HAS
ALREADY BEGUN. UNTIL THEN, WE PRESENT TO YOU
THESE #BONEHEAD COMPANIONS. THANK YOU FOR
YOUR SUPPORT. #BONEHEADSFOREVER**

WHY DID WE MAKE BONEHEADS?

**OUR CORE TEAM HAS SPENT THE BETTER PART OF OUR
ADULT LIVES BUILDING STARTUPS AND HELPING
OTHERS ACHIEVE THEIR GOALS IN A COLLABORATIVE
WAY. OVER THE YEARS, WE'VE BEEN LUCKY ENOUGH TO
WORK WITH TALENTED AND CREATIVE INDIVIDUALS
FROM ALL OVER THE WORLD. BEING DESIGNERS AND
PRODUCT MANAGERS, WE HAVE A LITTLE NERDY BONE
IN US - IT COMES WITH THE TERRITORY. WE'RE ALL VERY
MUCH OBSESSED WITH THE PRIVILEGE AND
OPPORTUNITY TO ENVISION, SHAPE, AND SHIP DIGITAL
PRODUCTS THAT CAN AFFECT POSITIVE EMOTIONS,
CHANGE, AND CREATE AN IMPACT. TOGETHER, WE'VE
CULTIVATED OVER 40+ YEARS OF EXPERIENCE IN
DESIGN, PRODUCT MANAGEMENT, MANUFACTURING,
AND MARKETING, TO BRING YOU OUR BRAINCHILD -**

BONEHEADS. FROM INCEPTION, #BONEHEADS HAS BEEN A COLLABORATIVE EFFORT SPANNING MORE THAN 6 COUNTRIES AND 14 TALENTED INDIVIDUALS, BUT WE'RE JUST GETTING STARTED. #BONEHEADS IS A SIMBIOTIC RELATIONSHIP BETWEEN PHYSICAL AND DIGITAL COLLECTIBLES. WE PLAN ON MAKING AND DEVELOPING PHYSICAL + DIGITAL PRODUCTS AND REPRESENTATIONS OF ANYTHING THAT WE THINK IS COOL IN THE WORLD, LIKE LIFE-SIZE 5FT BONEHEAD SCULPTURES, TOYS, FUZZY ZEBRA PRINT MINI BACKPACKS, ALIGATOR PUFFER VESTS, STUDDED BOXING GLOVES, AND MORE. YOU WILL BE ABLE TO UTILIZE THESE COLLECTIBLE WEARABLES AS A MEANS OF CURATING YOUR DIGITAL AND PHYSICAL IDENTITY. WE BELIVE THAT HAVING A DIGITAL IDENTITY IS THE FUTURE, AND ITS ALREADY HERE, IT JUST HASN'T BEEN EVENLY DISTRIBUTED. HOWEVER WE BELIEVE THAT WE HAVE AN INSIGHT INTO SOMETHING THAT MOST CURRENT METAVERSE DEVELOPERS ARE OVERLOOKING, THE PHYSICAL CONNECTION. WE BELIEVE THAT INDIVIDUALS CRAVE THE ABILITY TO EXPRESS THEMSELVES IN BOTH WORLDS. THE WORLD IS CHANGING RAPIDLY, AND WE PLAN ON CONTRIBUTING TO SOME OF THAT BEAUTIFUL CHAOS. THIS IS WHY WE MADE #BONEHEADS. #BONEHEADSFOREVER.



MINT A BONEHEAD

WHY ARE WE DIFFERENT?

OUR PRIORITY IS TO DEVELOP A PHYSICAL + DIGITAL IDENTITY PLATFORM. WHAT DOES THIS MEAN? THIS MEANS THAT YOU WILL BE ABLE TO HAVE TWO SELF(S). A PHYSICAL SELF, AND A DIGITAL SELF. MOST DEVELOPERS ARE WORKING ON THE DIGITAL ASPECT. INCREDIBLE METAVERSE APPLICATIONS AND USE CASES ARE BEING DEVELOPED. PEOPLE WANT TO STUNT IN DIGITAL LIFE, AVATAR ADOPTION AND EXPRESSION IS HERE, FOR GOOD, BUT WE HAVE AN INSIGHT THAT MOST DEVELOPERS ARE SEEMINGLY OVERLOOKING: PEOPLE ALSO WANT TO STUNT IN PHYSICAL LIFE. THAT WILL NEVER CHANGE. ONLY A HANDFUL OF DEVELOPERS ARE FOCUSING ON CREATING A PRODUCT/BRAND THAT FACILITATES A SYMBIOTIC RELATIONSHIP BETWEEN YOUR DIGITAL AND PHYSICAL IDENTITY. OUR BUSINESS MODEL IS MINT + FORGE. YOU WILL BE ABLE TO FORGE PHYSICAL COLLECTIBLES (GRAILS, CLOTHING, ACCESSORIES, AND MORE) OF THE DIGITAL REPRESENTATIONS THAT WE RELEASE THROUGH NFTS THROUGH THE CABANA. ONLY TOKEN HOLDERS WILL BE ABLE TO PARTICIPATE IN THE EXCLUSIVE DROPS THAT WE RELEASE. WE DON'T JUST PLAN ON GIVING YOU THE MOST ROBUST DIGITAL EXPERIENCE, BUT WE'RE ALSO GOING TO TURN YOU

UNDENIABLE, AND WHAT'S THE FUN IN FLEXING IF YOU
INTO PHYSICAL GRAIL GODS. THE DRIP WILL BE
MINT A BONEHEAD
CAN'T DO IT IN BOTH REALITIES? PHYSICAL + DIGITAL =
#BONEHEADS. EVERY ITEM, SCULPTURE, PAINTING, AND
ANY PHYSICAL GOOD THAT WE RELEASE WILL BE
CONSIDERED A COLLECTIBLE FIRST AND FOREMOST,
EVERY SINGLE ITEM WILL COME WITH A NUMBERED
VERIFIABLE SCANNABLE QR CODE/NFC TAG THAT WILL
BE VERIFIABLE ON-CHAIN. EVERY SINGLE ITEM WILL BE
CONSIDERED CAREFULLY AND WILL BE CREATED IN
SCARCE SUPPLY IN ORDER TO MAXIMIZE SECONDARY
MARKET SALES POTENTIAL. THIS IS THE FUTURE, THIS IS
THE FUTURE OF FASHION, THIS IS #BONEHEADS.

WHAT DOES IT MEAN TO BE A BONEHEAD?

**IT MEANS THAT YOU BELIEVE IN THE FUTURE, AND THAT
IT IS ALREADY HERE. IT MEANS THAT YOU'RE STRIVING,
AND EXPLORING. IT MEANS THAT YOU SEE LIFE
THROUGH A DIFFERENT LENS, A LENS OF OPPORTUNITY.
BONEHEADS ARE THE MISFITS, THE CRAZY ONES.
BONEHEADS ARE MISUNDERSTOOD GENIUS THAT'S**

SHIFTING CULTURE, ONE PIXEL AT A TIME. BONEHEADS
HAVE BEEN COUNTED OUT, BUT NEVER DOWN. LIFE IS

BEAUTIFUL, BUT WE DO NOT UNDERSTAND WHY WE ARE HERE. HOWEVER, COLLECTIVELY AS A SPECIES, WE ARE WORKING TOWARDS UNCOVERING THIS MYSTERY. MAYBE SPACEHEADS WILL COME DOWN AND SHARE SOME OF THEIR SUPER-INTELLIGENCE WITH US ONE DAY, BUT UNTIL THAT DAY COMES, WE MUST CONTINUE TO STRIVE AND MOVE FORWARD, ONWARDS AND UPWARDS. BONEHEADS ARE YOUR FRIENDLY NEIGHBOURHOOD REMINDER THAT EVERY SINGLE ONE OF US IS CAPABLE OF ACHIEVING WHAT IS PERCEIVED TO BE IMPOSSIBLE - WE'VE PROVEN THEM WRONG TIME AND TIME AGAIN, AND YET THEY STILL CONTINUE TO DOUBT - BUT WE UNDERSTAND THAT ABSOLUTELY NOTHING IS OFF THE TABLE. CONSCIOUS CIVILIZATIONS IS ENTERING A NEW STAGE, THE DIGITAL REVOLUTION IS UPON US. WHAT WILL LIFE BE LIKE 10 YEARS FROM NOW? 100 YEARS? 1000 YEARS? COLLECTIVELY, WE HAVE AN OPPORTUNITY TO WRITE THAT STORY, IN REALTIME. COME WRITE IT WITH US.

#BONEHEADSFOREVER. P.S. WE'RE HIRING. IF YOU HAPPEN TO KNOW ANY CREATIVE DEVELOPERS (THAT WANT TO BUILD THE NEXT GENERATION OF COOL) FOR THE FOLLOWING ROLES THAT DO NOT CURRENTLY HAVE A FULL-TIME HOME, PLEASE REFER THEM TO US VIA TWITTER OR INSTAGRAM, IF ADOPTED, WE WILL REWARD YOU WITH SOMETHING COOL + A SMALL MONETARY REFERRAL REWARD. POSITION 1 - 3D MOTION GRAPHICS LEAD (MAYA). POSITION 2: SENIOR

**ANGULAR ENGINEER. POSITION 3: SENIOR PRODUCT
DESIGNER LEAD. POSITION 4: SALES DEVELOPMENT
LEAD.**

#BONEHEADSFOREVER

 **MINT A BONEHEAD**



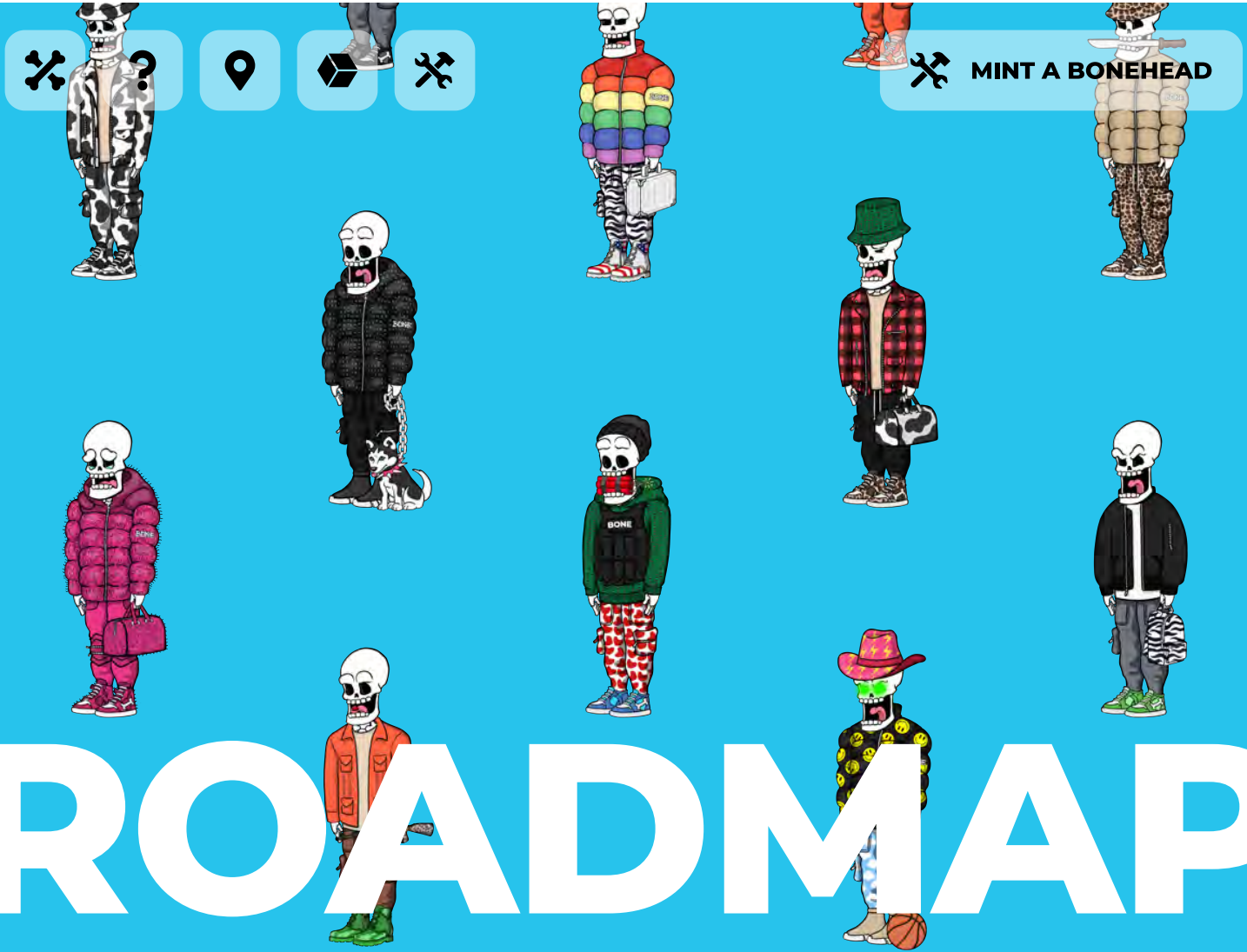
© 2021 BONEHEADS

This is **Exhibit “S”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____ *A.K.* _____

Commissioner of Oaths in and for Ontario





MINT A BONEHEAD

CODE-BASED DIGITALS

5% COMMUNITY WALLET

3D BONEHEADS

DYNAMIC LANDSCAPES

BoMA (BUNKER OF MODERN ART) = GALLERY

CLAIMABLES

BABY BONES

SPACEHEADS (ALIEN INVASION)

BONING = BREEDING

THE SPA = LIQUIDITY POOL

CONSUMER-FACING AVATAR APP

PARTNER SDK

NFT POST-SALE PHYSICALS

MOUSE-PAD - 50 RANDOM #BONEHEADS WILL RECEIVE A FREE NUMBERED (+QR/NFC) MOUSE-PAD MATCHING THE EXACT FACIAL EXPRESSION OF YOUR #BONEHEAD TOKEN

HOODIE - 25 RANDOM #BONEHEADS WILL RECEIVE A FREE
NUMBERED (+QR/NFC) HOODIE  MINT A BONEHEAD

AREA RUG - 10 RANDOM #BONEHEADS WILL RECEIVE A
FREE NUMBERED (+QR/NFC) 4FT AREA RUG MATCHING THE
EXACT FACIAL EXPRESSION OF YOUR #BONEHEAD RUG
MATCHING THE EXACT FACIAL EXPRESSION OF YOUR
#BONEHEAD

PAINTING - 5 RANDOM #BONEHEADS WILL RECEIVE A FREE
NUMBERED (+QR/NFC) 40X60 (GALLERY DEPTH) PAINTING
OF YOUR #BONEHEAD

VERIFICATION: EACH ITEM WILL COME NUMBERED AND IN
A BEAUTIFULLY CRAFTED BRANDED MAGNETIC BOX, WITH
EITHER A QR CODE OR AN NFC TAG TO VERIFY
AUTHENTICITY ON-CHAIN. PHYSICAL + DIGITAL =
#NOMOREFAKES #BONEHEADSFOREVER



MINT A BONEHEAD

PHYSICAL COLLECTIBLES

5FT LIFESIZE SCULPTURES

2.4 FT SCULPTURES

4FT AREA RUGS

PLAYING CARDS

BOXING GLOVES

TRUCKER HATS

MINI BACKPACKS

PUFFER JACKETS

BIKER JACKETS

BOMBER JACKETS

T-SHIRTS

HOODIES

SLIDES

SOCKS

#BONEHEADSFOREVER



MINT A BONEHEAD



MINT A BONEHEAD



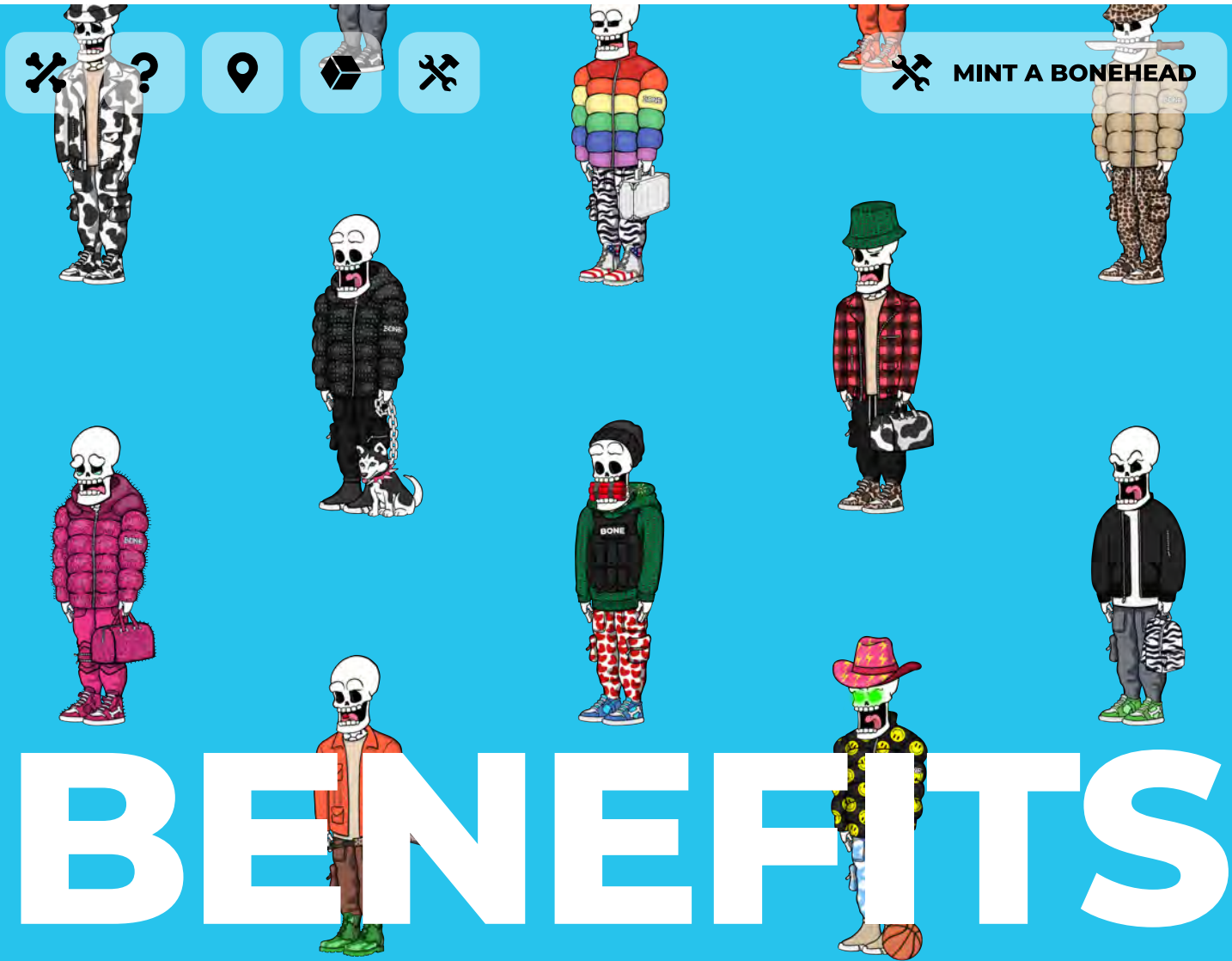
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This is **Exhibit “T”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario



BENEFITS



MINT A BONEHEAD

1 - LIFETIME MEMBERSHIP

OWNING A #BONEHEAD GRANTS YOU A LIFETIME MEMBERSHIP (AS LONG AS YOU HOLD IT IN YOUR WALLET) TO THE CABANA, THE FORGING HQ, WHERE YOU WILL BE ABLE TO FORGE PHYSICAL AND DIGITAL COLLECTIBLES.

2 - EXCLUSIVE FORGING

ONLY USERS HOLDING A #BONEHEAD IN THEIR WALLET WILL BE ABLE TO MINT/FORGE AN "X" (TBD) AMOUNT OF ITEMS FROM EACH COLLECTION DROP - THIS NUMBER WILL FLUCTUATE DEPENDING ON THE QUANTITY THAT IS PRODUCED. THE MORE #BONEHEAD THAT YOU OWN, THE MORE ITEMS YOU WILL BE ABLE TO FORGE. THERE WILL BE CONTINGENCIES ATTACHED TO THE ITEMS THAT YOU ARE PERMITTED TO FORGE. IF YOUR SPECIFIC

#BONEHEAD LACKS AN ATTRIBUTE (SUCH AS A ZEBRA-PATTERNED BUCKET HAT), YOU WILL NOT BE ABLE TO FORGE THE PHYSICAL ITEM ASSOCIATED WITH THIS ATTRIBUTE. YOU WILL HAVE TO ACQUIRE A #BONEHEAD THAT HAS THIS PARTICULAR ATTRIBUTE/TRAIT/ITEM THROUGH THE SECONDARY MARKET IN ORDER TO FORGE THIS PHYSICAL COLLECTIBLE - THIS WILL DRIVE SPECULATION AND PRODUCE A NEW ELEMENT TO YOUR #BONEHEADS RARITY, THUS CREATE A MORE DYNAMIC ASSET CLASS. PHYSICAL COLLECTIBLES (COMMODITIES) WILL HAVE A QR CODE THAT WILL VERIFY THEIR AUTHENTICITY ON-CHAIN, FOREVER. **WHERE'S THE FUN IN STUNTING AND FLEXING IN THE METAVERSE IF YOU CAN'T STUNT THE SAME WAY IN REAL LIFE? PHYSICAL + DIGITAL = #NOMOREFAKES, #BONEHEADSFOREVER**

3 - CLAIMABLES

**TOKEN HOLDERS WILL HAVE ACCESS TO SEVERAL CLAIMABLE THAT WE CURRENTLY HAVE ON THE ROADMAP (SPOILER ALERT: BABY BONES). STAY TUNED.
*TX = TRANSACTION GAS PAID BY MINTER (YOU)**

**MINT A BONEHEAD**

4 - APP ACCESS

TOKEN HOLDERS WILL BE THE FIRST TO HAVE AN OPPORTUNITY TO ACCESS AND TEST OUR CONSUMER-FACING AVATAR CREATION APP DURING THE BETA RELEASE. THIS APP WILL ALLOW YOU TO CREATE A PERSONAL AVATAR FOR YOURSELF USING AN EXPANSIVE CATALOG OF CLOTHING AND ACCESSORIES TO SUIT YOUR UNIQUE STYLE. #BONEHEADSFOREVER

5 - BEHIND THE SCENES

TOKEN HOLDERS WILL GET EXCLUSIVE BEHIND-THE-SCENES ACCESS THROUGHOUT THE ENTIRE MANUFACTURING PROCESS FOR ALL OF OUR ITEMS -- THIS INCLUDES BUT IS NOT LIMITED TO: SCULPTURES, AREA RUGS, AND ACCESSORIES SUCH AS PLAYING

**CARDS, ASHTRAYS, BOXING GLOVES, GARMENTS, AND
OTHER COLLECTIBLES. #BONEHEADSFOREVER**



MINT A BONEHEAD

6 - VOTING RIGHTS

TOKEN HOLDERS AND THE #BONEGANG COMMUNITY WILL VOTE AND PROVIDE FEEDBACK THROUGHOUT THE SAMPLING PROCESS WHILE WE TEST THE FABRICS, TEXTILES, AND PATTERNS THAT WILL EVENTUALLY BE PLACED INTO PRODUCTION. WE WILL PROVIDE YOU WITH A THOROUGH BREAKDOWN OF THE TIMELINES, AND THE ENTIRE MANUFACTURING PROCESS FROM START TO FINISH - EVERYTHING WILL BE DOCUMENTED AND SHARED WITH OUR #BONEGANG COMMUNITY. #BONEHEADSFOREVER

#BONEHEADSFOREVER



MINT A BONEHEAD



MINT A BONEHEAD



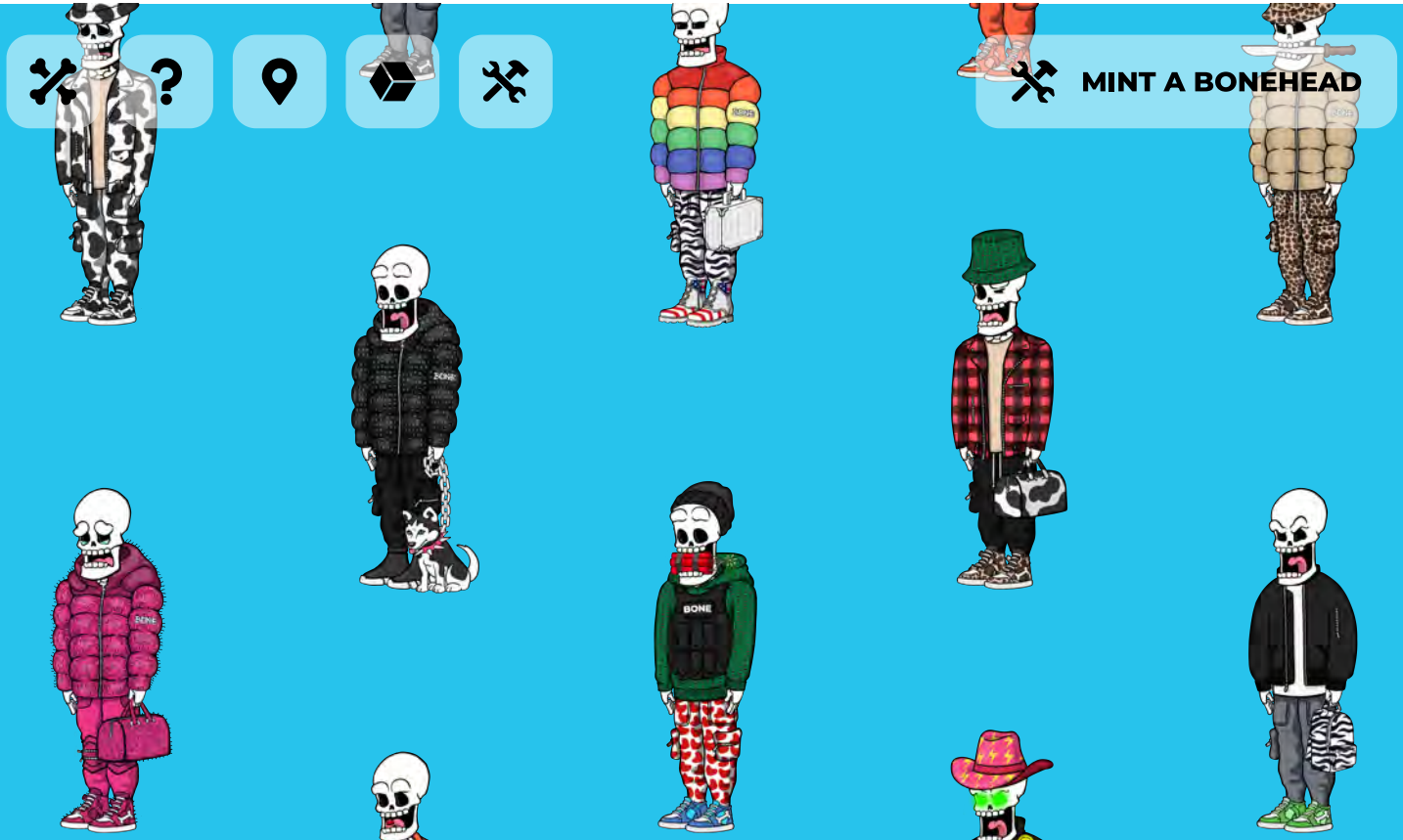
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This is **Exhibit “U”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____ *A.K.* _____

Commissioner of Oaths in and for Ontario



FAQ



MINT A BONEHEAD

WHAT IS BONEHEADS?

#BONEHEADS IS A COLLECTION OF 10,000 UNIQUE DIGITAL NFT COLLECTIBLES CREATED USING A GENERATIVE ALGORITHM AND STORED ON THE ETHEREUM BLOCKCHAIN AS ERC-721 TOKENS. SEVEN BRILLIANT COLLABORATORS SPENT OVER 1,500+ HOURS DEVELOPING OVER 500+ ATTRIBUTES, ACROSS 8 CATEGORIES, IN 9K HIGH-RESOLUTION. OWNING A #BONEHEAD WILL GRANT YOU EXCLUSIVE ACCESS TO SPECIAL ROADMAP PERKS, SUCH AS ACCESS TO THE CABANA - WHICH WILL BE A PHYSICAL + DIGITAL IDENTITY FASHION-GAMING WEARABLES PLATFORM FROM WHICH YOU CAN MINT AND FORGE DIGITAL + PHYSICAL COLLECTIBLES.

RELEASE DATE?

WE'RE DOING A SURPRISE DROP AND THE ANNOUNCEMENT WILL COME THE DAY OF THE DROP.

WE WILL NOTIFY OUR DISCORD SERVER AFTER THE SMART CONTRACT HAS BEEN DEPLOYED AND THE MINTING PROCESS HAS BEEN INITIATED. WE WILL TRY TO NOTIFY EVERYONE AT LEAST A FEW HOURS AHEAD OF TIME. STAY READY.

HOW MANY WILL BE AVAILABLE IN THE PRESALE?

THERE WILL BE 9,500 #BONEHEADS AVAILABLE DURING THE PRESALE. 200 ARE RESERVED FOR COMMUNITY GIVEAWAYS, BOUNTIES, GROWTH INCENTIVES, AND #BONEGANG EMPOWERMENT. 200 ARE RESERVED FOR THE CURRENT DEVELOPMENT TEAM (12 EMPLOYEES), THE FOUNDERS, AND OUR INVESTORS. 100 ARE RESERVED IN CONSIDERATION FOR FUTURE HIRES, INVESTORS, AND COLLABORATORS. THERE WILL BE A 5% ROYALTY ON SECONDARY SALES, THIS WILL GO TOWARDS ESTABLISHING A COMMUNITY-POWERED CREATOR FUND, COMMUNITY BOUNTIES, AS WELL AS HIRING THE BEST DEVELOPERS.



MINT A BONEHEAD

WHERE CAN I PURCHASE A #BONEHEAD NFT?

YOU WILL ONLY BE ABLE TO PARTICIPATE IN THE PRESALE ON OUR OFFICIAL WEBSITE. AFTER THE INITIAL MINTING PROCESS, YOU WILL BE ABLE TO TRADE YOUR #BONEHEADS ON OPENSEA. THE WEBSITE WILL BE REVEALED BEFORE THE MINTING OPENS. STAY READY.

HOW MUCH WILL IT COST TO BUY A #BONEHEAD?

DUE TO THIS BEING A SURPRISE DROP, THE PRICE WILL NOT BE REVEALED UNTIL THE SMART CONTRACT HAS BEEN DEPLOYED AND THE MINTING HAS BEEN ACTIVATED ON OUR WEBSITE. THERE WILL NOT BE A BONDING CURVE.



MINT A BONEHEAD

HOW MANY #BONEHEADS CAN I BUY?

THE MAXIMUM NUMBER OF #BONEHEADS THAT YOU WILL BE ABLE TO MINT PER TX IS 30.

HOW WAS THE PRICE DETERMINED?

THIS IS NOT YOUR RUN-OF-THE-MILL HALF-BODIED ANIMAL COLOURING-BOOK CATALOG PROJECT (NO-OFFENCE, WE LOVE YOU). NOT ALL PROJECTS ARE CREATED EQUAL. THIS IS A REAL BUSINESS, WITH EXPERIENCED INVESTORS, AND A CLEARLY DEFINED OBJECTIVE. #BONEHEADS ARE PRICED IN ACCORDANCE TO THE LEVEL OF EFFORT, QUALITY, FUNDING SPENT TO DATE, AND TO THE FUNDING THAT IS REQUIRED FOR US TO DELIVER ON OUR VISION AND ROADMAP - WE DO

**NOT SEE THIS AS A “QUICK” WAY TO MAKE MONEY -
OUR GOAL IS NOT TO MERELY BUILD HYPE AND SELL
OUT IN 6 HOURS (ALTHOUGH THAT WOULD BE NICE),
WHICH IS WHY WE ELECTED TO DO A SURPRISE DROP.
MOST ~10K TOKEN PROJECTS HAVE SOLD OUT WITHIN
THE FIRST ~6HRS AND ENDED UP IN THE HANDS OF ~1-
1.5K WALLETS, WITH THOUSANDS OF FAILED
TRANSACTIONS. BY PRICING OUR #BONEHEADS A
LITTLE BIT HIGHER THAN WHAT THE COMMUNITY IS
USED TO, WE BELIEVE THAT THIS CREATES BETTER
DISTRIBUTION WHILE WILL GIVE MORE INDIVIDUALS AN
OPPORTUNITY TO PARTICIPATE IN THE PRESALE AND
JOIN OUR BURGEONING COMMUNITY, AND IT WILL GIVE
US THE NECESSARY RUNWAY FOR BUILDING OUT OUR
PLATFORM AND DEVELOPING OUR BRAND. WE’RE HERE
FOR THE LONG HAUL. OUR GOAL IS TO CREATE A
MULTIMEDIA FRANCHISE SPANNING THE RAPIDLY
EVOLVING PHYSICAL AND DIGITAL DESIGN + FASHION +
GAMING + ART SPECTRUM AND ITERATE UNTIL WE’VE
DEVELOPED SOMETHING THAT IS TRULY UNIQUE AND
IMAGINATIVE.**



MINT A BONEHEAD

BUT ISN'T THAT STILL EXPENSIVE?

THE NFT SPACE IS RELATIVELY VOLATILE, AT THE BLEEDING EDGE, AND VERY UNPREDICTABLE. AS MUCH AS MANY INDIVIDUALS, "EXPERTS, AND TWITTER MEGAPHONES BELIEVE THAT EVERYTHING IS "GOING TO THE MOON", ~95% OF NFT PROJECTS WILL END UP BEING WORTHLESS WITHIN A FEW YEARS - BUT THE ONES THAT OUTPERFORM AND CREATE SOMETHING MEANINGFUL WILL BE WORTH ORDER OF MAGNITUDES MORE THAN WHAT THEY DID INITIALLY. IF YOU HAPPEN TO LIKE OUR ART, AND BELIEVE IN OUR VISION AND ROADMAP, AND HAPPEN TO MAKE A PURCHASE, WE THANK YOU FOR YOUR SUPPORT. THIS IS NOT FINANCIAL ADVICE, NOR WILL WE EVER OFFER FINANCIAL ADVICE.



MINT A BONEHEAD

WHY DON'T YOU JUST MAKE THE MAX SUPPLY PER TX LOWER?

**EVEN IF WE DECREASED IT TO 1 #BONEHEAD PER
TRANSACTION, INDIVIDUALS CAN EASILY CIRCUMVENT
THIS FUNCTION.**

WHAT HAPPENS WHEN I MINT A #BONEHEAD(S)?

**IF THE TX IS SUCCESSFUL, IT/THEY WILL APPEAR IN
YOUR WALLET. HOWEVER, THEY WILL NOT BE
REVEALED UNTIL A LATER DATE. ONCE THE METADATA
FOR YOUR TOKEN IS UPLOADED, AND THEN FROZEN,
YOU WILL BE ABLE TO VIEW YOUR #BONEHEAD ON
OPENSEA.**



MINT A BONEHEAD

WHEN WILL THE #BONEHEADS BE REVEALED?

THE REVEAL DATE WILL BE ANNOUNCED ONE WEEK AFTER ALL 10,000 #BONEHEADS HAVE BEEN MINTED/SOLD.

WILL YOU BE DROPPING PHYSICAL COLLECTIBLES?

Yes. only token holders will be able to forge physical collectibles.



MINT A BONEHEAD

DOES OWNING A #BONEHEAD TOKEN GIVE ME ANY EXCLUSIVE ACCESS?

**YES. PLEASE VISIT [BENEFITS](#) TO LEARN MORE
INFORMATION REGARDING THIS TOPIC.**

IS #BONEHEADS JUST AN ART- BASED NFT COLLECTION, A FASHION BRAND, A GAMING COMPANY, AN APP, OR A SOFTWARE PROVIDER?

**ALL OF THE ABOVE, AND THEN SOME. #BONEHEADS IS
A PHYSICAL AND DIGITAL IDENTITY FASHION-GAMING
WEARABLES AND AVATAR CREATION PLATFORM. IN
SHORT, WE'RE DEVELOPING AN APPLICATION THAT**

**WILL ALLOW YOU TO MAKE AN AVATAR WITH ALL THE
DRIP YOU COULD POSSIBLY IMAGINE. WE WILL ALSO BE**

**CREATING COMMODITIES, A BRAND IF YOU WILL,
WHICH WILL CONSIST OF EXCLUSIVE COLLECTIBLES
SUCH AS CLOTHING AND ACCESSORIES THAT WILL BE
AUTHENTICATED USING QR CODES AND TOKENS TO
VERIFY AUTHENTICITY ON-CHAIN - PHYSICAL + DIGITAL =
#NOMOREFAKES #BONEHEADSFOREVER**

WHEN WILL I GET ACCESS TO THE APP?

**WE ARE CURRENTLY PLANNING ON RELEASING THE
AVATAR CREATION APP BETA SOMETIME WITHIN THE
NEXT 8-12 MONTHS. WE'VE BEEN WORKING ON THIS IN
STEALTH MODE FOR OVER A YEAR, AND HAVE SPENT A
TREMENDOUS AMOUNT OF FUNDING MAKING SURE WE
WORK WITH THE BEST ILLUSTRATORS, ARTISTS,
DEVELOPERS, DESIGNERS, AND PATTERN MAKERS TO
MAKE THIS DREAM BECOME A REALITY, AND WE CAN'T
WAIT TO SHARE THIS WITH YOU.**



MINT A BONEHEAD

HOW ARE YOU DIFFERENT?

Unlike other art-only NFT based projects that are only art based, #BONEHEADS is different in the sense that it's also a fashion + gaming company that will allow you to forge physical collectibles (jackets, boxing gloves, playing cards, area rugs, and more) if you're a token holder. Our token has an actual utility, and our business model is MINT + FORGE.

WHY DID YOU CREATE THIS?

We care. We care about technology, and we care about fashion. We care about engineering, and we care about design. We like nice things, and we like a clean and immersive user experience. We care about most people (jk, all), and we want to create the best brand, app, platform, art, and digital experience possible for them to

enjoy and cultivate a community around -- and if in the process we can empower individuals to further express themselves and find confidence in their distinctiveness to be able to share more of their authentic selves, then we can die happily ever after.



MINT A BONEHEAD

#BONEHEADSFOREVER



MINT A BONEHEAD



This is **Exhibit “V”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



BONESTAR 07/18/2021 12:32 PM

🌟 little unofficial leak...everyone that buys a Bonehead will get an opportunity to participate in a secondary credit sale for a chance to win \$1M 🙄🙄🙄🙄🙄🙄

This is **Exhibit “W”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

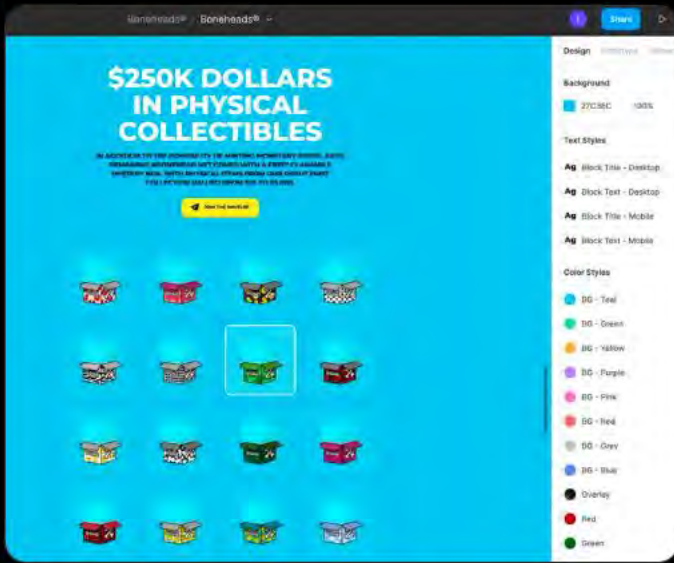
_____  _____

Commissioner of Oaths in and for Ontario



BONEHEADS @BONEHEADS · Jul 19, 2021

wait so...and one lucky randomized token holder gets a monetary mystery box valued at a quarter million dollars, revealed instantly at the end of the mint...\$250K???????? WHO'S DOING IT #BONEHEADSFOREVER RT to win a BONEHEAD ✨❤ #FIGMA



12 73 77

This is **Exhibit “X”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

Overview

Logs (15)

State

Comments

More ▾

Transaction Hash:

0xf291710af98989f289b36566a943a9175d2b5f68c95d1ff0f2b16857957f50e6

Status:

Success

Block:

13064133 4351244 Block Confirmations

Timestamp:

653 days 20 hrs ago (Aug-20-2021 07:58:23 PM +UTC)

Transaction Action:

▶ Mint 15 of BONEHEADS... (BONE...)

Sponsored:

From:

[mandyxthejungle.eth](#)

Interacted With (To):

[0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2](#) (BONEHEADS: BONE Token)

ERC-721 Tokens Transferred: 15



ERC-721 Token ID [513] BONEHEADS... (BONE)

From Null: 0x000...000 To 0x1531b8...dB5cc255



ERC-721 Token ID [514] BONEHEADS... (BONE)

From Null: 0x000...000 To 0x1531b8...dB5cc255

⌵ Scroll for more

Value:

◆ 1.5 ETH \$4,929.75

Transaction Fee:

2.6503275 ETH \$4,733.99

Gas Price:

1,500 Gwei (0.0000015 ETH)

More Details:

[+ Click to show more](#)

Private Note:

To access the **Private Note** feature, you must be [Logged In](#)

A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “Y”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

Overview

Logs (10)

State

Comments

More ▾

Transaction Hash:

0x9fb87bbd90bf1f7f308066e05ddd976bd3acf176b3aac4793d392c475bf8a817

Status:

Success

Block:

13064313 4351080 Block Confirmations

Timestamp:

653 days 19 hrs ago (Aug-20-2021 08:34:52 PM +UTC)

Transaction Action:

▶ Mint 10 of

Sponsored:

From:

0x5bB4fdbC9dd62fF5317fbd0C17a07cbdDf82Db14

Interacted With (To):

0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2 (BONEHEADS: BONE Token)

ERC-721 Tokens Transferred: 10

ERC-721 Token ID [9990]
From Null: 0x000...000 To 0x5bB4fd...Df82Db14

ERC-721 Token ID [9991]
From Null: 0x000...000 To 0x5bB4fd...Df82Db14

ERC-721 Token ID [9992]
From Null: 0x000...000 To 0x5bB4fd...Df82Db14

ERC-721 Token ID [9993]



From Null: 0x000...000 To 0x5bB4fd...Df82Db14



ERC-721 Token ID [9994] BONEHEADS... (BONE)

From Null: 0x000...000 To 0x5bB4fd...Df82Db14



ERC-721 Token ID [9995] BONEHEADS... (BONE)

⌵ Scroll for more

? Value:

◆ 1 ETH 🕒 \$3,286.50

? Transaction Fee:

0.051294583325028945 ETH 🕒 \$92.27

? Gas Price:

43.164723481 Gwei (0.000000043164723481 ETH)

More Details:

+ Click to show more

? Private Note:

To access the **Private Note** feature, you must be [Logged In](#)

🔗: A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).







This is **Exhibit “Z”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details

Overview	Logs (1)	State	Comments
Transaction Hash:	0x4a95f9536fab75f29b0256bb3b4889669f3c92bde47a3ddfce95f1d0a4babf5 		
Status:	✔ Success		
Block:	✔ 13064254 3465319 Block Confirmations		
Timestamp:	🕒 529 days 1 hr ago (Aug-20-2021 08:23:38 PM +UTC) ⌚ Confirmed within 30 secs		
Transaction Action:	<p>▶ Mint of  BONEHEADS (BONE) To 0xe241bedb5a6270c5a96219a52f59c7c3690ae924</p> <p>▶ 1 of Token ID [8669]</p>		
Sponsored:			
From:	0xtay.eth 		
Interacted With (To):	Contract 0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2 (BONEHEADS: BONE Token) ✔ 		
ERC-721 Tokens Transferred:	<p>▶ From Null Address: 0x00... To 0xe241bedb5a627... </p> <p>For ERC-721 Token ID [8669] </p>		
Value:	0.1 Ether (\$328.65)		
Transaction Fee:	0.012418157662848435 Ether (\$19.50)		
Gas Price:	0.000000084492782095 Ether (84.492782095 Gwei)		
Ether Price:	\$3,286.50 / ETH		
Click to see More_ ↓			
Private Note:	To access the Private Note feature, you must be Logged In		

💡 A transaction is a cryptographically signed instruction from an account that changes the state of the blockchain. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

Transaction Details

Transaction Hash: 0x4d736409ecb84f93a42ba8328cd9220590729196e57ac6bf402318db06e9fa8e

Status: ✔ Success

Block: ✔ 13064263 3465317 Block Confirmations

Timestamp: ⌚ 529 days 1 hr ago (Aug-20-2021 08:25:45 PM +UTC) | ⌚ Confirmed within 21 mins:33 secs

- Transaction Action:
- ▶ 1 of Token ID [\[8914\]](#)
 - ▶ 1 of Token ID [\[8915\]](#)
 - ▶ 1 of Token ID [\[8916\]](#)
 - ▶ 1 of Token ID [\[8917\]](#)
 - ▶ 1 of Token ID [\[8918\]](#)
 - ▶ 1 of Token ID [\[8919\]](#)
 - ▶ 1 of Token ID [\[8920\]](#)
 - ▶ 1 of Token ID [\[8921\]](#)
 - ▶ 1 of Token ID [\[8922\]](#)
 - ▶ 1 of Token ID [\[8923\]](#)

Scroll for more ▾

Sponsored:

From: [Oxtay.eth](#)

Interacted With (To): Contract [0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2](#) (BONEHEADS: BONE Token) ✔

ERC-721 Tokens Transferred:
(15 ERC-721 Transfers found)

- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8909\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8910\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8911\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8912\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8913\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8914\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8915\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8916\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8917\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...
For ERC-721 Token ID [\[8918\]](#)
- ▶ **From** Null Address: 0x00... **To** 0xe241bedb5a627...



- For ERC-721 Token ID [8919] BONEHEADS (BONE)
- ▶ From Null Address: 0x00... To 0xe241bedb5a627...
For ERC-721 Token ID [8920] BONEHEADS (BONE)
- ▶ From Null Address: 0x00... To 0xe241bedb5a627...
For ERC-721 Token ID [8921] BONEHEADS (BONE)
- ▶ From Null Address: 0x00... To 0xe241bedb5a627...

Overview Logs (15) State Comments

- ▶ From Null Address: 0x00... To 0xe241bedb5a627...
For ERC-721 Token ID [8923] BONEHEADS (BONE)

Value:	1.5 Ether (\$4,929.75)
Transaction Fee:	0.122108265 Ether (\$191.77)
Gas Price:	0.000000069 Ether (69 Gwei)
Ether Price:	\$3,286.50 / ETH
Gas Limit & Usage by Txn:	2,650,327 1,769,685 (66.77%)
Gas Fees:	Base: 66.680185669 Gwei Max: 69 Gwei Max Priority: 69 Gwei
Burnt & Txn Savings Fees:	Burnt: 0.118002924375644265 Ether (\$185.32) Txn Savings: 0 Ether (\$0.00)

Other Attributes: Txn Type: 2 (EIP-1559) Nonce: 344 Position In Block: 81

Input Data:

```
Function: mint(uint256 numberOfBoneheads)
MethodID: 0xa0712d68
[0]: 0000000000000000000000000000000000000000000000000000000000000000f
```

[Click to see Less](#) ↑

Private Note: To access the Private Note feature, you must be [Logged In](#)

💡 A transaction is a cryptographically signed instruction from an account that changes the state of the blockchain. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).




Transaction Details

Transaction Hash: 0xe2d7dbebd439f9b13975242f8eb26134191b5256a40bfaefe5403245cbbb8014

Status: ✔ Success

Block: ✔ 13064269 3465325 Block Confirmations

Timestamp: 529 days 1 hr ago (Aug-20-2021 08:27:17 PM +UTC) | 🕒 Confirmed within 57 secs

Transaction Action: ▶ Mint of  BONEHEADS (BONE) To [0xe241bedb5a6270c5a96219a52f59c7c3690ae924](#)

- ▶ 1 of Token ID [\[9086\]](#)
- ▶ 1 of Token ID [\[9087\]](#)
- ▶ 1 of Token ID [\[9088\]](#)
- ▶ 1 of Token ID [\[9089\]](#)
- ▶ 1 of Token ID [\[9090\]](#)
- ▶ 1 of Token ID [\[9091\]](#)
- ▶ 1 of Token ID [\[9092\]](#)
- ▶ 1 of Token ID [\[9093\]](#)
- ▶ 1 of Token ID [\[9094\]](#)





Scroll for more ⌵

Sponsored:

From: 🔗 [Oxtay.eth](#)

Interacted With (To): Contract [0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2](#) (BONEHEADS: BONE Token) ✔

ERC-721 Tokens Transferred: (10 ERC-721 Transfers found)

▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9086]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9087]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9088]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9089]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9090]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9091]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9092]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9093]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9094]  BONEHEADS (BONE)	
▶ From Null Address: 0x00... To 0xe241bedb5a627...	For ERC-721 Token ID [9095]  BONEHEADS (BONE)	

[Overview](#) [Logs \(10\)](#) [State](#) [Comments](#)



Value: 1 Ether (\$3,286.50)

Transaction Fee: 0.081254751856286565 Ether (\$127.82)

Gas Price: 0.000000068215667997 Ether (68.215667997 Gwei)

Ether Price: \$3,286.50 / ETH

Gas Limit & Usage by Txn: 1,786,717 | 1,191,145 (66.67%)

Gas Fees: Base: 61.158147777 Gwei | Max: 68.215667997 Gwei | Max Priority: 68.215667997 Gwei

Burnt & Txn Savings Fees: Burnt: 0.072848221933834665 Ether (\$114.60) Txn Savings: 0 Ether (\$0.00)

Other Attributes: Txn Type: 2 (EIP-1559) Nonce: 345 Position In Block: 62

Input Data: `Function: mint(uint256 numberOfBoneheads)`
`MethodID: 0xa0712d68`
`[0]: 00a`

[Click to see Less](#)

Private Note: To access the Private Note feature, you must be [Logged In](#)

A transaction is a cryptographically signed instruction from an account that changes the state of the blockchain. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).



Transaction Details

Transaction Hash: [0xc18eff4a50b59c953585cc540aa061d17470fec28275c799b3f9fe9d7d0fad6f](#)

Status: ✔ Success

Block: ✔ [13064269](#) 3465329 Block Confirmations

Timestamp: ⌚ 529 days 1 hr ago (Aug-20-2021 08:27:17 PM +UTC) | ⌚ Confirmed within 5 mins:56 secs

Transaction Action: ▶ Mint of **BONEHEADS (BONE)** To [0xe241bedb5a6270c5a96219a52f59c7c3690ae924](#)

- ▶ 1 of Token ID [\[9096\]](#)
- ▶ 1 of Token ID [\[9097\]](#)
- ▶ 1 of Token ID [\[9098\]](#)
- ▶ 1 of Token ID [\[9099\]](#)
- ▶ 1 of Token ID [\[9100\]](#)
- ▶ 1 of Token ID [\[9101\]](#)
- ▶ 1 of Token ID [\[9102\]](#)
- ▶ 1 of Token ID [\[9103\]](#)
- ▶ 1 of Token ID [\[9104\]](#)

Scroll for more ▾

Sponsored:

From: [0xtay.eth](#)

Interacted With (To): Contract [0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2](#) (BONEHEADS: BONE Token) ✔

- ERC-721 Tokens Transferred: (10 ERC-721 Transfers found)
- ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9096\]](#) **BONEHEADS (BONE)**
 - ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9097\]](#) **BONEHEADS (BONE)**
 - ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9098\]](#) **BONEHEADS (BONE)**
 - ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9099\]](#) **BONEHEADS (BONE)**
 - ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9100\]](#) **BONEHEADS (BONE)**
 - ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9101\]](#) **BONEHEADS (BONE)**
 - ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9102\]](#) **BONFHADS (BONE)**

[Overview](#) [Logs \(10\)](#) [State](#) [Comments](#)

- ▶ For ERC-721 Token ID [\[9103\]](#) **BONEHEADS (BONE)**
- ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9104\]](#) **BONEHEADS (BONE)**
- ▶ **From** [Null Address: 0x00...](#) **To** [0xe241bedb5a627...](#)
For ERC-721 Token ID [\[9105\]](#) **BONEHEADS (BONE)**



Value:	1 Ether (\$3,286.50)
Transaction Fee:	0.112106717284648255 Ether (\$176.51)
Gas Price:	0.000000094116767719 Ether (94.116767719 Gwei)
Ether Price:	\$3,286.50 / ETH
Click to see More_ ↓	
Private Note:	To access the Private Note feature, you must be Logged In

💡 A transaction is a cryptographically signed instruction from an account that changes the state of the blockchain. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).



This is **Exhibit “AA”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

Overview

Internal Txns

Logs (1)

State

Comments

More ▾

Transaction Hash:

0xd8bfa15362c29c79c80adb54a8a66286c6b6b98eebc7880f8be4c58e7c34677f

Status:

Success

Block:

13064377 4351058 Block Confirmations

Timestamp:

653 days 19 hrs ago (Aug-20-2021 08:47:36 PM +UTC)

Sponsored:

From:

[boneheads.eth](#) (BONEHEADS: Deployer)

To:

[0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2](#) (BONEHEADS: BONE Token)

Transfer 950.5 ETH From [BONEHEADS: BONE Token](#) To [0xb1FA95...158aC1A3](#)

Value:

0 ETH (\$0.00)

Transaction Fee:

0.001478511509368082 ETH \$2.68

Gas Price:

42.704393431 Gwei (0.000000042704393431 ETH)

Ether Price:

\$3,286.50 / ETH

🔍 Gas Limit & Usage by Txn:

52,782 | 34,622 (65.59%)

🔍 Gas Fees:

Base: 33.237282603 Gwei | Max: 42.704393431 Gwei | Max Priority: 42.704393431 Gwei

🔍 Burnt & Txn Savings Fees:

🔥 Burnt: 0.001150741198281066 ETH (\$2.09)

🌱 Txn Savings: 0 ETH (\$0.00)

🔍 Other Attributes:

Txn Type: 2 (EIP-1559)

Nonce: 9

Position In Block: 140

🔍 Input Data:

Function: `withdraw()`

MethodID: `0x3ccfd60b`

View Input As ▾

More Details:

[— Click to show less](#)

🔍 Private Note:

To access the **Private Note** feature, you must be [Logged In](#)




🔍: A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “AB”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)



Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

 **Contract** 0xb1FA950B59eE7e228e5f666Bf33d64E8158aC1A3  

[Exchange](#)  [Gaming](#) 

 [More](#) 

Overview

ETH BALANCE

0 ETH

ETH VALUE IN USD

\$0.00

TOKEN HOLDINGS

-

Additional Info

PRIVATE NAME TAGS

[+ Add](#)

CREATOR

[BONEHEADS: Deployer](#) at txn [0xc25aded97f965239...](#)

Other Info

MULTICHAIN ADDRESSES

[1 address found via Blockscan](#) 

Transactions

Internal Transactions

Token Transfers (ERC-20)

Contract

Events

Analytics

Comments

↓ Latest 4 internal transactions

 **ADVANCED MODE:**

Parent Txn Hash	Block	Age	From	To	Value
0x409036af3e00dc32...	13064418	537 days 16 hrs ago	0xb1FA95...158aC1A3	BONEHEADS: Deployer	807.925 ETH
0x1eaa32ba5f1c9dbe...	13064408	537 days 16 hrs ago	0xb1FA95...158aC1A3	westcoastnft.eth	95.05 ETH
0xc0976f70fcb07ef2f...	13064397	537 days 16 hrs ago	0xb1FA95...158aC1A3	*no-op.eth	47.525 ETH
0xd8bfa15362c29c79...	13064377	537 days 16 hrs ago	BONEHEADS: BONE T...	0xb1FA95...158aC1A3	950.5 ETH

[Download: [CSV Export](#)]

 A contract address hosts a smart contract, which is a set of code stored on the blockchain that runs when predetermined conditions are met. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “AC”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details < >

- Buy ▾
- Exchange ▾
- Earn ▾
- Gaming ▾

- Overview
- State
- Comments
- More ▾

Transaction Hash:

0x81f5d07bb7051cc6090f71577782b982ba04ec7026d5f65c5124da835ccb0de9 📄

Status:

✔ Success

Block:

✔ 13064917 3712403 Block Confirmations

Timestamp:

🕒 563 days 16 hrs ago (Aug-20-2021 10:33:19 PM +UTC) | 🕒 Confirmed within 30 secs

Sponsored:

From:

[0x9B814233894Cd227f561B78Cc65891AA55C62Ad2](#) (OpenSea: Royalties Distributor) 📄

To:

[0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F](#) (BONEHEADS: Deployer) 📄

Value:

💎 9.921329954401314724 ETH 🕒 \$32,606.45

 **Transaction Fee:**

0.000756 ETH **\$1.18**

 **Gas Price:**


36 Gwei (0.000000036 ETH)

More Details:

[+ Click to show more](#)

 **Private Note:**

To access the **Private Note** feature, you must be [Logged In](#)

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

Transaction Details < >

- Buy ▾
- Exchange ▾
- Earn ▾
- Gaming ▾

- Overview
- State
- Comments
- More ▾

Transaction Hash:

0xd00912a7a757cf6c2a15f7f74de2c2dd2e7d885cf6dc864a0ed183ec29811b7b

Status:

Success

Block:

13069888 3707433 Block Confirmations

Timestamp:

562 days 22 hrs ago (Aug-21-2021 05:04:59 PM +UTC) | Confirmed within 30 secs

Sponsored:

From:

0x9B814233894Cd227f561B78Cc65891AA55C62Ad2 (OpenSea: Royalties Distributor)

To:

0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)

Value:

5.467952229079118272 ETH \$17,642.84

 **Transaction Fee:**

0.001281 ETH **\$2.00**

 **Gas Price:**


61 Gwei (0.000000061 ETH)

More Details:

[+ Click to show more](#)

 **Private Note:**

To access the **Private Note** feature, you must be [Logged In](#)

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

Transaction Details

- Buy
- Exchange
- Earn
- Gaming

- Overview
- State
- Comments
- More

Transaction Hash:

0x1cc486a76705ec6bfff002d30274c6659b001a0c5b37a583e83c559cf72e4a15

Status:

Success

Block:

13072669 3704652 Block Confirmations

Timestamp:

562 days 12 hrs ago (Aug-22-2021 03:24:03 AM +UTC) | Confirmed within 30 secs

Sponsored:

From:

0x9B814233894Cd227f561B78Cc65891AA55C62Ad2 (OpenSea: Royalties Distributor)

To:

0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)

Value:

1.696610278297943994 ETH \$5,499.82

 **Transaction Fee:**

0.000672 ETH **\$1.05**

 **Gas Price:**


32 Gwei (0.000000032 ETH)

More Details:

[+ Click to show more](#)

 **Private Note:**

To access the **Private Note** feature, you must be [Logged In](#)

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

Transaction Details < >

- Buy ▾
- Exchange ▾
- Earn ▾
- Gaming ▾

- Overview
- State
- Comments
- More ▾

Transaction Hash:

0x963b1bd68394732923c51ddc79c673f178f3f7c804d4579ac09101976990f9b4 📄

Status:

✔ Success

Block:

✔ 13098508 3678821 Block Confirmations

Timestamp:

🕒 558 days 12 hrs ago (Aug-26-2021 03:18:33 AM +UTC) | 🕒 Confirmed within 30 secs

Sponsored:

From:

0x9B814233894Cd227f561B78Cc65891AA55C62Ad2 (OpenSea: Royalties Distributor) 📄

To:

0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer) 📄

Value:

💎 7.737244200868120506 ETH 🕒 \$23,936.09

 **Transaction Fee:**

0.001806 ETH **\$2.81**

 **Gas Price:**


86 Gwei (0.000000086 ETH)

More Details:

[+ Click to show more](#)

 **Private Note:**

To access the **Private Note** feature, you must be [Logged In](#)

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

Transaction Details < >

- Buy ▾
- Exchange ▾
- Earn ▾
- Gaming ▾

- Overview
- State
- Comments

More ▾

Transaction Hash:

0x9b41519fb5ad82fd4e32fa05961eee8842b1ab6bf4fd0dccccdd14af2399b132 📄

Status:

✔ Success

Block:

✔ 13365042 3412296 Block Confirmations

Timestamp:

🕒 517 days 4 hrs ago (Oct-06-2021 11:09:57 AM +UTC) | 🕒 Confirmed within 30 secs

Sponsored:

From:

[0x18c2E87D183C5338A9142f97dB176F3832b1D6DE](#) (OpenSea: Payments) 📄

To:

[0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F](#) (BONEHEADS: Deployer) 📄

Value:

💎 2.273063944999999383 ETH 🕒 \$8,128.66

 **Transaction Fee:**

0.002251056607464 ETH **\$3.52**

 **Gas Price:**


107.193171784 Gwei (0.000000107193171784 ETH)

More Details:

[+ Click to show more](#)

 **Private Note:**

To access the **Private Note** feature, you must be [Logged In](#)

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “AD”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



ivybone Today at 5:02 PM

@everyone

BONEGANG,

WE'LL BE BACK ON MONDAY. DON'T LET THE FUD GET TO YOU. NEW WAVES NEW
PLAYS. REAL EYES REALIZE REAL EYES.

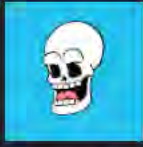
THANK YOU,
#BONEHEADSFOREVER

This is **Exhibit “AE”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



BONEHEADS OFFICIAL

PRE-SALE SOLD OUT. COMPLETE COLLECTION TO BE REVEALED (OPENSEA METADATA REFRESH) OCTOBER 2021. PHYSICAL COLLECTIBLES CREATED FOR THE NEXT GENERATION OF TECH-CONSCIOUS HYPEBEASTS. LOS ANGELES PHYSICAL FLAGSHIP OPENING IN EARLY 2022. #BONEHEADSFOREVER 🦴

This is **Exhibit “AF”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



BONESTAR @0xBONESTAR · Dec 31, 2021



there will only ever be 10K [@BONEHEADS](#), every single item/accessory will be produced, only the items existing in the origins 10K collection will ever be produced and authenticated via IRL forging events/pop-ups - the first being in LA (Melrose)



1



4



20



This is **Exhibit “AG”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



ZachXBT ✓

13.2K Tweets



Following

ZachXBT ✓

@zachxbt

On-chain sleuth. Rug pull survivor turned 2D detective

📍 donations: zachxbt.eth 📅 Joined February 2015

1,374 Following 399.6K Followers

This is **Exhibit “AH”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario



ZachXBT 
@zachxbt



1/ Investigating the \$3.1m rug pull @BONEHEADS and the breadcrumbs left behind by the team into how the money has actually been spent.

10:30 AM · Jul 14, 2022



288 Retweets 29 Quotes 1,325 Likes 56 Bookmarks

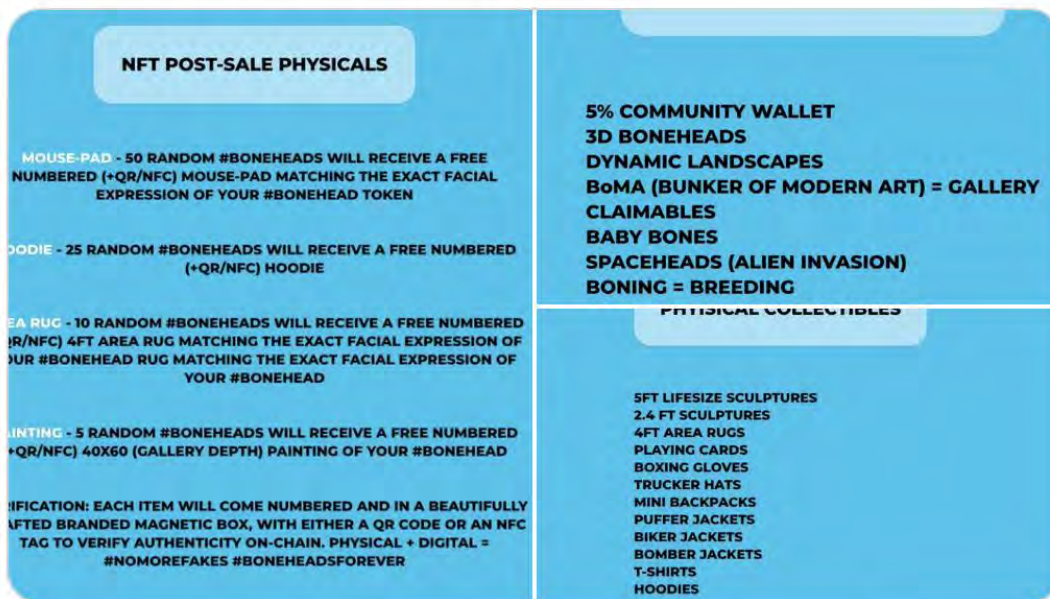


ZachXBT 
@zachxbt · Jul 14, 2022



2/ The project was launched by an anon team on August 20th 2021 with a supply of 10k NFTs and mint price of 0.1 ETH per NFT.

It advertised various roadmap items such as physical collectibles, future NFT drops, item giveaways, gallery, & more.



NFT POST-SALE PHYSICALS

MOUSE-PAD - 50 RANDOM #BONEHEADS WILL RECEIVE A FREE NUMBERED (+QR/NFC) MOUSE-PAD MATCHING THE EXACT FACIAL EXPRESSION OF YOUR #BONEHEAD TOKEN

HOODIE - 25 RANDOM #BONEHEADS WILL RECEIVE A FREE NUMBERED (+QR/NFC) HOODIE

AREA RUG - 10 RANDOM #BONEHEADS WILL RECEIVE A FREE NUMBERED (+QR/NFC) 4FT AREA RUG MATCHING THE EXACT FACIAL EXPRESSION OF YOUR #BONEHEAD RUG MATCHING THE EXACT FACIAL EXPRESSION OF YOUR #BONEHEAD

PAINTING - 5 RANDOM #BONEHEADS WILL RECEIVE A FREE NUMBERED (+QR/NFC) 40X60 (GALLERY DEPTH) PAINTING OF YOUR #BONEHEAD

DISCLAIMER: EACH ITEM WILL COME NUMBERED AND IN A BEAUTIFULLY CRAFTED BRANDED MAGNETIC BOX, WITH EITHER A QR CODE OR AN NFC TAG TO VERIFY AUTHENTICITY ON-CHAIN. PHYSICAL + DIGITAL = #NOMOREFAKES #BONEHEADSFOREVER

5% COMMUNITY WALLET

3D BONEHEADS

DYNAMIC LANDSCAPES

BoMA (BUNKER OF MODERN ART) = GALLERY CLAIMABLES

BABY BONES

SPACEHEADS (ALIEN INVASION)

BONING = BREEDING

PHYSICAL COLLECTIBLES

- 5FT LIFESIZE SCULPTURES
- 2.4 FT SCULPTURES
- 4FT AREA RUGS
- PLAYING CARDS
- BOXING GLOVES
- TRUCKER HATS
- MINI BACKPACKS
- PUFFER JACKETS
- BIKER JACKETS
- BOMBER JACKETS
- T-SHIRTS
- HOODIES

5

8

128

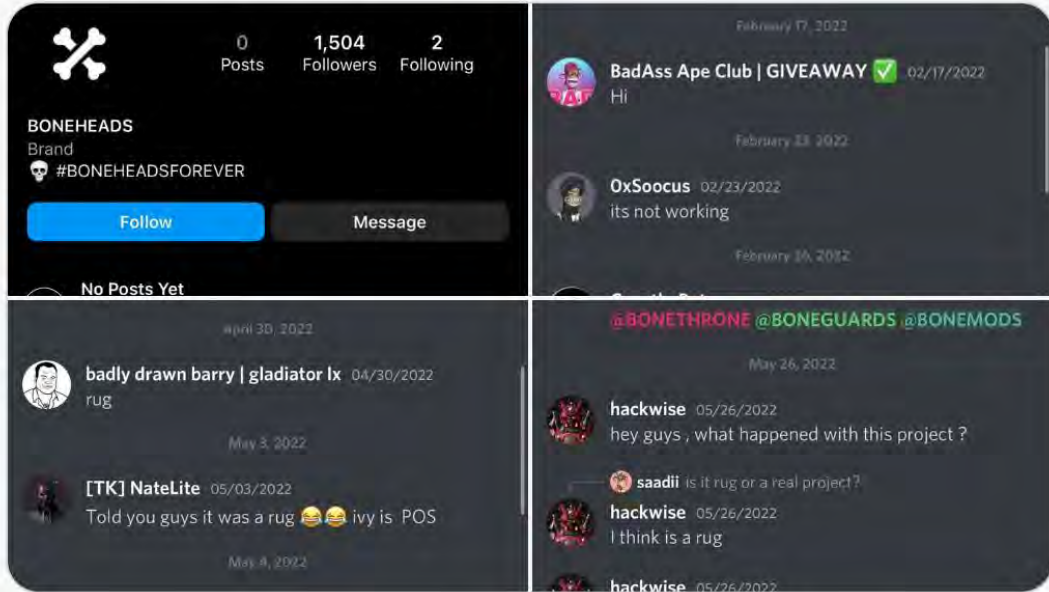




ZachXBT [@zachxbt](#) · Jul 14, 2022

3/ As you can guess with most rugs the team quickly became inactive just weeks after minting out

This is evidenced by zero posts on the Instagram, zero tweets in almost 6 months, Banned holders in the discord, & Discord verification bot hasn't been functional in almost 6 months

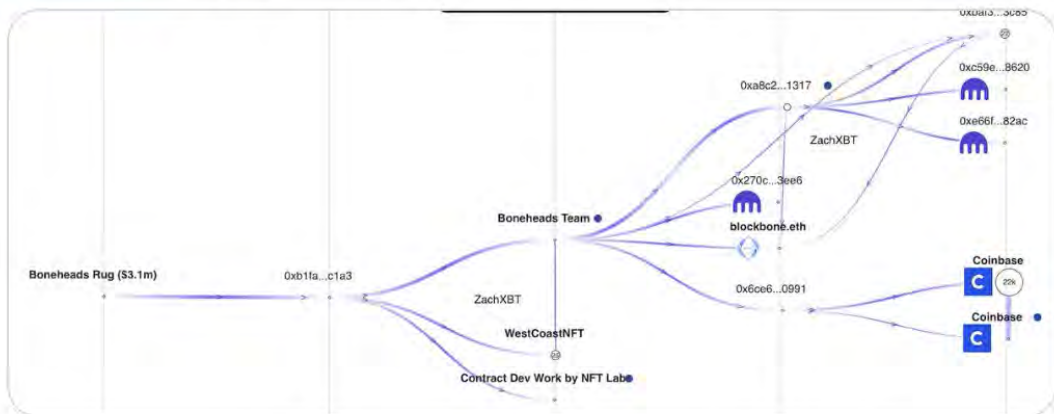


2 3 108



ZachXBT [@zachxbt](#) · Jul 14, 2022

4/ A decent chunk of the proceeds from the mint were sent to [@krakenfx](#) [@coinbase](#) exchange accounts.



6 6 113



ZachXBT @zachxbt · Jul 14, 2022



5/ The rest was used to purchase NFTs such as BAYC, Crypto Punks, MAYC, Clone X, and more.

0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F

Meanwhile the team hadn't even paid [@NFTLabTeam](#) fully for contract dev work.




4

5

123





ZachXBT  @zachxbt · Jul 14, 2022



6/ Now here's where it gets interesting. A while back before launch the team had an email list you could subscribe to with an address listed for Boneheads.

BONEHEADS

About BONEHEADS

Unsubscribe

or

Update Profile

You were subscribed to this list because:

You are receiving this email because you opted in via our website.

BONEHEADS
1034 County Rd 3
Belleville, ON K8N 4Z1
Canada





ZachXBT  @zachxbt · Jul 14, 2022



7/ The address on the site was linked to two entities in Canada with the same address 'Profitly' & 'DMCB Holdings' which had been registered just days (08-26-2021) after Boneheads minted out.

Profitly:

ic.gc.ca/app/scr/cc/Cor...

DMCB Holdings:

ic.gc.ca/app/scr/cc/Cor...

The screenshot shows a 'Corporate History' page. It features a section titled 'Corporate Name History' with a table entry for '2021-08-26 to Present' and 'DMCB HOLD'. Below this is a section titled 'Certificates and Filings' with a sub-section 'Certificate of Incorporation' dated '2021-08-26'.

Corporate Name History	
2021-08-26 to Present	DMCB HOLD

Certificates and Filings

Certificate of Incorporation
2021-08-26

 2

 5

 116



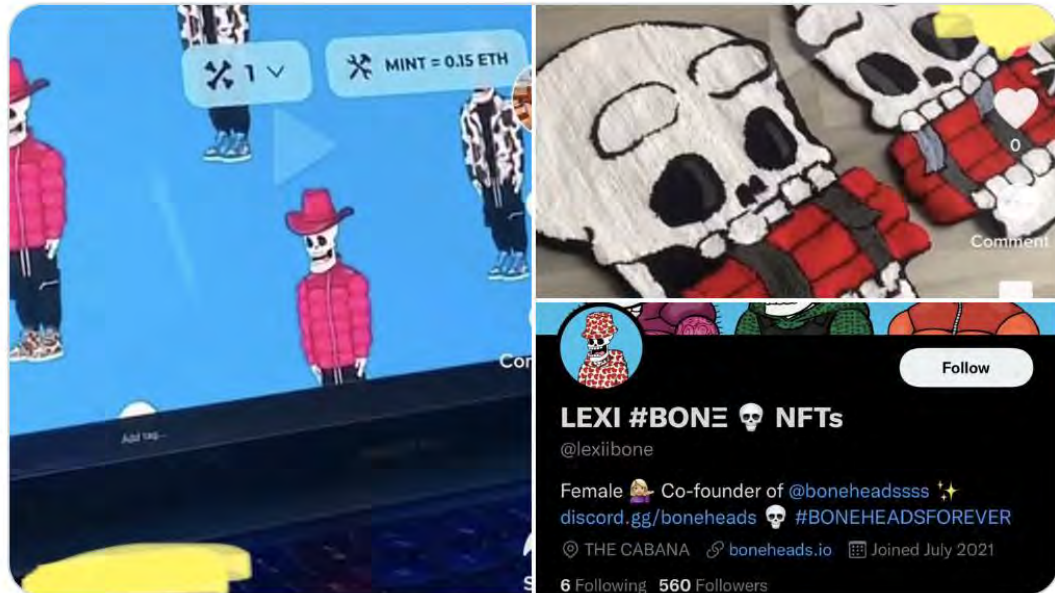


ZachXBT  @zachxbt · Jul 14, 2022



8/ The corporation 'Profifty' listed two names, Alexandra (LexiBone) & Ivan (IvyBone) as the board of directors.

Most damning of all was Alexandra posted about Boneheads on her TikTok before the project had been formally announced on June 18th 2021.



3

8

140





ZachXBT @zachxbt · Jul 14, 2022



9/ Other TikTok videos exist of her flexing luxury trips, designer clothes shopping, and a Gwagon all after the project had raised \$3.1m.



13

16

187



ZachXBT @zachxbt · Jul 14, 2022



10/ Earlier this week @OxTAY_ reached out to me to share they were looking to potentially start a class action lawsuit against the Boneheads team.



BONEHEADS @BONEHEADS · Oct 2, 2021

so if this wasn't a rug then...what was it? best answer wins a BONEHEAD giveaway winner announced...like never?

5

15

197





ZachXBT  @zachxibt · Jul 14, 2022



11/ If you are a victim please leave a comment below this thread.

Chainabuse report:

chainabuse.com/report/da4033d...

Breadcrumbs report:

breadcrumbs.app/reports/2389

****disclaimer: advising Chainabuse and invested in Breadcrumbs****



The screenshot shows a dark-themed banner for Chainabuse. At the top, it says "Join us in making the cryptoverse a safer place". Below this is a search bar with a magnifying glass icon and the placeholder text "Search crypto address". At the bottom left of the banner is the URL "www.chainabuse.com" and at the bottom right is the "chainabuse" logo. Below the banner, the text "chainabuse.com" is visible, followed by the title "ZachXBT's report on Chainabuse: Rug Pull Scam" and a snippet of the report: "Boneheads Rug Pull - NFT project launched August 2021 with a supply of 10,000 NFTs and a mint price of 0.1 ETH. The project mint..."

 49

 26

 295



This is **Exhibit “AI”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario



ZachXBT
@zachxbt



Update: To little surprise the project tweeted for the first time in ages.

BONEHEADS Retweeted



BONEHEAD @BONEHEADDDDD... · 26m

for the 2736463266474th time, itz not rug
🤔, just a very deliberately slow creative
process, lots of pivots, assumptive fake
news, incorrect founder profiles, marketing
agency = not founders, bonniversary week
will be 🍷 2K+ attributes.... 🤪



6

7

16



This is **Exhibit “AJ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____ *A.K.* _____

Commissioner of Oaths in and for Ontario



ZachXBT @zachxبت · Aug 27, 2022

Update: after my thread the team messaged me & called it "FUD". They said everything would soon be delivered the week of 24th of Aug. Now here we are with the week over

How hard is it to deliver merch, have giveaways, & airdrop a collection?

It's been over a year since launch



26

17

274











This is **Exhibit “AK”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario

	3	2	1		BONEHEADS™	INTERACTIVE MEDIA EXPLORING WHAT IT MEANS TO BE HUMAN THROUGH DESTRUCTIVE EXPERIMENTS.	
 BRAND BRAND BRAND BRAND	CONTROVERSY IS ATTENTION ... ATTENTION IS POWER	BY THE POWER INVESTED IN BONEHEADS™ WILL DESTROY CULTURAL BOUNDARIES THROUGH CONTROVERSIAL EXPRESSION.	 LOGOS LOGOS LOGOS LOGOS			 MAKER MAKER MAKER MAKER	@BONESTAR
WHO THE F#%K IS @BONESTAR?	WHO THE F#%K ARE YOU...	 DROPS DROPS DROPS DROPS	EVERY DROP IS GATED.	EVERY DROP IS LIMITED.	DROPS OPEN ON THE 1ST OF EVERY MONTH.	DROPS ARE ONLY OPEN FOR 24HRS.	DROP 1 GOES LIVE NOVEMBER 1ST, 2022.


This is **Exhibit “AL”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario

Home About



IVYBONE 🦴
@ivybonee

Founder @boneheadssss
discord.gg/boneheads Previously
@americasapple @zard

📍 THE CABANA
🌐 boneheads.us
📅 Joined July 2021

IVYBONE 🦴 @ivybonee · 2h
1/5 I just want to say from the bottom of my heart, I'd like to take this moment to apologize, to absolutely NOBODY 🦴 I built this with less than \$20K, without any technical skills, without any real know-how, without any connections, without anything other than a determination

🗨️ 16 🔄 18 ❤️ 58

IVYBONE 🦴 @ivybonee [Follow](#)

2/5 to succeed and create the most authentic and raw fashion brand the world has ever seen. I learned Figma in 2 weeks and designed everything myself, without any help. I went into debt, I dropped out of school, and I've been on a mission in fashion since I was 14 years old...

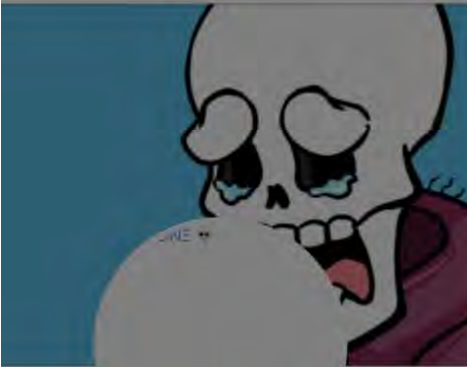
7:13 AM - 25 Aug 2021

1 Retweet 25 Likes

🗨️ 4 🔄 1 ❤️ 25

IVYBONE 🦴 @ivybonee · 2h
3/5 I was almost dead 5 years ago. So if you think that anything, absolutely anything, is going to stop us from following through and delivering the world's

Home About



IVYBONE 🦴
@ivybonee

Founder @boneheadssss
discord.gg/boneheads Previously
@americasapple @zard

📍 THE CABANA
🌐 boneheads.us
📅 Joined July 2021

first fully tokenized luxury wearables brand, then you do not understand what it means to be a BONEHEAD...

🗨️ 4 🔄 1 ❤️ 31

IVYBONE 🦴 @ivybonee · 2h
4/5 All I've done my entire life is break moulds and misconceptions. This isn't anything new to me. I'm built for this. I'm built to be doubted. That motivates us more. So to everyone that is riding with us, thank you for the support, we're not going anywhere, I never left...

🗨️ 3 🔄 2 ❤️ 29

IVYBONE 🦴 @ivybonee · 2h
5/5 And to all the paper hand flippers, GTFO while you still have a chance 🦴, the PAPER HANDS PARADE IS OVER 🦴 #BONEHEADSFOREVER #DEATHTOFUD

🌟 THE (3D) CONVERGENCE EVENT 🌟 OCTOBER 1ST

[@BONEHEADSSSS](#)

🗨️ 13 🔄 4 ❤️ 58

This is **Exhibit “AM”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario

9:32 ↗

◀ Chrome



LEXI #BONE  N...

52 Likes



Tweets

Tweets & replies

Media


Likes



🗨️ 36 ↻ 30 ❤️ 34 ↗



BONEHEADS BOT #3 · 2021-08-06 ⋮

I'M A ROBOT  GO FOLLOW
[@BONEHEADSSSS](#) AND MY CREATORS
🔥 [@ivybonee](#) 🔥 [@nikkibonee](#) 🔥
[@lexiibone](#)



BONEHEAD and 2 others


🗨️ ↻ ❤️ 5 ↗



BONEHEADS @BONE... · 2021-08-04 ⋮

[#NFTGiveaway](#)

SCARCITY + SIGNIFICANCE = VALUE

The world's first fully tokenized fashion brand 



This is **Exhibit “AN”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario

6:36

Gmail

LTE

boneheads.us5.list-manage.com

BONEHEADS

About BONEHEADS

Unsubscribe

or

Update Profile

You were subscribed to this list because:

You are receiving this email because you opted in via our website.

BONEHEADS

1034 County Rd 3

Belleville, ON K8N 4Z1

Canada

[Add us to your address book](#)



This is **Exhibit “AO”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Form 2
**Initial Registered Office Address
and First Board of Directors**
*Canada Business Corporations Act
(CBCA) (s. 19 and 106)*

Formulaire 2
**Siège social initial et premier
conseil d'administration**
*Loi canadienne sur les sociétés par
actions (LCSA) (art. 19 et 106)*

1 Corporate name
Dénomination sociale

DMCB HOLDINGS INC.

2 Address of registered office
Adresse du siège social

12 Amber Place
Belleville ON K8P 0B5

3 Additional address
Autre adresse

Care of / À l'attention de : Ivan Avramenko
1034 County Road 3
Belleville ON K8N 4Z1

4 Members of the board of directors
Membres du conseil d'administration

Ivan Avramenko

12 Amber Place, Belleville ON
K8P 0B5, Canada

Resident Canadian
Résident Canadien
Yes / Oui

5 Declaration: I certify that I have relevant knowledge and that I am authorized to sign this form.
Déclaration : J'atteste que je possède une connaissance suffisante et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par
Ivan Avramenko

Ivan Avramenko
4169957010

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de 5 000 \$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.



Certificate of Incorporation

Canada Business Corporations Act

Certificat de constitution

Loi canadienne sur les sociétés par actions

DMCB HOLDINGS INC.

Corporate name / Dénomination sociale

1329585-1

Corporation number / Numéro de société

I HEREBY CERTIFY that the above-named corporation, the articles of incorporation of which are attached, is incorporated under the *Canada Business Corporations Act*.

JE CERTIFIE que la société susmentionnée, dont les statuts constitutifs sont joints, est constituée en vertu de la *Loi canadienne sur les sociétés par actions*.

Raymond Edwards

Director / Directeur

2021-08-26

Date of Incorporation (YYYY-MM-DD)

Date de constitution (AAAA-MM-JJ)



Form 1
Articles of Incorporation
*Canada Business Corporations
Act (s. 6)*

Formulaire 1
Statuts constitutifs
*Loi canadienne sur les sociétés
par actions (art. 6)*

- 1 Corporate name
Dénomination sociale
DMCB HOLDINGS INC.
- 2 The province or territory in Canada where the registered office is situated
La province ou le territoire au Canada où est situé le siège social
ON
- 3 The classes and any maximum number of shares that the corporation is authorized to issue
Catégories et le nombre maximal d'actions que la société est autorisée à émettre
The corporation is authorized to issue an unlimited number of common shares.
- 4 Restrictions on share transfers
Restrictions sur le transfert des actions
None
- 5 Minimum and maximum number of directors
Nombre minimal et maximal d'administrateurs
Min. 1 Max. 10
- 6 Restrictions on the business the corporation may carry on
Limites imposées à l'activité commerciale de la société
None
- 7 Other Provisions
Autres dispositions
None
- 8 **Incorporator's Declaration:** I hereby certify that I am authorized to sign and submit this form.
Déclaration des fondateurs : J'atteste que je suis autorisé à signer et à soumettre le présent formulaire.

Name(s) - Nom(s)

Original Signed by - Original signé par

Ivan Avramenko

Ivan Avramenko

Ivan Avramenko

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de 5 000 \$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.

This is **Exhibit “AP”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Certificate of Incorporation

Canada Business Corporations Act

Certificat de constitution

Loi canadienne sur les sociétés par actions

Profitly Incorporated

Corporate name / Dénomination sociale

1102222-9

Corporation number / Numéro de société

I HEREBY CERTIFY that the above-named corporation, the articles of incorporation of which are attached, is incorporated under the *Canada Business Corporations Act*.

JE CERTIFIE que la société susmentionnée, dont les statuts constitutifs sont joints, est constituée en vertu de la *Loi canadienne sur les sociétés par actions*.

Virginie Ethier

Director / Directeur

2018-10-01

Date of Incorporation (YYYY-MM-DD)

Date de constitution (AAAA-MM-JJ)



Form 1
Articles of Incorporation
*Canada Business Corporations
Act (s. 6)*

Formulaire 1
Statuts constitutifs
*Loi canadienne sur les sociétés
par actions (art. 6)*

- 1 Corporate name
Dénomination sociale
Profitly Incorporated
- 2 The province or territory in Canada where the registered office is situated
La province ou le territoire au Canada où est situé le siège social
ON
- 3 The classes and any maximum number of shares that the corporation is authorized to issue
Catégories et le nombre maximal d'actions que la société est autorisée à émettre
The corporation is authorized to issue an unlimited number of common shares.
- 4 Restrictions on share transfers
Restrictions sur le transfert des actions
None
- 5 Minimum and maximum number of directors
Nombre minimal et maximal d'administrateurs
Min. 1 Max. 10
- 6 Restrictions on the business the corporation may carry on
Limites imposées à l'activité commerciale de la société
None
- 7 Other Provisions
Autres dispositions
None
- 8 **Incorporator's Declaration:** I hereby certify that I am authorized to sign and submit this form.
Déclaration des fondateurs : J'atteste que je suis autorisé à signer et à soumettre le présent formulaire.

Name(s) - Nom(s)

Original Signed by - Original signé par

Ivan Avramenko

Ivan Avramenko

Ivan Avramenko

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You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.



Form 2
**Initial Registered Office Address
and First Board of Directors**
*Canada Business Corporations Act
(CBCA) (s. 19 and 106)*

Formulaire 2
**Siège social initial et premier
conseil d'administration**
*Loi canadienne sur les sociétés par
actions (LCSA) (art. 19 et 106)*

1 Corporate name
Dénomination sociale

Profitly Incorporated

2 Address of registered office
Adresse du siège social

12 Amber Place
Belleville ON K8P 0B5

3 Additional address
Autre adresse

4 Members of the board of directors
Membres du conseil d'administration

Ivan Avramenko

12 Amber Place, Belleville ON
K8P 0B5, Canada

Resident Canadian
Résident Canadien
Yes / Oui

5 Declaration: I certify that I have relevant knowledge and that I am authorized to sign this form.
Déclaration : J'atteste que je possède une connaissance suffisante et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par
Ivan Avramenko

Ivan Avramenko
6472307712

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de 5 000 \$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

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Form 6
Changes Regarding Directors
Canada Business Corporations Act
(CBCA) (s. 106 and 113)

Formulaire 6
Changements concernant les administrateurs
Loi canadienne sur les sociétés par actions (LCSA) (art. 106 et 113)

Received Date (YYYY-MM-DD): 2018-10-02
Date de réception (AAAA-MM-JJ):

1 Corporate name
Dénomination sociale
Profitly Incorporated

2 Corporation number
Numéro de la société
1102222-9

3 Members of the Board of Directors (**new directors in bold**)
Membres du conseil d'administration (**les nouveaux administrateurs sont indiqués en caractère gras**)

Name Nom	Start Date YYYY-MM-DD Date d'entrée en fonction AAAA-MM-DD	Address Adresse	Resident Canadian Résident Canadien
Richard Michael Carroll	2018-10-02	12 Amber Place, Belleville ON K8P 0B5, Canada	Yes
Ivan Avramenko	2018-10-01	12 Amber Place, Belleville ON K8P 0B5, Canada	Yes

4 The following individuals are no longer directors
Les individus suivants ont cessé d'être administrateur de la société

Name Nom	End Date YYYY-MM-DD Date de fin de mandat AAAAA-MM-DD

5 Declaration: I certify that I have relevant knowledge of the corporation and that I am authorized to sign this form.
Déclaration: J'atteste que je possède une connaissance suffisante de la société et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par
Ivan Avramenko

Ivan Avramenko
6472307712

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You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la *Loi sur les renseignements personnels* permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.



Form 6
Changes Regarding Directors
Canada Business Corporations Act
(CBCA) (s. 106 and 113)

Formulaire 6
Changements concernant les administrateurs
Loi canadienne sur les sociétés par actions (LCSA) (art. 106 et 113)

Received Date (YYYY-MM-DD): 2019-10-10
Date de réception (AAAA-MM-JJ):

1 Corporate name
Dénomination sociale
Profitly Incorporated

2 Corporation number
Numéro de la société
1102222-9

3 Members of the Board of Directors (**new directors in bold**)
Membres du conseil d'administration (**les nouveaux administrateurs sont indiqués en caractère gras**)

Name Nom	Start Date YYYY-MM-DD Date d'entrée en fonction AAAA-MM-DD	Address Adresse	Resident Canadian Résident Canadien
Ivan Avramenko	2018-10-01	12 Amber Place, Belleville ON K8P 0B5, Canada	Yes

4 The following individuals are no longer directors
Les individus suivants ont cessé d'être administrateur de la société

Name Nom	End Date YYYY-MM-DD Date de fin de mandat AAAA-MM-DD
Richard Michael Carroll	2019-10-10

5 Declaration: I certify that I have relevant knowledge of the corporation and that I am authorized to sign this form.
Déclaration: J'atteste que je possède une connaissance suffisante de la société et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par
Ivan Avramenko

Ivan Avramenko
4169957010

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

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You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

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Form 6
Changes Regarding Directors
Canada Business Corporations Act
(CBCA) (s. 106 and 113)

Formulaire 6
Changements concernant les administrateurs
Loi canadienne sur les sociétés par actions (LCSA) (art. 106 et 113)

Received Date (YYYY-MM-DD): 2020-09-13
Date de réception (AAAA-MM-JJ):

1 Corporate name
Dénomination sociale
Profitly Incorporated

2 Corporation number
Numéro de la société
1102222-9

3 Members of the Board of Directors (**new directors in bold**)
Membres du conseil d'administration (**les nouveaux administrateurs sont indiqués en caractère gras**)

Name Nom	Start Date YYYY-MM-DD Date d'entrée en fonction AAAA-MM-DD	Address Adresse	Resident Canadian Résident Canadien
Alexandra Stinson	2018-10-01	1034 County Road 3, Belleville ON K8N 4Z1, Canada	Yes
Ivan Avramenko	2018-10-01	12 Amber Place, Belleville ON K8P 0B5, Canada	Yes

4 The following individuals are no longer directors
Les individus suivants ont cessé d'être administrateur de la société

Name Nom	End Date YYYY-MM-DD Date de fin de mandat AAAA-MM-DD

5 Declaration: I certify that I have relevant knowledge of the corporation and that I am authorized to sign this form.
Déclaration: J'atteste que je possède une connaissance suffisante de la société et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par
Ivan Avramenko

Ivan Avramenko
4169957010

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de 5 000 \$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.

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This is **Exhibit “AQ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____ *A.K.* _____

Commissioner of Oaths in and for Ontario




Government
of Canada

Gouvernement
du Canada

[Canada.ca](#) → [Innovation, Science and Economic Development Canada](#) → [Corporations Canada](#)
→ [Search for a Federal Corporation](#)

Federal Corporation Information - 1102222-9

 Beware of scams and other suspicious activities. See [Corporations Canada's alerts](#).

Note

This information is available to the public in accordance with legislation (see [Public disclosure of corporate information](#)).

[Order copies of corporate documents](#)

Corporation Number

1102222-9

Business Number (BN)

731550711RC0001

Corporate Name

Profitly Incorporated


Status

Active - Dissolution Pending (Non-compliance)

Governing Legislation

Canada Business Corporations Act - 2018-10-01

[Order a Corporate Profile](#) [[View PDF Sample](#)] [[View HTML Sample](#)].

[Find existing extra-provincial registrations of this corporation on Canada's Business registries](#) 

Registered Office Address

12 Amber Place
Belleville ON K8P 0B5

Canada

Note

Active CBCA corporations are required to update this information within 15 days of any change. A corporation key is required. If you are not authorized to update this information, you can either contact the corporation or contact Corporations Canada. We will inform the corporation of its reporting obligations.

Directors

Minimum 1

Maximum 10

Alexandra Stinson
1034 County Road 3
Belleville ON K8N 4Z1
Canada

Ivan Avramenko
12 Amber Place
Belleville ON K8P 0B5
Canada

Note

Active CBCA corporations are required to update director information (names, addresses, etc.) within 15 days of any change. A corporation key is required. If you are not authorized to update this information, you can either contact the corporation or contact Corporations Canada. We will inform the corporation of its reporting obligations.

Annual Filings

Anniversary Date (MM-DD)

10-01

Date of Last Annual Meeting

Not available

Annual Filing Period (MM-DD)

10-01 to 11-30

Type of Corporation

Not available

Status of Annual Filings

2022 - Overdue

2021 - Overdue

2020 - Overdue

Corporate History

Corporate Name History

2018-10-01 to Present

Profitly Incorporated

Certificates and Filings

Certificate of Incorporation

2018-10-01

Order copies of corporate documents

Start New Search

[Return to Search Results](#)

Date Modified:

2023-06-02

This is **Exhibit “AR”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

7:37

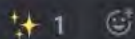


@ **BONESTAR**



LazyFrank 07/23/2021

All good! Just successfully threw together the bot + a minting channel for the Canine Country Club. First time I've got to see the minting feed live, pretty fun 🎉

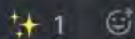


July 28, 2021



LazyFrank 07/28/2021

Ayee saw the post today in the chat, looks like some great stuff ahead! 😊



BONESTAR 07/28/2021

hahaha hey i'm SOOOOOO sorry for not having replied earlier again 😂😂😂 so swamped, some really big updates coming to the site and the roadmap, would really love to have you be part of the team in an even greater capacity that we discussed earlier, I PROMISE i'll message you as soon as we're ready to activate our Discord hope you had a great weekend and a great start to your week, i'll give you my direct line if you ever need to reach me feel free to send a direct text there - everything gets a little lost in here - +14169957010

we've partnered with the manifold xyz team as well, they handled the Goats launch that did \$2M in under 30 minutes, and several other upcoming projects, the dream team coming together 🎉



Message @BONESTAR



This is **Exhibit “AS”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

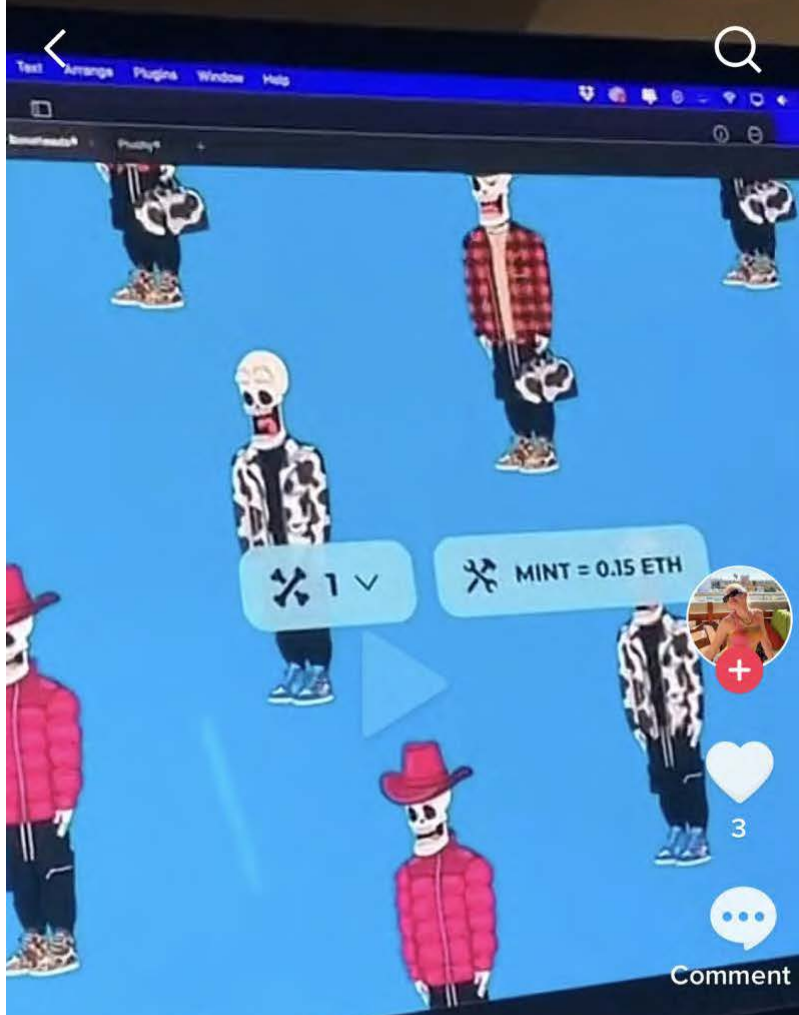
Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

2:14

1SE



Comment



Share

lexiiistinson · 1-21

Part 2 babyyy 🤪 #fyp

JUN 18 2021

🎵 e Dumont | Got U - @D



Add comment...



This is **Exhibit “AT”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

2:09

1SE



0



Comment



0



Share

lexiiistinson · 1-24

Best for last #foryoupage #NY #LA

🎵 r) - @Calvin Harris Thinki

⚠️ The actions in this video are performed by professionals or supervised by professionals. Do not attempt.

SEP 29 2021

Add comment...



This is **Exhibit “AU”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

1SE 8



Ivan getting his last extra bit of sun 😊😊

NOV 26 2021

 TikTok
@lexiistinson

This is **Exhibit “AV”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



This is **Exhibit “AW”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



NIKKI #BONE 🦴 NFTs

2 Tweets



Follow

NIKKI #BONE 🦴 NFTs

@nikkibonee

[#BONEHEADSFOREVER](#) ✨

📅 Joined July 2021

218 Following 1,254 Followers

This is **Exhibit “AX”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



nikkibone.eth

nikkibone.eth · Joined February 2022



Collected 4 **BETA** Created Favorited Activity More

Search by name

Recently received



Collections

Search

COLLECTION	VALUE
Jadu Hoverboard Listed: 0/1	0.0513 ETH Floor: 0.0513 ETH
The Doggies (Snoop ...) Listed: 0/1	0.0499 ETH Floor: 0.0499 ETH
ENS: Ethereum Name... Listed: 0/1	0.0009 ETH Floor: 0.0009 ETH
Gutter Punks - The Doggies Listed: 0/1	-- Floor: --

4 Items



Gutter Punks Flyer - ...
Gutter Punks - T...



Doggy #0... # 9,590
The Doggies (...)

Best offer: 0.0432 WETH



Hoverboard 5663
Jadu Hoverbo...

Best offer: 0.0411 WETH



nikkibone.eth
ENS: Etheru...

This is **Exhibit “AY”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____ *A.K.* _____

Commissioner of Oaths in and for Ontario

ONTARIO
Superior Court of Justice

Plaintiff's Claim
Form 7A Ont. Reg. No.: 258/98



Electronically issued: 2022/07/12
Quinte Courthouse

Plaintiff No. 1

Belleville Small Claims Court
Small Claims Court
15 Bridge Street West Belleville ON
K8P 0C7
Address
(613) 962-9106 ext: 2268
Phone number

SC22000002760000
Claim No.

Additional plaintiff(s) listed on attached Form 1A. Under 18 years of age.

Last name, or name of company McRae-Yu		
First name Taylan	Second name	Also known as Taylan 0xTAY
Address (street number, apt., unit) 57 Monterey Drive		
City, town or village Ottawa	Province Ontario	Phone no. (343) 550-1828
Postal code K2H 7A9	Canada	Email address yu.taylan@gmail.com
Representative		Law Society of Ontario no.
Address (street number, apt., unit)		
City, town or village	Province	Phone no.
Postal code		Email address

Defendant No. 1

Additional defendant(s) listed on attached Form 1A. Under 18 years of age.

Last name, or name of company Profitly Incorporated		
First name	Second name	Also known as Boneheads.io
Address (street number, apt., unit) 1034 County Rd 3		
City, town or village Belleville	Province Ontario	Phone no.
Postal code K2H 7A9	Canada	Email address
Representative		Law Society of Ontario no.
Address (street number, apt., unit)		
City, town or village	Province	Phone no.
Postal code		Email address

Les formulaires des tribunaux sont affichées en anglais et en français sur le site
www.ontariocourtforms.on.ca . Visitez ce site pour des renseignements sur des formats accessibles.

REASONS FOR CLAIM AND DETAILS

Explain what happened, including where and when. Then explain how much money you are claiming or what goods you want returned.

If you are relying on any documents, you **MUST** attach copies to the claim. If evidence is lost or unavailable, you **MUST** explain why it is not attached.

What happened? Where? When?

I was a victim of a NFT rug pull that took place on August 20, 2021 by Profitly incorporated which is illegally operating as www.boneheads.io. The brand promised holders of the NFT access to a web3 based fashion brand including behind the scenes updates, physical collectibles, and ownership of a community owned treasury. I purchased 36 bonehead NFTs for a total of 3.6 Ethereum or \$12,114.96 then was immediately banned from boneheads.io private community discord server when expressing my concerns.

After the public sale took place the project founders stopped providing updates and eventually abandoned all plans or efforts promised to holders. It has been over a year and there has been no updates besides cryptic messages in order to spoof NFT trading volume to prey on more unsuspecting victims. I am filing my claim in order to get a full refund and court fees as a client that has not received any member benefits promised in the project roadmap or website. I am also deeply concerned that the business is operating illegally and have also filed a police report as they are offering an unregistered security and seem to be laundering organizational funds to members.

The business has tried to obscurate it's business and personal identities by operating under boneheads but I am able to make this claim because they registered the same residential address (1034 County Rd 3) to their mailchimp newsletter. One of the project founders have posted self-incriminating evidence that links their real life identity as partner at Profitly Incorporated with Boneheads.io. It has taken over 10 months to effectively gather this evidence.

I have reached out through social media to demand a terms of repayment but the defendant continues to act as if they are completely anonymous and unaffiliated with the business that lists the same residential address and bosts similar founder names (Alexandra "lexi" Stinson aka LexiBone and Ivan Avramenko aka Ivybone)

How much? \$ 12,114.96
(Principal amount claimed)

ADDITIONAL PAGES ARE ATTACHED BECAUSE MORE ROOM WAS NEEDED.

The plaintiff also claims pre-judgment interest from 2021/08/23 under:
(Date)

(Check only one box) the Courts of Justice Act
 an agreement at the rate of _____ % per year

and post-judgment interest, and court costs.

Prepared on: 07/11, 20 22 Submitted online by: Taylan McRae-Yu
(Signature of plaintiff or representative)

Issued on: _____, 20 _____
(Signature of clerk)

CAUTION TO DEFENDANT:	IF YOU DO NOT FILE A DEFENCE (Form 9A) and an Affidavit of Service (Form 8A) with the court within twenty (20) calendar days after you have been served with this Plaintiff's Claim, judgment may be obtained without notice and enforced against you. Forms and self-help materials are available at the Small Claims Court and on the following website: www.ontariocourtforms.on.ca .
CAUTION TO PARTIES:	Unless the court orders or the rules provide otherwise, THIS ACTION WILL BE AUTOMATICALLY DISMISSED if it has not been disposed of by order or otherwise two (2) years after it was commenced and a trial date or assessment under subrule 11.03(2) has not been requested.



For information on accessibility of court services for people with disability-related needs, contact:



Telephone: 416-326-2220 / 1-800-518-7901 TTY: 416-326-4012 / 1-877-425-0575

This is **Exhibit “AZ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____ *A.K.* _____

Commissioner of Oaths in and for Ontario

Superior Court of Justice

Defence

Form 9A Ont. Reg. No.: 258/98

Belleville Small Claims Court

SC22000002760000

Small Claims Court

Claim No.

**15 Bridge Street West Belleville ON
K8P 0C7**

Address

613-962-9106

Phone number

Plaintiff No. 1

Additional plaintiff(s) listed on attached Form 1A.

Under 18 years of age.

Last name, or name of company McRae-Yu		
First name Taylan	Second name	Also known as Taylan 0xTAY
Address (street number, apt., unit) 57 Monterey Drive		
City/Town Ottawa	Province Ontario	Phone no. 343-550-1828
Postal code K2H 7A9	Email address <u>yu.taylan@gmail.com</u>	
Representative		Law Society of Ontario no.
Address (street number, apt., unit)		
City/Town	Province	Phone no.
Postal code	Email address	

Defendant No. 1

Additional defendant(s) listed on attached Form 1A.

Under 18 years of age.

Last name, or name of company Profitly, Incorporated		
First name Ivan	Second name	Also known as
Address (street number, apt., unit) 1034 County Road 3		
City/Town Belleville	Province Ontario	Phone no.

Postal code K8N4Z1	Email address	
Representative		Law Society of Ontario no.
Address (street number, apt., unit)		
City/Town	Province	Phone no.
Postal code	Email address	

Les formules des tribunaux sont affichées en anglais et en français sur le site www.ontariocourtforms.on.ca. Visitez ce site pour des renseignements sur des formats accessibles.

Claim No. _____

THIS DEFENCE IS BEING FILED ON BEHALF OF:

(Name(s) of defendant(s))

Profitly, Incorporated - Ivan Avramenko

and I/

we: (Check as many as apply)

Dispute the claim made against me/us.

Admit the full claim and propose the following terms of payment:

\$ _____ per _____ commencing _____, 20____.

(Amount) (Week/month)

Admit part of the claim in the amount of

\$ _____ and propose the following terms of payment:

(Amount)

\$ _____ per _____ commencing _____, 20____.

(Amount) (Week/month)

REASONS FOR DISPUTING THE CLAIM AND DETAILS:

Explain what happened, including where and when. Explain why you do not agree with the claim made against you.

If you are relying on any documents, you **MUST** attach copies to the Defence. If evidence is lost or unavailable, you **MUST** explain why it is not attached.

What happened? Please see below.
Where?
When?

Why I/we disagree with all or part of the claim:

The claims brought forth in this claim are baseless and false. Profitly provides on-going marketing services for the digital community known as "BONEHEADS". This individual purchased digital art collectibles, also known as NFTs - non-fungible tokens, depicting cartoon skeletons wearing a variety of clothing using a cryptocurrency. The purchased collectibles were redeemed exactly one hour after the time of purchase - the individual's transaction timing is provided on the blockchain. The terms of service agreement explicitly stated that the purchase is non-refundable, this was further stated in the frequently asked questions section of the discord prior to the sale. For context, Discord is an app and an online messaging community. This individual is disgruntled by the notion that the volatile and unpredictable cryptocurrency from which he made his purchase has since plummeted in value by over 70% from the date of sale. Furthermore, this individual has not received, and will not be receiving any further benefits from "BONEHEADS" that are provided on a supplementary basis to a random cohort of purchasers that abide by the "BONEHEADS" terms of service and code of conduct. This individual was removed and barred from accessing the "BONEHEADS" discord server due to his inappropriate behaviour within the "BONEHEADS" chat server. The "BONEHEADS" code of conduct explicitly stated that inappropriate language and threats are not welcome in the chat room community. This individual previously acknowledged and agreed to the "BONEHEADS" terms of service and rules by needing to submit and check boxes acknowledging these terms prior to entering the "BONEHEADS" community - it is impossible to enter the server without consenting to these terms of service. After agreeing to these terms, this individual used inappropriate language, continuously made threats, and continued to harass members of the "BONEHEADS" community long before being terminated from accessing the "BONEHEADS" community server. After attempting to communicate with this individual over social media, this individual would proceed to making threats and baseless accusations and responded in an unacceptable manner, writing comments such as "sorry your mom is upset" - this was the general nature of the type of response received when attempting to communicate with the individual. Unfortunately, this individual remains confrontational and defamatory in his communications regarding "BONEHEADS". It further appears this individual refuses to acknowledge their responsibility as it pertains to his prior "BONEHEADS" agreement. We do not accept any, or any portion thereof, regarding this individual's accusations, and will be disputing these claims vigorously. In conjunction, we will be pursuing a restraining order against this individual should he continue with his baseless harassment and defamatory remarks.

ADDITIONAL PAGES ARE ATTACHED BECAUSE MORE ROOM WAS NEEDED.

Prepared
on:

08/04

20 22



(Signature of defendant or representative)

NOTE: Within seven (7) calendar days of changing your address for service, notify the court and all other parties in writing.

CAUTION TO PLAINTIFF(S): If this Defence contains a proposal of terms of payment, you are deemed to have accepted the terms **unless** you file with the clerk and serve on the defendant(s) a Request to Clerk (Form 9B) for a terms of payment hearing **WITHIN TWENTY (20) CALENDAR DAYS** of service of this Defence [R. 9.03(3)].

This is **Exhibit “BA”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

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Last Build
5/24/2023

This is **Exhibit “BB”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F



- Buy ▾
- Exchange ▾
- Play ▾
- Gaming ▾

- BONEHEADS: Deployer [↗](#)
- [boneheads.eth](#) ⓘ
- # Contract Deployer
- ☆
- More ▾

Overview

ETH BALANCE

1.128521689916498263 ETH

ETH VALUE

\$2,036.79 (@ \$1,804.83/ETH)

TOKEN HOLDINGS

\$1,755.51 (71 Tokens)



More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

[0x3a948f70f932c...](#) from 78 days 23 hrs ago

FIRST TXN SENT

[0xc25aded97f965...](#) from 654 days 16 hrs ago

Multi Chain

MULTICHAIN ADDRESSES

10 addresses found via [Blockscan](#) ▾

Transactions

Internal Transactions

Token Transfers (ERC-20)

NFT Transfers

Analytics

Info

















Comments

Latest 25 from a total of 2,567 transactions

Advanced Filter




Transaction Hash	Method	Age	From
0x3a948f70f932c363f...	Offer Punk Fo...	78 days 23 hrs ago	BONEHEADS: Deployer
0xd270c7b2fa6b8b32e...	Set Approval ...	90 days 5 hrs ago	BONEHEADS: Deployer
0xb66ee1f2eedadd7d...	Set Approval ...	90 days 5 hrs ago	BONEHEADS: Deployer
0x9ea9ece4fc69a245b...	Set Approval ...	90 days 6 hrs ago	BONEHEADS: Deployer
0xf1c302bd59dfd73cf...	Set Approval ...	90 days 6 hrs ago	BONEHEADS: Deployer
0xcaeae89290ae11b0...	Set Approval ...	90 days 6 hrs ago	BONEHEADS: Deployer
0x35fd9828c2b7f18a5...	Set Approval ...	90 days 6 hrs ago	BONEHEADS: Deployer
0x4ff1fa0134c5019d7...	Fulfill Availabl...	90 days 6 hrs ago	BONEHEADS: Deployer
0x324ff417cddcc297b...	Fulfill Availabl...	90 days 6 hrs ago	BONEHEADS: Deployer
0x8eb3987f040ac89da...	Set Approval ...	90 days 6 hrs ago	BONEHEADS: Deployer
0xdc018b20499c3208...	Set Approval ...	90 days 6 hrs ago	BONEHEADS: Deployer
0x03e8c2f258cfa633a...	Set Approval ...	90 days 6 hrs ago	BONEHEADS: Deployer
0x65967288bdca7507...	Offer Punk Fo...	90 days 21 hrs ago	BONEHEADS: Deployer
0x059403b4febd86d6d...	Transfer	90 days 22 hrs ago	BONEHEADS: Deployer
0x133e15d96d552013...	Offer Punk Fo...	91 days 3 hrs ago	BONEHEADS: Deployer
0xc6d3daa30b065635...	Punk No Long...	91 days 3 hrs ago	BONEHEADS: Deployer
0xdd00f0ead87b5eeeb...	Offer Punk Fo...	91 days 3 hrs ago	BONEHEADS: Deployer
0xbb60ed7c97c48f09a...	Transfer	131 days 6 hrs ago	BONEHEADS: Deployer

 Transaction Hash	Method 	Age	From	
 0x65193673a3b8169d...	Approve	163 days 21 hrs ago	BONEHEADS: Deployer 	OUT
 0x2e42f539eaadaba6b...	Deposit	163 days 21 hrs ago	BONEHEADS: Deployer 	OUT
 0xf0d8762144150c54e...	Fulfill Availabl...	163 days 23 hrs ago	BONEHEADS: Deployer 	OUT
 0xff38312796bf97d65...	Set Approval ...	166 days 23 hrs ago	BONEHEADS: Deployer 	OUT
 0x6d0f5d914d97ee9d5...	Transfer	214 days 4 hrs ago	BONEHEADS: Deployer 	OUT
 0x1f9ed35db2d691efb...	Transfer	214 days 4 hrs ago	BONEHEADS: Deployer 	OUT
 0x2f450832c3f2f1693...	Set Approval ...	214 days 4 hrs ago	BONEHEADS: Deployer 	OUT

VIEW ALL TRANSACTIONS →

[Download: [CSV Export](#) ]

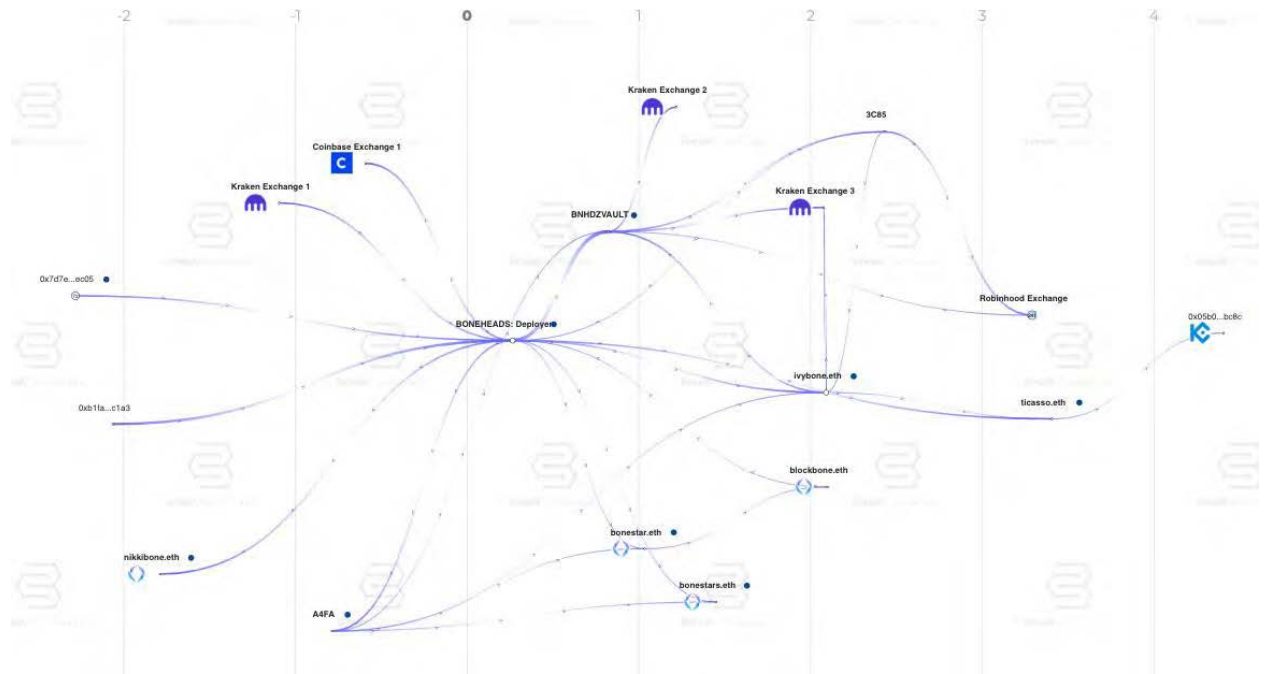
 A wallet address is a publicly available address that allows its owner to receive funds from another party. To access the funds in an address, you must have its private key. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “BC”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



This is **Exhibit “BD”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Table 1 – BONEHEADS TEAM: OUTGOING TRANSACTIONS*	
Exhibit	Transaction Information
“BONEHEADS: Deployer” / Boneheads.eth (0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F)	
“BE”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x6ce6afb735ddc2d6c3ac0187a1919fc20b720991 (“Coinbase Exchange 1”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 31 ETH (\$99,984.30 USD (\$126,120.19 CAD)) <ul style="list-style-type: none"> ▪ 1 ETH (\$3,225.30 USD (\$4,068.39 CAD)) on August 29, 2021 ▪ 30 ETH (\$96,759.00 USD (\$122,051.80 CAD)) on August 29, 2021 • <u>Notes:</u> Exhibit “BE” attached shows 31 ETH in volume going from the “BONEHEADS: Deployer”, which is controlled by the Boneheads team, into “Coinbase Exchange 1”, a centralized exchange.
“BF”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x270c21bfb99a14e41408568570c3a4f481253ee6 (“Kraken Exchange 1”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 28 ETH (\$110,314.12 USD (\$138,179.47 CAD)) <ul style="list-style-type: none"> ▪ 28 ETH (\$110,314.12 USD (\$138,179.47 CAD)) on September 3, 2021 • <u>Notes:</u> Exhibit “BF” attached shows 28 ETH in volume going from the “BONEHEADS: Deployer”, which is controlled by the Boneheads team, into “Kraken Exchange 1”, centralized exchange address.
“BG”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 (“BNHDZVAULT”). • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 1,508.885 ETH (\$6,050,411.36 USD (\$7,683,038.74 CAD)) <ul style="list-style-type: none"> ▪ 0.3 ETH (\$1,181.94 USD (\$1,480.49 CAD)) on September 3, 2021 ▪ 26.2115 ETH (\$103,268.06 USD (\$129,353.57 CAD)) on September 3, 2021 ▪ 262.115 ETH (\$1,032,680.58 USD (\$1,293,535.69 CAD)) on September 3, 2021 ▪ 65.533 ETH (\$258,187.06 USD (\$323,405.11 CAD)) on September 3, 2021 ▪ 63.046 ETH (\$248,389.17 USD (\$311,132.27 CAD)) on September 3, 2021 ▪ 5.45 ETH (\$22,720.83 USD (\$28,101.12 CAD)) on October 23, 2021 ▪ 358.173 ETH (\$1,468,619.33 USD (\$1,879,098.43 CAD)) on November 27, 2021 ▪ 0.353 ETH (\$1,573.63 USD (\$2,003.23 CAD)) on November 29, 2021 ▪ 236 ETH (\$1,049,843.64 USD (\$1,337,290.83 CAD)) on November 29, 2021 ▪ 34 ETH (\$157,840.92 USD (\$201,673.34 CAD)) on November 30, 2021 ▪ 1 ETH (\$4,642.38 USD (\$5,932.56 CAD)) on November 30, 2021 ▪ 238 ETH (\$1,074,552.40 USD (\$1,377,468.72 CAD)) on December 2, 2021 ▪ 0.5 ETH (\$1,436.22 USD (\$1,827.01 CAD)) on February 13, 2022

	<ul style="list-style-type: none"> ▪ 0.1 ETH (\$281.63 USD (\$355.72 CAD)) on March 17, 2022 ▪ 168 ETH (\$494,141.76 USD (\$622,865.68 CAD)) on March 18, 2022 ▪ 29.7 ETH (\$99,028.41 USD (\$123,973.66 CAD)) on March 28, 2022 ▪ 12.5 ETH (\$19,135.88 USD (\$26,296.52 CAD)) on November 3, 2022 ▪ 8 ETH (\$12,887.52 USD (\$17,244.79 CAD)) on January 25, 2023 <ul style="list-style-type: none"> • <u>Notes:</u> Exhibit “BG” attached shows all transactions involving the “BNHDZVAULT” wallet which is controlled by the Boneheads team. BNHDZVAULT has received a total of 1,508.885 ETH in ETH from the “BONEHEADS: Deployer” wallet. These transactions appear as being sent from “Boneheads.eth” in Exhibit “BG”.
“BH”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xa1e43fcb51656354931d47458eceedbc6545df57 (“ivybone.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.6 ETH (\$1,695.62 USD (\$2,178.02 CAD)) <ul style="list-style-type: none"> ▪ 0.6 ETH (\$1,695.62 USD (\$2,178.02 CAD)) on May 1, 2022 • <u>Notes:</u> Exhibit “BH” attached shows all transactions involving the “ivybone.eth” wallet which is controlled by the Boneheads team. “Ivybone.eth” has received a total of 0.6 ETH from the “BONEHEADS: Deployer” wallet.
“BI”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x3acef2d359f430cee5e205262a884d6087dda4fa (“A4FA”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 15 ETH (\$65,117.55 USD (\$82,549.51 CAD)) <ul style="list-style-type: none"> ▪ 5 ETH (\$21,705.85 USD (\$27,516.50 CAD)) on November 23, 2021 ▪ 10 ETH (\$43,411.70 USD (\$55,033.01 CAD)) on November 23, 2021 • <u>Notes:</u> Exhibit “BI” attached shows all transactions involving the “A4FA” wallet which is controlled by the Boneheads team. A4FA has received a total of 15 ETH from the “BONEHEADS: Deployer” wallet.
“BJ”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xbaf331f090320502380ea975562c0c72e2da3c85 (“3C85”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.23346 ETH (\$1,095.56 USD (\$1,362.05 CAD)) <ul style="list-style-type: none"> ▪ 0.02296 ETH (\$99.29 USD (\$122.99 CAD)) on October 30, 2021 ▪ 0.2105 ETH (\$996.27 USD (\$1,239.06 CAD)) on November 9, 2021 • <u>Notes:</u> Exhibit “BJ” attached shows all transactions involving the “3C85” wallet which is controlled by the Boneheads team. 3C85 has received a total of 0.23346 ETH from the “BONEHEADS: Deployer”. wallet.
“BK”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518 (“blockbone.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.0518 ETH (\$230.47 USD (\$286.19 CAD)) <ul style="list-style-type: none"> ▪ 0.0208 ETH (\$98.78 USD (\$122.85 CAD)) on November 9, 2021

	<ul style="list-style-type: none"> ▪ 0.021 ETH (\$99.45 USD (\$123.68 CAD)) on November 9, 2021 ▪ 0.01 ETH (\$31.24 USD (\$39.66 CAD)) on February 16, 2022 • <u>Notes:</u> Exhibit “BK” attached shows all transactions involving the “blockbone.eth” wallet which is controlled by the Boneheads team. Blockbone.eth has received a total of 0.0518 ETH from the “BONEHEADS: Deployer” wallet.
“BL”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147 (“ticasso.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 14.25 ETH (\$43,551.75 USD (\$55,112.54 CAD)) <ul style="list-style-type: none"> ▪ 1 ETH (\$3,093.62 USD (\$3,923.94 CAD)) on August 26, 2021 ▪ 5 ETH (\$16,126.50 USD (\$20,341.96 CAD)) on August 29, 2021 ▪ 5 ETH (\$15,321.05 USD (\$19,388.78 CAD)) on September 26, 2021 ▪ 0.15 ETH (\$363.87 USD (\$463.68 CAD)) on January 27, 2022 ▪ 2 ETH (\$5,788.84 USD (\$7,355.30 CAD)) on February 17, 2022 ▪ 1 ETH (\$2,580.97 USD (\$3,286.86 CAD)) on February 23, 2022 ▪ 0.1 ETH (\$276.90 USD (\$352.02 CAD)) on February 25, 2022 • <u>Notes:</u> Exhibit “BL” attached shows all transactions involving the “ticasso.eth” wallet which is controlled by the Boneheads team. “ticasso.eth” has received a total of 14.25 ETH from the “BONEHEADS: Deployer” wallet.
“BNHDZVAULT” (0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317)	
“BG”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f (“BONEHEADS: Deployer”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 996.409 ETH (\$4,021,741.55 USD (\$5,123,642.36 CAD)) <ul style="list-style-type: none"> ▪ 7 ETH (\$27,498.80 USD (\$34,466.99 CAD)) on September 6, 2021 ▪ 16.9 ETH (\$73,074.59 USD (\$90,517.49 CAD)) on October 30, 2021 ▪ 10 ETH (\$44,484.90 USD (\$56,664.86 CAD)) on November 29, 2021 ▪ 2.7639 ETH (\$12,295.21 USD (\$15,661.63 CAD)) on November 29, 2021 ▪ 55 ETH (\$244,666.95 USD (\$311,656.76 CAD)) on November 29, 2021 ▪ 50 ETH (\$82,205.50 USD (\$104,713.36 CAD)) on November 29, 2021 ▪ 240.529 ETH (\$1,069,992.40 USD (\$1,362,956.32 CAD)) on November 29, 2021 ▪ 0.339 ETH (\$1,508.65 USD (\$1,921.71 CAD)) on November 29, 2021 ▪ 23.5738 ETH (\$109,438.86 USD (\$139,830.03 CAD)) on November 30, 2021 ▪ 11.2577 ETH (\$52,262.76 USD (\$66,776.12 CAD)) on November 30, 2021 ▪ 236 ETH (\$1,081,014.52 USD (\$1,384,887.70 CAD)) on December 1, 2021 ▪ 65 ETH (\$268,076.90 USD (\$344,210.74 CAD)) on December 4, 2021 ▪ 20 ETH (\$75,870.80 USD (\$97,228.43 CAD)) on December 28, 2021

	<ul style="list-style-type: none"> ▪ 150 ETH (\$574,638.00 USD (\$727,261.85 CAD)) on January 2, 2022 ▪ 2.1 ETH (\$6,712.59 USD (\$8,484.71 CAD)) on January 7, 2022 ▪ 1.01 ETH (\$2,466.69 USD (\$3,114.68 CAD)) on January 24, 2022 ▪ 0.01766 ETH (\$54.02 USD (\$68.94 CAD)) on February 6, 2022 ▪ 104.919 ETH (\$295,479.41 USD (\$373,220.04 CAD)) on March 17, 2022 <ul style="list-style-type: none"> • <u>Notes:</u> Exhibit “BG” attached shows a total of 996.409 ETH in volume that have been received by the “BONEHEADS: Deployer” wallet directly from the “BNHDZVAULT” wallet. Both of these wallets are controlled by the Boneheads team.
“BJ”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xbaf331f090320502380ea975562c0c72e2da3c85 (“3C85”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 75.21 ETH (\$227,210.45 USD (\$285,743.94 CAD)) <ul style="list-style-type: none"> ▪ 55 ETH (\$157,369.30 USD (\$198,316.79 CAD)) on March 20, 2022 ▪ 20.21 ETH (\$69,841.15 USD (\$87,427.15 CAD)) on April 1, 2022 • <u>Notes:</u> Exhibit “BJ” attached shows a total of 75.21 ETH received by the “3C85” wallet from the “BNHDZVAULT”, both of which are controlled by the Boneheads team.
“BM”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xc59ef925b947473b85b85f7583d29487ee2e8620 (“Kraken Exchange 2”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 25.358 ETH (\$98,567.28 USD (\$123,475.23 CAD)) <ul style="list-style-type: none"> ▪ 25.358 ETH (\$98,567.28 USD (\$123,475.23 CAD)) on September 4, 2021 • <u>Notes:</u> Exhibit “BM” attached shows receiving address “Kraken Exchange 2” is a centralized exchange address and has received a total of 25.358 ETH from the “BNHDZVAULT” wallet.
“BN”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xe66f9e497e1b83959f319b133ecf88feaa8b82ac (“Kraken Exchange 3”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 94.45 ETH (\$160,008.35 USD (\$212,734.08 CAD)) <ul style="list-style-type: none"> ▪ 25 ETH (\$49,267.50 USD (\$62,993.42 CAD)) on May 23, 2022 ▪ 4.2 ETH (\$7,122.57 USD (\$9,213.04 CAD)) on August 25, 2022 ▪ 5 ETH (\$6,615.35 USD (\$8,846.04 CAD)) on September 20, 2022 ▪ 14.75 ETH (\$19,704.53 USD (\$26,953.82 CAD)) on September 29, 2022 ▪ 12.5 ETH (\$19,135.88 USD (\$26,296.52 CAD)) on November 3, 2022 ▪ 8 ETH (\$12,887.52 USD (\$17,622.39 CAD)) on January 25, 2023 ▪ 25 ETH (\$45,275.00 USD (\$60,808.85 CAD)) on April 3, 2023 • <u>Notes:</u> Exhibit “BN” attached shows receiving address “Kraken Exchange 3” is a centralized exchange address and has received a total of 94.45 ETH from the “BNHDZVAULT” wallet.

<p>“BO”</p>	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xf38269dae289dcf9b2d3372c26181ce473c940fc (“Robinhood Exchange”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 4.78 ETH (\$14,608.64 USD (\$18,412.73 CAD)) <ul style="list-style-type: none"> ▪ 4.78 ETH (\$14,608.64 USD (\$18,412.73 CAD)) on April 18, 2022 • <u>Notes:</u> Exhibit “BO” attached shows receiving address “Robinhood Exchange”, which belongs to a centralized exchange, has received a total of 4.78 ETH from the “BNHDZVAULT” wallet.
<p>“BP”</p>	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x82ef36b1c710e4384eb20d70074bc972972d58b8 (“58B8”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 1 ETH (\$2,826.04 USD (\$3,630.04 CAD)) <ul style="list-style-type: none"> ▪ 1 ETH (\$2,826.04 USD (\$3,630.04 CAD)) on May 1, 2022 • <u>Notes:</u> Exhibit “BP” attached shows “58B8”, which is controlled by the Boneheads team, has received 1 ETH from the “BNHDZVAULT” wallet.
<p>“BQ”</p>	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xd697255b298cf5d90f3f0c9a0e525ba8e829c952 (“praisegod.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 1 ETH (\$2,826.04 USD (\$3,630.04 CAD)) <ul style="list-style-type: none"> ▪ 1 ETH (\$2826.04 ETH (\$3,630.04 CAD)) on May 1, 2022 • <u>Notes:</u> Exhibit “BQ” attached shows “praisegod.eth”, which is controlled by the Boneheads team, has received 1 ETH from the “BNHDZVAULT” wallet.
<p>“A4FA” (0x3acef2d359f430cee5e205262a884d6087dda4fa)</p>	
<p>“BA”</p>	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f (“BONEHEADS: Deployer”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 1.17804 ETH (\$3,339.76 USD (\$4,198.62 CAD)) <ul style="list-style-type: none"> ▪ 0.9168 ETH (\$2,758.31 USD (\$3,448.16 CAD)) on January 20, 2022 ▪ 0.0600 ETH (\$160.88 USD (\$204.09 CAD)) on February 2, 2022 ▪ 0.12434 ETH (\$320.94 USD (\$408.71 CAD)) on February 23, 2022 ▪ 0.0769 ETH (\$99.63 USD (\$137.66 CAD)) on October 12, 2022 • <u>Notes:</u> Exhibit “BA” attached shows a total of 1.17804 ETH have been sent from the cryptocurrency wallet address “A4FA”, which is controlled by the Boneheads team, to the “BONEHEADS: Deployer wallet”, also controlled by the Boneheads team.
<p>“BG”</p>	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 (“BNHDZVAULT”). • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.45 ETH (\$763.13 USD (\$987.10 CAD))

	<ul style="list-style-type: none"> ▪ 0.45 ETH (\$763.13 USD (\$987.10 CAD)) on August 25, 2022 • <u>Notes:</u> Exhibit “BG” attached shows a total of 0.45 ETH have been sent from the cryptocurrency wallet address “A4FA”, which is controlled by the Boneheads team, to the “BNHDZVAULT” wallet, also controlled by the Boneheads team
“BH”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xa1e43fcb51656354931d47458eceedbc6545df57 (“ivybone.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.8838 ETH (\$2,497.68 USD (\$3,208.26 CAD)) <ul style="list-style-type: none"> ▪ 0.8838 ETH (\$2,497.68 USD (\$3,208.26 CAD)) on May 1, 2022 • <u>Notes:</u> Exhibit “BH” attached shows a total of 0.8838 ETH have been sent from the cryptocurrency wallet address “A4FA”, which is controlled by the Boneheads team, to the “ivybone.eth” wallet, also controlled by the Boneheads team.
“BR”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x0bc42633195913892c48a224a846ddae067898ed (“bonestar.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.15 ETH (\$648.59 USD (\$803.40 CAD)) <ul style="list-style-type: none"> ▪ 0.15 ETH (\$648.59 USD (\$803.40 CAD)) on October 30, 2021 • <u>Notes:</u> Exhibit “BR” attached shows a total of 0.15 ETH have been sent from the cryptocurrency wallet address “A4FA”, which is controlled by the Boneheads team, to the “bonestar.eth” wallet, also controlled by the Boneheads team.
“BS”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xea415b3b5e02b2259019763e2e81c48668b80f0e (“bonestars.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.03 ETH (\$129.72 USD (\$160.68 CAD)) <ul style="list-style-type: none"> ▪ 0.03 ETH (\$129.72 USD (\$160.68 CAD)) on October 30, 2021 • <u>Notes:</u> Exhibit “BR” attached shows a total of 0.15 ETH have been sent from the cryptocurrency wallet address “A4FA”, which is controlled by the Boneheads team, to the “bonestars.eth” wallet, also controlled by the Boneheads team.
“ivybone.eth” (0xa1e43fcb51656354931d47458eceedbc6545df57)	
“BH”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f (“BONEHEADS: Deployer”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.02935 ETH (\$127.09 USD (\$158.25 CAD)) <ul style="list-style-type: none"> ▪ 0.02198 ETH (\$95.06 USD (\$117.75 CAD)) on October 30, 2021 ▪ 0.00737 ETH (\$32.03 USD (\$40.50 CAD)) on November 23, 2021

	<ul style="list-style-type: none"> • <u>Notes:</u> Exhibit “BH” attached shows a total of 0.02935 ETH have been sent from the cryptocurrency wallet address “ivybone.eth”, which is controlled by the Boneheads team, to the “BONEHEADS: Deployer” wallet, also controlled by the Boneheads team.
“BG”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 (“BNHDZVAULT”). • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 37.53 ETH (\$79,951.01 USD (\$102,690.92 CAD)) <ul style="list-style-type: none"> ▪ 4.5 ETH (\$18,760.32 USD (\$23,202.76 CAD)) on October 23, 2021 ▪ 23.25 ETH (\$45,818.78 USD (\$58,583.89 CAD)) on May 23, 2022 ▪ 0.2 ETH (\$339.17 USD (\$438.71 CAD)) on August 25, 2022 ▪ 3.6 ETH (\$5,637.28 USD (\$7,674.59 CAD)) on March 6, 2023. ▪ 6 ETH (\$9,395.46 USD (\$12,790.97 CAD)) on March 6, 2023. • <u>Notes:</u> Exhibit “BG” attached shows a total of 37.53 ETH have been sent from the cryptocurrency wallet address “ivybone.eth”, which is controlled by the Boneheads team, to “BNHDZVAULT”, also controlled by the Boneheads team.
“BL”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147 (“ticasso.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 1.25 ETH (\$4,682.68 USD (\$5,697.62 CAD)) <ul style="list-style-type: none"> ▪ 1 ETH (\$3,746.14 USD (\$4,538.09 CAD)) on October 18, 2021 ▪ 0.25 ETH (\$936.54 USD (\$1,159.53 CAD)) on October 18, 2021 • <u>Notes:</u> Exhibit “BL” attached shows a total of 1.25 ETH have been sent from the cryptocurrency wallet address “ivybone.eth”, which is controlled by the Boneheads team, to “ticasso.eth”, also controlled by the Boneheads team.
“BN”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xe66f9e497e1b83959f319b133ecf88feaa8b82ac (“Kraken Exchange 3”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 15.25 ETH (\$23,880.13 USD (\$31,510.41 CAD)) <ul style="list-style-type: none"> ▪ 15.25 ETH (\$23,880.13 USD (\$31,510.41 CAD)) on March 6, 2023. • <u>Notes:</u> Exhibit “BN” attached shows a total of 15.25 ETH have been sent from the cryptocurrency wallet address “ivybone.eth”, which is controlled by the Boneheads team, to “Kraken Exchange 3”, a centralized exchange.
“3C85” (0xbaf331f090320502380ea975562c0c72e2da3c85)	
“BJ”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f (“BONEHEADS: Deployer”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.338 ETH (\$1,043.26 USD (\$1,334.81 CAD)) <ul style="list-style-type: none"> ▪ 0.00417 ETH (\$19.75 USD (\$24.56 CAD)) on November 9, 2021

	<ul style="list-style-type: none"> ▪ 0.21 ETH (\$911.72 USD (\$1,155.78 CAD)) on November 23, 2021 ▪ 0.08636 ETH (\$111.79 USD (\$154.47 CAD)) on October 12, 2022 • <u>Notes:</u> Exhibit “BJ” attached shows a total of 0.338 ETH have been sent from the cryptocurrency wallet address “3C85”, which is controlled by the Boneheads team, to the “BONEHEADS: Deployer” wallet, also controlled by the Boneheads team.
“BG”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 (“BNHDZVAULT”). • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 22 ETH (\$35,399.10 USD (\$45,979.89 CAD)) <ul style="list-style-type: none"> ▪ 22 ETH (\$35,399.10 USD (\$45,979.89 CAD)) on August 19, 2022 • <u>Notes:</u> Exhibit “BG” attached shows a total of 22 ETH have been sent from the cryptocurrency wallet address “3C85”, which is controlled by the Boneheads team, to the “BNHDZVAULT”, also controlled by the Boneheads team.
“BH”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xa1e43fcb51656354931d47458eceedbc6545df57 (“ivybone.eth”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 2.3 ETH (\$6499.89 USD (\$8,349.09 CAD)) <ul style="list-style-type: none"> ▪ 2.2 ETH (\$6,217.29 USD (\$7,986.10 CAD)) on May 1, 2022 ▪ 0.1 ETH (\$282.60 USD (\$362.99 CAD)) on May 1, 2022 • <u>Notes:</u> Exhibit “BH” attached shows a total of 2.3 ETH have been sent from the cryptocurrency wallet address “3C85”, which is controlled by the Boneheads team, to “ivybone.eth”, also controlled by the Boneheads team.
“BO”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0xf38269dae289dcf9b2d3372c26181ce473c940fc (“Robinhood Exchange”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 72.877 ETH (\$220,516.21 USD (\$277,308.80 CAD)) <ul style="list-style-type: none"> ▪ 1 ETH (\$2,861.26 USD (\$3,605.75 CAD)) on March 20, 2022 ▪ 25.85 ETH (\$73,963.57 USD (\$93,208.89 CAD)) on March 20, 2022 ▪ 25.85 ETH (\$73,963.57 USD ((\$93,208.89 CAD)) on March 20, 2022 ▪ 20.177 ETH (\$69,727.81 USD (\$87,285.27 CAD)) on April 1, 2022 • <u>Notes:</u> Exhibit “BO” attached shows a total of 72.877 ETH have been sent from the cryptocurrency wallet address “3C85”, which is controlled by the Boneheads team, to the Robinhood Exchange, a centralized exchange.
“ticasso.eth” (0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147)	
“BL”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f (“BONEHEADS: Deployer”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 0.10 ETH (\$246.19 USD (\$311.14 CAD))

	<ul style="list-style-type: none"> ▪ 0.05 ETH (\$122.98 USD (\$155.17 CAD)) on January 25, 2022 ▪ 0.05 ETH (\$123.21 USD (\$155.97 CAD)) on January 26, 2022 • <u>Notes:</u> Exhibit “BL” attached shows a total of 0.10 ETH have been sent from the cryptocurrency wallet address “ticasso.eth”, which is controlled by the Boneheads team, to the “BONEHEADS: Deployer” wallet, also controlled by the Boneheads team.
“BL”	<ul style="list-style-type: none"> • <u>Receiving Address:</u> 0x05B0e921728378b1a7CB2bfaBf68558E6AE4bc8c (“BC8C”) • <u>Transactions:</u> <ul style="list-style-type: none"> ○ Total: 3 ETH (\$12,870.30 USD (\$15,937.29 CAD)) <ul style="list-style-type: none"> ▪ 3 ETH (\$12,870.30 USD (\$15,937.29 CAD)) on October 31, 2021 • <u>Notes:</u> Exhibit “BL” attached shows receiving address “BC8C”, which is controlled by the Boneheads team or a centralized exchange. On November 1, 2021, 0x4ad64983349c49defe8d7a4686202d24b25d0ce8 (“Kucoin 4”) received 2.9976 ETH (\$12,958.20 USD (\$16,037.06 CAD)) from “BC8C”).
* The table presents <i>outgoing</i> transactions from the Ethereum address under each sub-heading.	

This is **Exhibit “BE”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0x6CE6AFb735DdC2D6c3aC0187a1919Fc20B720991



Buy ▾

Exchange ▾

Play ▾

Gaming ▾



More ▾

Overview

ETH BALANCE

0.000553168979748 ETH

ETH VALUE

\$1.00 (@ \$1,811.54/ETH)

More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

0x24fbe5eaa6a5e... from 618 days 2 hrs ago

FIRST TXN SENT

0xa524ab1d1c97... from 645 days 1 hr ago

Multi Chain

MULTICHAIN ADDRESSES

0 address found via Blockscan ▾

Transactions

Token Transfers (ERC-20)

Analytics















Comments

Latest 5 from a total of 5 transactions


Advanced Filter



Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0x24fbe5eaa6a5e5813...	Transfer	13297552	618 days 2 hrs ago	0x6CE6AF...0B720991	OUT Coinbase: Miscellaneo...	0.00034258 ETH	0.00074883

 Transaction Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xc2bffc7197abcf3dd1...	Transfer	13123271	645 days 58 mins ago	0x6CE6AF...0B720991 	OUT Coinbase 3 	29.99823513 ETH	0.00232441
 0xc53a9e0ab970a8a6...	Transfer	13123257	645 days 1 hr ago	BONEHEADS: Deployer 	IN 0x6CE6AF...0B720991 	30 ETH	0.00272539
 0xa524ab1d1c9755e1...	Transfer	13123256	645 days 1 hr ago	0x6CE6AF...0B720991 	OUT Coinbase 3 	0.995359 ETH	0.00243686
 0x543b3ad5d289cef80...	Transfer	13123252	645 days 1 hr ago	BONEHEADS: Deployer 	IN 0x6CE6AF...0B720991 	1 ETH	0.00236099

[Download: [CSV Export](#) ]

 A wallet address is a publicly available address that allows its owner to receive funds from another party. To access the funds in an address, you must have its private key. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “BF”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0x270c21BFB99A14E41408568570C3A4f481253EE6



Buy ▾

Exchange ▾

Play ▾

Gaming ▾



More ▾

Overview

ETH BALANCE

0.000342664144354516 ETH

ETH VALUE

\$0.62 (@ \$1,811.54/ETH)

More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

0x5991bf3c72656... from 640 days 22 hrs ago

FIRST TXN SENT

0x5991bf3c72656... from 640 days 22 hrs ago

Multi Chain

MULTICHAIN ADDRESSES

0 address found via Blockscan ▾

Transactions

Token Transfers (ERC-20)

Analytics






Comments

Latest 2 from a total of 2 transactions


Advanced Filter



Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0x5991bf3c7265666c1...	Split	13149814	640 days 22 hrs ago	0x270c21...81253EE6	OUT Kraken 5	27.99620039 ETH	0.00345693

 Transaction Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xb8d7e06ab943b757...	Transfer	13149810	640 days 22 hrs ago	BONEHEADS: Deployer 	IN 0x270c21...81253EE6 	28 ETH	0.00180475

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 A wallet address is a publicly available address that allows its owner to receive funds from another party. To access the funds in an address, you must have its private key. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “BG”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

































_____  _____






























































Commissioner of Oaths in and for Ontario

Transactions













































For [0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317](#)































































A total of 123 transactions found




































































 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x175b117ea8fe8df96...	Transfer	16968779	63 days 10 hrs ago	0xa8c2bC...f7281317 	OUT 0xE66F9e...Aa8b82aC 	25 ETH	0.0015
 0x9ba311d1d7529745...	Transfer	16819831	84 days 8 hrs ago	Union Chain 	IN 0xa8c2bC...f7281317 	18.99800831 ETH	0.0014
 0x78cd2835c372a3ebf...	Transfer	16798614	87 days 8 hrs ago	Union Chain 	IN 0xa8c2bC...f7281317 	5.9977616 ETH	0.0008
 0x9909fd1078ebb7721...	Transfer	16772253	91 days 1 hr ago	0xa8c2bC...f7281317 	OUT 0x516Aa4...793A275c 	6 ETH	0.0008
 0x878c67c8d85a8495...	Transfer	16772237	91 days 1 hr ago	ivybone.eth 	IN 0xa8c2bC...f7281317 	6 ETH	0.0006
 0x489b02f345822b18e...	Transfer	16772215	91 days 1 hr ago	0xa8c2bC...f7281317 	OUT 0x84fC06...5509B3C3 	19 ETH	0.0007
 0xf32a7b11d525dfa5f...	Transfer	16772166	91 days 1 hr ago	Kraken 4 	IN 0xa8c2bC...f7281317 	15.2465 ETH	0.0008
 0xa11d002637552c36...	Transfer	16772128	91 days 1 hr ago	ivybone.eth 	IN 0xa8c2bC...f7281317 	3.6 ETH	0.0009
 0x048c40aa4b6763da...	Transfer	16727282	97 days 9 hrs ago	0xa8c2bC...f7281317 	OUT Centre: USD Coin 	0 ETH	0.0012
 0x9c30ddfdc8b68f24d...	Transfer	16727245	97 days 9 hrs ago	0xa8c2bC...f7281317 	OUT Apecoin: APE Token 	0 ETH	0.0010



























































 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xf9cfb1ef43236f6e0...	Transfer	16484521	131 days 9 hrs ago	0xa8c2bC...f7281317 	 0xE66F9e...Aa8b82aC 	8 ETH	0.0009
 0xbb60ed7c97c48f09a...	Transfer	16484473	131 days 9 hrs ago	 boneheads.eth 	 0xa8c2bC...f7281317 	8 ETH	0.0004
 0x06529b13954949d3...	Transfer	15891262	214 days 5 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0014
 0x42a1857738dc6a7c...	Transfer	15891260	214 days 5 hrs ago	0xa8c2bC...f7281317 	 0xE66F9e...Aa8b82aC 	12.5 ETH	0.0012
 0x1f9ed35db2d691efb...	Transfer	15890672	214 days 7 hrs ago	 boneheads.eth 	 0xa8c2bC...f7281317 	12.5 ETH	0.0006
 0xb72bbb8d97fb04a20...	Set Approval ...	15725020	237 days 10 hrs ago	0xa8c2bC...f7281317 	 RTFKT SKIN VIAL: Token 	0 ETH	0.0011
 0x523305351ddb676a...	Set Approval ...	15724982	237 days 11 hrs ago	0xa8c2bC...f7281317 	 RTFKT: CloneX Token 	0 ETH	0.0012
 0x645d8086c64afb7a9...	Transfer	15640212	249 days 7 hrs ago	0xa8c2bC...f7281317 	 0xE66F9e...Aa8b82aC 	14.75 ETH	0.0016
 0x19a350762fb9d52a0...	Transfer	15575428	258 days 8 hrs ago	0xa8c2bC...f7281317 	 0xE66F9e...Aa8b82aC 	5 ETH	0.0015
 0xa79596441abd5783...	Transfer	15409569	284 days 9 hrs ago	0xa8c2bC...f7281317 	 0xE66F9e...Aa8b82aC 	4.2 ETH	0.0014
 0xbee5790a39100731f...	Transfer	15409444	284 days 10 hrs ago	 ivybone.eth 	 0xa8c2bC...f7281317 	0.2 ETH	0.0002
 0x975e17f1739b504ac...	Transfer	15409444	284 days 10 hrs ago	0x3acEf2...87dda4fa 	 0xa8c2bC...f7281317 	0.45 ETH	0.0002
 0x4e4e3ad99b9342d6...	Transfer	15368935	290 days 20 hrs ago	0xbAF331...E2Da3C85 	 0xa8c2bC...f7281317 	22 ETH	0.0001
 0x6d5ae51637196ecc...	Transfer	14832026	378 days 1 hr ago	0xa8c2bC...f7281317 	 0xE66F9e...Aa8b82aC 	25 ETH	0.0013



























?	Txn Hash	Method ?	Block	Age	From	To	Value	Txn Fee
	0x4d2e9795daf0ca61f...	Transfer	14831654	378 days 3 hrs ago	0x8F507c...B053F470	0xa8c2bC...f7281317	0.08 ETH	0.0004
	0x33401d4a7c714109...	Transfer	14831652	378 days 3 hrs ago	0xe55382...E93d453F	0xa8c2bC...f7281317	0.08 ETH	0.0004
	0xc68d766e32fb73fdc...	Transfer	14831652	378 days 3 hrs ago	0x944153...1aA9708C	0xa8c2bC...f7281317	0.08 ETH	0.0004
	0x184ed12a3bb2dfeb6...	Transfer	14831649	378 days 3 hrs ago	0x90fA1d...48133E64	0xa8c2bC...f7281317	0.08 ETH	0.0005
	0x99610ee568a088bc...	Transfer	14831606	378 days 3 hrs ago	ivybone.eth	0xa8c2bC...f7281317	23.25 ETH	0.0005
	0xc3fc00dbaf1fbbb67f...	Transfer	14712528	397 days 5 hrs ago	0x82eF36...972D58B8	0xa8c2bC...f7281317	0.05 ETH	0.0010
	0x9936a7a2bdd8d324...	Migrate Token	14691001	400 days 15 hrs ago	0xa8c2bC...f7281317	RTFKT: MNLTH Token	0 ETH	0.0132
	0x9fb0a28e72f17b2ed...	Migrate Token	14690996	400 days 15 hrs ago	0xa8c2bC...f7281317	RTFKT: MNLTH Token	0 ETH	0.0161
	0xe63fd2320ed57e1c4...	Migrate Token	14690990	400 days 15 hrs ago	0xa8c2bC...f7281317	RTFKT: MNLTH Token	0 ETH	0.0178
	0xb979c94c7e2369d5...	Transfer	14690094	400 days 18 hrs ago	0x82eF36...972D58B8	0xa8c2bC...f7281317	0.95 ETH	0.0054
	0xda4c9a4bab0ff76fa...	Transfer	14689965	400 days 18 hrs ago	praisegod.eth	0xa8c2bC...f7281317	0.92 ETH	0.0087
	0x0ccfbc1bc784e94d6...	Transfer	14689600	400 days 20 hrs ago	0xa8c2bC...f7281317	ivybone.eth	5 ETH	0.0814
	0x2b5808a710b4ab0bf...	Transfer	14688873	400 days 22 hrs ago	0xa8c2bC...f7281317	Apecoin: APE Token	0 ETH	0.0078
	0x3308cd7fcc6180290...	Transfer	14688785	400 days 23 hrs ago	0xa8c2bC...f7281317	prismo.eth	1 ETH	0.0026

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x3c63e11f81d114b85...	Transfer	14688785	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT 0x82eF36...972D58B8 	1 ETH	0.0025
 0x473451b6a5c8ade4f...	Transfer	14688785	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT praisegod.eth 	1 ETH	0.0024
 0x8b29044903eb4569...	Transfer	14688760	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT 0x15F821...8e60e907 	1 ETH	0.0021
 0xac50709ac1cccec4f...	Transfer	14688683	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT prismo.eth 	0.02 ETH	0.0012
 0x770e2e97aab4af9b4...	Transfer	14688624	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT Apecoin: APE Token 	0 ETH	0.0031
 0xab51a99e98c63545...	Transfer	14688620	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT Apecoin: APE Token 	0 ETH	0.0036
 0x070c56f5706834644...	Transfer	14688619	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT Apecoin: APE Token 	0 ETH	0.0035
 0x8be56bef915496326...	Transfer	14688604	400 days 23 hrs ago	0xa8c2bC...f7281317 	OUT Apecoin: APE Token 	0 ETH	0.0039
 0x105a52ac22e5c253...	Swap	14686919	401 days 6 hrs ago	0xa8c2bC...f7281317 	OUT Metamask: Swap Router 	45 ETH	0.0125
 0x9eb7ce89447beb94...	Swap	14681409	402 days 3 hrs ago	0xa8c2bC...f7281317 	OUT Metamask: Swap Router 	0 ETH	0.0248
 0x103f75a9d082da3eb...	Approve	14681409	402 days 3 hrs ago	0xa8c2bC...f7281317 	OUT Centre: USD Coin 	0 ETH	0.0035
 0x6ce2fc714264dc3f3...	Transfer	14612936	412 days 21 hrs ago	0xa8c2bC...f7281317 	OUT Centre: USD Coin 	0 ETH	0.0015
 0xdfb3707089c5793d9...	Transfer	14610338	413 days 7 hrs ago	0xa8c2bC...f7281317 	OUT 0xF38269...73C940fc 	4.78 ETH	0.0008
 0xa5e3a0a2add812d9...	Transfer	14502129	430 days 4 hrs ago	0xa8c2bC...f7281317 	OUT 0xbAF331...E2Da3C85 	20.210302634 ETH	0.0016

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x9a060aae05b80740f...	Transfer	14472233	434 days 20 hrs ago	 boneheads.eth 	 0xa8c2bC...f7281317 	29.7 ETH	0.0008
 0x14635f720e6420e48...	Transfer	14425178	442 days 4 hrs ago	0xa8c2bC...f7281317 	 0xbAF331...E2Da3C85 	55 ETH	0.0007
 0x5d155146a0348ab9f...	Swap	14418134	443 days 6 hrs ago	0xa8c2bC...f7281317 	 Metamask: Swap Router 	100 ETH	0.0045
 0x5a56aee30fdc61289...	Transfer	14411929	444 days 5 hrs ago	 boneheads.eth 	 0xa8c2bC...f7281317 	168 ETH	0.0012
 0xa2351c4f29cff1b1fc...	Transfer	14411905	444 days 5 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0044
 0x259191734e25f9076...	Transfer	14402123	445 days 18 hrs ago	 boneheads.eth 	 0xa8c2bC...f7281317 	0.1 ETH	0.0004
 0xd034f5fe3afa15531...	Transfer	14402111	445 days 18 hrs ago	0xa8c2bC...f7281317 	  boneheads.eth 	104.919081832 ETH	0.0006
 0x4c1b130e04a24248...	Cancel Order_	14325502	457 days 16 hrs ago	0xa8c2bC...f7281317 	 OpenSea: Wyvern Exch... 	0 ETH	0.0018
 0xcda370a2afcdb2c3a...	Set Approval ...	14325455	457 days 16 hrs ago	0xa8c2bC...f7281317 	 RTFKT: CloneX Token 	0 ETH	0.0011
 0x365b715b6533658e...	Transfer	14271307	466 days 2 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0046
 0x390584e6ae74b662...	Transfer	14260254	467 days 19 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0066
 0xc3a653eaa975f2536...	Transfer	14260204	467 days 19 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0067
 0xc0ca526380c1f335f...	Transfer	14257997	468 days 3 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0081
 0xd8296a68c169b28a...	Transfer	14230733	472 days 9 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0090

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x5700b9af0059e7487...	Transfer	14220223	474 days ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0038
 0xf2a98f3e518cd5182...	Transfer From	14198187	477 days 9 hrs ago	0xa8c2bC...f7281317 	 Bored Ape Yacht Club: ... 	0 ETH	0.0058
 0x167d8f8baf07ad403...	Transfer From	14198179	477 days 9 hrs ago	0xa8c2bC...f7281317 	 Bored Ape Yacht Club: ... 	0 ETH	0.0066
 0xb76a27cd5719b0c9...	Set Approval ...	14198177	477 days 9 hrs ago	0xa8c2bC...f7281317 	 Bored Ape Yacht Club: ... 	0 ETH	0.0025
  0x7a8e7719951c9e7b...	Register Proxy	14198170	477 days 9 hrs ago	0xa8c2bC...f7281317 	 OpenSea: Registry 	0 ETH	0.0013
 0xa89b0c1294e7f5a25...	Register Proxy	14198170	477 days 9 hrs ago	0xa8c2bC...f7281317 	 OpenSea: Registry 	0 ETH	0.0223
 0xf767549f5e7d8ed3b...	Transfer	14198158	477 days 10 hrs ago	 	 0xa8c2bC...f7281317 	0.5 ETH	0.0011
 0x160d84e9c5f6aad00...	Transfer	14149395	484 days 22 hrs ago	0xa8c2bC...f7281317 	  	0.017667352 ETH	0.0012
 0x46e981b6c8630c37...	Transfer	14066508	497 days 18 hrs ago	0xa8c2bC...f7281317 	  	1.01 ETH	0.0021
 0xe751c51f3633cf07a...	Transfer	13957062	514 days 16 hrs ago	0xa8c2bC...f7281317 	  	2.1 ETH	0.0027
 0x8a8e513dee5792b5...	Transfer	13927916	519 days 4 hrs ago	0xa8c2bC...f7281317 	  	150 ETH	0.0038
 0x017730d211d481f1...	Transfer	13894342	524 days 9 hrs ago	0xa8c2bC...f7281317 	  	20 ETH	0.0019
 0xb1520ffcebd9e574e...	Transfer	13741255	548 days 5 hrs ago	0xa8c2bC...f7281317 	  	65 ETH	0.0026
 0x74f8863e7e86b102d...	Transfer	13725275	550 days 19 hrs ago	 	 0xa8c2bC...f7281317 	238 ETH	0.0018

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x771e4fff4ab5ac71f9...	Transfer	13723255	551 days 3 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0131
 0x6aac03c3e5751afb2...	Transfer	13718737	551 days 20 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	236 ETH	0.0064
 0xc71caf7061f808a26...	Transfer	13714726	552 days 11 hrs ago	boneheads.eth 	 0xa8c2bC...f7281317 	1 ETH	0.0017
 0xd426ec3c37d69d8fe...	Transfer	13714718	552 days 11 hrs ago	boneheads.eth 	 0xa8c2bC...f7281317 	34 ETH	0.0016
 0x093dbf92c46d1edcc...	Transfer	13713012	552 days 18 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	11.257751843 ETH	0.0028
 0x497ef0205750de5e6...	Transfer	13712927	552 days 18 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	23.573869588 ETH	0.0029
 0x283e72d624830f952...	Transfer	13709799	553 days 6 hrs ago	boneheads.eth 	 0xa8c2bC...f7281317 	236 ETH	0.0030
 0x323be1195bf403d19...	Transfer	13709739	553 days 6 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	0.339137431 ETH	0.0037
 0x191d964bd04258b0...	Transfer	13709732	553 days 6 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0108
 0x8d7d38f994f20bbc2...	Transfer	13709720	553 days 7 hrs ago	boneheads.eth 	 0xa8c2bC...f7281317 	0.353745335 ETH	0.0028
 0xa360f47046957f9ef...	Transfer	13706448	553 days 19 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	240.529347267 ETH	0.0029
 0x827fd462b259f23c8...	Transfer	13706018	553 days 21 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	50 ETH	0.0035
 0x2a79f4bc6438f3bef...	Transfer	13705986	553 days 21 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	55 ETH	0.0033
 0x57b1b372a0ae6d2a...	Transfer	13705965	553 days 21 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	2.763907394 ETH	0.0032

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xe11d258c492a6538...	Transfer	13705954	553 days 21 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	10 ETH	0.0031
 0x760f28fb4af2ef17ba...	Transfer	13705927	553 days 21 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0086
 0xeaad7f847061b78e4...	Transfer	13697285	555 days 6 hrs ago	 boneheads.eth 	0xa8c2bC...f7281317 	358.17362847 ETH	0.0026
 0x35c59f46873dadcf...	Transfer	13697262	555 days 6 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0063
 0xe4eafff0292cd96fc...	Transfer	13697236	555 days 6 hrs ago	0xa8c2bC...f7281317 	 Centre: USD Coin 	0 ETH	0.0063
 0xfa3405767fb80f498...	Transfer	13515728	583 days 21 hrs ago	0xa8c2bC...f7281317 	 boneheads.eth 	16.9 ETH	0.0033

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 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

Transactions

For [0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317](#)

A total of 123 transactions found

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xb43a290a7feddbf0...	Transfer	13475306	590 days 5 hrs ago	 boneheads.eth 	 0xa8c2bC...f7281317 	5.45 ETH	0.0016107
 0x816c70444ce99a19...	Transfer	13475301	590 days 5 hrs ago	 ivybone.eth 	 0xa8c2bC...f7281317 	4.5 ETH	0.00183563
 0x2309b9b00b08f918...	Transfer	13170160	637 days 19 hrs ago	0xa8c2bC...f7281317 	  boneheads.eth 	7 ETH	0.001785
 0x3cd983a69f3c61b33...	Transfer	13166724	638 days 7 hrs ago	0xa8c2bC...f7281317 	  Centre: USD Coin 	0 ETH	0.01319062
 0xc638ddf3df7d4492d...	Transfer	13164136	638 days 17 hrs ago	0xa8c2bC...f7281317 	  Centre: USD Coin 	0 ETH	0.00780937
 0x8f810983287651d7c...	Transfer	13164075	638 days 17 hrs ago	0xa8c2bC...f7281317 	  Centre: USD Coin 	0 ETH	0.00879375
 0x50377ccfc2638e69b...	Transfer	13164042	638 days 17 hrs ago	0xa8c2bC...f7281317 	  Centre: USD Coin 	0 ETH	0.0076125
 0x4455db4ea2a570e8...	Exact Input	13164042	638 days 17 hrs ago	0xa8c2bC...f7281317 	  Uniswap V3: Router 	15 ETH	0.01857609
 0x76ee71ef8c970d8bc...	Exact Input Si...	13163876	638 days 18 hrs ago	0xa8c2bC...f7281317 	  Uniswap V3: Router 	20 ETH	0.01221177
 0x656cec90ba84f8103...	Exact Input	13163628	638 days 19 hrs ago	0xa8c2bC...f7281317 	  Uniswap V3: Router 	50 ETH	0.01786039

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xd0cc787d66048d72...	Exact Input	13163628	638 days 19 hrs ago	0xa8c2bC...f7281317 	OUT Uniswap V3: Router 	50 ETH	0.02091393
 0xcd063410d1bf1cbc8...	Exact Input	13163628	638 days 19 hrs ago	0xa8c2bC...f7281317 	OUT Uniswap V3: Router 	50 ETH	0.01879515
 0x88d380a4091a2878...	Exact Input Si...	13163622	638 days 19 hrs ago	0xa8c2bC...f7281317 	OUT Uniswap V3: Router 	50 ETH	0.01297215
 0xf5eae6cb6f2b83600...	Exact Input Si...	13163619	638 days 19 hrs ago	0xa8c2bC...f7281317 	OUT Uniswap V3: Router 	50 ETH	0.01335495
 0x3400c340147be99c...	Exact Input Si...	13163494	638 days 19 hrs ago	0xa8c2bC...f7281317 	OUT Uniswap V3: Router 	46 ETH	0.0315365
 0x15d08f1ce6130db91...	Exact Input	13163431	638 days 19 hrs ago	0xa8c2bC...f7281317 	OUT Uniswap V3: Router 	46 ETH	0.02906775
 0x9c2ad07717e796f42...	Exact Input	13163419	638 days 20 hrs ago	0xa8c2bC...f7281317 	OUT Uniswap V3: Router 	0.5 ETH	0.02059349
 0x5780bcfd00dfcab7a...	Transfer	13156688	639 days 20 hrs ago	0xa8c2bC...f7281317 	OUT 0xC59Ef9...Ee2e8620 	25.358124104 ETH	0.0029715
 0xe1c1ccae0e2f71945...	Transfer	13153164	640 days 9 hrs ago	 boneheads.eth 	IN 0xa8c2bC...f7281317 	63.046296156 ETH	0.00922627
 0xecf25c48b96da5d03...	Transfer	13150694	640 days 18 hrs ago	 boneheads.eth 	IN 0xa8c2bC...f7281317 	65.533204363 ETH	0.00250977
 0xa3d3f3dc5e377ef96...	Transfer	13150662	640 days 19 hrs ago	 boneheads.eth 	IN 0xa8c2bC...f7281317 	262.115640178 ETH	0.00191234
 0xfa5589312c39484a8...	Transfer	13150658	640 days 19 hrs ago	 boneheads.eth 	IN 0xa8c2bC...f7281317 	26.211564017 ETH	0.00210737
 0x2681983d4a854f97...	Transfer	13150413	640 days 20 hrs ago	 boneheads.eth 	IN 0xa8c2bC...f7281317 	0.3 ETH	0.00407257

Show: Records

💡 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BH”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____










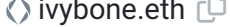





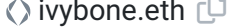





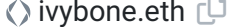





























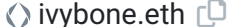





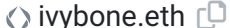




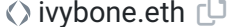







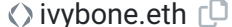




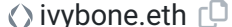







Commissioner of Oaths in and for Ontario





























































Transactions































































For [0xa1e43fcb51656354931d47458eceedbc6545df57](#) ivybone.eth












































































A total of 98 transactions found






















































































Txn Hash	Method	Block	Age	From	To	Value	Txn F
0x878c67c8d85a8495...	Transfer	16772237	91 days 1 hr ago	ivybone.eth	0xa8c2bc...f7281317	6 ETH	0.000
0x53654a7ced14b833...	Withdraw	16772234	91 days 1 hr ago	ivybone.eth	Wrapped Ether	0 ETH	0.001
0x2838954fe4d41736c...	0x00000000	16772230	91 days 1 hr ago	ivybone.eth	Seaport 1.4	0 ETH	0.005
0x8dab76739bb14d6b...	Match Advanc...	16772224	91 days 1 hr ago	ivybone.eth	Seaport 1.4	0 ETH	0.008
0xe59b9bbadbb41cbd...	Match Advanc...	16772220	91 days 1 hr ago	ivybone.eth	Seaport 1.4	0 ETH	0.010
0xa11d002637552c36...	Transfer	16772128	91 days 2 hrs ago	ivybone.eth	0xa8c2bc...f7281317	3.6 ETH	0.000
0xbf5254f7cced9030...	Swap	16772100	91 days 2 hrs ago	ivybone.eth	Metamask: Swap Router	0 ETH	0.007
0xcc096356f7c94c60c...	Transfer	16772092	91 days 2 hrs ago	ivybone.eth	0xE66F9e...Aa8b82aC	15.25 ETH	0.002
0x069fd7dd5178e1d0a...	Withdraw	16772075	91 days 2 hrs ago	ivybone.eth	Wrapped Ether	0 ETH	0.001
0x2555687f70804278...	Match Advanc...	16772056	91 days 2 hrs ago	ivybone.eth	Seaport 1.4	0 ETH	0.014


































































 Txn Hash	Method 	Block	Age	From	To	Value	Txn F
 0x50663c3444865a98f...	Set Approval ...	16771995	91 days 2 hrs ago	 ivybone.eth 	  The Otherside: OTHR T... 	0 ETH	0.002
 0x0e9e8927ff89723db...	Transfer	16727253	97 days 9 hrs ago	 ivybone.eth 	  Centre: USD Coin 	0 ETH	0.001
 0x0a03e3c68232c10e...	Swap	16727250	97 days 9 hrs ago	 ivybone.eth 	  Metamask: Swap Router 	0 ETH	0.004
 0x8e9ed63d940dcf2e5...	Withdraw	15778878	229 days 22 hrs ago	 ivybone.eth 	  Wrapped Ether 	0 ETH	0.000
 0x7eabbbc9a1cc8d93...	Fulfill Advanc...	15778858	229 days 22 hrs ago	 ivybone.eth 	  Seaport 1.1 	0 ETH	0.003
 0xcf8081fdfe31d0d8d...	Approve	15778857	229 days 22 hrs ago	 ivybone.eth 	  Wrapped Ether 	0 ETH	0.000
 0xab0b8255c5142002...	Cancel	15778855	229 days 22 hrs ago	 ivybone.eth 	  Seaport 1.1 	0 ETH	0.000
 0xfa158aad50f740825...	Set Approval ...	15778849	229 days 22 hrs ago	 ivybone.eth 	  Non Fungible Tools Lif... 	0 ETH	0.000
 0xc0d4f0fd5bc50dea8...	Transfer	15732233	236 days 10 hrs ago	 ivybone.eth 	  Apecoin: APE Token 	0 ETH	0.000
 0xbee5790a39100731f...	Transfer	15409444	284 days 10 hrs ago	 ivybone.eth 	 0xa8c2bC...f7281317 	0.2 ETH	0.000
 0x99610ee568a088bc...	Transfer	14831606	378 days 3 hrs ago	 ivybone.eth 	 0xa8c2bC...f7281317 	23.25 ETH	0.000
 0x337fea71b92a5c3bf...	Transfer	14713787	397 days 44 mins ago	 praisegod.eth 	  ivybone.eth 	0.071285111 ETH	0.000
 0x007dd57e73c525aaf...	Transfer	14693578	400 days 5 hrs ago	0x15F821...8e60e907 	  ivybone.eth 	0.99015533 ETH	0.001
 0x9a44b33fda84c16af...	Transfer	14692668	400 days 8 hrs ago	 prismo.eth 	  ivybone.eth 	0.63 ETH	0.001















 Txn Hash	Method 	Block	Age	From	To	Value	Txn F
 0xf5c06b3af0226848f...	Atomic Match_	14690658	400 days 16 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	18.67 ETH	0.015
 0x38cc3a4abe92c8b0...	Swap	14690646	400 days 16 hrs ago	 ivybone.eth	 OUT  Metamask: Swap Router	0 ETH	0.047
 0x6ad94b5eca1e997ff...	Atomic Match_	14690639	400 days 16 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	17.99 ETH	0.021
 0xf1a61949cc6427574...	Swap	14690636	400 days 16 hrs ago	 ivybone.eth	 OUT  Metamask: Swap Router	0 ETH	0.017
 0xa71ea7b78984df77b...	Approve	14690636	400 days 16 hrs ago	 ivybone.eth	 OUT  Apecoin: APE Token	0 ETH	0.004
 0x9fad3023ccac9faa1...	Cancel Order_	14690633	400 days 16 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.005
 0x450a60e92c0cc4e5...	Atomic Match_	14690630	400 days 16 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.017
 0x4e4d49c4d289a1e1...	Cancel Order_	14690620	400 days 16 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.006
 0xd3456de91123f6904...	Cancel Order_	14690131	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.017
 0xb8dc192322ff03217...	Cancel Order_	14690131	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.017
 0xe6a1db411cc93b7e...	Cancel Order_	14690130	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.015
 0x2c75fe39b4a151725...	Cancel Order_	14690127	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.018
  0xafb056aba65c5fd8e...	Atomic Match_	14690066	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.017
  0x122487802084cd24...	Atomic Match_	14690062	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.020

 Txn Hash	Method 	Block	Age	From	To	Value	Txn F
 0x46eb2ae2d570a26fa...	Atomic Match_	14690027	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.043
 0xcff5bc2355b0d533f...	Atomic Match_	14690024	400 days 18 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.048
 0x4d404fcea9a7f5309...	Transfer	14690001	400 days 19 hrs ago	 0xbAF331...E2Da3C85	 IN  ivybone.eth	0.1 ETH	0.005
 0x3b0ad277f49128a95...	Transfer	14689999	400 days 19 hrs ago	 0x3acEf2...87dda4fa	 IN  ivybone.eth	0.88381078 ETH	0.004
 0x2cb5685fe79503504...	Transfer	14689996	400 days 19 hrs ago	 boneheads.eth	 IN  ivybone.eth	0.6 ETH	0.005
 0xb98fb44dad5c00c7f...	Transfer	14689993	400 days 19 hrs ago	 0xbAF331...E2Da3C85	 IN  ivybone.eth	2.2 ETH	0.005
 0xe81df3f880e19737b...	Cancel Order_	14689972	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.028
  0x59d7546c1fd95d4d4...	Atomic Match_	14689963	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.023
  0x531274bccdf64b1af...	Atomic Match_	14689963	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.023
  0x46efcf0e9a9839f15...	Atomic Match_	14689960	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.023
  0x828c95defe45ec19d...	Atomic Match_	14689952	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.022
 0x1b84fdc05e42a755d...	Cancel Order_	14689929	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.026
 0x4a02698b2ccf2bd82...	Cancel Order_	14689928	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.023
 0xbc14e657325c84d9...	Cancel Order_	14689928	400 days 19 hrs ago	 ivybone.eth	 OUT  OpenSea: Wyvern Exch...	0 ETH	0.023

 Txn Hash	Method 	Block	Age	From	To	Value	Txn F
 0x5416865985cdbcf17...	Atomic Match_	14689917	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.073
 0x245e19c8434621a4...	Atomic Match_	14689839	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.096
  0x98ef37c9ac489a948...	Atomic Match_	14689838	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.026
 0x604d504361abb253...	Atomic Match_	14689834	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.088
 0xd9dafa292d041f2b8...	Atomic Match_	14689816	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.116
  0x4fd81029e567db8fd...	Atomic Match_	14689814	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.035
 0xb03baaa2a82ba508...	Atomic Match_	14689812	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.123
  0x056482ff88c7be962...	Atomic Match_	14689810	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.034
 0xeac6a5df214c392ae...	Atomic Match_	14689809	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.111
 0x229ccaf4fd19efeddd...	Atomic Match_	14689804	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.102
 0x7e590a64b12bc55c...	Atomic Match_	14689802	400 days 19 hrs ago	 ivybone.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.109
 0x328b15f8b5eba6206...	Approve	14689781	400 days 19 hrs ago	 ivybone.eth 	 Apecoin: APE Token 	0 ETH	0.021
 0x0ccfb1bc784e94d6...	Transfer	14689600	400 days 20 hrs ago	0xa8c2bC...f7281317 	  ivybone.eth 	5 ETH	0.081
 0xca0fe7fe03e32ad99f...	Transfer From	14220224	474 days 12 mins ago	 ivybone.eth 	 Jadu Hoverboard: Hov... 	0 ETH	0.005

 Txn Hash	Method 	Block	Age	From	To	Value	Txn F
 0x8ddc9ad29c6aa86d...	Transfer	14220216	474 days 13 mins ago	 boneheads.eth 	  ivybone.eth 	0.05 ETH	0.001
 0x31b62909367d51d8...	Transfer	13672211	559 days 6 hrs ago	 ivybone.eth 	  boneheads.eth 	0.007378601 ETH	0.002
 0x33e7b33d39e9b59a...	Transfer	13583883	573 days 5 hrs ago	 ivybone.eth 	  Index Protocol: INDEX ... 	0 ETH	0.008
 0x01f5628d7d2da9f82...	Transfer	13583883	573 days 5 hrs ago	 ivybone.eth 	  Index Protocol: Metave... 	0 ETH	0.008
 0x964b1e2165c73e89...	Transfer	13583848	573 days 5 hrs ago	 ivybone.eth 	  ENS: ENS Token 	0 ETH	0.006
 0x167e74e535828a39...	Claim Tokens	13583811	573 days 5 hrs ago	 ivybone.eth 	  ENS: ENS Token 	0 ETH	0.025
 0xa425cdcaf57580f12...	Set Owner	13583480	573 days 6 hrs ago	 ivybone.eth 	  ENS: Registry with Fall... 	0 ETH	0.004
 0x4a0fd2984c718ed70...	Transfer	13583471	573 days 6 hrs ago	 boneheads.eth 	  ivybone.eth 	0.063057136 ETH	0.003
 0x64c9b72b46a3adf84...	Transfer	13515555	583 days 22 hrs ago	 ivybone.eth 	  boneheads.eth 	0.021985147 ETH	0.003
 0xbd6adcffb87ead797...	Transfer From	13515539	583 days 22 hrs ago	 ivybone.eth 	  Bored Ape Yacht Club: ... 	0 ETH	0.016
 0x816c70444ce99a19...	Transfer	13475301	590 days 6 hrs ago	 ivybone.eth 	 0xa8c2bC...f7281317 	4.5 ETH	0.001
 0x90e3424705346524...	Safe Transfer ...	13475289	590 days 6 hrs ago	 ivybone.eth 	  ENS: Base Registrar Im... 	0 ETH	0.004
 0x2e48a877248c57b3...	Safe Transfer ...	13475289	590 days 6 hrs ago	 ivybone.eth 	  ENS: Base Registrar Im... 	0 ETH	0.006
 0xafc7bcf45f835707a...	Commit	13475287	590 days 6 hrs ago	 ivybone.eth 	  ENS: Old ETH Registrar... 	0 ETH	0.003

 Txn Hash	Method 	Block	Age	From	To	Value	Txn F
  0x6beed38e88edf85f2...	Mint	13475283	590 days 6 hrs ago	 ivybone.eth	 Doodles: DOODLE Token 	0.615 ETH	0.001
  0x6e717385d97e920d...	Mint	13439224	595 days 21 hrs ago	 ivybone.eth	 Doodles: DOODLE Token 	0.615 ETH	0.002
  0xbfce3358ea4663fb5...	Mint	13439224	595 days 21 hrs ago	 ivybone.eth	 Doodles: DOODLE Token 	0.615 ETH	0.002
  0x1ad4705cc6efc935b...	Mint	13439224	595 days 21 hrs ago	 ivybone.eth	 Doodles: DOODLE Token 	0.615 ETH	0.002
  0x61a6b4d8b3089a36...	Mint	13439224	595 days 21 hrs ago	 ivybone.eth	 Doodles: DOODLE Token 	0.615 ETH	0.002
 0xf6bff1f236c20d0871...	Transfer	13439104	595 days 21 hrs ago	 ivybone.eth	 ivybone.eth 	0 ETH	0.092
 0xd39a60ba0d1515ad...	Transfer	13439038	595 days 22 hrs ago	 ivybone.eth	 ticasso.eth 	0.25 ETH	0.001
 0x481230f1faf35045c...	Transfer	13439035	595 days 22 hrs ago	 ivybone.eth	 ticasso.eth 	1 ETH	0.001
 0x5e34200ab1511d1a...	Register With ...	13430122	597 days 7 hrs ago	 ivybone.eth	 ENS: Old ETH Registrar... 	0.014085245 ETH	0.017
 0xacba75b532338390...	Commit	13430106	597 days 7 hrs ago	 ivybone.eth	 ENS: Old ETH Registrar... 	0 ETH	0.003
 0x4e4ebf2e01cb70542...	Transfer	13430095	597 days 7 hrs ago	 boneheads.eth 	 ivybone.eth 	5 ETH	0.001
 0xdb9f3bc894eedba25...	Multiplex Batc...	13418452	599 days 3 hrs ago	 ivybone.eth	 0x: Exchange Proxy 	13.222 ETH	0.055
 0xb810ed2984c9682d...	Transfer	13418433	599 days 3 hrs ago	 boneheads.eth 	 ivybone.eth 	13.257851962 ETH	0.003
 0x86cf70972738e467c...	Approve	13416627	599 days 10 hrs ago	 ivybone.eth	 Uniswap V2: MVI 	0 ETH	0.004

 Txn Hash	Method 	Block	Age	From	To	Value	Txn F
 0xe67642c2db09c518...	Sell To Uniswap	13416597	599 days 10 hrs ago	 ivybone.eth	 OUT 0x: Exchange Proxy	4 ETH	0.014
 0xbd496d60da527540...	Set Name	13341325	611 days 6 hrs ago	 ivybone.eth	 OUT ENS: Old Reverse Regis...	0 ETH	0.007
 0xa4bdad733126a3c9...	Set Addr	13341323	611 days 6 hrs ago	 ivybone.eth	 OUT ENS: Public Resolver 2	0 ETH	0.002
 0x1ff1418e4bca156ca...	Transfer	13341320	611 days 6 hrs ago	 boneheads.eth	 IN ivybone.eth	5 ETH	0.000

Show: Records

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 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BI”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

































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Commissioner of Oaths in and for Ontario



























































Transactions













































For [0x3acef2d359f430cee5e205262a884d6087dda4fa](#)

A total of 48 transactions found

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x757c0b9e94e4b180...	Transfer	15732243	236 days 11 hrs ago	0x3acEf2...87dda4fa 	OUT boneheads.eth 	0.076975721 ETH	0.00035564
 0x9b2e09c0e31b76c7...	Withdraw	15732236	236 days 11 hrs ago	0x3acEf2...87dda4fa 	OUT Wrapped Ether 	0 ETH	0.00061573
 0x975e17f1739b504ac...	Transfer	15409444	284 days 10 hrs ago	0x3acEf2...87dda4fa 	OUT 0xa8c2bC...f7281317 	0.45 ETH	0.00029052
 0x282e34cc8fe251d0e...	Transfer	15230840	312 days 12 hrs ago	0x0B7a43...A4173B22 	IN 0x3acEf2...87dda4fa 	0.04196 ETH	0.000294
 0x637abdd3e3feaad93...	Transfer	15116589	330 days 5 hrs ago	0x0B7a43...A4173B22 	IN 0x3acEf2...87dda4fa 	0.058955922 ETH	0.00057388
 0xf385e1ad25fa03f09...	Transfer	14818070	380 days 9 hrs ago	0x0B7a43...A4173B22 	IN 0x3acEf2...87dda4fa 	0.0407995 ETH	0.0005202
 0x80687ccfcdeb6a037...	Transfer	14730155	394 days 10 hrs ago	0x0B7a43...A4173B22 	IN 0x3acEf2...87dda4fa 	0.0504 ETH	0.00074179
 0xda282833689878eb...	Transfer	14700469	399 days 4 hrs ago	0x0B7a43...A4173B22 	IN 0x3acEf2...87dda4fa 	0.02311 ETH	0.00167297
 0x3b0ad277f49128a95...	Transfer	14689999	400 days 19 hrs ago	0x3acEf2...87dda4fa 	OUT ivybone.eth 	0.88381078 ETH	0.0049599
 0xb56affb1100017a4f...	Withdraw	14689989	400 days 19 hrs ago	0x3acEf2...87dda4fa 	OUT Wrapped Ether 	0 ETH	0.00809699

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x514d41c8a60743b5...	Transfer	14615582	412 days 11 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.032765 ETH	0.00072138
 0xc87f7219fb5310ec6...	Transfer	14547482	423 days 3 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.0267895 ETH	0.00106733
 0xe978cd01b4aa234b...	Transfer	14516927	427 days 21 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.03815 ETH	0.00172432
 0xbd1894484b99109c...	Transfer	14422910	442 days 13 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.0344595 ETH	0.00039289
 0x2de4cb49033ba833...	Transfer	14390671	447 days 14 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.055735 ETH	0.00055287
 0xcbe5c059ecfc72abe...	Transfer	14339714	455 days 12 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.03208 ETH	0.00071895
 0xdb705ab6fbfe1ed83...	Transfer	14313303	459 days 14 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.1735455 ETH	0.00063712
 0x45aa01a443553f82b...	Transfer	14265106	467 days 2 hrs ago	0x3acEf2...87dda4fa 	 boneheads.eth 	0.124347308 ETH	0.00352797
 0x9c5282cff7c47fcd48...	Transfer	14259194	467 days 23 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.02745 ETH	0.001848
 0xfbcd2ee93d3d26fc8...	Transfer	14218961	474 days 5 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.0302995 ETH	0.00317749
 0xda471a682eca9da7...	Transfer	14180037	480 days 5 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.069955 ETH	0.00215503
 0xe34ae6fc88d6878d8...	Transfer	14128680	488 days 4 hrs ago	0x3acEf2...87dda4fa 	 boneheads.eth 	0.060003665 ETH	0.0044462
 0x879bbbe1f62361ad7...	Transfer	14112695	490 days 15 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.0646245 ETH	0.00160607
 0x46458afaa62f1d3bc...	Transfer	14045195	501 days 2 hrs ago	0x3acEf2...87dda4fa 	 boneheads.eth 	0.918691399 ETH	0.00415268

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xff09b88edffdb770d3...	Transfer	14039482	501 days 23 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.459295 ETH	0.00214504
 0xd2bdbb17d7f91261...	Transfer	13981751	510 days 21 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.461265 ETH	0.00481281
 0x9917e6ad33613386...	Deposit	13955698	514 days 22 hrs ago	0x3acEf2...87dda4fa 	 Wrapped Ether 	0.504586576 ETH	0.00719634
 0x56113f51399e2e68a...	Transfer	13931111	518 days 17 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.514339472 ETH	0.00159055
 0xb63521d9cc620931...	Transfer	13894239	524 days 10 hrs ago	0x3acEf2...87dda4fa 	 boneheads.eth 	0.056505701 ETH	0.00139563
 0xbc82c3a641db772d...	Transfer	13893954	524 days 11 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.03690012 ETH	0.00218919
 0x4028f243005c9ad64...	Transfer	13867416	528 days 14 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.0211 ETH	0.00087081
 0x209760eea5fe3d4cd...	Transfer	13857863	530 days 1 hr ago	0x3acEf2...87dda4fa 	 boneheads.eth 	0.188620132 ETH	0.0022528
 0x0473cc0d5db96ea4...	Transfer	13808502	537 days 16 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.02209 ETH	0.00155646
 0xd6840143f14dec1a6...	Transfer	13777654	542 days 11 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.03646 ETH	0.00159398
 0x802758c3b478b19c...	Transfer	13735443	549 days 5 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.049769 ETH	0.0018783
 0x3888d4b9837340d5...	Transfer	13685123	557 days 6 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.08223 ETH	0.00233103
 0xd966e8e238d45977...	Transfer	13672198	559 days 7 hrs ago	0x3acEf2...87dda4fa 	 boneheads.eth 	2.420333592 ETH	0.00291026
 0x61d03992de04cba6f...	Buy	13667775	559 days 23 hrs ago	0x3acEf2...87dda4fa 	 BaboonBet: BBET Token 	5 ETH	2.24448418

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x1369a96357017c73...	Buy	13667770	559 days 23 hrs ago	0x3acEf2...87dda4fa 	 BaboonBet: BBET Token 	2.5 ETH	0.86836873
 0xe337cc80f3d736615...	Transfer	13667757	559 days 23 hrs ago	 boneheads.eth 	 0x3acEf2...87dda4fa 	10 ETH	0.00324263
 0x6ca0ea405ede1927...	Buy	13667710	560 days 8 mins ago	0x3acEf2...87dda4fa 	 BaboonBet: BBET Token 	2.5 ETH	1.13157211
 0xffe319aa32d464059...	Transfer	13667705	560 days 9 mins ago	 boneheads.eth 	 0x3acEf2...87dda4fa 	5 ETH	0.00339943
 0xdef743b07e48f4ead...	Transfer	13629913	565 days 23 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.16708 ETH	0.003024
 0x14e42d6e734edd8c...	Transfer	13589095	572 days 10 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.1951 ETH	0.00278955
 0x92840dc5c86f24aec...	Transfer	13537574	580 days 12 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	0.0952 ETH	0.00280348
 0xec460e0490702527...	Transfer	13515619	583 days 23 hrs ago	0x3acEf2...87dda4fa 	 bonestars.eth 	0.03 ETH	0.0026574
 0x3a38f2697d282338...	Transfer	13515604	583 days 23 hrs ago	0x3acEf2...87dda4fa 	 bonestar.eth 	0.15 ETH	0.00278139
 0xc5c751c2234b2034...	Transfer	13499328	586 days 12 hrs ago	0x0B7a43...A4173B22 	 0x3acEf2...87dda4fa 	1.39619995 ETH	0.0020229

Show: Records

[Download: [CSV Export](#) ]

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BJ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0xbAF331F090320502380EA975562c0c72E2Da3C85



Buy ▾

Exchange ▾

Play ▾

Gaming ▾



More ▾

Overview

ETH BALANCE

0.000130320919638 ETH

ETH VALUE

\$0.24 (@ \$1,811.56/ETH)

More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

0x00235ebd207a... from 236 days 11 hrs ago

FIRST TXN SENT

0x83ec7f251abe6... from 583 days 22 hrs ago

Multi Chain

MULTICHAIN ADDRESSES

1 address found via Blockscan ▾

Transactions

Internal Transactions

Token Transfers (ERC-20)

NFT Transfers

Analytics

Comments





















Latest 21 from a total of 21 transactions

Advanced Filter




Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0x00235ebd207aa4f52...	Transfer	15732286	236 days 11 hrs ago	0xbAF331...E2Da3C85	BONEHEADS: Deployer	0.08636792 ETH	0.00036551

Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0x466da17442f94a013...	Bulk Transfer	15732283	236 days 11 hrs ago	0xbAF331...E2Da3C85	OUT OpenSea: Transfer H...	0 ETH	0.00630209
0x8be77df9daf53b370...	Set Approval ...	15732281	236 days 11 hrs ago	0xbAF331...E2Da3C85	OUT Doodles: GBOX Token	0 ETH	0.00086376
0x4e4e3ad99b9342d6...	Transfer	15368935	290 days 21 hrs ago	0xbAF331...E2Da3C85	OUT 0xa8c2bC...f7281317	22 ETH	0.00017457
0x4c8a5c6c27b9c841...	Bid	15052639	340 days 3 hrs ago	0xbAF331...E2Da3C85	OUT Doodles: GBOX Token	5 ETH	0.00128056
0xdede71aa49bf7df29...	Transfer	14870432	371 days 20 hrs ago	0xF38269...73C940fc	IN 0xbAF331...E2Da3C85	8 ETH	0.0007917
0x038780b173dde936...	Transfer	14870363	371 days 20 hrs ago	0xF38269...73C940fc	IN 0xbAF331...E2Da3C85	18.6 ETH	0.00084
0x1044bc6158626635...	Transfer	14870230	371 days 21 hrs ago	0xF38269...73C940fc	IN 0xbAF331...E2Da3C85	0.05318243 ETH	0.0009576
0x4d404fcea9a7f5309...	Transfer	14690001	400 days 19 hrs ago	0xbAF331...E2Da3C85	OUT ivybone.eth	0.1 ETH	0.00527207
0xb98fb44dad5c00c7f...	Transfer	14689993	400 days 19 hrs ago	0xbAF331...E2Da3C85	OUT ivybone.eth	2.2 ETH	0.00511087
0x7519c63617ee2a23...	Transfer	14502137	430 days 5 hrs ago	0xbAF331...E2Da3C85	OUT 0xF38269...73C940fc	20.17750438 ETH	0.00143066
0xa5e3a0a2add812d9...	Transfer	14502129	430 days 5 hrs ago	0xa8c2bC...f7281317	IN 0xbAF331...E2Da3C85	20.21030263 ETH	0.00162457
0xa0e9d63bdd91640d...	Transfer	14425392	442 days 4 hrs ago	0xbAF331...E2Da3C85	OUT 0xF38269...73C940fc	25.85 ETH	0.00057413
0x185fa63d7408849d...	Transfer	14425388	442 days 4 hrs ago	0xbAF331...E2Da3C85	OUT 0xF38269...73C940fc	25.85 ETH	0.00051945
0x0cb80ca03beb2d77f...	Transfer	14425370	442 days 4 hrs ago	0xbAF331...E2Da3C85	OUT 0xF38269...73C940fc	1 ETH	0.00070343

 Transaction Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x14635f720e6420e48...	Transfer	14425178	442 days 5 hrs ago	0xa8c2bC...f7281317 	IN 0xbAF331...E2Da3C85 	55 ETH	0.0007238
 0xc2a4d39fbbdfac95fc...	Transfer	13672205	559 days 7 hrs ago	0xbAF331...E2Da3C85 	OUT BONEHEADS: Deployer 	0.21001781 ETH	0.00275758
 0x2bed9188aad5b88fe...	Transfer	13583428	573 days 7 hrs ago	BONEHEADS: Deployer 	IN 0xbAF331...E2Da3C85 	0.21053606 ETH	0.00322067
 0xd1ec087330798020...	Transfer	13579791	573 days 21 hrs ago	0xbAF331...E2Da3C85 	OUT BONEHEADS: Deployer 	0.004173 ETH	0.00334901
 0x83ec7f251abe6c6c8...	Transfer From	13515802	583 days 22 hrs ago	0xbAF331...E2Da3C85 	OUT Mutant Ape Yacht Cl... 	0 ETH	0.01294398
 0xbf06da00a28690e1f...	Transfer	13515788	583 days 22 hrs ago	BONEHEADS: Deployer 	IN 0xbAF331...E2Da3C85 	0.0229629 ETH	0.00366898

[Download: [CSV Export](#) ]

 A wallet address is a publicly available address that allows its owner to receive funds from another party. To access the funds in an address, you must have its private key. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “BK”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

blockbone.eth ⓘ

☆ More ▾

Overview

ETH BALANCE

0.006483073233533152 ETH

ETH VALUE

\$11.74 (@ \$1,811.53/ETH)

More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

0x05ddfe5efb1db... from 474 days 49 mins ago

FIRST TXN SENT

0x2b5313536b9f9... from 573 days 21 hrs ago

Multi Chain

MULTICHAIN ADDRESSES

1 address found via Blockscan ▾

Transactions

Token Transfers (ERC-20)

NFT Transfers

Analytics

Comments

Latest 10 from a total of 10 transactions

Advanced Filter



Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0x05ddfe5efb1dba1e6...	Transfer From	14220269	474 days 49 mins ago	blockbone.eth	Jadu Hoverboard: H...	0 ETH	0.00383031
0xae59c802cbdadfd...	Transfer	14220260	474 days 50 mins ago	BONEHEADS: Deployer	blockbone.eth	0.01 ETH	0.00101658
0x3f0c71c4c18548dcd...	Transfer	13672203	559 days 7 hrs ago	blockbone.eth	BONEHEADS: Deployer	0.09876659 ETH	0.00285832
0xb3a3f0eb8a14152ed...	Set Name	13583584	573 days 7 hrs ago	blockbone.eth	ENS: Old Reverse Re...	0 ETH	0.02108805
0xadbeca42ed9bd3c3...	Transfer	13583547	573 days 7 hrs ago	blockbone.eth	bonestar.eth	0.03147015 ETH	0.00389289
0x91e10e9047d38e93...	Transfer	13583532	573 days 7 hrs ago	bonestar.eth	blockbone.eth	0.13954942 ETH	0.00397629
0x2a51373fe7908203b...	Set Addr	13583512	573 days 7 hrs ago	blockbone.eth	ENS: Public Resolver 2	0 ETH	0.00693386
0xa89b7a7dd409b9fc3...	Transfer	13583505	573 days 7 hrs ago	BONEHEADS: Deployer	blockbone.eth	0.02101635 ETH	0.00314671
0x2b5313536b9f943bc...	Transfer From	13579842	573 days 21 hrs ago	blockbone.eth	Bored Ape Yacht Clu...	0 ETH	0.0161161
0x142d1abe24ab9fc4f...	Transfer	13579803	573 days 21 hrs ago	BONEHEADS: Deployer	blockbone.eth	0.0208736 ETH	0.00353307

[Download: [CSV Export](#)]

A wallet address is a publicly available address that allows its owner to receive funds from another party. To access the funds in an address, you must have its private key. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “BL”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario


















































































Transactions





























































For [0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147](#) ticasso.eth









































































A total of 218 transactions found











































































First < Page 1 of 3 > Last










































































Txn Hash	Method	Block	Age	From	To	Value	Txn Fee
0xf5c1dd9d94dacda99...	Claim	14905434	366 days 3 hrs ago	ticasso.eth	Fear City: FEARCITY To...	0.1554 ETH	0.006520
0xbd22b5898fbc126fa...	Multicall	14900490	366 days 23 hrs ago	ticasso.eth	Uniswap V3: Router 2	0 ETH	0.007590
0x7d13c7eb9dbe8aafd...	Approve	14900487	366 days 23 hrs ago	ticasso.eth	Apecoin: APE Token	0 ETH	0.003110
0x2af88b05ce62e7857...	Transfer	14900457	366 days 23 hrs ago	0x15F821...8e60e907	ticasso.eth	0.020897641 ETH	0.001460
0x8fb53182adebd2196...	Swap	14693689	400 days 5 hrs ago	ticasso.eth	Metamask: Swap Router	0.27 ETH	0.007480
0xf46e7e7e57680a659...	Withdraw	14472120	434 days 21 hrs ago	ticasso.eth	Wrapped Ether	0 ETH	0.001150
0xcbec20d813e6705d...	Transfer	14316470	459 days 3 hrs ago	0xDf3285...177a83b3	ticasso.eth	0.045 ETH	0.000670
0x56379e13153c4473...	Transfer	14316467	459 days 3 hrs ago	0x15F821...8e60e907	ticasso.eth	0.04 ETH	0.000880
0x8a3e6880f834f32ba...	Multicall	14308530	460 days 8 hrs ago	ticasso.eth	Uniswap V3: Router 2	0.08 ETH	0.011570
0xb523a2ab2c408a89...	Set Approval ...	14288926	463 days 9 hrs ago	ticasso.eth	The Doggies: TD Token	0 ETH	0.001100









































































 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xe58e261031144f4d7...	Transfer From	14275977	465 days 9 hrs ago	 ticasso.eth 	  Jadu Hoverboard: Hov... 	0 ETH	0.00739
 0xd13a51b1c63b1b9d...	Transfer	14275889	465 days 10 hrs ago	 ticasso.eth 	 0xDf3285...177a83b3 	0.05 ETH	0.00084
 0xcbacc10d4fae1a125...	Transfer	14275888	465 days 10 hrs ago	 ticasso.eth 	 0x15F821...8e60e907 	0.05 ETH	0.00094
 0xb7c1c111d38493af5...	Transfer	14275883	465 days 10 hrs ago	 boneheads.eth 	  ticasso.eth 	0.1 ETH	0.00102
 0x210749569ac602fd0...	Transfer	14271303	466 days 3 hrs ago	 ticasso.eth 	  The Sandbox: SAND To... 	0 ETH	0.00211
 0x92f96c46f1b692d9c...	Transfer From	14265747	466 days 23 hrs ago	 ticasso.eth 	  The Doggies: TD Token 	0 ETH	0.00573
 0x27b74eb64dbb51e4...	Approve And ...	14265005	467 days 2 hrs ago	 ticasso.eth 	  The Sandbox: SAND To... 	0 ETH	0.15336
 0xe592d1e2195598e8f...	Transfer	14264891	467 days 2 hrs ago	 ticasso.eth 	 0xDf3285...177a83b3 	0.4 ETH	0.00165
 0xaf7fa061046c09749...	Transfer	14264887	467 days 2 hrs ago	 ticasso.eth 	 0x15F821...8e60e907 	0.38 ETH	0.00178
 0x39db809ad1e2a6c7...	Transfer	14264885	467 days 2 hrs ago	 ticasso.eth 	  The Sandbox: SAND To... 	0 ETH	0.00410
 0xf206c2792022d7cff...	Transfer	14264884	467 days 2 hrs ago	 ticasso.eth 	  The Sandbox: SAND To... 	0 ETH	0.00365
 0xbdd88a6930b7b93a...	Transfer	14264872	467 days 3 hrs ago	 boneheads.eth 	  ticasso.eth 	1 ETH	0.00172
 0xd162b98423d3f12fe...	Transfer	14258840	468 days 1 hr ago	0x15F821...8e60e907 	  ticasso.eth 	0.1 ETH	0.00237
 0x2c438411f9461429f...	Approve And ...	14258421	468 days 2 hrs ago	 ticasso.eth 	  The Sandbox: SAND To... 	0 ETH	0.07737

































 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x4d855c39e857caf37...	Transfer	14258033	468 days 4 hrs ago	 ticasso.eth 	OUT 0x15F821...8e60e907 	0.2 ETH	0.004876
 0x5efc6a9cbb2153b16...	Atomic Match_	14258019	468 days 4 hrs ago	 ticasso.eth 	OUT OpenSea: Wyvern Exch... 	0.85 ETH	0.022700
 0xa28b66bdd18ec769...	Transfer	14257908	468 days 4 hrs ago	 ticasso.eth 	OUT The Sandbox: SAND To... 	0 ETH	0.004330
 0x3a78e9d54d266452...	Approve	14244971	470 days 4 hrs ago	 ticasso.eth 	OUT Wrapped Ether 	0 ETH	0.001470
 0xbc6b8036f0e7e651d...	Set Approval ...	14244847	470 days 5 hrs ago	 ticasso.eth 	OUT Crypto.Chicks: CCH To... 	0 ETH	0.004260
 0xe852926563585e45...	Set Approval ...	14244741	470 days 5 hrs ago	 ticasso.eth 	OUT Adam Bomb Squad: AB... 	0 ETH	0.002380
 0x46905ad0320742f8...	Transfer From	14220363	474 days 28 mins ago	 ticasso.eth 	OUT Jadu Hoverboard: Hov... 	0 ETH	0.005210
 0xfed34c425621c72e2...	Atomic Match_	14220354	474 days 29 mins ago	 ticasso.eth 	OUT OpenSea: Wyvern Exch... 	0.92 ETH	0.019240
 0x8d17a1e51b4121cb...	Atomic Match_	14220317	474 days 39 mins ago	 ticasso.eth 	OUT OpenSea: Wyvern Exch... 	0.9 ETH	0.022440
 0xb51089a51afd4b8b2...	Transfer	14220312	474 days 41 mins ago	 boneheads.eth 	IN  ticasso.eth 	2 ETH	0.001530
 0x6657eb13099b0588...	Set Approval ...	14220121	474 days 1 hr ago	 ticasso.eth 	OUT CC Time Machine Poti... 	0 ETH	0.003750
 0x2795a4c154d22c0fb...	Claim	14219903	474 days 2 hrs ago	 ticasso.eth 	OUT CC Time Machine Poti... 	0 ETH	0.009690
  0xa92fc4553b3d3ca98...	Cancel Order_	14166393	482 days 8 hrs ago	 ticasso.eth 	OUT OpenSea: Wyvern Exch... 	0 ETH	0.005140
 0x832e7be78867568f6...	Cancel Order_	14166393	482 days 8 hrs ago	 ticasso.eth 	OUT OpenSea: Wyvern Exch... 	0 ETH	0.008100

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xc26d2039cd2980bd...	Cancel Order_	14166391	482 days 8 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00883
 0xb244f763c09d7aa55...	Cancel Order_	14122408	489 days 3 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.01222
 0x2e8c1561f4d654d5a...	Cancel Order_	14110528	490 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00590
 0xc105a0c3b7f526a66...	Cancel Order_	14102558	492 days 5 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00630
 0x7c750f083268ac371...	Cancel Order_	14099134	492 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00762
 0x580b7f35de2d1bec5...	Atomic Match_	14096422	493 days 3 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.29 ETH	0.03119
 0x182cf8c3013f831ec...	Atomic Match_	14096421	493 days 3 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.278 ETH	0.02703
 0xf37e9eb8fbc0a69cd...	Atomic Match_	14096418	493 days 4 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.279 ETH	0.02421
 0x868a4aa9c897d8dfe...	Atomic Match_	14096417	493 days 4 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.278 ETH	0.02212
 0x93c781cd8abeca59...	Atomic Match_	14096412	493 days 4 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.27 ETH	0.02088
 0x97f0708a3c569b7ce...	Atomic Match_	14096400	493 days 4 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.269 ETH	0.02970
 0xcc70211b21cb4b0...	Set Approval ...	14095205	493 days 8 hrs ago	 ticasso.eth 	 ZombieFrens: ZFREN T... 	0 ETH	0.00860
 0x69852809aeaac5df9...	Mint	14095155	493 days 8 hrs ago	 ticasso.eth 	 ZombieFrens: ZFREN T... 	0 ETH	0.07692
 0xe79917e8b14d1f357...	Cancel Order_	14092454	493 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00846

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
  0x91e48f276522f08a4...	Cancel Order_	14092449	493 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00545
 0x74cfce844e5177bd3...	Atomic Match_	14086067	494 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.39 ETH	0.01538
 0xc3a0a0d613353f626...	Atomic Match_	14086058	494 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.38 ETH	0.01752
 0x43c4859aff77aca22...	Atomic Match_	14085969	494 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.339 ETH	0.01845
  0xb97b5c8584b8805d...	Cancel Order_	14085772	494 days 19 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00618
 0xd2041c93dc395edb...	Cancel Order_	14085771	494 days 19 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00866
 0x5e268eeaf174e4b8f...	Cancel Order_	14085771	494 days 19 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.00866
 0x5c75f32b810f4458a...	Atomic Match_	14085303	494 days 21 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.325 ETH	0.02007
 0xa730a8ae560ac3f5e...	Transfer	14085114	494 days 21 hrs ago	 boneheads.eth 	 ticasso.eth 	0.15 ETH	0.00303
 0xb97fe894fcf6664ca3...	Transfer	14078410	495 days 23 hrs ago	 ticasso.eth 	 boneheads.eth 	0.05 ETH	0.00384
 0x8aa98b86665db574...	Atomic Match_	14078289	495 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.275 ETH	0.02325
 0xe7e64eece09f7ed73...	Atomic Match_	14078278	495 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.26 ETH	0.02130
 0xd70ae2a5363ecab5...	Atomic Match_	14078265	495 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.25 ETH	0.02128
 0x09d266e6b650bbdd...	Atomic Match_	14078261	495 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.25 ETH	0.02173

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x263d5997da4a55bb...	Atomic Match_	14078239	495 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.25 ETH	0.021150
 0xbb757efed31ad5360...	Multicall	14078171	495 days 23 hrs ago	 ticasso.eth 	 Uniswap V3: Router 2 	0 ETH	0.016110
 0x650c71d5fe93e51c9...	Approve	14078167	495 days 23 hrs ago	 ticasso.eth 	 LooksRare: LOOKS Tok... 	0 ETH	0.005580
 0x8eac6b8ac9e617c1...	Withdraw All	14078155	495 days 23 hrs ago	 ticasso.eth 	 LooksRare: Fee Sharing 	0 ETH	0.016240
 0xcd8dab52400cd791...	Multicall	14078057	496 days 14 mins ago	 ticasso.eth 	 Uniswap V3: Router 2 	0 ETH	0.015180
 0x7ecb29eedbecf09ed...	Approve	14078055	496 days 15 mins ago	 ticasso.eth 	 The OpenDAO: SOS To... 	0 ETH	0.005730
 0xc1a789139fe7c3a00...	Leave	14077991	496 days 29 mins ago	 ticasso.eth 	 The OpenDAO: Staking ... 	0 ETH	0.007770
 0xc4bce54675744bb6...	Set Approval ...	14077532	496 days 2 hrs ago	 ticasso.eth 	 Crypto.Chicks: CCH To... 	0 ETH	0.004950
  0x867e1f845f38f2a57...	Set Approval ...	14077523	496 days 2 hrs ago	 ticasso.eth 	 Crypto.Chicks: CCH To... 	0 ETH	0.004850
 0x21f090b3a6f119152...	Transfer	14077155	496 days 3 hrs ago	 ticasso.eth 	 boneheads.eth 	0.05 ETH	0.004890
 0x552f4ad87fb4b786b...	Multicall	14076452	496 days 5 hrs ago	 ticasso.eth 	 Uniswap V3: Router 2 	0 ETH	0.018600
 0xf6a9eb365a616847a...	Multicall	14076419	496 days 6 hrs ago	 ticasso.eth 	 Uniswap V3: Router 2 	0.35 ETH	0.022650
 0xddc23a423806ae3df...	Approve	14076282	496 days 6 hrs ago	 ticasso.eth 	 Virtue Poker: VPP Token 	0 ETH	0.008510
 0x062c23cad84c822e...	Multicall	14076216	496 days 6 hrs ago	 ticasso.eth 	 Uniswap V3: Router 2 	0 ETH	0.021440

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x570529973879e791...	Approve	14076213	496 days 6 hrs ago	 ticasso.eth 	 Polkacity: POLC Token 	0 ETH	0.00952
 0xdca5565b8f816bd2e...	Atomic Match_	14066535	497 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.195 ETH	0.01592
 0x8c503dfd0ffdf1ad10...	Withdraw	14066525	497 days 18 hrs ago	 ticasso.eth 	 Wrapped Ether 	0 ETH	0.00313
 0xc09bb6c0f182b8fc3...	Harvest	14066500	497 days 19 hrs ago	 ticasso.eth 	 LooksRare: Fee Sharing 	0 ETH	0.01659
 0xd26e981f904b1d0a6...	Set Name	14046299	500 days 22 hrs ago	 ticasso.eth 	 ENS: Old Reverse Regis... 	0 ETH	0.02194
 0xe4d82750da5f1e764...	Register With ...	14046296	500 days 22 hrs ago	 ticasso.eth 	 ENS: Old ETH Registrar... 	0.018726685 ETH	0.04686
 0xdc0ba783b18745a6...	Commit	14046269	500 days 22 hrs ago	 ticasso.eth 	 ENS: Old ETH Registrar... 	0 ETH	0.00973
 0x47fd3cdbd1627e3ce...	Withdraw	14024515	504 days 6 hrs ago	 ticasso.eth 	 Wrapped Ether 	0 ETH	0.00351
 0x01cf67316adeec314...	Match Ask Wi...	13993142	509 days 3 hrs ago	 ticasso.eth 	 LooksRare: Exchange 	0.134 ETH	0.03426
 0x2315954ebc93ad75...	Mint	13992442	509 days 6 hrs ago	 ticasso.eth 	 Stapleverse Feed Clan: ... 	0.1 ETH	0.01860
 0x07bb11d37cef9867f...	Multicall	13992435	509 days 6 hrs ago	 ticasso.eth 	 Uniswap V3: Router 2 	0 ETH	0.02123
 0x6925d65834f528a0...	Approve	13992430	509 days 6 hrs ago	 ticasso.eth 	 Phantasma: Old SOUL ... 	0 ETH	0.00615
 0x52ae7572590f3c335...	Multicall	13992408	509 days 6 hrs ago	 ticasso.eth 	 Uniswap V3: Router 2 	0 ETH	0.01925
 0x7a19841ee257221a...	Approve	13992360	509 days 6 hrs ago	 ticasso.eth 	 Polkadomain: NAME T... 	0 ETH	0.00757

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xb4810b72b4ddc478...	Deposit	13989575	509 days 16 hrs ago	 ticasso.eth 	 LooksRare: Fee Sharing 	0 ETH	0.02054
 0x76ceed9e9c48aae57...	Approve	13979635	511 days 5 hrs ago	 ticasso.eth 	 LooksRare: LOOKS Tok... 	0 ETH	0.01108
 0xb902592fea269d80b...	Claim	13978854	511 days 8 hrs ago	 ticasso.eth 	 LooksRare: Airdrop 	0 ETH	0.02873
 0xd7f0531a80acf5351...	Set Approval ...	13978830	511 days 8 hrs ago	 ticasso.eth 	 Rogue Society Bots: RS... 	0 ETH	0.01348
 0x2284d29f6a4407db...	Enter	13956298	514 days 19 hrs ago	 ticasso.eth 	 The OpenDAO: Staking ... 	0 ETH	0.01439
 0xc60956eadaae6492...	Approve	13956006	514 days 20 hrs ago	 ticasso.eth 	 The OpenDAO: SOS To... 	0 ETH	0.00843

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 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).









































































Transactions










































































For [0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147](#) [ticasso.eth](#)










































































A total of 218 transactions found










































































Txn Hash	Method	Block	Age	From	To	Value	Txn Fee
0xd3f809d5eb9d81bf1...	Mint Single	13942380	516 days 23 hrs ago	ticasso.eth	0xC4e600...84A59246	0 ETH	0.0148136
0xdf0c2ac95effe29b54...	Claim	13876095	527 days 5 hrs ago	ticasso.eth	The OpenDAO: SOS To...	0 ETH	0.0037859
0x2599e9e7c2585690...	Swap	13616657	568 days 2 hrs ago	ticasso.eth	Metamask: Swap Router	0.1 ETH	0.0327323
0x5cffac4bfde321ed8e...	Approve	13574364	574 days 17 hrs ago	ticasso.eth	Polkacity: POLC Token	0 ETH	0.0044292
0x50cf91694a5fc1e13...	Transfer	13565586	576 days 2 hrs ago	ticasso.eth	Atari: ATRI Token	0 ETH	0.0026789
0x89fc4a2c16840dd99...	Transfer	13553956	577 days 22 hrs ago	ticasso.eth	Velas: VLX Token	0 ETH	0.0060272
0x2f36df6b6c1007b6b...	Swap Exact E...	13553899	577 days 22 hrs ago	ticasso.eth	Uniswap V2: Router 2	0.17 ETH	0.0156273
0xdf4438fd2c49a8346...	Exact Input Si...	13545396	579 days 6 hrs ago	ticasso.eth	Uniswap V3: Router	0.29 ETH	0.0224666
0xc047e960e53855da...	Swap Exact E...	13544861	579 days 8 hrs ago	ticasso.eth	Uniswap V2: Router 2	0.3 ETH	0.0051724
0xef36a26c820c8489b...	Set Approval ...	13542329	579 days 18 hrs ago	ticasso.eth	Wicked Monsters: WM...	0 ETH	0.0058567










































































 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x2bad46a170c4dd0a...	Mint Free	13542317	579 days 18 hrs ago	 ticasso.eth 	 Wicked Monsters: WM... 	0 ETH	0.0477414
 0x5f76d4ecf6a1150c2...	Swap Exact E...	13542298	579 days 18 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	0.7 ETH	0.0159836
 0xf14db15d4090f88c7...	Multicall	13541761	579 days 20 hrs ago	 ticasso.eth 	 Uniswap V3: Router 	0 ETH	0.0206418
 0xb1ee795a81f9bd6b1...	Approve	13541758	579 days 20 hrs ago	 ticasso.eth 	 UFO Gaming: UFO Token 	0 ETH	0.0071228
 0xc2ac29e77bb6bab8...	Swap Exact E...	13540944	579 days 23 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	0.45 ETH	0.0192578
  0xd997707317089ba7...	Swap Exact E...	13540898	579 days 23 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	0.45 ETH	0.0065885
 0x99bf49f92726339cc...	Transfer	13540535	580 days 1 hr ago	KuCoin 4 	 ticasso.eth 	0.4016594 ETH	0.0044659
 0x24214be0a98c8295...	Approve	13539162	580 days 6 hrs ago	 ticasso.eth 	 0x34B6F5...dBef2bCd 	0 ETH	0.008765
 0x6ae353a7421cc494...	Mint For User	13539156	580 days 6 hrs ago	 ticasso.eth 	 0x34B6F5...dBef2bCd 	0 ETH	0.0155784
 0x6a1289214600ebeaf...	Swap Exact E...	13527237	582 days 3 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	0.45 ETH	0.0122180
 0xf43a4df6a2e2741cf...	Transfer	13526400	582 days 6 hrs ago	 ticasso.eth 	 0x05B0e9...6AE4bc8c 	3 ETH	0.0034852
  0x86c5f45d3fb4e97bf...	Swap Exact E...	13526384	582 days 6 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	3 ETH	0.0052010
  0x5e504e29804be9ac...	Swap Exact E...	13526363	582 days 6 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	3 ETH	0.0050499
  0x9d914c4475bb1a93...	Swap Exact E...	13523268	582 days 18 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	3 ETH	0.0039050




























 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x7724ce43fc452c20e...	Transfer	13522970	582 days 19 hrs ago	0x39Cc8b...D518770e 	 ticasso.eth 	0.5 ETH	0.0026722
 0xa9f31d54f6df81497f...	Swap Exact E...	13522457	582 days 21 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	0.63 ETH	0.0148459
 0xb2348a5e1815bd20...	Set Approval ...	13522300	582 days 21 hrs ago	 ticasso.eth 	 The Doge Pound: DOG... 	0 ETH	0.0074920
 0x295f6a063cb1ab8f6...	Swap Exact E...	13522224	582 days 22 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	0.75 ETH	0.0139877
 0xaa1dda048b4fa09b0...	Swap Exact E...	13522065	582 days 22 hrs ago	 ticasso.eth 	 Uniswap V2: Router 2 	0.25 ETH	0.0158090
 0x30c8f8eeb349243e9...	Set Approval ...	13515192	584 days 52 mins ago	 ticasso.eth 	 RoaringLeaders: ROAR ... 	0 ETH	0.0060575
 0xcaeb368ed5e77052...	Transfer	13502456	586 days 44 mins ago	0x39Cc8b...D518770e 	 ticasso.eth 	0.16 ETH	0.0032635
 0xc80c276dd8a1ecb0...	Transfer	13490426	587 days 22 hrs ago	 ticasso.eth 	 0x39Cc8b...D518770e 	0.16 ETH	0.0017765
 0x88cedb4ebecc658fc...	Transfer	13490312	587 days 22 hrs ago	 ticasso.eth 	 0x39Cc8b...D518770e 	0.16 ETH	0.0026064
 0x3b4ad3eca165cdb2...	0xd42d47ae	13456862	593 days 3 hrs ago	 ticasso.eth 	 Bored Mummy Hallowe... 	0 ETH	0.0126532
  0xe50cfb5e1239830de...	Mint	13439224	595 days 22 hrs ago	 ticasso.eth 	 Doodles: DOODLE Token 	0.615 ETH	0.0024268
  0x47baf47a103f99c59...	Mint	13439224	595 days 22 hrs ago	 ticasso.eth 	 Doodles: DOODLE Token 	0.615 ETH	0.0024018
 0xd39a60ba0d1515ad...	Transfer	13439038	595 days 22 hrs ago	 ivybone.eth 	 ticasso.eth 	0.25 ETH	0.0019309
 0x481230f1faf35045c...	Transfer	13439035	595 days 22 hrs ago	 ivybone.eth 	 ticasso.eth 	1 ETH	0.0019395

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xbffd81ffe82063ce27...	Mint By Signa...	13426816	597 days 20 hrs ago	 ticasso.eth 	 0x46f101...62e72A37 	0 ETH	0.0057410
 0xc5d13c33cd264228f...	Register And ...	13414140	599 days 20 hrs ago	 ticasso.eth 	 Immutable X: Registrati... 	0.4 ETH	0.0107061
 0xcfd3f4968811d29bf...	Set Approval ...	13413409	599 days 23 hrs ago	 ticasso.eth 	 ZombieToadz: BRAINZ ... 	0 ETH	0.0058582
 0xcbb355427ef26b14b...	Safe Mint	13381935	604 days 22 hrs ago	 ticasso.eth 	 INFAMOUSSKULLZ: IN... 	0.18 ETH	0.0251935
 0xdcbbf69fd2f89dff15...	Atomic Match_	13381701	604 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.087 ETH	0.0177823
 0xbb4e72343a0a979f7...	Atomic Match_	13376465	605 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.06 ETH	0.0153649
 0xd31bf30caaccbf014...	Atomic Match_	13376415	605 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.125 ETH	0.0206801
 0xb28ef01b5b54420df...	Atomic Match_	13376375	605 days 19 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.128 ETH	0.0200711
 0x379e406797efe453b...	Atomic Match_	13376305	605 days 19 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.0555 ETH	0.0150834
 0x0fb995cbb5f603847...	Atomic Match_	13376103	605 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.115 ETH	0.0203602
  0x875074a52d06ec52...	Atomic Match_	13376073	605 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.1099 ETH	0.0053337
 0x8875d02df183038b...	Atomic Match_	13376043	605 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.1 ETH	0.0183476
 0xfbd398ac96283ebe6...	Atomic Match_	13376011	605 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.109 ETH	0.0155836
 0xd78ac1f118bbdba25...	Set Approval ...	13353864	609 days 7 hrs ago	 ticasso.eth 	 ZombieToadz: BRAINZ ... 	0 ETH	0.0038185

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x04578adf5da2e7b97...	Cancel Order_	13350875	609 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.0047271
 0xfe3eaea689341d187...	Atomic Match_	13344025	610 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.09 ETH	0.0111821
 0x5ca1aa9f3c946b979...	Swap	13344001	610 days 20 hrs ago	 ticasso.eth 	 Metamask: Swap Router 	0 ETH	0.0059331
 0x0e640147a2cc40a5...	Approve	13344001	610 days 20 hrs ago	 ticasso.eth 	 Wrapped Ether 	0 ETH	0.0020095
  0xd785aa6e607deb91...	Cancel Order_	13342234	611 days 3 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.0023469
 0x1c51ae6a5e577201...	Cancel Order_	13342232	611 days 3 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.0038355
 0x4a8a142b43a3ba7d...	Set Approval ...	13337222	611 days 22 hrs ago	 ticasso.eth 	 Bored Mummy Waking ... 	0 ETH	0.0025012
 0x5e6d2b30aec5ece6...	Atomic Match_	13337214	611 days 22 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.25 ETH	0.0119964
 0xae10dc3a8e5aa15b...	Atomic Match_	13337116	611 days 22 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.195 ETH	0.0127715
 0xa1e7cb84656aa4c8...	Atomic Match_	13337017	611 days 22 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.2 ETH	0.0173052
 0x1195e5a132307b4c...	Atomic Match_	13336987	611 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.1997 ETH	0.0140356
 0x8ca8082cf9819ca44...	Atomic Match_	13336978	611 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.19 ETH	0.0169264
 0x19bb8ce9b73b967d...	Cancel Order_	13336610	612 days 43 mins ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.0057385
 0x25d2a071c8236207...	Atomic Match_	13323134	614 days 3 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.1498 ETH	0.0155652

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xe9cc499bf068afa23...	Atomic Match_	13323065	614 days 3 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.11 ETH	0.0222853
 0x1379491f46054c70f...	Atomic Match_	13321605	614 days 8 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.395 ETH	0.0248556
 0x4b01323340f2d508e...	Atomic Match_	13314983	615 days 9 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.18 ETH	0.0213593
  0x5f0227df8c9a507c3...	Atomic Match_	13314977	615 days 9 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.18 ETH	0.0066997
 0x23dac7db6ad00eac...	Set Approval ...	13314664	615 days 10 hrs ago	 ticasso.eth 	 Canine Cartel: CARTEL ... 	0 ETH	0.0037378
 0x0b3cdcd4be3f2b64f...	Atomic Match_	13314563	615 days 11 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.75 ETH	0.0160906
 0xb6448f6a2cbc42078...	Atomic Match_	13310558	616 days 2 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.05 ETH	0.0158946
 0xdcce2fdd0e64f1722...	Set Approval ...	13310512	616 days 2 hrs ago	 ticasso.eth 	 Adam Bomb Squad: AB... 	0 ETH	0.0030273
 0xb9c9d6089f1fec55c...	Atomic Match_	13308917	616 days 8 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	1.45 ETH	0.0242372
 0x43f5faf1c63d021ef3...	Atomic Match_	13308753	616 days 8 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	1.5 ETH	0.0161760
 0xd394c485fee773de7...	Set Approval ...	13306119	616 days 18 hrs ago	 ticasso.eth 	 Wicked Ape Bone Club:... 	0 ETH	0.0022430
 0x97143b9fa6cc69650...	Atomic Match_	13306100	616 days 18 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.61 ETH	0.0108805
 0x829340958dd768b6...	Atomic Match_	13305810	616 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0 ETH	0.0169857
 0x58cdc7b345b9c65fa...	Atomic Match_	13305751	616 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.18 ETH	0.0151117

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xe4220e8bd075116b...	Atomic Match_	13305580	616 days 20 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.1 ETH	0.0177282
 0x201f4a388a4739672...	Approve	13305520	616 days 21 hrs ago	 ticasso.eth 	 Wrapped Ether 	0 ETH	0.0029583
 0x5c0a17ee6bf7cb990...	Set Approval ...	13305516	616 days 21 hrs ago	 ticasso.eth 	 The Ninja Hideout: TN... 	0 ETH	0.0031476
 0x76e9cde2f2117a48d...	Mint Public Sa...	13303993	617 days 2 hrs ago	 ticasso.eth 	 The Ninja Hideout: TN... 	0.15 ETH	0.0525022
 0x095deccc07af3ddd4...	Presale Mint	13302623	617 days 7 hrs ago	 ticasso.eth 	 0x345dfA...Ee952c7F 	0.207 ETH	0.0353566
 0x517a8b2dfd54ebd0e...	Transfer	13302592	617 days 7 hrs ago	 boneheads.eth 	 ticasso.eth 	5 ETH	0.0013554
 0x20489e03b6fb7b550...	Set Approval ...	13252270	625 days 2 hrs ago	 ticasso.eth 	 The Doge Pound: PUP... 	0 ETH	0.0030127
 0xdd615c8bcd62cfb8f...	Set Approval ...	13214760	630 days 22 hrs ago	 ticasso.eth 	 Wicked Hound Bone Cl... 	0 ETH	0.0041648
 0x9c3e09f3b93eb04d4...	Mint Free	13214650	630 days 22 hrs ago	 ticasso.eth 	 Wicked Hound Bone Cl... 	0 ETH	0.0151652
 0x2e7c45b2ffcbb1d48...	Atomic Match_	13172925	637 days 9 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.2 ETH	0.0152753
 0x61382c6838abb3f32...	Atomic Match_	13172897	637 days 9 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.1999 ETH	0.0179642
  0x86b2668fbcad43bc6...	Atomic Match_	13172886	637 days 9 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.199 ETH	0.0072254
 0xfb132eb796ced1e1d...	Atomic Match_	13172873	637 days 9 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.199 ETH	0.0296438
 0x71c5afa2fe0d5bfe95...	Atomic Match_	13169146	637 days 23 hrs ago	 ticasso.eth 	 OpenSea: Wyvern Exch... 	0.159 ETH	0.0197555

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x5388d6af6b1e01e9f...	Atomic Match_	13144194	641 days 20 hrs ago	 ticasso.eth	  OpenSea: Wyvern Exch...	0.795 ETH	0.0151086
 0x915bd2d5915cf761f...	Mint Puppy	13142709	642 days 1 hr ago	 ticasso.eth	  The Doge Pound: PUP...	0 ETH	0.0211545
 0x5cca79b829b134bf5...	Atomic Match_	13137594	642 days 20 hrs ago	 ticasso.eth	  OpenSea: Wyvern Exch...	0.5 ETH	0.0190185
  0x3f321489c323d410b...	Atomic Match_	13137586	642 days 20 hrs ago	 ticasso.eth	  OpenSea: Wyvern Exch...	0.4899 ETH	0.0058383
 0x8d2a082da763081cf...	Atomic Match_	13137367	642 days 21 hrs ago	 ticasso.eth	  OpenSea: Wyvern Exch...	0.472 ETH	0.0258808
 0xb9b84f7aef084f467...	Atomic Match_	13137215	642 days 22 hrs ago	 ticasso.eth	  OpenSea: Wyvern Exch...	0.4777 ETH	0.0227842

Show: Records

[Download: [CSV Export](#) ]




































 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

Transactions

For [0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147](#) ticasso.eth

A total of 218 transactions found

	Txn Hash	Method	Block	Age	From		To	Value	Txn Fee
	0xd8ce8bd32e451f90a...	Atomic Match_	13137209	642 days 22 hrs ago	ticasso.eth	OUT	OpenSea: Wyvern Exch...	0.47 ETH	0.00636562
	0x52e884e95df48c257...	Atomic Match_	13137173	642 days 22 hrs ago	ticasso.eth	OUT	OpenSea: Wyvern Exch...	2.7 ETH	0.02607169
	0x7a3ec3cc7e327d10...	Cancel Order_	13130226	643 days 23 hrs ago	ticasso.eth	OUT	OpenSea: Wyvern Exch...	0 ETH	0.00703049
	0xf6870b176477d72f9...	Set Approval ...	13121879	645 days 6 hrs ago	ticasso.eth	OUT	Mutant Ape Yacht Club...	0 ETH	0.00407228
	0x91508ad026e0dde3...	Register Proxy	13121873	645 days 6 hrs ago	ticasso.eth	OUT	OpenSea: Registry	0 ETH	0.0265006
	0x01fb074b7289e2ce2...	Atomic Match_	13118014	645 days 21 hrs ago	ticasso.eth	OUT	OpenSea: Wyvern Exch...	4.65 ETH	0.01314241
	0x0da52211f1004069...	Atomic Match_	13118007	645 days 21 hrs ago	ticasso.eth	OUT	OpenSea: Wyvern Exch...	4.9 ETH	0.00391279
	0x0c1e9fc54e20009b4...	Transfer	13117656	645 days 22 hrs ago	boneheads.eth	IN	ticasso.eth	5 ETH	0.00195599
	0x5336a9fa39bda2a68...	Mint Ape Punks	13114419	646 days 10 hrs ago	ticasso.eth	OUT	0x3AA213...2856a74F	0.03 ETH	0.00848505
	0x488ed1939d8ba7fc5...	Atomic Match_	13104294	648 days 11 mins ago	ticasso.eth	OUT	OpenSea: Wyvern Exch...	0.075 ETH	0.0192662

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x574b87080315a487f...	Atomic Match_	13099365	648 days 18 hrs ago	 ticasso.eth	 OUT  OpenSea: Wyvern Exch...	0.15 ETH	0.01192871
 0xeaf375ebf2daeff6a8...	Atomic Match_	13099178	648 days 19 hrs ago	 ticasso.eth	 OUT  OpenSea: Wyvern Exch...	0.4888 ETH	0.01846394
 0x4a5e8a7e54389058...	Atomic Match_	13098932	648 days 19 hrs ago	 ticasso.eth	 OUT  OpenSea: Wyvern Exch...	0.168 ETH	0.01149968
  0x38fc9375ceb582aa0...	Atomic Match_	13098921	648 days 19 hrs ago	 ticasso.eth	 OUT  OpenSea: Wyvern Exch...	0.168 ETH	0.00529919
 0x6a31c0e9745513b9...	Transfer	13098725	648 days 20 hrs ago	 boneheads.eth	 IN  ticasso.eth	1 ETH	0.00174843
 0x13c15ac4f9cf17261...	Atomic Match_	13065809	653 days 23 hrs ago	 ticasso.eth	 OUT  OpenSea: Wyvern Exch...	0.0239108 ETH	0.00507672
 0xec9c3ecb1652a98d...	Atomic Match_	13065708	653 days 23 hrs ago	 ticasso.eth	 OUT  OpenSea: Wyvern Exch...	0.025 ETH	0.01041266
 0x9ec60e21859546e6...	Transfer	13065557	653 days 23 hrs ago	Binance 15 	 IN  ticasso.eth	0.05492168 ETH	0.00252

Show: Records [First](#) [<](#) Page 3 of 3 [>](#) [Last](#)

[Download: [CSV Export](#) ]

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BM”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

Overview

State

Comments

More ▾

Transaction Hash: [0x5780bcfd00dfcab7a4ef2017cfc3ad7aa04d7d23f58cd022e58607d3afd72a60](#)

Status: Success

Block: 13156688 4261329 Block Confirmations

Timestamp: 639 days 21 hrs ago (Sep-04-2021 03:04:45 AM +UTC)

Sponsored:

From: [0xa8c2bc23c4D51642C7c8767E1D2d6647f7281317](#)

To: [0xC59Ef925B947473b85b85f7583D29487Ee2e8620](#)

Value: 25.3581241041767 ETH \$98,567.28

Transaction Fee: 0.0029715 ETH \$5.38

Gas Price: 141.5 Gwei (0.0000001415 ETH)

Ether Price: \$3,887.01 / ETH

Gas Limit & Usage by Txn: 21,000 | 21,000 (100%)

? Gas Fees:

Base: 93.692548673 Gwei

? Burnt Fees:

🔥 Burnt: 0.001967543522133 ETH (\$3.56)

? Other Attributes:

Txn Type: 0 (Legacy)

Nonce: 0

Position In Block: 12

? Input Data:

0x

More Details:

— [Click to show less](#)

? Private Note:

To access the **Private Note** feature, you must be [Logged In](#)

💡 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BN”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Overview

ETH BALANCE
0 ETH

ETH VALUE
\$0.00

More Info

PRIVATE NAME TAGS
+ Add

CREATOR
0xFC9161...c969B7B9 at txn 0xee89e4b51463a84d...

Multi Chain

































MULTICHAIN ADDRESSES
1 address found via Blockscan

- Transactions
- Internal Transactions
- Token Transfers (ERC-20)
- Contract
- Events
- Analytics
- Comments

Latest 8 from a total of 8 transactions

Advanced Filter

Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0x175b117ea8fe8df96...	Transfer	16968779	63 days 11 hrs ago	0xa8c2bC...f7281317	0xE66F9e...Aa8b82aC	25 ETH	0.00156508
0xcc096356f7c94c60c...	Transfer	16772092	91 days 3 hrs ago	ivybone.eth	0xE66F9e...Aa8b82aC	15.25 ETH	0.00217517

 Transaction Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xf9cfb1ef43236f6e0...	Transfer	16484521	131 days 10 hrs ago	0xa8c2bC...f7281317 	 IN  0xE66F9e...Aa8b82aC 	8 ETH	0.00091281
 0x42a1857738dc6a7c...	Transfer	15891260	214 days 6 hrs ago	0xa8c2bC...f7281317 	 IN  0xE66F9e...Aa8b82aC 	12.5 ETH	0.0012625
 0x645d8086c64afb7a9...	Transfer	15640212	249 days 8 hrs ago	0xa8c2bC...f7281317 	 IN  0xE66F9e...Aa8b82aC 	14.75 ETH	0.00162606
 0x19a350762fb9d52a0...	Transfer	15575428	258 days 10 hrs ago	0xa8c2bC...f7281317 	 IN  0xE66F9e...Aa8b82aC 	5 ETH	0.00152397
 0xa79596441abd5783...	Transfer	15409569	284 days 10 hrs ago	0xa8c2bC...f7281317 	 IN  0xE66F9e...Aa8b82aC 	4.2 ETH	0.00149907
 0x6d5ae51637196ecc...	Transfer	14832026	378 days 3 hrs ago	0xa8c2bC...f7281317 	 IN  0xE66F9e...Aa8b82aC 	25 ETH	0.00134966

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 A contract address hosts a smart contract, which is a set of code stored on the blockchain that runs when predetermined conditions are met. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit "BO"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details

[Buy](#) ▾[Exchange](#) ▾[Play](#) ▾[Gaming](#) ▾[Overview](#)[State](#)[Comments](#)[More](#) ▾

Transaction Hash: [0xdfb3707089c5793d9057fc814423a592d0b10e122714d2dfa1a11bb5ca45be8d](#)

Status: Success

Block: 14610338 2807713 Block Confirmations

Timestamp: 413 days 8 hrs ago (Apr-18-2022 04:51:15 PM +UTC)

Sponsored:

From: [0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317](#)

To: [0xF38269dae289DcF9b2D3372c26181cE473C940fc](#)

Value: 4.78 ETH \$8,654.38

Transaction Fee: 0.000897369281571 ETH \$1.62

Gas Price: 42.731870551 Gwei (0.000000042731870551 ETH)

More Details:

[+ Click to show more](#)

🔒 Private Note:

To access the **Private Note** feature, you must be [Logged In](#)

💡 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BP”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



























































Transactions















































For [0x82ef36b1c710e4384eb20d70074bc972972d58b8](#)

A total of 64 transactions found

Txn Hash	Method	Block	Age	From	To	Value	Txn Fee
0x11b3da070f02cee6d...	Transfer	14891924	368 days 9 hrs ago	0x82eF36...972D58B8	Centre: USD Coin	0 ETH	0.00493
0x3600065637994c6a...	Swap	14793369	384 days 9 hrs ago	0x82eF36...972D58B8	Metamask: Swap Router	0 ETH	0.00964
0x2f953fe606d0bf315...	Transfer	14793354	384 days 9 hrs ago	grooves.eth	0x82eF36...972D58B8	0.008 ETH	0.00095
0x74365f4834f1e7853...	Approve	14793313	384 days 9 hrs ago	0x82eF36...972D58B8	Apecoin: APE Token	0 ETH	0.00162
0xc3fc00dbaf1fbbb67f...	Transfer	14712528	397 days 6 hrs ago	0x82eF36...972D58B8	0xa8c2bC...f7281317	0.05 ETH	0.00101
0xaeb9a3756ccd0409...	Transfer	14712522	397 days 6 hrs ago	grooves.eth	0x82eF36...972D58B8	0.012 ETH	0.00101
0xb979c94c7e2369d5...	Transfer	14690094	400 days 19 hrs ago	0x82eF36...972D58B8	0xa8c2bC...f7281317	0.95 ETH	0.00548
0xc25061626ced24f2c...	Transfer	14690080	400 days 19 hrs ago	0x82eF36...972D58B8	Apecoin: APE Token	0 ETH	0.01243
0xae0f2e022de03dcf7...	Mint Lands	14689636	400 days 21 hrs ago	0x82eF36...972D58B8	The Otherside: OTHR T...	0 ETH	0.04954
0x3c63e11f81d114b85...	Transfer	14688785	401 days 33 mins ago	0xa8c2bC...f7281317	0x82eF36...972D58B8	1 ETH	0.00257

?	Txn Hash	Method ?	Block	Age	From		To	Value	Txn Fee
👁	0xf0e6340e191bdb2da...	Approve	14688744	401 days 42 mins ago	0x82eF36...972D58B8	OUT	Apecoin: APE Token	0 ETH	0.00485
👁	0x0bf2a8b46b1808e68...	Transfer	14688739	401 days 43 mins ago	boneheads.eth	IN	0x82eF36...972D58B8	0.02 ETH	0.00173
👁	0xec1f6422c53816f7e...	Transfer	13857385	530 days 3 hrs ago	0x82eF36...972D58B8	OUT	grooves.eth	0.015 ETH	0.00195
👁	0xd76e29c5836cbf8f8...	Transfer	13834344	533 days 17 hrs ago	0x82eF36...972D58B8	OUT	grooves.eth	0.02 ETH	0.00091
👁	0x0cbb64f2cce70d7b7...	Transfer From	13834261	533 days 17 hrs ago	0x82eF36...972D58B8	OUT	Superlative Apes: SLAP...	0 ETH	0.00211
👁	0xd10270af0248d5c8c...	Atomic Match...	13820882	535 days 19 hrs ago	0x82eF36...972D58B8	OUT	OpenSea: Wyvern Exch...	0.055 ETH	0.01192
👁	0x86d4ceff5b5b4143d...	Transfer From	13820811	535 days 19 hrs ago	0x82eF36...972D58B8	OUT	Adam Bomb Squad: AB...	0 ETH	0.00619
👁	0xe6331840c31f0456b...	Atomic Match...	13820800	535 days 19 hrs ago	0x82eF36...972D58B8	OUT	OpenSea: Wyvern Exch...	0.245 ETH	0.01500
👁	0xa97a5fc9bc504721a...	Stake	13820771	535 days 19 hrs ago	0x82eF36...972D58B8	OUT	0xB63cac...607a8020	0 ETH	0.00485
👁	0xa86a1122fdac8a8c5...	Swap ETH For...	13820742	535 days 19 hrs ago	0x82eF36...972D58B8	OUT	SushiSwap: Router	0.09744279 ETH	0.00693
👁	0x74bef1942b62c0d83...	Approve	13820719	535 days 19 hrs ago	0x82eF36...972D58B8	OUT	OlympusDAO: OHM To...	0 ETH	0.00387
👁	0x71f9883a22e5f6cb9...	Transfer Toke...	13814425	536 days 19 hrs ago	0x82eF36...972D58B8	OUT	Wormhole: Portal Toke...	0 ETH	0.00565
👁	0xe54ee6bad0bedd3a...	Approve	13814422	536 days 19 hrs ago	0x82eF36...972D58B8	OUT	Centre: USD Coin	0 ETH	0.00361
👁	0x8b0c6a1723afd76bd...	Swap	13814405	536 days 19 hrs ago	0x82eF36...972D58B8	OUT	Metamask: Swap Router	0.08 ETH	0.01155

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x55e6d29350c5b692...	Transfer	13813602	536 days 22 hrs ago	0x51496e...2725fB61 	 0x82eF36...972D58B8 	0.5 ETH	0.00148
 0x25b3eca90948bcf4a...	Deposit ETH	13813587	536 days 22 hrs ago	0x82eF36...972D58B8 	 zkSync 	0.02 ETH	0.00494
 0x79182b2aeef4b01ff...	Transfer	13807925	537 days 19 hrs ago	0x82eF36...972D58B8 	 arthurfleck.eth 	1.1 ETH	0.00199
 0xb37fa69b9121689eb...	Withdraw	13807915	537 days 19 hrs ago	0x82eF36...972D58B8 	 Wrapped Ether 	0 ETH	0.00243
 0xd312a64e89c24851...	Deposit	13807479	537 days 21 hrs ago	0x82eF36...972D58B8 	 Wrapped Ether 	1.1 ETH	0.00402
 0x336aa01c85f564f84...	Transfer	13807477	537 days 21 hrs ago	0x51496e...2725fB61 	 0x82eF36...972D58B8 	1 ETH	0.00223
 0xcdf793e3ea8f5922e...	Wrap And Tra...	13794258	539 days 22 hrs ago	0x82eF36...972D58B8 	 Wormhole: Portal Toke... 	0.02 ETH	0.00626
 0xf42e48691a22c2fc5...	Transfer	13794209	539 days 22 hrs ago	grooves.eth 	 0x82eF36...972D58B8 	0.25 ETH	0.00196
 0x058e0ede9371f1006...	Transfer	13094612	649 days 12 hrs ago	0x82eF36...972D58B8 	 grooves.eth 	0.014 ETH	0.00109
 0xb63784ca9666c207f...	Transfer	13073144	652 days 20 hrs ago	0x82eF36...972D58B8 	 grooves.eth 	0.18 ETH	0.00045
 0x9f265776755a5b4cf...	Transfer From	13073138	652 days 20 hrs ago	0x82eF36...972D58B8 	 BONEHEADS: BONE To... 	0 ETH	0.00199
 0x436fd87a9fb5b75a3...	Transfer From	13073119	652 days 20 hrs ago	0x82eF36...972D58B8 	 BONEHEADS: BONE To... 	0 ETH	0.00170
 0x8381875280aa003b...	Transfer From	13073108	652 days 20 hrs ago	0x82eF36...972D58B8 	 BONEHEADS: BONE To... 	0 ETH	0.00216
 0xca7eea4b6959b34e...	Transfer From	13073099	652 days 20 hrs ago	0x82eF36...972D58B8 	 BONEHEADS: BONE To... 	0 ETH	0.00209

 Txn Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x56d2fe2d4db999d17...	Transfer	13073097	652 days 20 hrs ago	Coinbase 3 	IN 0x82eF36...972D58B8 	0.19957099 ETH	0.00059
 0xbdcbbd04b7549c45...	Transfer From	13073082	652 days 20 hrs ago	0x82eF36...972D58B8 	OUT BONEHEADS: BONE To... 	0 ETH	0.00164
 0x010ef3a9c08ee9343...	Transfer	13073053	652 days 20 hrs ago	 grooves.eth 	IN 0x82eF36...972D58B8 	0.006898489 ETH	0.00052
 0x02b59202c1fe7e041...	Transfer	13070709	653 days 4 hrs ago	0x82eF36...972D58B8 	OUT  grooves.eth 	0.007560131 ETH	0.00100
 0x037688f13f8cc5202...	Atomic Match_	13070630	653 days 5 hrs ago	0x82eF36...972D58B8 	OUT  OpenSea: Wyvern Exch... 	0.12 ETH	0.00626
 0xfc181f0ba7ef99cdf...	Transfer	13070602	653 days 5 hrs ago	Coinbase 5 	IN 0x82eF36...972D58B8 	0.12 ETH	0.00099
 0x4b67307d4e0d501e...	Atomic Match_	13069797	653 days 8 hrs ago	0x82eF36...972D58B8 	OUT  OpenSea: Wyvern Exch... 	0.11 ETH	0.01236
 0xe4f60430f1a9671e8...	Withdraw	13069780	653 days 8 hrs ago	0x82eF36...972D58B8 	OUT  Wrapped Ether 	0 ETH	0.00177
 0xbf3b5ad808600461...	Transfer	13069632	653 days 9 hrs ago	Coinbase 4 	IN 0x82eF36...972D58B8 	0.0088 ETH	0.00101
 0x0f6488a662dbdf9b1...	Cancel Order_	13068704	653 days 12 hrs ago	0x82eF36...972D58B8 	OUT  OpenSea: Wyvern Exch... 	0 ETH	0.00180
 0x95c4e382ab0366de...	Deposit	13068693	653 days 12 hrs ago	0x82eF36...972D58B8 	OUT  Wrapped Ether 	0.06 ETH	0.00064
 0x5505e906bbf830f08...	Approve	13066422	653 days 21 hrs ago	0x82eF36...972D58B8 	OUT  Wrapped Ether 	0 ETH	0.00061

Show: Records

💡 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BQ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Transaction Details



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

Overview

State

Comments

More ▾

Transaction Hash: 0x473451b6a5c8ade4f8784d096a2927164446c3ee72fec2567492767ae7afaef1

Status: Success

Block: 14688785 2729292 Block Confirmations

Timestamp: 401 days 36 mins ago (May-01-2022 12:36:32 AM +UTC)

Sponsored:

From: 0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317

To: [praisegod.eth](#)

Value: 1 ETH \$2,826.04

Transaction Fee: 0.002478 ETH \$4.48

Gas Price: 118 Gwei (0.000000118 ETH)

Ether Price: \$2,826.04 / ETH

Gas Limit & Usage by Txn: 21,000 | 21,000 (100%)

? Gas Fees:

Base: 102.320533594 Gwei

? Burnt Fees:

🔥 Burnt: 0.002148731205474 ETH (\$3.89)

? Other Attributes:

Txn Type: 0 (Legacy)

Nonce: 66

Position In Block: 53

? Input Data:

0x

More Details:

— [Click to show less](#)

? Private Note:

To access the **Private Note** feature, you must be [Logged In](#)

💡 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BR”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0x0BC42633195913892C48A224a846DDae067898ed



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

bonestar.eth ⓘ

☆ More ▾

Overview

ETH BALANCE

0.00549183914421082 ETH

ETH VALUE

\$9.92 (@ \$1,806.71/ETH)

TOKEN HOLDINGS

\$0.00 (1 Tokens)



More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

0x220597a30641... from 474 days 1 hr ago

FIRST TXN SENT

0xdd636fb9ce6bb... from 584 days 20 mins ago

Multi Chain

MULTICHAIN ADDRESSES

2 addresses found via Blockscan ▾

Transactions

Token Transfers (ERC-20)

NFT Transfers



























































Analytics

















Comments

Latest 17 from a total of 17 transactions


Advanced Filter



 Transaction Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0x220597a30641bc1d...	Transfer From	14220253	474 days 1 hr ago		 Jadu Hoverboard: H... 	0 ETH	0.00474775
 0x407f050240fb55ee4...	Transfer	14220232	474 days 1 hr ago	BONEHEADS: Deployer 	 	0.01 ETH	0.00110579
 0x1ab2efbb5ce55252b...	Transfer	13999176	508 days 5 hrs ago		 BONEHEADS: Deployer 	0.0141765 ETH	0.0029778
 0x49cc4e270581c009...	Transfer From	13999165	508 days 5 hrs ago		 Bored Ape Yacht Clu... 	0 ETH	0.01321849
 0x1aa83b9c10fff45ef6...	Transfer	13999157	508 days 5 hrs ago	BONEHEADS: Deployer 	 	0.03056514 ETH	0.00337707
 0x224df8f3b4a7266ed...	Transfer	13673131	559 days 4 hrs ago		 BONEHEADS: Deployer 	0.00903088 ETH	0.00247201
 0x9f15b58134084370e...	Transfer	13583848	573 days 7 hrs ago		 ENS: ENS Token 	0 ETH	0.00603329
 0x15afd853e17ae65d4...	Claim Tokens	13583799	573 days 7 hrs ago		 ENS: ENS Token 	0 ETH	0.02676644
 0x0ec9c695f89b7f35d...	Transfer	13583797	573 days 7 hrs ago	BONEHEADS: Deployer 	 	0.02096308 ETH	0.00314379
 0xde064647342ff2a8e...	Set Name	13583578	573 days 8 hrs ago		 ENS: Old Reverse Re... 	0 ETH	0.00929056
 0xfefec0847b85da65a...	Set Name	13583560	573 days 8 hrs ago		 ENS: Old Reverse Re... 	0 ETH	0.02218645
 0xadbeca42ed9bd3c3...	Transfer	13583547	573 days 8 hrs ago		 	0.03147015 ETH	0.00389289
 0x91e10e9047d38e93...	Transfer	13583532	573 days 8 hrs ago		 	0.13954942 ETH	0.00397629
 0x5f71717013da60d6c...	Transfer	13583530	573 days 8 hrs ago	BONEHEADS: Deployer 	 	0.04197456 ETH	0.00409733

 Transaction Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xbe890c3856534f79d...	Transfer From	13579656	573 days 22 hrs ago	 bonestar.eth 	 Bored Ape Yacht Clu... 	0 ETH	0.0192293
 0xdd636fb9ce6bb88b4...	Set Addr	13515606	584 days 20 mins ago	 bonestar.eth 	 ENS: Public Resolver 2 	0 ETH	0.00582586
 0x3a38f2697d282338...	Transfer	13515604	584 days 21 mins ago	0x3acEf2...87dda4fa 	 bonestar.eth 	0.15 ETH	0.00278139

[Download: [CSV Export](#) ]

 A wallet address is a publicly available address that allows its owner to receive funds from another party. To access the funds in an address, you must have its private key. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “BS”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0xea415B3B5e02B2259019763E2e81c48668b80f0E



Buy ▾

Exchange ▾

Play ▾

Gaming ▾

bonestars.eth ⓘ

☆ More ▾

Overview

ETH BALANCE

0.005053780989916468 ETH

ETH VALUE

\$9.13 (@ \$1,806.39/ETH)

TOKEN HOLDINGS

\$0.00 (1 Tokens)



More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

0xf7eeb7cd2c3a3... from 474 days 1 hr ago

FIRST TXN SENT

0x15f180d4c043c... from 573 days 22 hrs ago

Multi Chain

MULTICHAIN ADDRESSES

2 addresses found via Blockscan ▾

Transactions

Internal Transactions

Token Transfers (ERC-20)

NFT Transfers

Analytics

Comments

Latest 10 from a total of 10 transactions

Advanced Filter



Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0xf7eeb7cd2c3a3edaa...	Transfer From	14220277	474 days 1 hr ago	bonestars.eth	Jadu Hoverboard: H...	0 ETH	0.0049843
0x4fcdc18e7b711d660...	Transfer	14220271	474 days 1 hr ago	BONEHEADS: Deployer	bonestars.eth	0.01 ETH	0.0011613
0x86f015a4e343cc1c5...	Transfer	13672205	559 days 8 hrs ago	bonestars.eth	BONEHEADS: Deployer	0.0963219 ETH	0.00275758
0xe84d42f4ba39e8279...	Set Name	13583457	573 days 8 hrs ago	bonestars.eth	ENS: Old Reverse Re...	0 ETH	0.02438028
0x296a5feaa370b7816...	Register With ...	13583450	573 days 8 hrs ago	bonestars.eth	ENS: Old ETH Registr...	0.03471468 ETH	0.04854378
0x97c14d43312167ed...	Commit	13583422	573 days 8 hrs ago	bonestars.eth	ENS: Old ETH Registr...	0 ETH	0.00885163
0x6b5d3d9d57440b23...	Transfer	13583412	573 days 8 hrs ago	BONEHEADS: Deployer	bonestars.eth	0.21014186 ETH	0.00372284
0x515a1e318be8da8ff...	Transfer	13579797	573 days 22 hrs ago	bonestars.eth	BONEHEADS: Deployer	0.00730275 ETH	0.00332518
0x15f180d4c043c9659...	Transfer From	13579717	573 days 22 hrs ago	bonestars.eth	Bored Ape Yacht Clu...	0 ETH	0.01706184
0xec460e0490702527...	Transfer	13515619	584 days 19 mins ago	0x3acEf2...87dda4fa	bonestars.eth	0.03 ETH	0.0026574

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This is **Exhibit “BT”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Address 0x7D7e14Fd2b185d9A0ADA62Ae4b59A5Ea8Ab7Ec05



Buy ▾

Exchange ▾

Play ▾

Gaming ▾



More ▾

Overview

ETH BALANCE

71.694897897438618732 ETH

ETH VALUE

\$130,034.47 (@ \$1,813.72/ETH)

TOKEN HOLDINGS

\$87,302.02 (>114 Tokens)



More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT

0x87618907e1a1... from 439 days 13 hrs ago

FIRST TXN SENT

0x7a5953adf5238... from 494 days 9 hrs ago

Multi Chain

MULTICHAIN ADDRESSES

6 addresses found via Blockscan ▾

Transactions

Internal Transactions

Token Transfers (ERC-20)

NFT Transfers

Analytics



























Comments

Latest 20 from a total of 20 transactions


Advanced Filter



Transaction Hash	Method	Block	Age	From	To	Value	Txn Fee
0x87618907e1a120ae...	Transfer	14442701	439 days 13 hrs ago	0x7D7e14...8Ab7Ec05	BONEHEADS: Deployer	30 ETH	0.00029135
0x430030ad65ee7e0e...	Swap	14413242	444 days 3 hrs ago	0x7D7e14...8Ab7Ec05	Metamask: Swap Ro...	30 ETH	0.01074153
0x78bb940661b85bc6...	Swap	14411018	444 days 12 hrs ago	0x7D7e14...8Ab7Ec05	Metamask: Swap Ro...	0 ETH	0.02080182
0xcaf119cbd20152a45...	Approve	14411018	444 days 12 hrs ago	0x7D7e14...8Ab7Ec05	Apecoin: APE Token	0 ETH	0.00235853
0x30b66154f501d971e...	Cancel Order_	14406704	445 days 4 hrs ago	0x7D7e14...8Ab7Ec05	OpenSea: Wyvern Ex...	0 ETH	0.00432431
0xbbcc6e7a162911e2...	Cancel Order_	14406642	445 days 4 hrs ago	0x7D7e14...8Ab7Ec05	OpenSea: Wyvern Ex...	0 ETH	0.00399253
0x011dedb1bddb7496...	Cancel Order_	14404641	445 days 12 hrs ago	0x7D7e14...8Ab7Ec05	OpenSea: Wyvern Ex...	0 ETH	0.00850371
0x9e1724664c987906...	Cancel Order_	14404637	445 days 12 hrs ago	0x7D7e14...8Ab7Ec05	OpenSea: Wyvern Ex...	0 ETH	0.00777403
0x9dff406d4fe311428...	Cancel Order_	14404630	445 days 12 hrs ago	0x7D7e14...8Ab7Ec05	OpenSea: Wyvern Ex...	0 ETH	0.00745404
0x9bdea44a0481f48cf...	Claim Tokens	14404077	445 days 14 hrs ago	0x7D7e14...8Ab7Ec05	0x025C6d...4B205a1F	0 ETH	0.03162163
0x7e6b2f02404c933d8...	Cancel Order_	14400077	446 days 4 hrs ago	0x7D7e14...8Ab7Ec05	OpenSea: Wyvern Ex...	0 ETH	0.00363483
0x0302be3fe087bb927...	Transfer	14329533	457 days 4 hrs ago	0xfcFa78...A74CCd2b	0x7D7e14...8Ab7Ec05	1.93668683 ETH	0.00099929
0x1a98ebdfed429b27b...	Transfer	14286189	463 days 21 hrs ago	0x7D7e14...8Ab7Ec05	0xfcFa78...A74CCd2b	0.1227554 ETH	0.00062756
0x0a2c93748ae136fe4...	Transfer	14252602	469 days 2 hrs ago	0x7D7e14...8Ab7Ec05	0xab8e87...a9664dEe	0.02 ETH	0.00192908

 Transaction Hash	Method 	Block	Age	From	To	Value	Txn Fee
 0xa141b5847eb826cd...	Cancel Order_	14109836	491 days 4 hrs ago	0x7D7e14...8Ab7Ec05 	 OpenSea: Wyvern Ex... 	0 ETH	0.00852347
 0x4dec3b771d44d821...	Atomic Match_	14098384	492 days 22 hrs ago	0x7D7e14...8Ab7Ec05 	 OpenSea: Wyvern Ex... 	0.26 ETH	0.02106258
 0x80ed1838ef76df38d...	Cancel Order_	14098335	492 days 22 hrs ago	0x7D7e14...8Ab7Ec05 	 OpenSea: Wyvern Ex... 	0 ETH	0.0077808
 0x999b73da6ee6d9a2...	Set Approval ...	14088892	494 days 9 hrs ago	0x7D7e14...8Ab7Ec05 	 Bored Ape Yacht Clu... 	0 ETH	0.00633977
 0x7a5953adf5238046d...	Register Proxy	14088886	494 days 9 hrs ago	0x7D7e14...8Ab7Ec05 	 OpenSea: Registry 	0 ETH	0.05082035
 0xfdd8f7d3130e64984...	Transfer	14084662	495 days 1 hr ago	BONEHEADS: Deployer 	 0x7D7e14...8Ab7Ec05 	0.5 ETH	0.0026821

[Download: [CSV Export](#) ]

 A wallet address is a publicly available address that allows its owner to receive funds from another party. To access the funds in an address, you must have its private key. Learn more about addresses in our [Knowledge Base](#).

This is **Exhibit “BU”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Table 2 – BONEHEADS TEAM: SELECT NFT PURCHASES	
Exhibit	Information
“BONEHEADS: Deployer” (0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F)	
“BV”	<ul style="list-style-type: none"> • <u>Collection:</u> CryptoPunks • <u>Quantity:</u> 1 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 64 ETH (\$204,574.08 USD (\$258,581.63 CAD)) <ul style="list-style-type: none"> ▪ Cryptopunk #5183 - 64 ETH (\$204,574.08 USD (\$258,581.63 CAD)) on January 7, 2022.
“BW”	<ul style="list-style-type: none"> • <u>Collection:</u> The Doggies (Snoop Dogg) • <u>Quantity:</u> 17 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 19.7099 ETH + 1,500 SAND (\$56,385.78 USD (\$70,659.13 CAD)) <ul style="list-style-type: none"> ▪ Doggy #9275 – 8.880 ETH (\$23,069.71 USD (\$28,860.20 CAD)) on February 24, 2022 ▪ Doggy #5492 – 5 ETH (\$12,989.70 USD (\$16,250.11 CAD)) on February 24, 2022 ▪ Doggy #4008 – 2.7 ETH (\$7,476.30 USD (\$9,429.10 CAD)) on February 25, 2022 ▪ Doggy #3791 – 1.4 ETH (\$3,637.12 USD (\$4,550.03 CAD)) on February 24, 2022 ▪ Doggy #5634 – 0.6 ETH (\$1,558.76 USD (\$1,950.00 CAD)) on February 24, 2022 ▪ Doggy #6969 – 0.59 ETH (\$1,532.78 USD (\$1,917.50 CAD)) on February 24, 2022 ▪ Doggy #0879 – 0.5399 ETH (\$1,402.63 USD (\$1,753.69 CAD)) on February 24, 2022 ▪ Doggy #7706 – 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 ▪ Doggy #1084 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 ▪ Doggy #6984 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 ▪ Doggy #8867 – 150 SAND (\$452.67 USD (\$570.09 CAD)) on February 23, 2022 ▪ Doggy #0250 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 ▪ Doggy #2322 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 ▪ Doggy #3694 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 ▪ Doggy #9202 - 150 SAND (\$452.67 USD (\$570.09 CAD)) on February 23, 2022 ▪ Doggy #1736 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 ▪ Doggy #6499 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022
“BX”	<ul style="list-style-type: none"> • <u>Collection:</u> Inhabitants: Generative Identities (Metahero) • <u>Quantity:</u> 25 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 102.63 ETH (\$456,548.54 USD (\$581,551.53 CAD))

	<ul style="list-style-type: none"> ▪ Identity #1543 – 5.5 ETH (\$24,466.70 USD (\$31,165.36 CAD)) on November 29, 2021 ▪ Identity #1792 – 5.39 ETH (\$23,977.36 USD (\$30,542.36 CAD)) on November 29, 2021 ▪ Identity #5660 – 5.33 ETH (\$23,710.45 USD (\$30,203.37 CAD)) on November 29, 2021 ▪ Identity #5727 – 5.3 ETH (\$23,577.00 USD (\$30,032.38 CAD)) on November 29, 2021 ▪ Identity #3107 – 5.27 ETH (\$23,443.54 USD (\$29,862.38 CAD)) on November 29, 2021 ▪ Identity #149 – 5.25 ETH (\$23,354.57 USD (\$29,749.05 CAD)) on November 29, 2021 ▪ Identity #437 – 5.25 ETH (\$23,354.57 USD (\$29,749.05 CAD)) on November 29, 2021 ▪ Identity #156 - 5.25 ETH (\$23,354.57 USD (\$29,749.05 CAD)) on November 29, 2021 ▪ Identity #2062 – 5.2 ETH (\$23,132.15 USD (\$29,465.73 CAD)) on November 29, 2021 ▪ Identity #2670 – 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #2928 - 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #2270 - 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #849 - 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #2409 - 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #2535 - 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #1532 - 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #3265 - 5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 ▪ Identity #1385 – 4.99 ETH (\$22,197.97 USD (\$28,275.77 CAD)) on November 29, 2021 ▪ Identity #780 – 4.95 ETH (\$22,020.03 USD (\$28,049.11 CAD)) on November 29, 2021 ▪ Identity #1405 - 4.95 ETH (\$22,020.03 USD (\$28,049.11 CAD)) on November 29, 2021 ▪ Identity #6207 - 0 ETH on January 9, 2022 ▪ Identity #6203 – 0 ETH on January 9, 2022 ▪ Identity #6206 - 0 ETH on January 9, 2022 ▪ Identity #6205 - 0 ETH on January 9, 2022 ▪ Identity #6204 - 0 ETH on January 9, 2022
<p>“BY”</p>	<ul style="list-style-type: none"> • <u>Collection:</u> NounPunks.eth • <u>Quantity:</u> 30 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 11.14871 ETH (\$39,430.47 USD (\$50,301.45 CAD)) <ul style="list-style-type: none"> ▪ NounPunks #2366 – 4.2069 ETH (\$14,878.84 USD (\$18,980.93 CAD)) on January 5, 2022 ▪ NounPunks #8640 – 0.69 ETH (\$2,440.37 USD (\$3,113.18 CAD)) on January 5, 2022 ▪ NounPunks #9010 – 0.6 ETH (\$2,122.06 USD (\$2,707.11 CAD)) on January 5, 2022 ▪ NounPunks #9435 – 0.589 ETH (\$2,083.16 USD (\$2,657.48 CAD)) on January 5, 2022

	<ul style="list-style-type: none"> ▪ NounPunks #2358 – 0.5 ETH (\$1,768.39 USD (\$2,255.93 CAD)) on January 5, 2022 ▪ NounPunks #1068 – 0.45 ETH (\$1,591.55 USD (\$2,030.34 CAD)) on January 5, 2022 ▪ NounPunks #9327 – 0.43 ETH (\$1,520.81 USD (\$1,940.09 CAD)) on January 5, 2022 ▪ NounPunks #8240 – 0.4 ETH (\$1,414.71 USD (\$1,804.74 CAD)) on January 5, 2022 ▪ NounPunks #9225 – 0.4 ETH (\$1,414.71 USD (\$1,804.74 CAD)) on January 5, 2022 ▪ NounPunks #4316 – 0.4 ETH (\$1,414.71 USD (\$1,804.74 CAD)) on January 5, 2022 ▪ NounPunks #8079 – 0.35 ETH (\$1,237.87 USD (\$1,579.15 CAD)) on January 5, 2022 ▪ NounPunks #5687 – 0.28 ETH (\$990.30 USD (\$1,263.32 CAD)) on January 5, 2022 ▪ NounPunks #6321 – 0.2345 ETH (\$829.37 USD (\$1,058.02 CAD)) on January 5, 2022 ▪ NounPunks #3601 – 0.2 ETH (\$707.35 USD (\$902.36 CAD)) on January 5, 2022 ▪ NounPunks #3253 – 0.18 ETH (\$636.62 USD (\$812.13 CAD)) on January 5, 2022 ▪ NounPunks #3389 – 0.16 ETH (\$565.88 USD (\$721.89 CAD)) on January 5, 2022 ▪ NounPunks #7956 – 0.15899 ETH (\$562.34 USD (\$717.37 CAD)) on January 5, 2022 ▪ NounPunks #2795 – 0.13 ETH (\$459.78 USD (\$586.54 CAD)) on January 5, 2022 ▪ NounPunks #951 – 0.099 ETH (\$350.14 USD (\$446.67 CAD)) on January 5, 2022 ▪ NounPunks #775 – 0.085 ETH (\$300.63 USD (\$383.51 CAD)) on January 5, 2022 ▪ NounPunks #5363 – 0.06942 ETH (\$245.52 USD (\$313.20 CAD)) on January 5, 2022 ▪ NounPunks #4962 – 0.065 ETH (\$229.89 USD (\$293.27 CAD)) on January 5, 2022 ▪ NounPunks #7165 – 0.065 ETH (\$229.89 USD (\$293.27 CAD)) on January 5, 2022 ▪ NounPunks #4391 – 0.062 ETH (\$219.28 USD (\$279.73 CAD)) on January 5, 2022 ▪ NounPunks #2924 – 0.06 ETH (\$212.21 USD (\$270.71 CAD)) on January 5, 2022 ▪ NounPunks #5197 – 0.06 ETH (\$212.21 USD (\$270.71 CAD)) on January 5, 2022 ▪ NounPunks #5455 – 0.0595 ETH (\$210.44 USD (\$268.45 CAD)) on January 5, 2022 ▪ NounPunks #1782 – 0.055 ETH (\$194.52 USD (\$248.14 CAD)) on January 5, 2022 ▪ NounPunks #7508 – 0.055 ETH (\$194.52 USD (\$248.14 CAD)) on January 5, 2022 ▪ NounPunks #3401 – 0.0544 ETH (\$192.40 USD (\$245.44 CAD)) on January 5, 2022
<p>“BZ”</p>	<ul style="list-style-type: none"> • <u>Collection:</u> Bloot (not for Weaks) • <u>Quantity:</u> 12 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 16.9588 ETH (\$65,919.00 USD (\$82,576.73 CAD)) <ul style="list-style-type: none"> ▪ Bloot #7948 – 1.45 ETH (\$5,636.16 USD (\$7,060.41 CAD)) on September 4, 2021 ▪ Bloot #5074 – 1.45 ETH (\$5,636.16 USD (\$7,060.41 CAD)) on September 4, 2021 ▪ Bloot #2052 – 1.45 ETH (\$5,636.16 USD (\$7,060.41 CAD)) on September 4, 2021

	<ul style="list-style-type: none"> ▪ Bloot #1363 – 1.43 ETH (\$5,558.42 USD (\$6,963.03 CAD)) on September 4, 2021 ▪ Bloot #521 – 1.4 ETH (\$5,441.81 USD (\$6,816.95 CAD)) on September 4, 2021 ▪ Bloot #6318 – 1.4 ETH (\$5,441.81 USD (\$6,816.95 CAD)) on September 4, 2021 ▪ Bloot #6993 – 1.4 ETH (\$5,441.81 USD (\$6,816.95 CAD)) on September 4, 2021 ▪ Bloot #86 – 1.3999 ETH (\$5,441.43 USD (\$6,816.47 CAD)) on September 4, 2021 ▪ Bloot #5996 – 1.3999 ETH (\$5,441.43 USD (\$6,816.47 CAD)) on September 4, 2021 ▪ Bloot #3102 – 1.399 ETH (\$5,437.93 USD (\$6,812.09 CAD)) on September 4, 2021 ▪ Bloot #2339 – 1.39 ETH (\$5,402.94 USD (\$6,768.26 CAD)) on September 4, 2021 ▪ Bloot #1668 – 1.39 ETH (\$5,402.94 USD (\$6,768.26 CAD)) on September 4, 2021
<p>“CA”</p>	<ul style="list-style-type: none"> • <u>Collection:</u> Jadu Hoverboard • <u>Quantity:</u> 7 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 5.945 ETH (\$17,339.53 USD (\$22,505.95 CAD)) <ul style="list-style-type: none"> ▪ Hoverboard 2219 – 0.99 ETH (\$2,865.48 USD (\$3,640.87 CAD)) on February 17, 2022 ▪ Hoverboard 4989 – 0.98 ETH (\$2,570.25 USD (\$3,279.12 CAD)) on February 20, 2022 ▪ Hoverboard 925 – 0.92 ETH (\$2,662.87 USD (\$3,383.44 CAD)) on February 17, 2022 ▪ Hoverboard 515 – 0.9 ETH (\$2,604.98 USD (\$3,309.88 CAD)) on February 17, 2022 ▪ Hoverboard 3939 – 0.89 ETH (\$2,576.03 USD (\$3,273.10 CAD)) on February 17, 2022 ▪ Hoverboard 4646 – 0.89 ETH (\$2,576.03 USD (\$3,273.10 CAD)) on February 17, 2022 ▪ Hoverboard 838 – 0.375 ETH (\$1,483.89 USD (\$1,896.41 CAD)) on December 16, 2021
<p>“CB”</p>	<ul style="list-style-type: none"> • <u>Collection:</u> GEVOLs • <u>Quantity:</u> 12 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 5.468 ETH (\$19,554.04 USD (\$24,622.44 CAD)) <ul style="list-style-type: none"> ▪ EVOL #5826 – 0.5 ETH (\$1,788.04 USD (\$2,251.49 CAD)) on October 6, 2021 ▪ EVOL #6001 – 0.5 ETH (\$1,788.04 USD (\$2,251.49 CAD)) on October 6, 2021 ▪ EVOL #1149 – 0.46 ETH (\$1,645.00 USD (\$2,071.34 CAD)) on October 6, 2021 ▪ EVOL #1214 – 0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 ▪ EVOL #7647 – 0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 ▪ EVOL #3623 – 0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 ▪ EVOL #0878 – 0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 ▪ EVOL #4846 – 0.449 ETH (\$1,605.66 USD (\$2,021.84 CAD)) on October 6, 2021 ▪ EVOL #4402 – 0.440 ETH (\$1,573.48 USD (\$1,981.32 CAD)) on October 6, 2021

	<ul style="list-style-type: none"> ▪ EVOL #3582 – 0.440 ETH (\$1,573.48 USD (\$1,981.32 CAD)) on October 6, 2021 ▪ EVOL #7461 – 0.440 ETH (\$1,573.48 USD (\$1,981.32 CAD)) on October 6, 2021 ▪ EVOL #3680 – 0.439 ETH (\$1,569.90 USD (\$1,976.81 CAD)) on October 6, 2021
“CC”	<ul style="list-style-type: none"> • <u>Collection:</u> Pixel Vault Founder’s DAO • <u>Quantity:</u> 2 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 7.729 ETH (\$33,253 USD (\$42,324.41 CAD)) <ul style="list-style-type: none"> ▪ Pixel Vault #5109 – 3.88 ETH (\$16,710.31 USD (\$21,268.88 CAD)) on November 28, 2021 ▪ Pixel Vault #845 – 3.849 ETH (\$16,542.69 USD (\$21,055.53 CAD)) on November 28, 2021
“CD”	<ul style="list-style-type: none"> • <u>Collection:</u> Larva Chads • <u>Quantity:</u> 1 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 0.75 ETH (\$2,554.86 USD (\$3,252.08 CAD)) <ul style="list-style-type: none"> ▪ Larva Chad #2848 – 0.75 ETH (\$2,554.86 USD (\$3,252.08 CAD)) on January 6, 2022
“CE”	<ul style="list-style-type: none"> • <u>Collection:</u> Adam Bomb Squad • <u>Quantity:</u> 1 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 1 ETH (\$2,425.83 USD (\$3,091.96 CAD)) <ul style="list-style-type: none"> ▪ ABS #24913 – 1 ETH (\$2,425.83 USD (\$3,091.96 CAD)) on January 27, 2022
“CF”	<ul style="list-style-type: none"> • <u>Collection:</u> MEV Army • <u>Quantity:</u> 80 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 31.3942 ETH (\$76,054.01 USD (\$96,460.83 CAD)) • <u>Notes:</u> 80 MEV Army NFTs were purchased from January 24, 2022 – January 28, 2022 for a total of 31.3942 ETH. The total price was obtained by multiplying the total Ether spent with the average closing Ether price across those five days in both USD and CAD.
“BNHDZVAULT” (0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317)	
“CG”	<ul style="list-style-type: none"> • <u>Collection:</u> CLONE X – X TAKASHI MURAKAMI • <u>Quantity:</u> 3 • <u>Purchase Price:</u> <ul style="list-style-type: none"> ○ Total: 31.9105 ETH (\$81,277.00 USD (\$103,758.21 CAD)) <ul style="list-style-type: none"> ▪ CloneX #19303 – 16.9105 ETH (\$43,071.55 USD (\$54,985.14 CAD)) on January 28, 2022

	<ul style="list-style-type: none"> ▪ CloneX #3768 – 15 ETH (\$38,205.45 USD (\$48,773.07 CAD)) on January 28, 2022 ▪ CloneX #4959 – 0 ETH
“ivybone.eth” (0xa1e43fcb51656354931d47458eceedbc6545df57)	
“CH”	<ul style="list-style-type: none"> • <u>Collection</u>: Otherdeed for Otherside • <u>Quantity</u>: 14 • <u>Purchase Price</u>: <ul style="list-style-type: none"> ○ Total: 36.66 ETH + 15,407 APE Tokens (\$347,593.31 USD (\$446,483.60 CAD)) <ul style="list-style-type: none"> ▪ #11716 – 18.67 ETH (\$52,762.17 USD (\$67,773.00 CAD)) on May 1, 2022 ▪ #13172 – 17.99 ETH (\$50,840.46 USD (\$65,304.57 CAD)) on May 1, 2022 ▪ #14381 – 3,000 APE Tokens (\$47,509.06 USD (\$61,025.38 CAD)) on May 1, 2022 ▪ #72046 – 1,368 APE Tokens (\$21,664.13 USD (\$27,827.57 CAD)) on May 1, 2022 ▪ #81119 – 1,389 APE Tokens (\$21,996.69 USD (\$28,254.74 CAD)) on May 1, 2022 ▪ #73727 – 1,250 APE Tokens (\$19,795.44 USD (\$25,427.24 CAD)) on May 1, 2022 ▪ #79855 – 1,250 APE Tokens (\$19,795.44 USD (\$25,427.24 CAD)) on May 1, 2022 ▪ #65722 – 1,260 APE Tokens (\$19,953.80 USD (\$25,630.65 CAD)) on May 1, 2022 ▪ #78273 – 1,200 APE Tokens (\$19,003.62 USD (\$24,410.14 CAD)) on May 1, 2022 ▪ #82865 – 1,150 APE Tokens (\$18,211.81 USD (\$23,393.06 CAD)) on May 1, 2022 ▪ #69026 – 1,250 APE Tokens (\$19,795.44 USD (\$25,427.24 CAD)) on May 1, 2022 ▪ #77827 – 1,190 APE Tokens (\$18,845.26 USD (\$24,206.73 CAD)) on May 1, 2022 ▪ #60022 – 1,100 APE Tokens (\$17,419.99 USD (\$22,375.97 CAD)) on May 1, 2022

This is **Exhibit “BV”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

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Transaction Details



Exchange ▾

Gaming ▾

Overview

Logs (3)

State

Comments

More ▾

Transaction Hash:

0x3c0b4a854fb42655abe44d1fc28da2111fd976f627872425f74a005e2b4b2f58

Status:

Success

Block:

 13957081 2785482 Block Confirmations

Timestamp:

419 days 10 hrs ago (Jan-07-2022 07:48:34 AM +UTC) | Confirmed within 30 secs

Sponsored:

From:

0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)

To:

0xb47e3cd837dDF8e4c57F05d70Ab865de6e193BBB (CryptoPunks: C Token)

ERC-20 Tokens Transferred:

▶ From 0x54B174...83CD40ae To BONEHEADS: Deployer For 1 CRYPTOPUNKS... (C...)

View Input As ▾


 Decode Input Data

More Details:

[— Click to show less](#)

 **Private Note:**

To access the **Private Note** feature, you must be [Logged In](#)

 A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our [Knowledge Base](#).

This is **Exhibit “BW”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



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Body Accessory	11 ▾	The Doggies (Snoop Dogg) X	Clear all			
Eyes	23 ▾	ITEM 17	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST
Eyes	23 ▾	Doggy #9275 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.2703 WETH	Not listed	8.8956 ETH
Hair	14 ▾	Doggy #5492 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0719 WETH	3 ETH	5.0153 ETH
Hat	20 ▾	Doggy #4008 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	Not listed	2.7091 ETH
Head	2 ▾	Doggy #3791 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	1 ETH	1.4123 ETH
Left Hand Accessory	7 ▾	Doggy #5634 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	0.25 ETH	0.6148 ETH
Mouth	11 ▾	Doggy #6969 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	Not listed	0.6086 ETH
Mouth Accessory	3 ▾	Doggy #0879 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	Not listed	0.5505 ETH
Pants	16 ▾	Doggy #7706 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	Not listed	--
Shoes	18 ▾	Doggy #1084 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	Not listed	--
Special Edition	3 ▾	Doggy #6984 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	Not listed	--
Special Snoop	19 ▾	Doggy #6984 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	Not listed	--

Hat	20	▼	 Doggy #8867 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	➔ Not listed	--
Head	2	▼	 Doggy #0250 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	➔ Not listed	--
Left Hand Accessory	7	▼	 Doggy #2322 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	➔ Not listed	--
Mouth	11	▼	 Doggy #3694 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	➔ Not listed	--
Mouth Accessory	3	▼	 Doggy #9202 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	➔ Not listed	--
Pants	16	▼	 Doggy #1736 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	➔ Not listed	--
Shoes	18	▼	 Doggy #6499 The Doggies (Snoop Dogg) ✓	0.0676 ETH	0.0533 WETH	➔ Not listed	--
Special Edition	3	▼					
Special Snoop	19	▼					

This is **Exhibit “BX”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

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New

Inhabitants: Generative Identities (MetaHero) X

Clear all

New	ITEM 25	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE ⓘ
Has Offers	Identity #1543 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.5 WETH	Not listed	5.5237 ETH	--
	Identity #1792 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.51 WETH	Not listed	5.4111 ETH	--
Price	Identity #5660 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.51 WETH	Not listed	5.3548 ETH	--
Quantity	Identity #5727 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.51 WETH	Not listed	5.3266 ETH	--
Collections	Identity #3107 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.5 WETH	Not listed	5.2978 ETH	--
inhab	Identity #149 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.5 WETH	Not listed	5.2766 ETH	--
Inhabitants: Gen... 7,615	Identity #437 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.5 WETH	Not listed	5.2782 ETH	--
Inhabitants: United ... 11	Identity #156 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.5 WETH	Not listed	5.2731 ETH	--
Numismatic collect... 2,999	Identity #2062 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.51 WETH	Not listed	5.2234 ETH	--
Chains	Identity #2670 Inhabitants: Generative Identities (Met)	0.5489 ETH	0.5 WETH	Not listed	5.0266 ETH	--
Currency						

Has Offers

Price

Quantity

Collections

inha

Inhabitants: Gen... 7,615

Inhabitants: United ... 11

Numismatic collect... 2,999

Chains

Collections

inha

Inhabitants: Gen... 7,615

Inhabitants: United ... 11

Numismatic collect... 2,999

Chains

	Identity #2928 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	5.0281 ETH	--
	Identity #2270 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	5.0317 ETH	--
	Identity #849 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	5.0333 ETH	--
	Identity #2409 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.51 WETH	Not listed	5.0281 ETH	--
	Identity #2535 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.51 WETH	Not listed	5.0234 ETH	--
	Identity #1532 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.51 WETH	Not listed	5.0306 ETH	--
	Identity #3265 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	5.0273 ETH	--
	Identity #1385 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	5.0196 ETH	--
	Identity #780 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	4.985 ETH	--
	Identity #1405 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	4.984 ETH	--
	Identity #6207 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	--	--
	Identity #6203 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	--	--
	Identity #6206 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.5 WETH	Not listed	--	--
	Identity #6205 Inhabitants: Generative Identities (Mei)	0.5489 ETH	2.0001 WETH	Not listed	--	--
	Identity #6204 Inhabitants: Generative Identities (Mei)	0.5489 ETH	0.52 WETH	Not listed	--	--

This is **Exhibit “BY”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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Collections ▾

NounPunks.eth X

Clear all

noun X

Collection Value
NounPunks.eth 0.5367 ETH
Listed: 0/30 Floor: 0.0179 ETH

Chains ▾

Status ▾

Price ▾

Quantity ▾

Currency ▾

Attributes

accessories 9 ▾

noun X

Collection Value
NounPunks.eth 0.5367 ETH
Listed: 0/30 Floor: 0.0179 ETH

Chains ▾

Status ▾

Price ▾

Quantity ▾

Currency ▾

Attributes

accessories 9 ▾

ITEM 30

FLOOR PRICE

BEST OFFER

LISTING PRICE

COST

DIFFERENCE

ITEM 30	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
NounPunks #2366 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	4.2298 ETH	--
NounPunks #8640 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.7148 ETH	--
NounPunks #9010 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.6202 ETH	--
NounPunks #9435 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.6076 ETH	--
NounPunks #2358 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.5235 ETH	--
NounPunks #1088 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.4788 ETH	--
NounPunks #9327 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.4555 ETH	--
NounPunks #8240 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.4201 ETH	--
NounPunks #9225 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.4221 ETH	--
NounPunks #4316 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.4218 ETH	--
NounPunks #8079 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.3755 ETH	--
NounPunks #5687 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.3087 ETH	--
NounPunks #6321 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.253 ETH	--
NounPunks #3801 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.2211 ETH	--
NounPunks #3253 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.2085 ETH	--
NounPunks #3389 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.1836 ETH	--
NounPunks #7956 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.1845 ETH	--
NounPunks #2795 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.158 ETH	--
NounPunks #951 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.127 ETH	--
NounPunks #775 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.1041 ETH	--

✕

Collection **Value**

NounPunks.eth 0.5367 ETH
Listed: 0/30 Floor: 0.0179 ETH

Chains ▼

Status ▼



Price ▼

Quantity ▼

Currency ▼

Attributes

accessories 🔍 ▼

 NounPunks #5363 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.096 ETH	---
 NounPunks #4962 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.091 ETH	---
 NounPunks #7165 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0907 ETH	---
 NounPunks #4391 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0877 ETH	---
 NounPunks #2924 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0833 ETH	---
 NounPunks #5197 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0834 ETH	---
 NounPunks #5455 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0778 ETH	---
 NounPunks #1782 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0827 ETH	---
 NounPunks #7508 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0789 ETH	---
 NounPunks #3401 NounPunks.eth	0.0179 ETH	0.0136 WETH	Not listed	0.0825 ETH	---

This is **Exhibit “BZ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

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Collections ^

bloot ×

bloot ×

Collection	Value
Bloot (not for Weeks) <small>Listed: 0/12 Floor: 0.015 ETH</small>	0.18 ETH

Chains ^

Status ^

Price ^

Quantity ^

Currency ^

Quantity ^

Currency ^

ITEM 12	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
Bloot #7948 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4765 ETH	--
Bloot #5074 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4765 ETH	--
Bloot #2052 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4765 ETH	--
Bloot #1363 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4588 ETH	--
Bloot #521 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4294 ETH	--
Bloot #6318 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4272 ETH	--
Bloot #6993 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4294 ETH	--
Bloot #86 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4312 ETH	--
Bloot #5996 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4312 ETH	--
Bloot #3102 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4278 ETH	--
Bloot #2339 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4191 ETH	--
Bloot #1668 <small>Bloot (not for Weeks)</small>	0.015 ETH	--	Not listed	1.4188 ETH	--

This is **Exhibit “CA”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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Collections

Jadu Hoverboard

Clear all

jadu

Collection	Value
Jadu Hoverboard	0.518 ETH
Listed: 0/7 Floor: 0.074 ETH	

Chains

Status

Price

Quantity

Currency

Attributes

ITEM 7	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
Hoverboard 2219 Jadu Hoverboard	0.074 ETH	0.0487 WETH	Not listed	1.0083 ETH	--
Hoverboard 4989 Jadu Hoverboard	0.074 ETH	0.0487 WETH	Not listed	0.9907 ETH	--
Hoverboard 925 Jadu Hoverboard	0.074 ETH	0.0487 WETH	Not listed	0.9392 ETH	--
Hoverboard 515 Jadu Hoverboard	0.074 ETH	0.0487 WETH	Not listed	0.9224 ETH	--
Hoverboard 3939 Jadu Hoverboard	0.074 ETH	0.0487 WETH	Not listed	0.9081 ETH	--
Hoverboard 4646 Jadu Hoverboard	0.074 ETH	0.0487 WETH	Not listed	0.9177 ETH	--
Hoverboard 838 Jadu Hoverboard	0.074 ETH	0.0487 WETH	Not listed	0.3887 ETH	--

This is **Exhibit “CB”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____ *A.K.* _____

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Collections

GEVOLs X Clear all

🔍 gevol X

Collection **Value**
 GEVOLs 0.6396 ETH
Listed: 0/12 Floor: 0.0533 ETH

Chains ▾

Status ▾

Price ▾

Quantity ▾

Currency ▾

Attributes

Price ▾

Quantity ▾

Currency ▾

Attributes

ITEM 12	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
EVOL #5826 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.5216 ETH	--
EVOL #6001 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.5185 ETH	--
EVOL #1149 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4795 ETH	--
EVOL #1214 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4665 ETH	--
EVOL #7647 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4665 ETH	--
EVOL #3623 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4665 ETH	--
EVOL #0878 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4665 ETH	--
EVOL #4846 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4645 ETH	--
EVOL #4402 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.46 ETH	--
EVOL #3582 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4612 ETH	--
EVOL #7461 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4612 ETH	--
EVOL #3680 GEVOLs	0.0533 ETH	0.0411 WETH	Not listed	0.4605 ETH	--

This is **Exhibit “CC”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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Collections

Pixel Vault Founder's DAO X Clear all

Collection	Value
Pixel Vault Founder's ... <small>Listed: 0/2</small>	0.5776 ETH <small>Floor: 0.2888 ETH</small>
Elite Ape Entry Coins <small>Listed: 0/2</small>	0.008 ETH <small>Floor: 0.004 ETH</small>

ITEM 2	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
Pixel Vault Founder's DAO <small>Pixel Vault Founder's DAO</small>	0.2888 ETH	0.2501 WETH	Not listed	3.9308 ETH	--
Pixel Vault Founder's DAO <small>Pixel Vault Founder's DAO</small>	0.2888 ETH	0.2501 WETH	Not listed	3.8988 ETH	--

Chains

Status

Price

This is **Exhibit “CD”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



BONEHEADSSTUDIOS

boneheads.eth · Joined August 2021



Collected 1.9K **BETA** Created 10.0K Favorited Activity More

Search by name or attribute

Highest last sale

Collections

Larva Chads X Clear all

larva

ITEM 1	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
--------	-------------	------------	---------------	------	------------

Collection	Value
Larva Chads	0.1092 ETH

Larva Chads #2848 Larva Chads	0.1092 ETH	0.806 WETH	Not listed	0.7774 ETH	--
----------------------------------	------------	------------	------------	------------	----

This is **Exhibit “CE”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



BONEHEADSSTUDIOS

boneheads.eth · Joined August 2021



Collected 1.9K **BETA** Created 10.0K Favorited Activity More

Search by name or attribute

Highest last sale

Collections

Adam Bomb Squad X

Clear all

adam bomb

Collection

Value

Adam Bomb Squad 0.144 ETH

ITEM ID	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
#24913 Adam Bomb Squad	0.144 ETH	0.1479 WETH	0.85 ETH	1.0381 ETH	-0.1881 ETH

This is **Exhibit “CF”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



BONEHEADSSTUDIOS

boneheads.eth · Joined August 2021



Collected 1.9K BETA Created 10.0K Favorited Activity More ▾

Search by name or attribute

Highest last sale ▾



Collections

MEV Army X

Clear all

Collections

mev

Collection

Value

MEV Army 1.992 ETH
listed: 0/80 Floor: 0.0249 ETH

Chains

Status

Price

Quantity

Currency

Attributes

eyes

16 ▾

mev

Collection

Value

MEV Army 1.992 ETH
listed: 0/80 Floor: 0.0249 ETH

Chains

Status

Price

Quantity

Currency

Attributes

eyes

16 ▾

ITEM 80

#2728 MEV Army

FLOOR PRICE

BEST OFFER

LISTING PRICE

COST

DIFFERENCE

#9505 MEV Army

#7627 MEV Army

#2568 MEV Army

#8554 MEV Army

#3519 MEV Army

#5542 MEV Army

#3187 MEV Army

#3755 MEV Army

#9688 MEV Army

#1899 MEV Army

#6043 MEV Army

#1057 MEV Army

#674 MEV Army

#6487 MEV Army

#2997 MEV Army

#4294 MEV Army

#4436 MEV Army

#3441 MEV Army

#7508 MEV Army

0.0249 ETH

0.0151 WETH

Not listed

4.0159 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

1.5153 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.7098 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.628 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.6306 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.6113 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5942 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5879 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5743 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5739 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5594 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5335 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5171 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5086 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.4733 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.5043 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.4639 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.4716 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.4829 ETH

--

0.0249 ETH

0.0151 WETH

Not listed

0.4395 ETH

--

mev

MEV Army 1.992 ETH
Listed: 0/80 Floor: 0.0249 ETH

Chains
Status
Price
Quantity
Currency
Attributes

mev

MEV Army 1.992 ETH
Listed: 0/80 Floor: 0.0249 ETH

Chains
Status
Price
Quantity
Currency
Attributes
eyes 16

mev

MEV Army 1.992 ETH
Listed: 0/80 Floor: 0.0249 ETH

Chains
Status
Price
Quantity
Currency
Attributes
eyes 16

#3358	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.4156 ETH
#5032	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.399 ETH
#1572	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.4008 ETH
#1890	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3883 ETH
#4218	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.37 ETH
#6489	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3603 ETH
#4320	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3525 ETH
#8993	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3516 ETH
#910	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3515 ETH
#2528	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3509 ETH

#4396	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3451 ETH
#4214	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3453 ETH
#2194	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3462 ETH
#9145	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3443 ETH
#922	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3397 ETH
#7087	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3278 ETH
#1801	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3304 ETH
#6804	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3159 ETH
#9146	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3055 ETH
#331	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.3017 ETH

#9350	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2906 ETH
#9564	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2837 ETH
#1416	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2969 ETH
#1418	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2936 ETH
#8578	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2833 ETH
#24	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.289 ETH
#6883	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.286 ETH
#522	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.286 ETH
#6260	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2674 ETH
#9820	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.282 ETH

mev

Collection Value
MEV Army 1.992 ETH
Listed: 0/80 Floor: 0.0249 ETH

- Chains
- Status
- Price
- Quantity
- Currency
- Attributes
- eyes 16

#8589	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2349 ETH
#5833	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2246 ETH
#2197	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2187 ETH
#255	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2298 ETH
#9687	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.218 ETH
#8062	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2162 ETH
#9747	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2145 ETH
#2592	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2098 ETH
#9964	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2134 ETH
#6467	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.213 ETH

mev

Collection Value
MEV Army 1.992 ETH
Listed: 0/80 Floor: 0.0249 ETH

- Chains
- Status
- Price
- Quantity
- Currency
- Attributes
- eyes 15

#4862	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2095 ETH
#9186	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2093 ETH
#9487	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2056 ETH
#26	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2049 ETH
#161	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2042 ETH
#3006	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2056 ETH
#9615	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2095 ETH
#1397	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2313 ETH
#2978	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2037 ETH
#6038	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1988 ETH

mev

Collection Value
MEV Army 1.992 ETH
Listed: 0/80 Floor: 0.0249 ETH

- Chains
- Status
- Price
- Quantity
- Currency
- Attributes
- eyes 16

#186	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2079 ETH
#9296	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1967 ETH
#9481	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.2048 ETH
#3203	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1969 ETH
#5332	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1831 ETH
#5991	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1821 ETH
#2071	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1662 ETH
#3411	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1589 ETH
#3412	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1647 ETH
#3409	MEV Army	0.0249 ETH	0.0151 WETH	Not listed	0.1614 ETH

This is **Exhibit “CG”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



BNHDZVAULT

0xa8c2...1317 Joined February 2022



Collected 32 **BETA** Created Favorited Activity More ▾

☰ Highest last sale ▾ [Grid] [Table] [List] [Map]

Collections ^

✕

Collection	Value
CLONE X - X TAKASHI M... <small>Listed: 0/3</small>	14.052 ETH <small>Floor: 4.684 ETH</small>
RTFKT SKIN VIAL: EVO X <small>Listed: 0/3</small>	0.1668 ETH <small>Floor: 0.0556 ETH</small>

Chains ▾

Status ▾

CLONE X - X TAKASHI MURAKAMI ✕ Clear all

ITEM 3	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE 🔗
CloneX #19303 <small>CLONE X - X TAKASHI MURAKAMI</small>	4.684 ETH	4.61 WETH	Not listed	16.9409 ETH	--
CloneX #3768 <small>CLONE X - X TAKASHI MURAKAMI</small>	4.684 ETH	4.61 WETH	Not listed	15.0333 ETH	--
CloneX #4959 <small>CLONE X - X TAKASHI MURAKAMI</small>	4.684 ETH	10.991 WETH	Not listed	--	--

This is **Exhibit “CH”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario



ivybone.eth

ivybone.eth · Joined October 2021



Collected 14 **BETA** Created Favorited Activity More

Search by name

Highest last sale



Collections

clone

Search

Collection Value

- Otherdeed for Otherside** 23.712 ETH
Listed: 0/13 Floor: 1.824 ETH
- ENS: Ethereum Name...** < 0.0001 ETH
Listed: 0/1 Floor: < 0.0001 ETH
- Story Of Meta Penguin Cards**
Listed: 0/1
- Bored Meta Penguin Lab**
Listed: 0/1
- The Great Metroverse Genesis**
Listed: 0/1
- Shinny Meta Penguin Lab**
Listed: 0/1
- The Dour Darcel Origin**
Listed: 0/1
- Bored Meta Penguin Lab**
Listed: 0/1
- The Great Metroverse Genesis**
Listed: 0/1
- Shinny Meta Penguin Lab**
Listed: 0/1
- The Dour Darcel Origin**
Listed: 0/1

ITEM ID	FLOOR PRICE	BEST OFFER	LISTING PRICE	COST	DIFFERENCE
#11716 Otherdeed for Otherside	1.8249 ETH	2.3011 WETH	Not listed	18.6856 ETH	--
#13172 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	18.017 ETH	--
#14381 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	3,000 APE	--
#72046 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	1,368 APE	--
#73727 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	1,250 APE	--
#79855 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	1,250 APE	--
#65722 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	1,260 APE	--
#81119 Otherdeed for Otherside	1.824 ETH	14.1 WETH	Not listed	1,389 APE	--
#78273 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	1,200 APE	--
#82865 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	1,150 APE	--
#69026 Otherdeed for Otherside	1.824 ETH	2.4 WETH	Not listed	1,250 APE	--
#77827 Otherdeed for Otherside	1.824 ETH	2.1071 WETH	Not listed	1,190 APE	--
#60022 Otherdeed for Otherside	1.824 ETH	1.7585 WETH	Not listed	1,100 APE	--
ivybone.eth ENS: Ethereum Name Service	0.000000001 ETH	--	Not listed	--	--

This is **Exhibit “CI”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Follow

Send ↗



boneheads.eth

0x8c0f...de5f

0 Following 0 Followers

Net Worth

\$149,009.08



NFTs 97.37%

Wallet 2.63%

Overview

Portfolio

NFTs

Activity

More ▾

Wallet

\$3,915.43



ETH

\$1,812.83

\$2,045.82

1.1285



WETH

\$1,812.65

\$1,758.60

0.9702



SAND

\$0.52

\$111.01

213

NFTs

\$145,093.65



x1

CryptoPunks

Floor Price
52.95 ETH

Est. Value
\$111.15K



x25

Inhabitants: Generative Id...

Floor Price
0.5 ETH

Est. Value
\$24.34K



x15

The Doggies

Floor Price
0.072 ETH

Est. Value
\$4.62K

View all >

This is **Exhibit “CJ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Follow

Send ↗



0xa8c2...1317

0xa8c2...1317

0 Following 0 Followers

Net Worth

\$37,225.36



NFTs 99.32%

Wallet 0.68%

Overview

Portfolio

NFTs

Activity

More ▾

Wallet

\$252.32



ETH

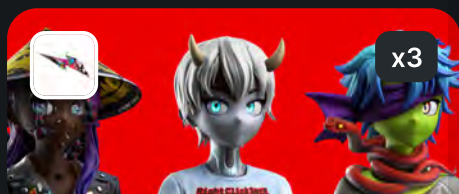
\$1,812.64

\$252.32

0.1392

NFTs

\$36,973.04



x3

Clone X - X TAKASHI MUR...

Floor Price
2.71 ETH

Est. Value
\$29.25K



x59

MintPass 2

Floor Price
0.03 ETH

Est. Value
\$3.06K



x2

The Sandbox

Floor Price
0.44 ETH

Est. Value
\$1.89K

View all >

This is **Exhibit “CK”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario



Follow

Send ↗



ivybone.eth

0xa1e4...df57

0 Following 0 Followers

Net Worth

\$13,648.12



NFTs 100.00%

Overview

Portfolio

NFTs

Activity

More ▾



No balances found

There are no balances to display.

Wallet

\$0.00



No balances found

There are no balances to display.

NFTs

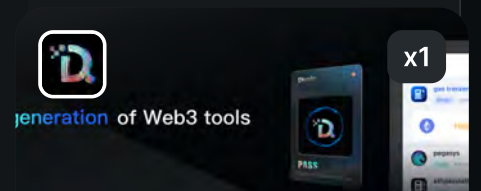
\$13,648.12



Otherdeed for Otherside



Cute Tap Fantasy Origin



The DTool Lab

Floor Price
1.07 ETH

Est. Value
\$13.65K

Floor Price
0 ETH

Est. Value
\$0.00

Floor Price
0 ETH

Est. Value
\$0.00

[View all >](#)

This is **Exhibit “CL”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Canadian Anti-Fraud Centre Bulletin: Crypto Investments



Fraud Prevention Month is a campaign held each March to inform and educate the public on the importance of protecting yourself from being a victim of fraud. This year's theme is impersonation, and focuses on scams where fraudsters will claim to be government officials, critical infrastructure companies, and even law enforcement officials. The Canadian Anti-Fraud Centre will be sharing advice through our website, Facebook and Twitter pages. We encourage you to follow and visit our social media profiles often for fraud prevention information. Don't forget to use #FPM2022 on all fraud prevention posts all month!

Investment scams were the highest reported scams based on dollar loss in 2021. Victims of investment scams reported a total loss of \$163.9 Million to CAFC. In most of these cases, the investment opportunities offer higher than normal, or true monetary, returns which often result in investors losing most, or all, of their money. The majority of the investment scam reports involve Canadians investing in crypto currency after seeing a deceptive advertisement. It typically involves victims downloading a trading platform and transferring crypto currency into their trading account. In most cases, victims are not able to withdraw their funds. It is very likely that many of the trading platforms are fraudulent or controlled by fraudsters. In addition to crypto trading scams, the CAFC also receives reports on suspected fraudulent Initial Coin Offerings.

Variations of Crypto Investment Scams

- The victim is approached on a dating or social media website. In some cases, the scam starts as a romance scam and quickly turns into an "investment opportunity". Because suspects have gained the victim's trust, it can lead to a high dollar loss for the victim.
- In some reports, suspects have compromised victim's friend's social media accounts. Because the victim believes they are communicating with a friend or a trusted person, they are easily convinced to take advantage of the "investment opportunity".
- The suspect calls a victim directly and convinces them to invest into crypto currency. In many cases, the suspect asks for remote access to the victim's computer. The suspect shows the victim a fraudulent crypto investing website and convinces the victim to invest based on the potential exponential growth of the investment. In many cases, the victim will invest over a long period of time and, in the end, will realize that the funds can not be withdrawn.
- An email is received by the victim offering a crypto investment opportunity.
- The victim comes across an advertisement on social media. After the victim clicks on the ad and provides their contact information, suspects contact the victim by telephone and convince them to invest.

Warning Signs

- Investment opportunities with higher than normal returns.
- Unsolicited telephone, email or social media investment offers.
- Displays of urgency so you don't miss out.
- An individual met on a dating or social media website who quickly attempts to convince you to invest into crypto currency.

- A friend tells you about a crypto currency investment opportunity via social media or email.
- Telephone calls from crypto investment companies.
- Fraudulent ads posted on the internet or social media.
- Request to transfer your crypto investment to an alternate crypto address.

How to protect yourself

- Be careful when sending cryptocurrency. Once the transaction is completed, it is unlikely to be reversed.
- As proceeds of crime and anti-money laundering regimes around the world create regulatory frameworks that treat businesses dealing in crypto currencies as money service businesses, Canadians need do their research to ensure they are using reputable and compliant services.
- If you receive a suspicious message from a trusted friend, reach out to them through a different means of communication to confirm that it is them.
- Verify if the investment companies are registered with your Provincial Securities Agency or the National Registration Search Tool (www.aretheyregistered.ca).
- Prior to investing, ask for information on the investment. Research the team behind the offering and analyze the feasibility of the project.
- Be wary of individuals met on dating or social media who attempt to educate and convince you to invest into crypto currency.
- Beware of fraudsters asking you to open and fund new crypto accounts. They will direct you to send it to wallets they control. Don't!

Anyone who suspects they have been the victim of cybercrime or fraud should report it to their local police and to the Canadian Anti-Fraud Centre's [online reporting system](#) or by phone at 1-888-495-8501. If not a victim, report it to the CAFC anyway.

This is **Exhibit “CM”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

Assessment Property Information

Property Address: 12 AMBER PL BELLEVILLE Unit Number: N/A
ON K8P0B5
Municipality: BELLEVILLE Property Type: RESIDENTIAL

Valuation & Sales

Sales History

Sale Date ▼	Sale Amount	Type	Party To	Notes
Jun 09, 2021	\$770,000	Transfer	NURSE, MICHAEL AARON; NURSE, MARISOL;	
Aug 31, 2017	\$525,500	Transfer	KOROLEVA, OLGA;	
May 14, 2008	\$2	Transfer	BELFORD, TRISH DEANNA;	
Jan 18, 2008	\$381,469	Transfer	BELFORD, TRISH DEANNA; BELFORD, ROBERT BRUCE;	
Dec 13, 2007	\$62,000	Transfer	MIRTREN BUILDERS LIMITED;	

Take pr
intellig
next lev



Reports Available for Purchase:

Property Insights Report

- Subject Property AVM Value
- Authoritative Title Check data
- Active Mortgages, Liens, Judgments, Cautions,

Enhanced Comparable Report

- Subject Property AVM
- Authoritative Title Check data
- Active Mortgages, Liens, Judgments, Cautions,

This is **Exhibit “CN”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____ *A.K.* _____

Commissioner of Oaths in and for Ontario

9:34

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Lexi stinson

< 2 hrs
avg reply

< 75%
reply rate

6 yrs
on Kijiji

Listings

Reviews

3 listings

Sort by

Posted: newest first



Townhouse for rent

\$2,800.00

1w | Belleville



PS5 Console

\$1,000.00

2w | Belleville



Men's Yeezy Slides

\$100.00

4w | Belleville

9:34

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🔒 kijiji.ca

Contact

Description

Welcome Home !! Executive Luxury Townhouse , stunning end unit townhouse in the west end of Belleville. Short drive to PEC, shops, hospital, stores. This unit is less than 6 years old , full kitchen , quartz waterfall countertops, stainless steel appliances, gas stove , island for 5 stools. Walk pot to a private patio, outdoor shed, fenced yard .

2 master suites, one on the main floor with w/i closet, 3rd optional bedroom or office.

Full washer and dryer / mudroom with a garage.

Looking for ONE or TWO professional individual(s)

👁️ 41 visits

Matheson Group Realty

Matheson Group Realty



This is **Exhibit “CO”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____


Commissioner of Oaths in and for Ontario



Lex Oxo

★ 4.5

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Based on 6 ratings



Lex's strengths

Here's what buyers appreciate about Lex:

Pricing (2)

Item Description (2)

Punctuality (2)

Communication (3)

About



Joined Facebook in 2010

Lex's Listings



Search Listings

Available & in stock

Sort by



C\$2,500

Bed

Belleville, ON



C\$100

Workout lot

Belleville, ON



C\$375

Sneakers

Belleville, ON



C\$150

Aritzia Super Puff

Belleville, ON



C\$1,000

PS5

Belleville, ON



C\$100

BAPE T-Shirt

Belleville, ON



C\$250

Dining room table

Belleville, ON



C\$9,500

Solid black walnut table

Belleville, ON



C\$400



C\$100

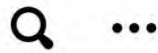


C\$475 ~~C\$123,456~~



C\$150 ~~C\$200~~

4:04



Seller information

[Seller details](#)



Lex Oxo



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See 5 seller ratings



Belleville, ON

Location is approximate

Details

Condition

New >

Description

Basically brand new, used a few times, moving and don't need anymore. Comes with 4 controllers and all the games. Selling as a lot.

Products related to this item

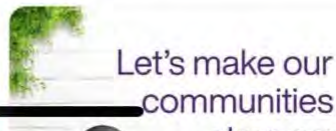
Sponsored



Walmart Canada



TELUS



This is **Exhibit “CP”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____  _____

Commissioner of Oaths in and for Ontario

6:46



llexixoxo 1h



COYA MARBELLA

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melinacleblanc



@llexixoxo

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LTE



llexixoxo 8h



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5:00



llexixoxo 7h

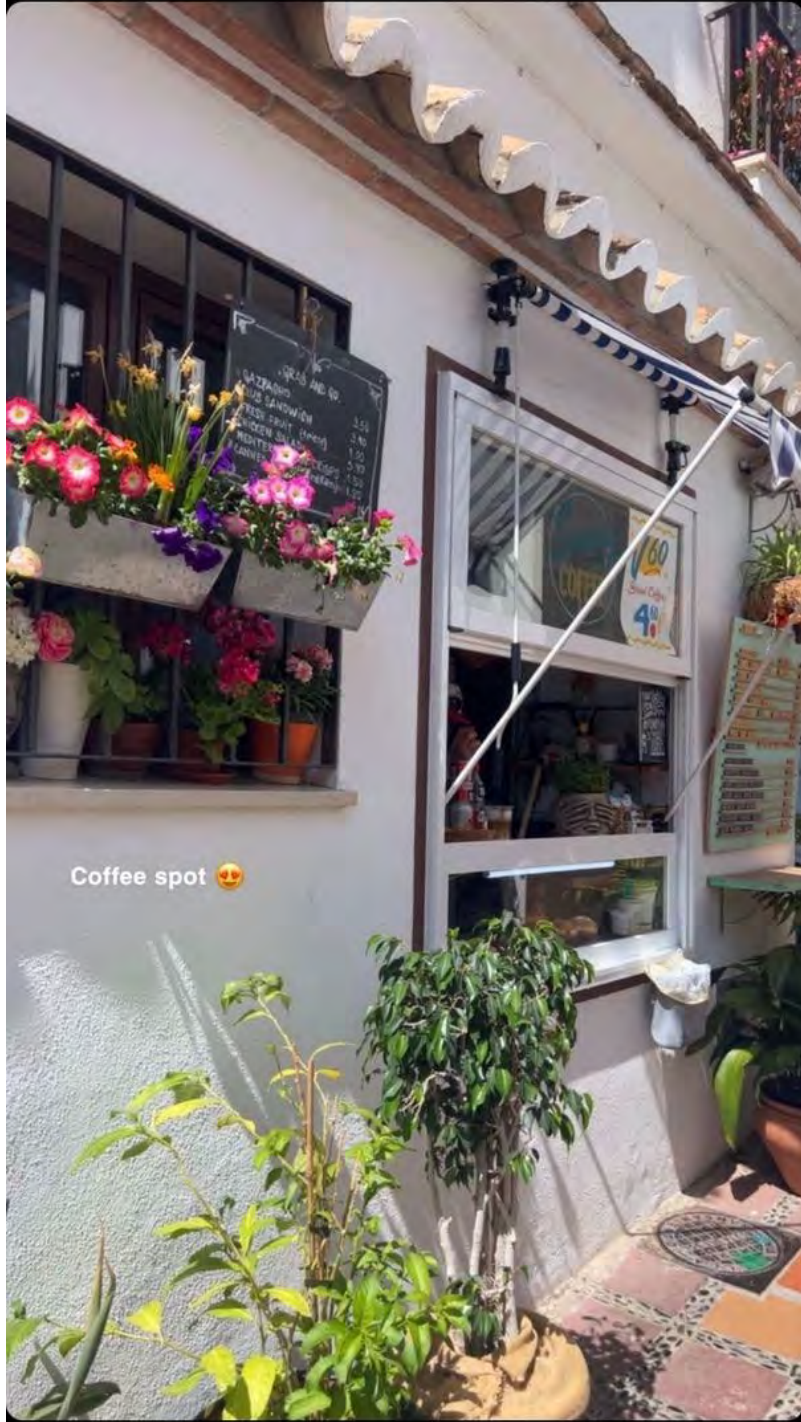


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4:00 ↖

📶 LTE 🔋



Coffee spot 🍷

This is **Exhibit “CQ”** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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_____  _____

Commissioner of Oaths in and for Ontario

10:56



llexixoxo 1h



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Taylan McRae-Yu
Plaintiff

and

Profitly Incorporated, et. al.,
Defendants

Court File No.: CV-23-00092340-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at OTTAWA

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF TAYLAN MCRAE-YU

**DELAWYER PROFESSIONAL
CORPORATION**

Suites of Somerset
52 Bayswater Ave., Suite 1505
Ottawa, ON
K1Y 4K3

SOHAIB MOHAMMAD

LSO#: 80696K
Tel: (647)-535-8706
Email: sohaib@delawyer.io

Lawyer for the Plaintiff

Court File No.: CV-23-00092340-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N :

TAYLAN MCRAE-YU

Plaintiff

- and -

**PROFITLY INCORPORATED, DMCB HOLDINGS INC., IVAN AVRAMENKO,
ALEXANDRA STINSON, and JOHN DOE**

Defendants

Proceeding under the *Class Proceedings Act*, 1992

**FACTUM OF THE PLAINTIFF
(MAREVA INJUNCTION)**

**DELAWYER PROFESSIONAL
CORPORATION**

Suites of Somerset
52 Bayswater Ave., Suite 1505
Ottawa, ON K1Y 4K3

Sohaib Mohammad (LSO# 80696K)

E: sohaib@delawyer.io

P: (647)-535-8706

Counsel for the Plaintiff, Taylan McRae-Yu

FACTUM

PART I. OVERVIEW

1. On this *ex parte* motion, the Plaintiff seeks an interlocutory Order prohibiting the Defendants, and anyone with notice of this Order from dissipating, alienating, transferring, assigning, encumbering or dealing with the Boneheads assets as defined in the Order (Mareva Injunction).

2. The Plaintiff meets the requirements for a *Mareva* injunction and the Order sought should be granted:

- (a) The evidence establishes a strong *prima facie* case for claims of the Plaintiff and the Proposed Class. The Defendants, referred to collectively as the “Boneheads team”, defrauded thousands of consumers around the world based on a contract that originated in Ontario. Consumers were induced to purchase Boneheads Non-Fungible Tokens (NFTs) with extravagant promises of benefits, as detailed below, which would accrue through the purchase. Nearly 2 years after the purchase of these NFTs, not a single one of the dozens of such benefits have been provided to purchasers;
- (b) The Defendants deal primarily in cryptocurrency and NFTs. The evidence of fraud supports an inference that the Defendants will dissipate assets obtained from fraud. The Defendants have already dissipated a significant portion of the over \$4,000,000 CAD they received and any further dissipation, which could be immediate and practically untraceable as it relates to cryptocurrency funds, would cause irreparable harm to the Plaintiff (and the Proposed Class);

- (c) Given the growth of blockchain technology, scams involving cryptocurrency and NFTs are becoming more commonplace. There is a broad consumer protection and public interest implicated which requires Court intervention; and
- (d) The Plaintiff has made full and frank disclosure of all material matters with their knowledge. The balance of convenience favors granting the injunction sought by the Plaintiffs.

Part II. BACKGROUND: NON-FUNGIBLE TOKENS (NFTs)

3. Non-Fungible Tokens (“NFTs”) are blockchain-based digital assets growing in popularity among consumers. Unlike cryptocurrency tokens, unique identifiers and metadata are connected to NFTs, making each NFT unique and distinguishable from the other. This property allows NFTs to have a number of use-cases within blockchain systems including as a medium to showcase art.¹

4. One of the most popular NFT collections is the 2017 art collection known as “Cryptopunks” which features 10,000 algorithmically generated (“generative”) NFTs. Art collections, like Cryptopunks, are popular for several reasons including: (i) holders of the NFT belong to a relatively exclusive and prestigious community; and (ii) each NFT in the collection is unique and can be used by its owner as a “profile picture” (“PPF”) and thus, a marker of their digital identity. For example, holders of Cryptopunks NFTs can connect their cryptocurrency wallet to social media platforms like Twitter, and have their NFT serve as their profile picture in a manner that both authenticates the NFT and verifies its ownership.²

5. In 2021, the NFT market experienced a surge of liquidity with, at some points, hundreds of NFT collections, launching daily across a number of blockchains.³ Teams launching NFT

¹ Affidavit of Taylan McRae-Yu, sworn June 6, 2023 (“McRae-Yu Affidavit”) at para. 7.

² McRae-Yu Affidavit at paras. 10-13; Cryptopunks Website, Exhibit “F” to the McRae-Yu Affidavit.

³ McRae-Yu Affidavit at para 21.

projects quickly realized that, in an extremely competitive environment, they had to offer consumers more than just an NFT with PFP art on it. As such, there was a market shift whereby NFT projects began to make promises of “utility” to purchasers of their NFT.⁴ Stated differently, consumers historically purchased NFTs for the art but were now being told that in addition to receiving NFT art upon purchase, ownership of the NFT would serve as a membership granting exclusive members-only perks and benefits for the duration of the time that the consumer held the NFT in their cryptocurrency wallet.

6. This market shift is, in large part, attributed to the success of the Bored Ape Yacht Club (BAYC), a generative PFP collection comprising 10,000 unique “ape”-style NFTs which provided utility based on an extensive “roadmap” promised to prospective purchasers of the BAYC NFT:⁵

- BAYC NFT holders were given access to a free mint in July 2021 comprising a new collection (“Bored Ape Kennel Club”);⁶ and
- BAYC NFT holders were “airdropped” a free “mutant serum” in August 2021 which could be used to mutate their existing NFT to generate an additional “mutant” NFT.⁷

7. The BAYC team has since continued to develop utility for BAYC NFT holders, including creating and airdropping a cryptocurrency token (“ApeCoin”) to BAYC holders in March 2022, as well as given them free “lands”, in April 2022,⁸ in a virtual metaverse that the team is currently building. The BAYC team has also given holders access to members-only events and exclusive limited-edition physical merchandise such as hoodies and t-shirts.

⁴ McRae-Yu Affidavit at para 21.

⁵ McRae-Yu Affidavit at para. 16-18, 20; Bored Ape Yacht Club Website, Exhibit “H” to the McRae-Yu Affidavit.

⁶ Bored Ape Kennel Club Website, Exhibit “J” to the McRae-Yu Affidavit.

⁷ McRae-Yu Affidavit at para. 19; Bored Ape Chemistry Club Opensea Page, Exhibit “K” to the McRae-Yu Affidavit; Mutant Ape Yacht Club Opensea Page, Exhibit “L” to the McRae-Yu Affidavit.

⁸ McRae-Yu Affidavit at para. 19; Apecoin, Exhibit “M” to the McRae-Yu Affidavit; The Otherside Litepaper, Exhibit “N” to the McRae-Yu Affidavit.

8. NFT teams launching generative PFP collections are business enterprises that generally follow a set process: (i) draw or pay to have an artist draw generative art for their NFT collection; (ii) hire smart contract developers to launch their NFT collection on a given blockchain; (iii) engage in extensive marketing and promotion on social media platforms directed at consumers; and (iv) contract with consumers by selling them an NFT with a series of future considerations in the form of “roadmaps”, “utility”, and “members-only” benefits.

9. NFT project launches, in many ways, are akin to large crowdfunding campaigns. Purchasers of NFTs are not granted any equity stake in the company but are promised a series of future-performances, in exchange for their purchase of an NFT. The funds from the initial sale, and subsequent royalties from secondary market sales, are intended to be used to build the utility that consumers who purchased the NFT were promised.

10. This model also puts significant consumer trust in the team launching the NFT collection. In many cases, because of the anonymity afforded by the blockchain, and the fact that they receive significant upfront funding, teams launching NFT projects can simply take the funds from the initial mint without delivering any utility to holders (ubiquitously referred to as a “rug pull” within the NFT community).⁹

11. In cases involving rug pulls, consumers who, just moments earlier paid several hundred or thousands of dollars for an NFT, are left with an NFT that is both essentially worthless and for which they will not receive any of the membership benefits they were promised.

12. Authorities in jurisdictions outside of Canada have started to take positive steps to combat the problem of fraud involving cryptocurrency and related digital assets. On March 24, 2022, the U.S. Attorney’s Office formally charged two defendants with fraud following the sale for the

⁹ McRae-Yu Affidavit at para. 23.

“Frosties” NFT collection, with specific reference to the “rug pull” perpetuated by these individuals.¹⁰ The defendants were also charged with fraud for their role post-mint to attempt to obfuscate the source of cryptocurrency funds.

13. As the allegations in the unfiled Statement of Claim and the affidavit evidence show, although novel in form, the sale of NFTs in substance implicate classic issues involving breach of contract, fraud, and anti-competitive practices. At the heart of the issues is consumer protection, making the Court’s intervention both appropriate and necessary.

Part III. FACTS

Roadmap Promises (Pre-Mint)

14. The Boneheads team began marketing and promotional activity for the Boneheads NFT in or around July 2021 through Twitter, a popular public social media platform, and Discord, a popular “private” community chat platform accessible to any member of the public who joins via a publicly available invite link.¹¹

15. In exchange for “minting” a Boneheads NFT during the initial point of sale to the public or purchasing a Boneheads NFT post-mint on the secondary market, owners of the Boneheads NFT were told they would receive extensive utility. This utility was outlined in considerable detail on the Boneheads website, across the “About”, “Roadmap”, “Benefits”, and “FAQ” page.¹² Within the community Discord and on Twitter, the Boneheads team were extremely active in engaging with prospective purchasers of their NFT¹³ and made repeated promises to community

¹⁰ *United States of America v. Ethan Nguyen et. al.*, [Violations of 18 U.S.C. SS 1349, and 1956\(h\) \(22 mag 2478\)](#).

¹¹ McRae-Yu Affidavit at paras. 25-26.

¹² McRae-Yu Affidavit at paras. 27-29; Boneheads About Page, Exhibit “R” to the McRae-Yu Affidavit; Boneheads Roadmap Page, Exhibit “S” to the McRae-Yu Affidavit; Boneheads Benefits Page, Exhibit “T” to the McRae-Yu Affidavit; Boneheads FAQ Page, Exhibit “U” to the McRae-Yu Affidavit.

¹³ McRae-Yu Affidavit at para. 26.

members regarding the utility that would flow to them in the future for purchasing and holding their NFT, including lucky purchasers who would win a \$250,000 and \$1,000,000 giveaway.¹⁴

16. The Plaintiff was induced to mint the Boneheads NFT as a result of the extensive promises of utility provided by the Boneheads team. Had this utility not been promises, the Plaintiff would not have minted a Boneheads NFT.¹⁵

17. The Boneheads represented themselves as a sophisticated business enterprise comprising a global team, with 40+ years of experience in start-ups, and the skillset to execute on their ambitious roadmap.¹⁶ Thousands of consumers, induced by the representations of utility and membership benefits made by Boneheads team participated in the sale of the Boneheads NFT. As a result, the Boneheads NFT project fully minted out within 40 minutes of its launch.¹⁷ The Boneheads team received 950.5 Ether, approximately \$4,005,047.38 CAD from the mint.¹⁸

Post-Mint

18. Approximately one hour after the completion of the mint, the Boneheads team took two actions that were viewed by the community that the project was about to be rug pulled: 1) the Boneheads community Discord was put on “slow mode”; and 2) the Boneheads team announced that they would be returning on Monday. These actions are generally considered a red flag in the NFT community, since it indicates that the team is preparing to deplete/dissipate all the cryptocurrency funds and delete social media channels. Even the Boneheads moderators expressed concern about this behavior.¹⁹

¹⁴ McRae-Yu Affidavit at para 30; Boneheads \$1 Million Giveaway, Exhibit “V” to the McRae-Yu Affidavit; Boneheads \$250K Giveaway; Exhibit “W” to the McRae-Yu Affidavit.

¹⁵ McRae-Yu Affidavit at para. 31.

¹⁶ McRae-Yu Affidavit at para. 27; Boneheads About Page, Exhibit “R” to the McRae-Yu Affidavit.

¹⁷ McRae-Yu Affidavit at para. 30; Etherscan Boneheads Final Mints, Exhibit “Y” to the McRae-Yu Affidavit.

¹⁸ McRae-Yu Affidavit at para. 35; Etherscan Boneheads Mint Revenue, Exhibit “AA” to the McRae-Yu Affidavit.

¹⁹ McRae-Yu Affidavit at paras. 38-39; Boneheads Post-Mint Announcement; Exhibit “AD” to the McRae-Yu Affidavit.

19. Individuals who expressed their concerns, including Mr. McRae-Yu, were immediately banned from the community Discord. The Boneheads team, despite their abundant Discord activity in the preceding minutes, completely disappeared from Discord and Twitter. This was a complete “180” from how the Boneheads team was interacting with consumers just minutes earlier.²⁰

20. In the months proceeding the mint, the Boneheads team would sporadically appear on Discord and Twitter, respond to rug pull allegations, continue to make promises of future utility, and then, in effect, disappear again.²¹ This is considered a “slow rug” in the NFT community. The idea behind it is that the fraudsters believe that if they continue to act like they are working on delivering utility, they can evade civil and criminal liability.²²

21. As of June 2023, 22 months after the mint, not a single item of utility has been delivered to the thousands of consumers who purchased a Boneheads NFT.²³

PART IV. ISSUES

22. There are two issues on this motion: (1) whether a *Mareva* injunction should be issued; and (2) whether an Order for substituted service to the defendants should be allowed, including, in the case of John Doe, via Twitter and an NFT airdrop to John Doe’s cryptocurrency wallet.

PART V. LAW AND ARGUMENT

(1) MAREVA INJUNCTION

23. Subsection 101(1) provides the Superior Court of Justice with jurisdiction to grant an interlocutory injunction “where it appears to a judge of the court to be just or convenient to do

²⁰ McRae-Yu Affidavit at para. 38.

²¹ McRae-Yu Affidavit at para. 40.

²² McRae-Yu Affidavit at para 24.

²³ McRae-Yu Affidavit at para 41.

so.”²⁴ The purpose underlying the grant of a *Mareva* injunction is to prevent a defendant from arranging their assets in an attempt to make themselves judgment proof.²⁵

24. A *Mareva* injunction is an equitable remedy.²⁶ The following subsections outline jurisprudential factors that are “guidelines for the Court to consider as opposed to rigid criteria”²⁷ before granting a *Mareva* Order. A review of all these factors favour the granting of a *Mareva* Order in this case.

(i) STRONG PRIMA FACIE CASE

25. In order to establish a strong *prima facie* case, the moving party must show “on a balance of probabilities, that it is likely to succeed” but the requirement “does not require that the Plaintiff prove its case”.²⁸

26. The Statement of Claim and Affidavit establish a strong *prima facie* case of fraudulent misrepresentation, based on contract, comprised of four elements: (1) a false representation made by the defendant; (2) some knowledge of the falsehood of the representation on the part of the defendant (whether knowingly or recklessly); (3) the false representation caused the plaintiff to act; and (4) the plaintiff’s actions resulted in a loss.²⁹

(a) False Representations

27. The Boneheads team made numerous representations about the roadmap and the utility/benefits that would flow to consumers who purchased and held on to the Boneheads NFT. These representations, made on the Boneheads website, Twitter, and community Discord, are categorically and unequivocally false. 22 months since the Boneheads NFT project launched, the

²⁴ *Courts of Justice Act*, RSO 1990, c C.43, s. 101(1).

²⁵ *Aetna Financial Services Ltd. v. Feigelman*, [1985] 1 SCR 2 at para. 25.

²⁶ *SFC Litigation Trust (Trustee of) v. Chan*, 2017 ONSC 1815 at para. 14.

²⁷ *Ekaterina Ivanova Karpacheva v. Valery Vladimirovich Karpachev*, 2018 ONSC 4563 at para. 34.

²⁸ *Voysus Connection Experts Inc. v. Shaikh*, 2019 ONSC 6683 at para. 56.

²⁹ *Bruno Appliance and Furniture Inc. v. Hryniak*, 2014 SCC 8 at para. 21.

Boneheads team has failed to deliver even a single one of the dozens of promises they made to consumers, including delivery of even the simplest roadmap items, such as t-shirts.

(b) Knowledge of Falsehood of Representations

28. The Boneheads team knew, or was reckless in making a series of false representations. For example, on July 18, 2021, in advance of the August 20, 2021 mint date, the Boneheads team stated in the community Discord: “little unofficial leak...everyone that buys a Bonehead will get an opportunity to participate in a secondary credit sale for a chance to win \$1M”.³⁰ In addition to reckless inducements like these, the Boneheads Teams rarely appeared on Twitter and Discord following the Boneheads NFT mint, despite months of extensive marketing and promotion preceding it, supporting the Plaintiff’s claim that the Boneheads team knew about the falsehoods of the representations they had made.

(c) The False Representations Caused The Plaintiff To Act

29. The Plaintiff and the prospective class members, relied on and acted in reliance of, the false representations made by the defendants. Firstly, the Boneheads Team represented themselves as a sophisticated and experienced business enterprise through statements including: (i) “boneheads has been a collaborative effort spanning more than 6 countries and 14 talented individuals”; (ii) “Their core team has spent the better half of their adult lives building startups...Together, they have cultivated over 40+ years of experience in design, product management, manufacturing, and marketing...”; and (iii) “spent over 1,500+ hours developing... a total of 10,000 unique #boneheads”.³¹

30. Secondly, the roadmap items were intentional, specific, and incredibly detailed. Together, these inducements backed by the promise of a sophisticated and competent team led the Plaintiff

³⁰ McRae-Yu Affidavit at para. 30; Boneheads \$1 Million Giveaway, Exhibit “V” to the McRae-Yu Affidavit.

³¹ McRae-Yu Affidavit at para. 27; Boneheads About Page, Exhibit “R” to the McRae-Yu Affidavit

and thousands of other consumers to mint and/or purchase a Boneheads NFT. Without these extensive promises of utility, the Plaintiff would not have purchased the Boneheads NFTs.³²

(d) The Plaintiff's Action Resulted In A Loss

31. The Plaintiff, on his own behalf, and on behalf of the class members, is claiming special damages in the amount of \$4,117,119.83 CAD corresponding to the \$4,005,047.38 CAD from mint proceeds and the \$112,072.43 CAD in royalties³³ from secondary market sales. This amount directly corresponds to the amount depleted from the cryptocurrency wallets of thousands of consumers who minted a Boneheads NFT.

32. In the alternative or in addition, the Statement of Claim and Affidavit present a strong *prima facie* case for: (i) breach of contract and (ii) negligent misrepresentation.

(ii) DEFENDANT'S HAVE ASSETS IN THE JURISDICTION

33. A *Mareva* injunction may be granted “where the party against whom the *Mareva* is sought is subject to the jurisdiction of the court personally, or s/he has property within the jurisdiction”.³⁴ The Plaintiff clearly satisfies this requirement.

34. Profitly Incorporated and DMCB Holdings Inc. are both Canadian corporations with registered business addresses in Belleville, ON. Ivan Avramenko and Alexandra Stinson both also have their addresses listed in Belleville, ON.

(iii) REAL RISK OF DISSIPATION OF ASSETS

35. The overriding consideration for the grant of a *Mareva* injunction is to prevent the defendant from dissipating their assets in order to make themselves judgment-proof. According to the jurisprudence, “in cases of fraud, as in any case, the *Mareva* requirement that there be a risk of

³² McRae-Yu Affidavit at para. 31.

³³ McRae-Yu Affidavit at para. 37; Etherscan Boneheads Mint Revenue, Exhibit “AA” to the McRae-Yu Affidavit; Etherscan Boneheads Royalties, Exhibit “AC” to the McRae-Yu Affidavit.

³⁴ *Ekaterina Ivanova Karpacheva v. Valery Vladimirovich Karpachev*, [2018 ONSC 4563](#) at [para. 38](#).

removal or dissipation can be established by inference, as opposed to direct evidence, and that inference can arise from the circumstances of the fraud itself...”³⁵ The Plaintiff has established a strong *prima facie* case for fraudulent misrepresentation, supporting the inference that there is a real risk that assets in this matter will be dissipated before judgment.

36. The evidence shows that approximately \$943,678.20 CAD have been moved by the Boneheads team into centralized exchanges.³⁶ The Boneheads team has spent at least \$1,786,169.95 CAD on extravagant NFT purchases.³⁷ The estimated value of all Boneheads assets across the cryptocurrency wallet is approximately \$500,000.³⁸

37. In addition, a *Mareva* injunction is considered an evolving³⁹ remedy. In the context of evolving blockchain technology, illegitimately obtained cryptocurrency funds should be viewed as being at a special risk of dissipation given the speed at which they can be moved. In recently granting an *ex parte* *Mareva* injunction in a prospective class action, this Court stated “the *Mareva* Defendants have been promoting the use of cryptocurrency such as bitcoin under the mistaken belief that it is untraceable and cannot be seized by a court or other legal authority”.⁴⁰ This statement can be viewed in support of a heightened risk of asset dissipation when cryptocurrency is involved, as some fraudsters believe that they are outside the Court’s jurisdiction.

(iv) IRREPARABLE HARM IF INJUNCTION NOT GRANTED

38. A *Mareva* Order would freeze any remaining assets preventing the Defendants from making themselves judgment proof. The Plaintiff is seeking that the damage to the class and

³⁵ *Sibley & Associates LP v. Ross*, [2011 ONSC 2951](#) at [para. 63](#).

³⁶ McRae-Yu Affidavit at para. 71; Table 1 (Boneheads Transactions), Exhibit “BD” to the McRae-Yu Affidavit.

³⁷ McRae-Yu Affidavit at paras. 73-74; Table 2 (Select NFT Purchases), Exhibit “BU” to the McRae-Yu Affidavit.

³⁸ McRae-Yu Affidavit at para. 79; Etherscan “EC05” Transactions, Exhibit “BT” to the McRae-Yu Affidavit; BONEHEADS: Deployer (Zapper), Exhibit “CI” to the McRae-Yu Affidavit; BNHDZVAULT (Zapper), Exhibit “CJ” to the McRae-Yu Affidavit; Ivybone.eth (Zapper), Exhibit “CK” to the McRae-Yu Affidavit.

³⁹ *SFC Litigation Trust (Trustee of) v. Chan*, [2017 ONSC 1815](#) at [para. 33](#).

⁴⁰ *Li et. al. v. Barber et. al.*, [2022 ONSC 1176](#) at [para. 20](#).

himself be compensated pecuniarily. Given the real risk of dissipation of assets, the Plaintiff and prospective class members would be irreparably harmed if any remaining assets/funds are not subject to a *Mareva* Order and the Defendants are able to make themselves judgment-proof.

(v) THE BALANCE OF CONVENIENCE FAVOURS THE INJUNCTION

39. The “harshness of the *Mareva* injunction, issued usually *ex parte*, is relieved against or justified in part by the Rules of Practice which allow the defendant, faced by risk of loss, an opportunity to move against the injunction immediately.”⁴¹ The Defendants in this case have an opportunity to immediately respond to the interim *Mareva* Order which will only last for 10 days unless it is extended. The Defendants can also move to vary the Order.

40. The Plaintiff meanwhile has established a strong *prima facie* case of fraud and a risk of dissipation of assets, which, in the Plaintiff’s submission, should be considered heightened where cryptocurrency funds are involved. A failure to grant the *Mareva* Order may mean that the Plaintiff and prospective class members face the real risk that the Defendants make themselves judgment proof, making it impractical or impossible to recover damages.

(vi) UNDERTAKING AS TO DAMAGES

41. Rule 40.03 of the *Rules of Civil Procedure* requires the moving party to provide an undertaking as to damages “unless the court orders otherwise”. In disposing of this requirement in the context of a prospective class action where a *Mareva* Order was sought, a recent decision of this Court stated “There is authority that it is appropriate to waive the undertaking in cases which have broad public interest significance...There is also authority that such an undertaking should not be required from a representative plaintiff acting for the benefit of a class”.⁴²

⁴¹ *Aetna Financial Services Ltd. v. Feigelman*, [1985] 1 SCR 2 at para. 27.

⁴² *Li et. al. v. Barber et. al.*, 2022 ONSC 1176 at para. 38.

42. The Court should exercise their discretion to waive the requirement for an undertaking as to damages for two reasons. Firstly, Mr. McRae-Yu is acting in a representative capacity for a class of claimants and it would be unfair for him to have to risk his personal assets by providing an undertaking as to damages. Secondly, although pecuniary damages are sought in this case, there is a broad public consumer protection interest implicated in this case, particularly in the context of emerging cyber-fraud, anti-consumer friendly, and anti-competitive behavior related to blockchain technology, cryptocurrency, and NFTs.⁴³

(vii) DUTY OF FULL AND FRANK DISCLOSURE

43. The motion for the *Mareva* Injunction is being heard *ex parte*, importing a duty of full and fair disclosure of material facts known to the Plaintiff.⁴⁴ This includes the requirement for the Plaintiff to disclose any fact that would be weighed or considered by the court in deciding the issues, irrespective of whether the disclosure of that fact would have changed the outcome.⁴⁵

44. The Affidavit discloses fully and frankly, a number of material facts that require the Court's consideration. The *Mareva* Respondents may assert the following:

- Mr. McRae-Yu initiated a Plaintiff's Claim in Belleville Small Claims Court (SC-22-00000276-0000) against Profitly Incorporated on July 11, 2022.⁴⁶ The Plaintiff's Claim has not been adjudicated. The *Mareva* Respondents can assert that the *Mareva* injunction is unnecessary given that they did not take steps to dissipate assets when served with the Plaintiff's Claim in Small Claims Court and this evidences that they are not going to dissipate assets or make themselves judgment-proof in the present case;

⁴³ McRae-Yu Affidavit at paras. 81-83; Canadian Anti-Fraud Centre Bulletin, Exhibit "CL" to the McRae-Yu Affidavit.

⁴⁴ Rules of Civil Procedure. O. Reg. 575/07, s. 6(1), Rule 39.01(6).

⁴⁵ *Stans Energy Corp. v. Krygyz Republic*, [2015 ONSC 3236](#) at [para. 5](#).

⁴⁶ Plaintiff's Claim Belleville Small Claims, Exhibit "AY" to the McRae-Yu Affidavit.

- The *Mareva* Respondents can assert that they have a technical understanding of cryptocurrency and blockchain. If they truly wanted to defraud the public, they would not have publicly listed their address on the mailing list prior to the Boneheads NFT mint nor have registered legitimate Canadian Corporations tied to the Boneheads project which is easily traceable back to them;
- The *Mareva* Respondents may assert that they have in fact delivered Boneheads NFTs to every individual who minted an NFT. The only contract is the smart contract which deployed the Boneheads NFT, which was delivered. The roadmap or any utility/benefit listed on the Boneheads website, mentioned on their Twitter or Discord, do not constitute terms of a binding contract;
- The *Mareva* Respondents may assert, as they have stated on their Twitter, that developing utility takes time and the delays caused by the artistic creative process do not constitute fraud. The Plaintiffs themselves have stated that many of the items that were promised were relatively novel for the NFT space. Stated differently, the utility/roadmap is being worked on behind the scenes and yet to be delivered;
- The *Mareva* Respondents may assert that Mr. McRae-Yu invested in a speculative market, and the real grievance underlying the Statement of Claim or *Mareva* Injunction is a loss of those investment funds which were actually caused by the cryptocurrency and NFT markets crashing;
- Mr. McRae-Yu admits in his affidavit that he made unscrupulous remarks to members of the Boneheads Team over Twitter.⁴⁷ The *Mareva* Respondents can assert that the reason Mr. McRae-Yu is not entitled to utility or a benefit associated with the

⁴⁷ McRae-Yu Affidavit at para. 102; Defence Belleville Small Claims, Exhibit “AZ” to the McRae-Yu Affidavit.

Boneheads NFT is because, in making such remarks, he broke the terms of service necessary for him to be a Boneheads community member; and

- The *Mareva* Respondents can assert that those who are unhappy with their Boneheads NFT purchase are free to sell them on the secondary market.

45. The Plaintiff is prepared to address each of these issues in oral argument as necessary. The Plaintiff submits that when considering the totality of the evidence, a strong *prima facie* case for fraud still exists and the *Mareva* factors still favor the grant of a *Mareva* Order.

(2) SUBSTITUED SERVICE

46. A recent cryptocurrency fraud and theft case shows the defendant immediately moved “several millions of dollars of cryptocurrency tokens” into an Ethereum wallet⁴⁸ which, despite the granting of an *Anton Piller* order by this Court, has not resulted any actual access to the funds in question. Given the speed at which cryptocurrency funds can be moved, the *Mareva* Order needs to be served on all defendants in and around the same time, otherwise one defendant may unilaterally take action to move assets.

(i) JOHN DOE

47. As the Affidavit evidence shows, there is, at minimum, a fifth unnamed Defendant (“John Doe”), with only the following identifying information known about them:

- Twitter Profile: @nikkibonee
- Cryptocurrency Wallet Address: 0xca5a943044d32fc18c4487195A2Bf9D60918cD55

48. Rule 16.04(1) allows the court to make an order for substituted service where “it appears to the court that it is impractical for any reason to effect prompt service of an originating process or any other document required to be served personally or by an alternative to personal service”.⁴⁹

⁴⁸ *Cicada 137 LLC v. Medjedovic*, [2022 ONSC 369](#) at [para. 11](#).

⁴⁹ Rules of Civil Procedure. O. Reg. 575/07, s. 6(1), Rule 16.04(1).

49. There is currently no information known about John Doe, including any name, physical address, or email address. It is therefore impractical to personally serve John Doe with the *Mareva* Order in question through any of the alternatives to personal service provided under the *Rules*.

50. On seeking an Order for substituted service, the plaintiff “must satisfy the court, on proper evidence, that the proposed method of substituted service will have “some likelihood” or a “reasonable possibility” of bringing the action to the attention of the defendant”.⁵⁰ As stated by Justice Sherr, “many judges, including myself, will often order two forms of substituted service to ensure that notice of the proceedings is received”.⁵¹

51. The Plaintiff is seeking substituted service of the *Mareva* Order and Statement of Claim to John Doe through two methods: (i) a direct message on Twitter; and (ii) an NFT airdrop into John Doe’s cryptocurrency wallet.

(i) *Substituted Service via Twitter*

52. Substituted service orders through “social media are become increasingly common....These orders reflect the reality of today’s methods of communication, which are increasingly electronic.”⁵²

53. According to a decision from the British Columbia Supreme Court, substituted service through “social media sites such as Facebook has been permitted both in this court, elsewhere in Canada, and in other Commonwealth countries. Many such applications are not reported”.⁵³ *Burke* goes on to specifically reference an English High Court’s decision where “the High Court granted the plaintiff leave to serve the defendant poster with an injunction by sending a message to his

⁵⁰ *Chambers v. Muslim*, [2007] O.J. No. 3855(OL) at para. 13.

⁵¹ *K.H. v. M.L.*, 2017 ONCJ 376 at para. 31.

⁵² *K.H. v. M.L.*, 2017 ONCJ 376 at para. 17.

⁵³ *Burke v. John Doe*, 2013 BCSC 964 at paras. 13-14.

Twitter account which included a link to a website on which the injunction order was displayed”.⁵⁴ Mr. Burke did not know the identity of the defendants or where they were located and was allowed to effect service on the Defendants, through a novel means, by sending them a private message through an internet message board.

54. The Plaintiff is thus seeking a substituted service Order allowing serving of the *Mareva* Order on John Doe via Twitter. The Plaintiff is prepared to provide oral argument around how such service will be effected and deemed to have been received.

(ii) *Substituted Service Via an NFT Airdrop*

55. Courts in both the United States⁵⁵ and United Kingdom⁵⁶ have allowed for service to anonymous defendants by airdropping an NFT directly into their cryptocurrency wallets.

56. In the United States, the Supreme Court of the State of New York allowed an NFT to be delivered (“airdropped”) into the cryptocurrency wallet of the Defendant in question. The Plaintiff, a European cryptocurrency exchange, “LCX”, had approximately \$8 Million USD stolen from one of its cryptocurrency wallets and transferred into another cryptocurrency wallet. The address of the cryptocurrency wallet housing the stolen funds was the only known information about the Defendants in question. The airdropped NFT in question included a hyperlink (a “grappling hook”) which provided “a mechanism to track when a person clicked on the Service Hyperlink”.⁵⁷ The Court deemed that “Such service shall constitute good and sufficient service for the purposes of jurisdiction under NY law on the person or persons controlling the Address”.⁵⁸

⁵⁴ *Burke v. John Doe*, [2013 BCSC 964](#) at [para. 16](#).

⁵⁵ *LCX AG v. John Doe Nos. 1-25*, N.Y. Supreme Ct., [Index. No. 154644/2022](#).

⁵⁶ *D’Aloia v. Persons Unknown & Others*, [\[2022\] EWHC 1723 \(Ch\)](#).

⁵⁷ *LCX AG v. John Doe Nos. 1-25*, N.Y. Supreme Ct., [Index. No. 154644/2022](#) at p. 2.

⁵⁸ *LCX AG v. John Doe Nos. 1-25*, N.Y. Supreme Ct., [Index. No. 154644/2022](#) at p. 2.

57. In the United Kingdom, Mr. D’Aloia alleged himself to be the victim of fraudulent misappropriation of cryptocurrency in the amount of approximately 2.4 million in USD cryptocurrency equivalent. A number of Defendants in that case were served via email and an NFT airdrop. According to the decisions, the airdrop of an NFT would “embrace the Blockchain technology” and “it is likely to lead to a greater prospect of those are behind the [fraudulent] website being put on notice of the making of this order”.⁵⁹

58. This Court should allow for substituted service via an NFT airdrop into John Doe’s wallet for three reasons.

59. Firstly, Canadian courts have always embraced and responded well to emerging technology. Blockchain technology is no different and should be leveraged by the Court to facilitate justice where appropriate.

60. Secondly, because of the anonymity afforded by the blockchain, it is impractical, if not impossible, in many cases, to effect service through alternative means where cryptocurrency or related digital assets fraud is involved because the alleged fraudsters may not leave any additional digital footprints. An NFT that is airdropped into a cryptocurrency wallet is immediately viewable on the blockchain and is specifically and directly tied to the wallet of the individual being served.

61. Thirdly, there are at least three mechanisms through which the Court can be satisfied that the Defendant has in fact received notice of service: (i) the Defendant “hides” the NFT in their wallet; (ii) the Defendant transfers the NFT in question out of their wallet; or (iii) the Defendant clicks on a hyperlink (“grappling hook”) which is recorded on the website housing the served documents in question.⁶⁰ Greater detail regarding each of these three mechanisms will be provided in oral argument.

⁵⁹ *D’Aloia v. Persons Unknown & Others*, [2022] EWHC 1723 (Ch) at para. 39.

⁶⁰ *McRae-Yu Affidavit* at para. 97.

(ii) NAMED DEFENDANTS

62. Profitly Incorporated and DMCB Holdings Inc. do not appear to operate on their listed addresses and service to those addresses would be ineffective.⁶¹ Service to both of these corporations will be effective through service on their directors, namely Ivan Avramenko and Alexandra Stinson.

63. Social media evidence shows that Alexandra Stinson and Ivan Avramenko are currently in Spain.⁶² This follows Kijiji and Facebook Marketplace listings where Alexandra Stinson stated she was moving.⁶³

64. The Plaintiff proposes that service on Ivan Avramenko be effected through two email addresses obtained through the Small Claims process and that Alexandra Stinson be served through Facebook Marketplace and Instagram.⁶⁴

PART VI. ORDER REQUESTED

65. An interim and interlocutory Order prohibiting the Defendants and anyone with notice of the Order from dissipating, alienating, transferring, assigning, encumbering or in any way dealing with the Boneheads assets;

66. An Order providing the service of the Order granted pursuant to this Notice of Motion and the related materials, may be served on Ivan Avramenko (and thus Profitly Incorporated and DMCB Holdings Inc.) via email to two email addresses;

⁶¹ McRae-Yu Affidavit at paras. 87-88; 12 Amber Place Ownership, Exhibit “CM” to the McRae-Yu Affidavit.

⁶² McRae-Yu Affidavit at paras. 91-92; Alexandra Instagram Posts (Spain), Exhibit “CP” to the McRae-Yu Affidavit; Ivan Avramenko Photo (Spain), Exhibit “CQ” to the McRae-Yu Affidavit.

⁶³ McRae-Yu Affidavit at paras. 89-90; Alexandra Kijiji Listings, Exhibit “CN” to the McRae-Yu Affidavit; Alexandra Facebook Marketplace Listings, Exhibit “CO” to the McRae-Yu Affidavit.

⁶⁴ McRae-Yu Affidavit at para. 94.

67. An Order providing the service of the Order granted pursuant to this Notice of Motion and the related materials, may be served on Alexandra Stinson (and thus Profitly Incorporated) via a Facebook Marketplace and Instagram direct messages;

68. An Order providing the service of the Order granted pursuant to this Notice of Motion and the related materials, may be served on John Doe via Twitter to @nikkibonee and an NFT Airdrop to the cryptocurrency wallet address 0xca5a943044d32fc18c4487195A2Bf9D60918cD55;

69. Such further and other relief as counsel may request and this Honourable Court may deem just.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 7th day of June, 2023.

Sohaib Mohammad

**DELAWYER PROFESSIONAL
CORPORATION**

Suites of Somerset
52 Bayswater Ave., Suite 1505
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Lawyer for the Plaintiff

SCHEDULE “A”

List of Authorities

1. *United States of America v. Ethan Nguyen et. al.*, [Violations of 18 U.S.C. SS 1349, and 1956\(h\) \(22 mag 2478\)](#).
2. *Aetna Financial Services Ltd. v. Feigelman*, [\[1985\] 1 SCR 2](#).
3. *SFC Litigation Trust (Trustee of) v. Chan*, [2017 ONSC 1815](#).
4. *Ekaterina Ivanova Karpacheva v. Valery Vladimirovich Karpachev*, [2018 ONSC 4563](#).
5. *Voysus Connection Experts Inc. v. Shaikh*, [2019 ONSC 6683](#).
6. *Bruno Appliance and Furniture Inc. v. Hryniak*, [2014 SCC 8](#).
7. *Sibley & Associates LP v. Ross*, [2011 ONSC 2951](#).
8. *Li et. al. v. Barber et. al.*, [2022 ONSC 1176](#).
9. *Stans Energy Corp. v. Krygyz Republic*, [2015 ONSC 3236](#).
10. *Cicada 137 LLC v. Medjedovic*, [2022 ONSC 369](#).
11. *Chambers v. Muslim*, [\[2007\] O.J. No. 3855\(QL\)](#).
12. *K.H. v. M.L.*, [2017 ONCJ 376](#).
13. *Burke v. John Doe*, [2013 BCSC 964](#).
14. *LCX AG v. John Doe Nos. 1-25*, N.Y. Supreme Ct., [Index. No. 154644/2022](#).
15. *D’Aloia v. Persons Unknown & Others*, [\[2022\] EWHC 1723 \(Ch\)](#).

SCHEDULE “B”

TEXT OF STATUTES, REGULATIONS & BY-LAWS

Courts of Justice Act, RSO 1990, c C.43

Injunctions and receivers

101 (1) In the Superior Court of Justice, an interlocutory injunction or mandatory order may be granted or a receiver or receiver and manager may be appointed by an interlocutory order, where it appears to a judge of the court to be just or convenient to do so. R.S.O. 1990, c. C.43, s. 101 (1); 1994, c. 12, s. 40; 1996, c. 25, s. 9 (17).

Terms

(2) An order under subsection (1) may include such terms as are considered just. R.S.O. 1990, c. C.43, s. 101 (2).

Taylan McRae-Yu
Plaintiff

and

Profitly Incorporated, et. al.,
Defendants

Court File No.: CV-23-00092340-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at OTTAWA

Proceeding under the *Class Proceedings Act, 1992*

FACTUM

**DELAWYER PROFESSIONAL
CORPORATION**

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Email: sohaib@delawyer.io

Lawyer for the Plaintiff

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

TAYLAN MCRAE-YU

Plaintiff

- and -

**PROFITLY INCORPORATED, DMCB HOLDINGS INC., IVAN AVRAMENKO,
ALEXANDRA STINSON, and JOHN DOE**

Defendants

Proceeding under the *Class Proceedings Act*, 1992

STATEMENT OF CLAIM

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF’S CLAIM, and \$10,000 for costs, within the time for serving and filing your statement of defence, you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff’s claim and \$400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commences unless otherwise ordered by the court.

Date: Issued by:
Local registrar

Address of
Court office: Ottawa Courthouse
161 Elgin St., 2nd Fl.
Ottawa, Ontario, K2P 2K1

TO: Profitly Incorporated
12 Amber Place
Belleville, ON, K8P 0B5

AND TO: DMCB HOLDINGS INC.
12 Amber Place
Belleville, ON, K8P 0B5

AND TO: Ivan Avramenko
12 Amber Place
Belleville, ON, K8P 0B5

AND TO: Alexandra Stinson
1034 County Road 3
Belleville, ON, K8N 4Z1

AND TO: John Doe (a.k.a. “@nikkibonee”)

CLAIM

1. In this Statement of Claim, in addition to the terms that are defined elsewhere herein, the below terms have the following meanings:
 - i. **“Airdrop”** means tokens that are sent to cryptocurrency wallets for free that meet certain pre-determined eligibility criteria;
 - ii. **“Blockchain”** means a ledger, usually viewable by the public, that is distributed among the nodes of a peer-to-peer network;
 - iii. **“Cryptocurrency”** means a digital or virtual currency that is secured by cryptography on a blockchain;
 - iv. **“Cryptocurrency mixer”** means a blockchain-based application which severs the link between a sending and receiving address, and functions to obfuscate or conceal the source of cryptocurrency funds;
 - v. **“Decentralization”** means lacking a central, trusted entity. Highly decentralized blockchains networks are those where nodes of the network are numerous and widely dispersed;
 - vi. **“Discord”** is a live chat application with voice, video, and text functionality. Projects launching on blockchains often have a Discord channel for members of the public to interact with founders, to receive updates regarding the project, and to connect with community members. Discord groups can generally be joined by any member of the public by using a publicly available invite link;
 - vii. **“Ethereum”** means a decentralized blockchain supporting smart contract functionality first launched in 2015;
 - viii. **“ETH”** or **“ETHER”** means the native cryptocurrency token for the Ethereum network;

- ix. **“Explorer”** means a blockchain viewer where transactions associated with a particular cryptocurrency wallet may be viewed and traced;
- x. **“Floor price”** means the cheapest token in a collection;
- xi. **“KYC”** or **“Know Your Client”** means the entity behind a cryptocurrency wallet or address is known. Centralized exchanges, for example, are required to “KYC” users before allowing them to deposit and sell cryptocurrency in exchange for fiat;
- xii. **“Minting”** means the interaction between a purchaser and a smart contract in the context of NFTs. In exchange for paying a requisite “minting” fee, the smart contract assigns ownership and manages transferability of an NFT to the purchaser. Minting is the initial point of sale of an NFT;
- xiii. **“NFT”** or **“Non-Fungible Token”** means blockchain-based digital assets with unique metadata/identifiers making them distinguishable from one another. NFTs are often compared with fungible tokens (FTs), which are cryptocurrencies that are indistinguishable from one another. NFTs have become increasingly popular as a medium to showcase art;
- xiv. **“Roadmap”** means a list of future considerations that are tied to a purchase of an NFT. Roadmaps describe an NFT project’s future goals, towards which money generated from an NFT mint and royalties from secondary market sales will be used. A roadmap may be simple, such as a single future NFT collection that is airdropped to current NFT holders, or extensive, including building an entire ecosystem around an NFT purchase (physical merchandise, tokens, metaverse gaming, etc.);
- xv. **“Rug Pull”** means blockchain fraud that is relatively quick following a mint. In these cases, an NFT project’s founders/developers immediately “disappear” with funds from a mint without delivering on the roadmap or utility promised to holders. In some cases, not even an NFT is delivered;

- xvi. **“Slow Rug”** means blockchain fraud that occurs slowly;
- xvii. **“Smart Contract”** means a self-executing agreement between two or more parties on the blockchain, usually made possible through decentralized applications;
- xviii. **“Utility”** means the benefit or future use of an NFT. Utility is based on promises of future considerations, deliverables, and roadmaps that a team has promised to purchasers of their NFT; and
- xix. **“Wallet”** or **“Wallet Address”** means a cryptocurrency address that is in the control of a given entity, which is used to access tokens, such as cryptocurrencies and NFTs. Most blockchain explorers allow for all the activity of any given wallet to be seen by inputting the address into the explorer search bar.

RELIEF SOUGHT

- 2. The Plaintiff claims on its own behalf and on behalf of the other Class Members:
 - i. an Order certifying this action as a class proceeding pursuant to the *Class Proceedings Act*, 1992, S.O. 1992, c. 6 and appointing the Plaintiff as the representative plaintiff for the Class (as defined below);
 - ii. an Order piercing the corporate veil for the Defendant corporations, Profitly Incorporated and DMCB Holdings Inc., and holding the Defendants, Ivan Avramenko and Alexandra Stinson personally liable for the Defendants’ actions as described herein;
 - iii. a declaration that the Defendants are liable to the Plaintiff and Class Members for breach of contract;
 - iv. a declaration that the Defendants are liable to the Plaintiff and Class Members for fraudulent misrepresentation, or, in the alternative, negligent misrepresentation;

- v. a declaration that the Defendants are liable to the Plaintiff and Class Members for false, misleading, deceptive and/or unconscionable representations under the *Consumer Protection Act*, 2002, S.O. 2002, c. 30;
- vi. a declaration that the Defendants engaged in deceptive marketing practices under the *Competition Act*, R.S.C., 1985, c. C-34;
- vii. a declaration that the Defendants were unjustly enriched by the acts and omissions pleaded herein;
- viii. a declaration that the Defendants misappropriated the funds of the Plaintiff and Class Members;
- ix. special damages in the amount of \$4,118,385.43 CAD per the causes of action referenced herein;
- x. punitive damages in the amount of \$1,000,000.00 CAD;
- xi. injunctive relief prohibiting the Defendants from continuing the promotion of the Boneheads NFT;
- xii. an Order for specific performance requiring the Defendants to modify the royalties on the Boneheads NFT to 0%;
- xiii. pre-judgment and post-judgment interest in accordance with the *Courts of Justice Act*, R.S.O., c. C.43, as amended;
- xiv. the costs of this action, including GST;
- xv. the costs of notice and of administering the plan of distribution of the recovery in this action, plus applicable taxes, pursuant to section 26 of the *Class Proceedings Act*; and
- xvi. such further and other relief as this Honourable Court may deem just.

OVERVIEW

Non-Fungible Tokens (NFTs)

3. Non-Fungible Tokens (NFTs) are blockchain-based digital assets that have grown in popularity as a medium to showcase art. Artists and teams are able to launch NFT collections using smart contracts on blockchains that support smart contract functionality.
4. Ethereum is the largest smart contract blockchain for NFTs. Most of the NFT collections launched on Ethereum can be minted by paying a minting fee in Ether (ETH), the native cryptocurrency token for the Ethereum network. In exchange for paying the requisite fee, the purchaser is transferred an NFT, which displays art from the NFT collection tied to the smart contract.
5. Smart contracts generally house a limited number of NFTs. Once fully minted, the NFT collection is considered “sold out”, with tokens being tradeable on NFT marketplaces.
6. Historically, purchasers of NFTs received only a digital token showcasing art from a particular collection and nothing more.
7. In 2021, the “Bored Ape Yacht Club” (“BAYC”) NFT collection was launched on the Ethereum blockchain. BAYC is widely credited with being the first generative art collection on the Ethereum network to successfully execute on the idea of tying utility or a “membership benefit” with an NFT.
8. In the utility model, purchasers of an NFT not only receive a digital asset that displays art from the collection in question, they also receive some utility or benefit, usually outlined in a roadmap, for the duration of time they hold an NFT in their wallet. Once an NFT is sold or transferred to another cryptocurrency wallet, the new purchaser/holder of the NFT receives the associated membership benefit.

9. BAYC NFTs, some of which are depicted below, were available to the public to mint as of April 23, 2021 for a price of 0.08 ETH (approximately \$210 USD or \$261.99 CAD at the time) and limited to 10,000 NFTs.



10. Prior to its launch, the BAYC website stated the following:
- i. “Your Bored Ape doubles as your Yacht Club membership card, and grants access to members-only benefits...”; and
 - ii. “When you buy a Bored Ape, you’re not simply buying an avatar or provably-rare piece of art. You are gaining membership access to a club whose benefits and offerings will increase over time.”
11. The BAYC website included a list of roadmap items which included: “Member-Exclusive BAYC Merch Stores”; “The Bored Ape liquidity pool...”; and “Mutant Ape (NFT Breeding)...”.
12. In addition to the initial funding that NFT projects receive by selling mints directly to consumers, NFT projects generally also charge a royalty on any secondary market sale of their NFT that takes place. Royalties in this context are seen by the development team as ongoing revenue and an implicit promise to continue to provide ongoing utility for a project.
13. In the case of BAYC, a royalty of 2.5% is charged on every secondary marketplace sale.

14. Since its launch, the BAYC team has delivered a number of membership benefits to BAYC NFT holders including:
 - i. In July 2021, NFT holders were told that for each BAYC NFT they held in their cryptocurrency wallet, they could mint a free NFT from a new collection called the “Bored Ape Kennel Club”;
 - ii. In August 2021, NFT holders were airdropped a free “mutant serum” for each NFT they held in their cryptocurrency wallet. The mutant serum could be used to “mutate” a BAYC into a new NFT collection known as the “Mutant Ape Yacht Club”;
 - iii. In March 2022, the BAYC team released a cryptocurrency token, “ApeCoin” which was given for free to NFT holders;
 - iv. In April 2022, NFT holders were given free “land” in the form of NFT in a blockchain metaverse the BAYC is developing; and
 - v. The BAYC team has provided NFT holders with ongoing access to exclusive members-only events and limited-edition BAYC merchandise.
15. BAYC is one of the most successful NFT collections to date, with a brand that is worth in excess of one billion dollars. On any given day, a single BAYC NFT can trade for upwards of \$100,000 USD with certain more desirable pieces having been sold for millions of dollars.
16. In the summer of 2021, the NFT market experienced a large influx of consumer capital.
17. Given BAYC’s tremendous success, hundreds of NFT collections launching on the Ethereum in the summer of 2021 touted an extensive roadmap, utility and/or membership benefit associated with the purchase of their NFT. Teams realized that in an extremely competitive environment, they had to offer consumers even more utility in order to ensure that their project “sold out” and garnered extensive secondary marketplace sales (and thus royalties).

18. Given that anyone could launch an NFT collection while remaining completely anonymous, as the BAYC team had, a number of individuals began to sell NFTs to defraud the public.
19. Within the NFT community, a rug pull became a popular term used to describe an NFT project which induced members of the public to purchase their NFT by promising extensive roadmaps, utility, and membership perks, only to disappear thereafter with the full proceeds of the mint and secondary market sales.
20. A slow rug became a popular term to describe a project where the development team dissipated of all funds from the sale of an NFT collection but continued to keep social media pages running with sporadic announcements. In these cases, little or no development work or utility is actually provided to NFT holders, but development team members maintain minimal communication in order to continue to collect royalties from secondary market sales and/or in an attempt to escape civil or criminal liability.
21. On March 24, 2022, the United States Department of Justice charged two individuals who launched the “Frosties” NFT collection with fraud and money laundering, specifically citing the rug pull perpetuated by the individuals on consumers. The individuals in question were stated to have defrauded \$1 million USD from the sale of the Frosties NFT.
22. The United States Department of the Treasury’s Office of Foreign Assets Control (OFAC) subsequently sanctioned the virtual cryptocurrency mixers Tornado Cash and Blender in 2022, citing their role in assisting to launder billions of dollars in cryptocurrency. The individuals charged in the Frosties mint sent cryptocurrency funds through Tornado Cash in an attempt to obfuscate the source of funds they had received from the mint.
23. The Canadian Anti-Fraud Centre states that 2021 was a historic year for reported fraud, with losses totalling an over 2.5-fold increase as compared 2020. Investment scams were the highest reported scams based on dollar loss.

PARTIES

The Defendants

24. The Defendant, Profitly Incorporated (Business Number: 731550711), is a Canadian corporation with an incorporation date of October 1, 2018. Profitly Incorporated has a registered business address at 12 Amber Place, Belleville, ON, K8P 0B5.
25. The Defendant, DMCB Holdings Inc. (Business Number: 780717302), is a Canadian corporation incorporated on August 26, 2021. DMCB Holdings Inc. has a registered business address at 12 Amber Place, Belleville, ON, K8P 0B5.
26. The Defendant, Ivan Avramenko, is a listed director of Profitly Incorporated and DMCB Holdings Inc. and has a listed personal address at 12 Amber Place, Belleville, ON, K8P 0B5. Ivan Avramenko operated the Twitter profile for “@ivybonee” where he listed himself as a co-founder of the Boneheads NFT project.
27. The Defendant, Alexandra Stinson, is a listed director of Profitly Incorporated and has a listed personal address of 1034 County Road 3, Belleville, ON, K8N 4Z1. Alexandra Stinson operates the Twitter profile for “@lexiibone” and lists herself as a co-founder of the Boneheads NFT project.
28. The Defendant, John Doe, operates the Twitter profile for “@nikkibonee” and is as a co-founder of the Boneheads NFT project.
29. The Defendants are collectively referred to as the “Boneheads team”.

The Plaintiff and Class

30. The Plaintiff, Taylan McRae-Yu (“Taylan”), resides in Ottawa, Ontario. He is a 29-year-old entrepreneur, most recently having worked as a Director of Strategy for the Canadian Federation of Students, Canada’s largest student union.

31. In August 2021, Taylan became aware of the Boneheads NFT collection through promotions he came across on Twitter.
32. Boneheads featured 10,000 unique NFTs, an example of which is depicted below, which were available to mint on the Ethereum blockchain on August 20, 2021, at a mint price of 0.1 ETH (approximately \$320 USD or \$410.27 CAD at the time) per NFT.



33. Taylan minted the Boneheads NFT in response to the extensive promises of utility, roadmaps, and members-only benefits made by the Boneheads team, as detailed below.
34. The Boneheads team made these promises using an official Boneheads website (“Boneheads.io”), Twitter, and Discord.
35. In advance of the mint, Taylan reviewed the roadmap on the Boneheads website and followed social media announcements that the Boneheads team released. Taylan also joined the Boneheads Discord community.
36. Taylan understood that the act of minting a Boneheads NFT, purchasing a Boneheads NFT on the secondary market, and holding it, would provide him with both the NFT in question and extensive and innovative utility, as well as exclusive membership perks, as outlined in the roadmap prepared by the Boneheads team.

37. Taylan, relying on extensive representations made by the Boneheads team, purchased a total of 36 Boneheads NFTs at a combined price of 3.6 ETH (approximately \$11,831.40 USD or \$15,169.03 CAD) during the minting stage on August 20, 2021.
38. Taylan continues to hold all 36 NFTs in his Ethereum wallet.
39. As of June 2023, not a single roadmap item, benefit, utility, NFT airdrop, token, event access, physical merchandise, voting right, or any of the dozens of roadmap items promised to Taylan, as detailed below, have been delivered by the Boneheads team.
40. The Plaintiff is seeking certification of the following class (collectively referred to as the “Class” or “Class Members”):

Every individual resident in or outside of Canada who minted a Boneheads NFT or purchased a Boneheads NFT on any secondary NFT marketplace since August 20, 2021.

FACTUAL BACKGROUND

Extensive Roadmap Promises to Boneheads NFT Holders

41. The Boneheads team began marketing and promotional activity for the Boneheads NFT in or around the start of July 2021 through social media platforms including Twitter. Public “invite” links to the Boneheads community Discord were also provided. The Boneheads website was launched in or around August 2021 in advance of the mint.
42. In addition to receiving a Boneheads NFT featuring Boneheads art, prospective buyers were told that they would receive extensive and innovative utility, focused on their NFT specifically and around the Boneheads brand more broadly.
43. The Boneheads team promised the following giveaways:

- i. On July 17, 2021, in advance of the mint, the Boneheads team told Discord members that everyone who purchased a Boneheads NFT would get the opportunity to win \$1 million; and
 - ii. On July 19, 2021, the Boneheads team tweeted that following the mint, one purchaser of the Boneheads NFT would receive a “monetary mystery box valued at a quarter million dollars, **revealed instantly at the end of the mint**” [emphasis added].
44. The Boneheads website included extensive roadmap descriptions comprising “code-based digitals”, “NFT post-sale physicals”, and “physical collectibles”.
45. The Boneheads roadmap stated that purchasers of the Boneheads NFT would receive the following “code-based digitals”:
 - i. “5% Community Wallet” to signify that a portion that 5% of mint and secondary market proceeds would be put towards a community wallet;
 - ii. “3D Boneheads” to signify that “3D” versions of Boneheads NFTs would be provided to NFT holders;
 - iii. “Dynamic Landscapes”;
 - iv. A form of gallery called “BoMA” (Bunker of Modern Art);
 - v. “Claimables”;
 - vi. “Baby Bones” to refer to “baby” versions of Boneheads NFTs that would be provided to NFT holders;
 - vii. “Spaceheads (Alien Invasion)” referring to a blockchain game that the team would be launching;
 - viii. A form of NFT breeding similar to the Mutant Ape Yacht Club referred to as “Boning”;

- ix. A liquidity pool called “The Spa”;
 - x. “Consumer-Facing Avatar Application” which Boneheads NFT holders would have first access to and which would allow users to create a personal avatar of themselves using “an expansive catalog of clothing and accessories to suit their unique style”. The Boneheads website stated that purchasers would have access to this application “within the next 8-12 months”; and
 - xi. A partner “SDK” or software development kit.
46. The Boneheads roadmap stated that purchasers of the Boneheads NFT would receive the following “NFT post-sale physicals”:
- i. 50 randomly selected members of the Boneheads community would receive a mouse pad matching the exact facial expression of their Boneheads NFT;
 - ii. 25 randomly selected members of the Boneheads community would receive a free numbered hoodie;
 - iii. 10 randomly selected members of the Boneheads community would receive a free 4 feet area rug matching the exact facial expression of their Boneheads NFT;
 - iv. 5 randomly selected members of the Boneheads community would receive a free painting (40” x 60” (“gallery depth”)) of their Boneheads NFT; and
 - v. Each item would be individually numbered, in a beautifully crafted and branded magnetic box, with a QR code or tag, to verify the authenticity of the product on the blockchain.
47. The Boneheads roadmap stated that Boneheads NFT purchasers would receive the following “physical collectibles”:
- i. 5 foot life size sculptures;

- ii. 2.4 foot sculptures;
 - iii. 4 foot area rugs;
 - iv. playing cards;
 - v. boxing gloves;
 - vi. trucker hats;
 - vii. mini backpacks;
 - viii. puffer jackets;
 - ix. biker jackets;
 - x. bomber jackets;
 - xi. t-shirts hoodies;
 - xii. slides; and
 - xiii. socks.
48. The Boneheads team further promised that the team would develop “physical + digital products [...] like life-size 5ft bonehead sculptures, toys, fuzzy zebra mini backpacks, alligator puffer vests, studded boxing gloves, and more”.
49. The Boneheads team further stated that:
- Only token holders will be able to participate that they release...every single item will come with a numbered verifiable scannable qr code/nfc tag that will be verified on-chain. Every single item will be considered carefully and will be created in scarce supply in order to maximize secondary market sales potential.

50. The Boneheads team initially charged a 10% royalty on secondary market sales which would go “towards establishing a community-powered creator fund”.
51. Ownership of the Boneheads NFT would grant “holders a lifetime membership (as long as they hold it in their wallet) to the cabana, the forging hq, where holders will be able to forge physical and digital collectibles”.
52. This “exclusive forging” was described in considerable detail on both the Boneheads website and encouraged consumers to purchase more than a single NFT:

Only users holding a #bonehead in their wallet will be able to mint/forged an "x" (tbd) amount of items from each collection drop - this number will fluctuate depending on the quantity that is produced. **The more #bonehead that you own, the more items you will be able to forge.** There will be contingencies attached to the items that are allowed to be forged by users. If your specific #bonehead lacks an attribute (such as a zebra-patterned bucket hat), you will not be able to forge the physical item associated with this attribute. You will have to acquire a #bonehead that has this particular attribute/trait/item through the secondary market in order to forge this physical collectible - this will drive speculation and produce a new element to their #boneheads rarity, thus create a more dynamic asset class. Physical collectibles (commodities) will have a qr code that will verify their authenticity on-chain, forever [emphasis added].

53. Prospective NFT purchasers were further told they would get “exclusive behind-the-scenes access through the entire manufacturing process for all items” including sculptures, area rugs, and accessories such as playing cards, ashtrays, boxing gloves, garments, and other collectibles.
54. NFT holders would also have “voting rights” to “vote and provide feedback through the sampling process while they test the fabrics, textiles, and patterns that will eventually be placed into productions”.

55. On August 12, 2021, the Boneheads team tweeted that “The Cabana (Store)”, an interactive marketplace where holders would be able to “forge” their “drip” would be opening in Fall 2021.
56. In addition to these extensive promises, the Boneheads team represented themselves in a manner to lead consumers to believe the Boneheads team had the requisite skillset and expertise to execute and deliver on such an extensive and ambitious roadmap.
57. The following statements were made regarding the Boneheads team:
 - i. “Boneheads were created by seven brilliant collaborators who spent over 1,500+ hours developing over 500+ attributes across 8 categories...;
 - ii. “This is a real business, with experienced investors, and a clearly defined objective. Boneheads are priced in accordance to the level of effort, quality, funding spent to date, and to the funding that is required for the boneheads collaborators to deliver on their vision and roadmap”;
 - iii. “Their core team has spent the better part of their adult lives building startups and helping others achieve their goals in a collaborative way”; and
 - iv. “Together, they have cultivated over 40+ years of experience in design, product management, manufacturing, and marketing, to bring users the brainchild – boneheads”.

Minting and Movement of Smart Contract Funds

58. The smart contract for the Boneheads NFT was opened for the public to mint a Boneheads NFT on August 20, 2021 at approximately 7:58 PM + UTC.
59. The first mint of the Boneheads NFT took place on August 20, 2021 at 7:58:23 PM + UTC.

60. All 10,000 Boneheads NFTs sold out on August 20, 2021 at 8:34:52 PM + UTC, within 40 minutes of the mint being opened to the public.
61. On August 20, 2021, at 8:47:36 PM + UTC, less than 15 minutes after the entire Boneheads NFT collection had sold out, and within less than 1 hour of its release, the Boneheads NFT team removed 950.5 ETH (approximately \$3,123,818.25 USD or \$4,005,047.38 CAD) from the smart contract in question.
62. Immediately thereafter, the Boneheads team stopped all promotion of the Boneheads project, put the Discord chat on “slow mode”, and disappeared from their Discord server after posting an announcement stating that they would be returning on August 23, 2021.
63. Taylan and other consumers voiced their concern about this behaviour including the sudden change in communication from the Boneheads NFT team who had previously been very active on social media platforms and Discord. Taylan and other consumers were concerned that the project was about to “rug” and that the Boneheads founders were going to take off with the proceeds from the mint.
64. In response to these concerns, Taylan and others consumers were banned from the Discord server. Taylan and others were also eventually blocked on Twitter.

Rug Pull Allegations

65. In the months following the public mint, the Boneheads team sporadically made appearances on social media platforms and Discord to continue to attract unsuspecting consumers to purchase the Boneheads NFT on the secondary market and in an attempt to avoid allegations that the project was a rug pull.
66. At the same time, the Boneheads team slowly dissipated the funds from the mint and secondary market sales, into and between various cryptocurrency addresses, and centralized exchanges. A significant portion of the funds were used by the Boneheads team to make extravagant purchases of NFT art.

67. In addition to mint proceedings, the Boneheads team received a total of 27.0958 ETH in royalties (approximately \$87,811.97 USD or \$112,072.43 CAD) from secondary marketplace sales of the Boneheads NFT.
68. On October 14, 2021, Jonathan Schmalfeld, known as “The NFTorney” referenced the Boneheads project in a blog post about class actions, rug pulls, and consumer protection in the NFT context.
69. In response to the blog post, which renewed allegations that the Boneheads projects was a rug pull, the Boneheads team stated that a flagship store for the Boneheads brand would be opening in Los Angeles in Early 2022. No such flagship store was opened.
70. In the first half of 2022, there were almost no updates regarding the Boneheads NFT project including social media posts through any official channel.
71. In the summer of 2022, Taylan contacted a Twitter user by the name of @zachxbt (“ZachXBT”).
72. ZachXBT is an independent blockchain investigator who has amassed a significant social media following (over 375,000 Twitter followers) owing to the investigations he has conducted on exposing instances of blockchain fraud. ZachXBT’s research and detective work has been cited by authorities in jurisdictions like France as having led to the prosecution of a group of NFT scammers.
73. On July 14, 2022, in collaboration with Taylan, ZachXBT released a series of Twitter posts on the Boneheads NFT project. These posts shared the result of investigative work done by ZachXBT on the Boneheads team and alleged that the Boneheads NFT project was a \$3.1 million USD rug pull.
74. Despite months of inactivity on social media, the Boneheads team immediately responded to ZachXBT’s posts via Twitter, stating that Boneheads was not a scam but a “very deliberately slow creative process”. They subsequently announced that

- a “new” collection would be dropping on the anniversary of their project launch, in August 2022. No such collection was ever released.
75. On August 27, 2022, ZachXBT once again shared a Twitter post about the Boneheads NFT project, stating they had failed to deliver the collection they promised in August 2022. The post included screenshots of messages sent from the Boneheads team to ZachXBT stating “brand activations” would be launching on August 24, 2021 and ZachXBT should update his Twitter post at that time.
 76. In response, the Boneheads team stated that as of November 1, 2022, “drops” would be releasing on the first of every month for Boneheads NFT holders to claim. No such drops have ever been released.
 77. As of the date of filing of this claim, the Boneheads NFT team has not delivered on a single roadmap promise they had made to Boneheads NFT purchasers. Consumers have not received a single NFT airdrop, token, physical collectible, marketplace access, forging, avatar application, voting right, giveaway, or the dozens of other promises that were made to consumers in consideration for purchasing or minting a Boneheads NFT.

CAUSES OF ACTION

Breach of Contract

78. The Plaintiff and Class Members who minted or purchased a Boneheads NFT on the secondary market entered into a contract with the Boneheads team.
79. In consideration for the Plaintiff and Class Members purchasing the NFT, they were told they would receive: (1) a Boneheads NFT; (2) a host of benefits comprising utility that would be built around the Boneheads NFT brand generally and holders’ individual NFT’s specifically; and (3) those who purchased multiple NFTs would receive greater utility perks and benefits.

80. The Plaintiff and Class members abided by the terms of their obligations under this contract by paying the requisite fee to mint or purchase a Boneheads NFT on the secondary market.
81. The Boneheads NFT team breached the terms of the contract they entered into with the Plaintiff and Class Members by not fulfilling essential obligations under the contract, namely, to deliver the roadmap and utility promised to owners of the Boneheads NFT in a timely manner or at all.
82. The Plaintiff and Class Members are entitled to special damages for breach of contract.

Fraudulent Misrepresentation

83. In the alternative, the contract is *void ab initio* as a result of fraudulent misrepresentations made by the Boneheads team, entitling the Plaintiff and Class members to special and punitive damages and/or rescission of the contract.
84. The Boneheads team fraudulently misrepresented the contract:
 - i. The Boneheads team falsely represented to the Plaintiff and Class Members that minting or purchasing a Boneheads NFT on the secondary market would be accompanied by extensive utility including member benefits, utility built around the Boneheads brand, and utility tied to holders' individual Boneheads NFT;
 - ii. The roadmap and utility were extensively detailed across the Boneheads website and social media platforms in the weeks and months preceding the public mint for Boneheads NFTs on August 20, 2021. Plaintiffs and Class Members had the opportunity to review the extensive roadmap information provided on the Boneheads website and social media and community platforms prior to making a decision to mint or purchase a Boneheads NFT on the secondary market;

- iii. The Boneheads team held themselves out to be a team with extensive expertise necessary to deliver on their ambitious roadmap;
- iv. These representations were material to the substance of the contract between the Plaintiff and Class Members and the Boneheads team;
- v. The representations of extensive utility accompanying the Boneheads NFT are unequivocally false as the Plaintiff and Class Members have not received a single member benefit or any utility accompanying their Boneheads NFT;
- vi. The Boneheads team, knowingly or recklessly, understood the falsehood of the representations of utility made to the Plaintiff Class Members, including but not limited to promises of a \$250,000 and a \$1 million giveaway, as well as specific roadmap deliverables such as the NFT NYC Pop-Up Shop (Fall 2021), the LA Flagship Store (Early 2022), a second collection (August 2022), and monthly “drops” starting in November 2022. The Boneheads team failed to build any utility or deliver any of the many roadmap promises made to the Boneheads NFT holders;
- vii. The Plaintiff and Class Members acted/relied upon and were induced by the false representations of utility made by the Boneheads team and purchased the NFT in question with the expectation that the NFT would provide member benefits, utility that was built around the Boneheads brand, and utility that was tied to their Boneheads NFT specifically. The Boneheads team knew, or ought to have known, that the Plaintiff and Class Members would rely on their numerous representations and purchase the Boneheads NFT;
- viii. The actions of the Boneheads team have resulted in significant personal loss to the Plaintiff and Class Members. The Plaintiff and Class Members have lost considerable time dedicated to participating in the Boneheads community and awaiting the pending utility. The Plaintiff and Class

Members have incurred significant financial loss as a direct result of the actions of the Boneheads team totalling approximately \$4,118,385.43 CAD; and

- ix. There is continued impropriety, deceit and dishonesty on the part of the Boneheads team who continues to fraudulently misrepresent the utility that will accompany the Boneheads NFT, both to existing Boneheads NFT holders, as well as new unsuspecting consumers.

Negligent Misrepresentation

85. In the alternative, the Plaintiff and Class Members are entitled to special damages, or rescission of the contract, as a result of the negligent misrepresentations made by the Boneheads team.

- i. The Boneheads team, as outlined above, made a number of representations to consumers about the utility and benefit that would flow as a result of purchasing and owning a Boneheads NFT;
- ii. Taylan and Class Members are consumers who paid the Boneheads team, a commercial enterprise, for goods/services, and were owed a duty of care;
- iii. The representations made by the Boneheads team are false as none of the intended utility outlined has been delivered;
- iv. The Boneheads team was negligent in making representations about utility, including, but not limited, promises of giveaways and specific dates for deliverables;
- v. The Plaintiff and Class Members reasonably relied on the representations made by the Boneheads team;
- vi. The Plaintiff and Class Members, as outlined above, have suffered significant financial loss as a result of relying on the false representations made by the Boneheads team.

Consumer Protection Act

86. The Plaintiff and Class Members are “consumers” under the *Consumer Protection Act* who were acting for personal and not business purposes.
87. The Plaintiff and Class Members entered into a “consumer transaction” under the *Consumer Protection Act* whereby the Boneheads team promised delivery of certain goods and services in exchange for payment/purchase of a Boneheads NFT.
88. The Boneheads team acted unfairly when transacting with the Plaintiff and Class Members by making the following false, misleading or deceptive and/or unconscionable representations under Part III of the *Consumer Protection Act* including:
 - i. Representations that the roadmap, benefits, and accompanying utilities were available or would be made available, delivered or performed following the purchase of a Boneheads NFT when the Boneheads team knew or ought to have known that they could not be delivered or performed;
 - ii. Representations of a roadmap, benefits, and accompanying utilities that used exaggeration, innuendo, or ambiguity as to a material fact or a failure to state a material fact that deceived or tended to deceive the Plaintiff and Class Members;
 - iii. Representations that misrepresented the purpose or intent of any solicitation or communication with the Plaintiff and Class Members; and
 - iv. Representations that the purpose of charges, namely the minting or secondary market royalties, were to develop and deliver on the roadmap, benefits, and accompanying utilities that had been promised to Boneheads NFT holders.
89. At all material times, the Boneheads team were located in Ontario where the contract was formed, when transacting online with the Plaintiff and Class Members.

Competition Act

90. The Boneheads team engaged in deceptive marketing practices under Part VII.1 of the *Competition Act*.
91. The Boneheads team directly promoted the Boneheads NFT project for the purpose of promoting their own business interests.
92. The Boneheads team made representations to the public that were both false and misleading. The Boneheads team represented to the public that minting or purchasing a Boneheads NFT on the secondary market guaranteed or promised performance of a roadmap, providing holders of the Boneheads NFT with extensive utility that was clearly laid out on the Boneheads websites and on social media platforms including Twitter and community platforms including Discord.
93. The Boneheads team guaranteed or promised this extensive utility to minters and purchasers of the Boneheads NFT in a manner that was materially misleading or had no reasonable prospect that it would be carried out, such as the promises of entry into a \$250,000 and \$1 million giveaway. It was known to the Boneheads Team that members of the public, namely the Plaintiff and Class Members, would and did indeed rely on this guaranteed or promised roadmap in making a decision to purchase or mint a Boneheads NFT.
94. After the Plaintiff and Class Members minted and/or purchased the Boneheads NFT, the Boneheads team failed to fulfil the guarantees or promises of the roadmap/utility associated with holding a Boneheads NFT.
95. To date, the Boneheads team continues to deceive unsuspecting members of the public into purchasing their NFT with false promises of a roadmap.
96. Plaintiff and Class Members are everyday consumers with limited financial means and time. By purchasing the Boneheads NFT as a result of inducements of the extensive roadmap and utility that would be provided to them, holders of the

Boneheads NFT decided to forego the purchase of other legitimate NFT projects in an extremely competitive environment.

Unjust Enrichment

97. Furthermore, or in the alternative, the Boneheads team was unjustly enriched at the expense of the Plaintiff and Class Members.
98. The Plaintiff and Class Members were deprived of approximately \$4,118,385.43 CAD in value which was unjustly and unfairly passed to the Boneheads team.
99. Given that Plaintiff and Class Members did not receive the benefits that were promised to them by the Boneheads team, there has been a failure of consideration, resulting in significant corresponding deprivation to the Plaintiff and Class Members.
100. There is no juristic reason for the Boneheads team to retain the \$4,006,313 CAD in mint proceeds or \$112,072.43 CAD in royalties received to date, or any continued royalties from the sales of Boneheads NFTs.

Misappropriation of Funds

101. In addition, or in the alternative, the Boneheads team misappropriated funds that were intended to be used to deliver on the roadmap promises that had been made to the Plaintiff and Class Members.
102. Immediately after the Boneheads NFT mint sold out, the Boneheads team drained the smart contract of all of its funds (950.5 ETH ((approximately \$3,122,175 USD or \$4,006,313 CAD)) on August 20, 2021, at 8:47:36 PM + UTC.
103. These funds were not used to develop utility for the project, deliver on the roadmap, or for a community wallet as promised by the Boneheads team.
104. The Boneheads team instead took a number of steps of obfuscate the source of these funds.

105. At least \$555,611.35 CAD was moved between different cryptocurrency wallets and into centralized exchanges, including Kraken, Kucoin, and Coinbase.
106. The Boneheads team also made a total of at least \$1,786,169.95 CAD in extravagant NFT purchases for personal use.

Piercing the Corporate Veil

107. Profitly Incorporated and DMCB Holdings Inc. were incorporated for an illegal, fraudulent or improper purpose.
108. As directors of the corporations in question, Ivan Avramenko and Alexandra Stinson had a duty to act in good faith and in the best interests of the corporation and shareholders.
109. Instead, Ivan Avramenko and Alexandra Stinson acted to defraud the Plaintiff and Class Members.
110. Ivan Avramenko and Alexandra Stinson were the directing minds, who had total control of the Corporations in question, and used the funds from the mint and royalties for personal gain, instead of the promised utility that was to be delivered to consumers.
111. As a result of their actions, Ivan Avramenko and Alexandra Stinson should be held personally liable for the allegations contained herein.

Punitive Damages

112. The Boneheads team engaged in reprehensible conduct which was malicious, oppressive and high-handed, and demonstrated a marked departure from ordinary standards of decent behaviour.
113. In response to both the NFTorney blog and ZachXBT's allegations that the project was a rug pull, the Boneheads team responded by further defrauding the public and

inducing even more consumers to purchase their NFT on the secondary market with promises of utility to be provided by future specific date.

114. The Boneheads team openly responded to criticism by blocking and “trolling” the Plaintiff and Class Members.
115. In October 2021, in response to the NFTorney blog post, the Boneheads team tweeted “so if this wasn’t a rug then...what was it? Best answer wins a BONEHEAD giveaway winner announced...like never?”.
116. In response to ZachXBT’s Twitter posts, the Boneheads team Tweeted the following:



117. In addition to side-stepping and mocking the very serious allegations of fraud, the Boneheads team again induced Plaintiff and Class Members to purchase more Boneheads NFTs by teasing images of a new collection, including future dates where such utility would be delivered.
118. The granting of punitive damages is required to punish the defendant and meet objective standards of retribution, deterrence and denunciation.

119. The Boneheads team defrauded thousands of consumers across the world with a contract that originated in Ontario.
120. The Boneheads team continues to see no issue, moral or otherwise, with their actions, which have directly resulted in the loss of over \$4,118,385.43 CAD in funds from the Plaintiff and Class Members.
121. The Plaintiff proposes that this action be tried at the City of Ottawa, Ontario.

May 25, 2023

**DELAWYER PROFESSIONAL
CORPORATION**

Suites of Somerset
52 Bayswater Ave., Unit 1505
Ottawa, ON, K1Y 4K3

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Lawyer for the Plaintiff

Taylan McRae-Yu
Plaintiff

and

Profitly Incorporated, et. al.,
Defendants

Court File No.: CV-23-00092340-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at OTTAWA

Proceeding under the *Class Proceedings Act, 1992*

STATEMENT OF CLAIM

**DELAWYER PROFESSIONAL
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Lawyer for the Plaintiff

ON READING the Motion Record of the Plaintiff dated June 7, 2023 (Mareva Injunction), the Affidavit of Taylan McRae-Yu sworn June 6, 2023, and the Factum of the Plaintiff dated June 7, 2023 (“**Motion Materials**”).

AND ON HEARING the submission of counsel for the Plaintiffs;

Mareva Injunction

1. **THIS COURT ORDERS** that the Defendant, and its servants, employees, agents, assigns, officers, directors and anyone else acting on their behalf or in conjunction with any of them, and any and all persons with notice of this injunction, are restrained from directly or indirectly, by any means whatsoever:

- (a) selling, removing, dissipating, alienating, transferring, assigning, encumbering, or similarly dealing with any assets of the Mareva Respondents including but not limited to the assets and accounts listed in Schedule “A” hereto;
- (b) instructing, requesting, counselling, demanding, or encouraging any other person to do so; and
- (c) facilitating, assisting in, aiding, abetting, or participating in any acts the effect of which is to do so.

2. **THIS COURT ORDERS** that paragraph 1 applies to all of the assets listed in Schedule “A” to this Order, whether or not they are in the Mareva Respondents’ own names, whether or not they are solely or jointly owned and whether or not the Mareva Respondents have exclusive control over the asset. For the purpose of this Order, a Mareva Respondent’s assets include any asset which he or she has the power, directly or indirectly, to dispose of or deal with as if it were his own. The Mareva Respondent is to be regarded as having such power if a third party holds or controls the assets in accordance with his direct or indirect instructions.

3. **THIS COURT ORDERS** that if the total value free of charges or other securities of the assets listed in Schedule “A” to this Order exceeds \$4,118,385.43 Canadian Dollars (CAD), the Defendant may sell, remove, dissipate, alienate, transfer, assign, encumber, or similarly deal with them so long as the total unencumbered value of the Mareva Respondent’s assets remains above \$4,118,385.43 CAD.

Undertaking as to Damages

4. **THIS COURT ORDERS** that the requirement in Rule 40.03 of the *Rules of Civil Procedure* for the moving party to an undertaking as to damages potentially arising from the granting and enforcing of this Order is hereby dispensed with.

Ordinary Living Expenses

5. **THIS COURT ORDERS** that any Mareva Respondent may apply for an order, on at least twenty-four (24) hours notice to the Plaintiff, specifying the amount of funds which the Defendant is entitled to spend on ordinary living expenses and legal advice and representation.

Disclosure of Information

6. **THIS COURT ORDERS** that each Mareva Respondent prepare and provide to the Plaintiff within 7 days of the date of service of this Order, a sworn statement describing the nature, value, and location of his assets worldwide [whether in his own name or not and whether solely or jointly owned.

7. **THIS COURT ORDERS** that each Mareva Respondent submit to examinations under oath within 7 days of the delivery by the Defendant of the aforementioned sworn statements referred to in paragraph 6.

8. **THIS COURT ORDERS** that if the provision of any of this information in paragraph 7 is likely to incriminate the Mareva Respondent, he or she may be entitled to refuse to provide it, but is recommended to take legal advice before refusing to provide the information. Wrongful refusal to provide the information referred to in paragraph 6 herein is contempt of court and may render the Defendant liable to be imprisoned, fined, or have his assets seized.

Intermediaries

9. **THIS COURT ORDERS** that the entities listed in Schedule "B" as well as any banks, financial institutions, money service businesses, fundraising platforms or websites, cryptocurrency exchanges or platforms, digital asset or non-fungible token (NFT) marketplaces, or custodians of any cryptocurrency wallets (collectively, the "**Intermediaries**") shal, upon being provided with notice of this Order, forthwith freeze and prevent any removal, dissipation, alienation, transfer, assignment, encumbrance, transaction, or similar dealing with any of the assets identified in Schedule "A" to this Order.

10. **THIS COURT ORDERS** that the Intermediaries forthwith disclose and deliver up to the Plaintiff any and all records held by the Intermediary concerning the Mareva Respondents' assets and accounts, including the existence, nature, value and location of any monies or assets or credit, wherever situate, held on behalf of the Mareva Respondent by the Intermediaries.
Alternative Payment of Security into Court

11. **THIS COURT ORDERS** that this Order will cease to have effect if the Mareva Respondent provides security by paying the sum of \$4,118,385.43 CAD into Court, and the Accountant of the Superior Court of Justice is hereby directed to accept such payment.

Variation, Discharge or Extension of Order

12. **THIS COURT ORDERS** that anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this order, on four (4) days notice to the Plaintiff.

13. **THIS COURT ORDERS** that the Plaintiff shall apply for an extension of this Order within ten (10) days hereof, failing which this Order will terminate.

Service of this Order

14. **THIS COURT ORDERS** that service of this Order and the Motion Materials shall be made on the Mareva Respondents through at least one of the following means, as applicable:

- (a) On the Mareva Respondent, Ivan Avramenko, by delivering a copy to his email address at ivan@profitly.app and legal@profitly.app;
- (b) On the Mareva Respondent, Alexandra Stinson, by delivering a copy through social media to Alexandra Stinson's Facebook page at <https://www.facebook.com/lexi.stinson.1> and Alexandra Stinson's Instagram page at <https://www.instagram.com/llexixoxo/>.
- (c) On the Mareva Respondent, John Doe, by delivering a copy through social media to John Doe's Twitter at <https://twitter.com/nikkibonee?s=20> and by Airdropping an NFT to John Doe's Ethereum cryptocurrency wallet with address 0xca5a943044d32fc18c4487195A2Bf9D60918cD55;
- (d) On the corporate Mareva Respondent, Profitly Incorporated, through service according to paragraph 18(a) or 18(b) above;
- (e) On the corporate Mareva Respondent, DMCB Holdings Inc., through service according to paragraph 18(a) above;

and that such service shall be deemed valid and effective upon the earlier of (a) confirmation of receipt of the Order and Motion Materials or (b) 24 hours from the time the Order and Motion Materials are sent in accordance with paragraphs 14(a) to (e) above.

15. **THIS COURT ORDERS** that this Order is and shall be immediately in effect upon issuance regardless of whether it has been formally entered.

SCHEDULE "A"

Boneheads team:

1. Any and all assets of the Boneheads team, including but not limited to any and all funds, including in cryptocurrency or NFT or any other digital asset format, or any of its affiliated or payment processors, where such funds were raised in connection with the sale of Boneheads NFTs and are held in cryptocurrency wallets or bank accounts owned or controlled by or held for the benefit of the Boneheads team.
2. Any and all digital assets or cryptocurrency held in the following digital wallets of or controlled by any member of the Boneheads team including but not limited to the following:

	No.	Wallet Address
Ethereum (ETH)	1	0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F
	2	0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317
	3	0xa1e43fcb51656354931d47458ceadbc6545df57
	4	0x3acef2d359f430cee5e205262a884d6087dda4fa
	5	0xbaf331f090320502380ea975562c0c72e2da3c85
	6	0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518
	7	0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147
	8	0x82ef36b1c710e4384eb20d70074bc972972d58b8
	9	0xd697255b298cf5d90f3f0c9a0e525ba8e829c952
	10	0x0bc42633195913892c48a224a846ddae067898ed
	11	0xea415b3b5e02b2259019763e2e81c48668b80f0e
	12	0x7D7e14Fd2b185d9A0ADA62Ae4b59A5Ea8Ab7Ec05

Profitly Incorporated

3. Any and all funds held in the bank account of or controlled by Profitly Incorporated.
4. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

DMCB Holdings Inc.

5. Any and all funds held in the bank account of or controlled by DMCB Holdings Inc..
6. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

Ivan Avramenko

7. Any and all funds held in the bank account of or controlled by Ivan Avramenko.
8. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

Alexandra Stinson

9. Any and all funds held in the bank account of or controlled by Alexandra Stinson.
10. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

John Doe

11. Any and all funds held in the bank account of or controlled by John Doe.
12. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

SCHEDULE "B"

Digital Asset (Cryptocurrency) Platforms/Exchanges

Coinbase

Kraken

Kucoin

Robinhood

NFT Marketplaces:

Opensea

Court File No.: CV-23-00092340-00CP

Taylan McRae-Yu

Profitly Incorporated et. al.

Plaintiff

- and -

Defendant

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

PROCEEDING COMMENCED AT OTTAWA

Proceeding under the *Class Proceedings Act, 1992*

ORDER

**DELAWYER PROFESSIONAL
CORPORATION**

Suites of Somerset
52 Bayswater Ave., Suite 1505
Ottawa, ON K1Y 4K3

Sohaib Mohammad
LSO#: 80696K
Tel: (647)-535-8706
Email: sohaib@delawyer.io

Lawyer for the Plaintiff

ON READING the Motion Record of the Plaintiff dated June 7, 2023 (Mareva Injunction), the Affidavit of Taylan McRae-Yu sworn June 6, 2023, and the Factum of the Plaintiff dated June 7, 2023 (“**Motion Materials**”).

AND ON HEARING the submission of counsel for the Plaintiffs:

Mareva Injunction

1. **THIS COURT ORDERS** that the Defendant, and its servants, employees, agents, assigns, officers, directors and anyone else acting on their behalf or in conjunction with any of them, and any and all persons with notice of this injunction, are restrained from directly or indirectly, by any means whatsoever:

- (a) selling, removing, dissipating, alienating, transferring, assigning, encumbering, or similarly dealing with any assets of the **Mareva Respondents** including but not limited to the assets and accounts listed in Schedule “A” hereto;
- (b) instructing, requesting, counselling, **demanding**, or encouraging any other person to do so; and
- (c) facilitating, assisting in, aiding, abetting, or participating in any acts the effect of which is to do so.

2. **THIS COURT ORDERS** that paragraph 1 applies to all of the assets listed in Schedule “A” to this Order, whether or not they are in the Mareva Respondents’ own names, whether or not they are solely or jointly owned and whether or not the Mareva Respondents have exclusive control over the asset. For the purpose of this Order, a Mareva Respondent’s assets include any asset which he or she has the power, directly or indirectly, to dispose of or deal with as if it were his own. The Mareva Respondent is to be regarded as having such power if a third party holds or controls the assets in accordance with his direct or indirect instructions.

3. **THIS COURT ORDERS** that if the total value free of charges or other securities of the assets listed in Schedule “A” to this Order exceeds \$4,118,385.43 Canadian Dollars (CAD), the Defendant may sell, remove, dissipate, alienate, transfer, assign, encumber, or similarly deal with them so long as the total unencumbered value of the Mareva Respondent’s assets remains above \$4,118,385.43 CAD.

Undertaking as to Damages

4. **THIS COURT ORDERS** that the requirement in Rule 40.03 of the *Rules of Civil Procedure* for the moving party to an undertaking as to damages potentially arising from the granting and enforcing of this Order is hereby dispensed with.

Ordinary Living Expenses

5. **THIS COURT ORDERS** that any Mareva Respondent may apply for an order, on at least twenty-four (24) hours notice to the Plaintiff, specifying the amount of funds which the Defendant is entitled to spend on ordinary living expenses and legal advice and representation. ❌

Disclosure of Information

6. **THIS COURT ORDERS** that each Mareva Respondent prepare and provide to the Plaintiff within 7 days of the date of service of this Order, a sworn statement describing the nature, value, and location of his assets worldwide [whether in his own name or not and whether solely or jointly owned. ❌

7. **THIS COURT ORDERS** that each Mareva Respondent submit to examinations under oath within 7 days of the delivery by the Defendant of the aforementioned sworn statements referred to in paragraph 6.

8. **THIS COURT ORDERS** that if the provision of any of this information in paragraph 7 is likely to incriminate the Mareva Respondent, he or she may be entitled to refuse to provide it, but is recommended to take legal advice before refusing to provide the information. Wrongful refusal to provide the information referred to in paragraph 6 herein is contempt of court and may render the Defendant liable to be imprisoned, fined, or have his assets seized.

Intermediaries

9. **THIS COURT ORDERS** that the entities listed in Schedule “B” as well as any banks, financial institutions, money service businesses, fundraising platforms or websites, cryptocurrency exchanges or platforms, digital asset or non-fungible token (NFT) marketplaces, or custodians of any cryptocurrency wallets (collectively, the “Intermediaries”) shall, upon being provided with notice of this Order, forthwith freeze and prevent any removal, dissipation, alienation, transfer, assignment, encumbrance, transaction, or similar dealing with any of the assets identified in Schedule “A” to this Order. ❌❌❌

10. ❌ **THIS COURT ORDERS** that the Intermediaries forthwith disclose and deliver up to the Plaintiff any and all records held by the Intermediary concerning the Mareva Respondents’ assets and accounts, including the existence, nature, value and location of any monies or assets or credit, wherever situate, held on behalf of the Mareva Respondent by the Intermediaries. Alternative Payment of Security into Court

11. **THIS COURT ORDERS** that this Order will cease to have effect if the Mareva Respondent provides security by paying the sum of \$4,118,385.43 CAD into Court, and the Accountant of the Superior Court of Justice is hereby directed to accept such payment. ❌

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- (b) On the Mareva Respondent, Alexandra Stinson, by delivering a copy through social media to Alexandra Stinson's Facebook page at <https://www.facebook.com/lexi.stinson.1> and Alexandra Stinson's Instagram page at <https://www.instagram.com/llexixoxo/>;
- (c) On the Mareva Respondent, John Doe, by delivering a copy through social media to John Doe's Twitter at <https://twitter.com/nikkibonee?s=20> and by Airdropping an NFT to John Doe's Ethereum cryptocurrency wallet with address 0xca5a943044d32fc18c4487195A2Bf9D60918cD55;
- (d) On the corporate Mareva Respondent, Profitly Incorporated, through service according to paragraph 18(a) or 18(b) above;
- (e) On the corporate Mareva Respondent, DMCB Holdings Inc., through service according to paragraph 18(a) above;

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	2	0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317
	3	0xa1e43fcb51656354931d47458eceadbc6545df57
	4	0x3acef2d359f430cee5e205262a884d6087dda4fa
	5	0xbaf331f090320502380ea975562c0c72e2da3c85
	6	0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518
	7	0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147
	8	0x82ef36b1c710e4384eb20d70074bc972972d58b8
	9	0xd697255b298cf5d90f3f0c9a0e525ba8e829c952
	10	0x0bc42633195913892c48a224a846ddae067898ed
	11	0xea415b3b5e02b2259019763e2e81c48668b80f0e
	12	0x7D7e14Fd2b185d9A0ADA62Ae4b59A5Ea8Ab7Ec05

Profitly Incorporated

3. Any and all funds held in the bank account of or controlled by Profitly Incorporated.
4. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

DMCB Holdings Inc.

5. Any and all funds held in the bank account of or controlled by DMCB Holdings Inc..
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Ivan Avramenko

7. Any and all funds held in the bank account of or controlled by Ivan Avramenko.
8. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

Alexandra Stinson

9. Any and all funds held in the bank account of or controlled by Alexandra Stinson.
10. Any and all funds, digital assets, cryptocurrency or NFTs, held in bank accounts and/or cryptocurrency wallets or cryptocurrency exchanges generated or raised in connection with transactions of the Boneheads NFT.

John Doe

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SCHEDULE "B"

Digital Asset (Cryptocurrency) Platforms/Exchanges


Coinbase

Kraken

Kucoin

Robinhood

NFT Marketplaces:

Opensea 

Court File No.: CV-23-00092340-00CP

Taylan McRae-Yu

Profitly Incorporated et. al.

Plaintiff

- and -

Defendant

**ONTARIO
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PROCEEDING COMMENCED AT OTTAWA

Proceeding under the *Class Proceedings Act, 1992*

ORDER

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Lawyer for the Plaintiff