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

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

RESPONDING MOTION RECORD OF THE PLAINTIFF, TAYLAN MCRAE-YU

September 22, 2023

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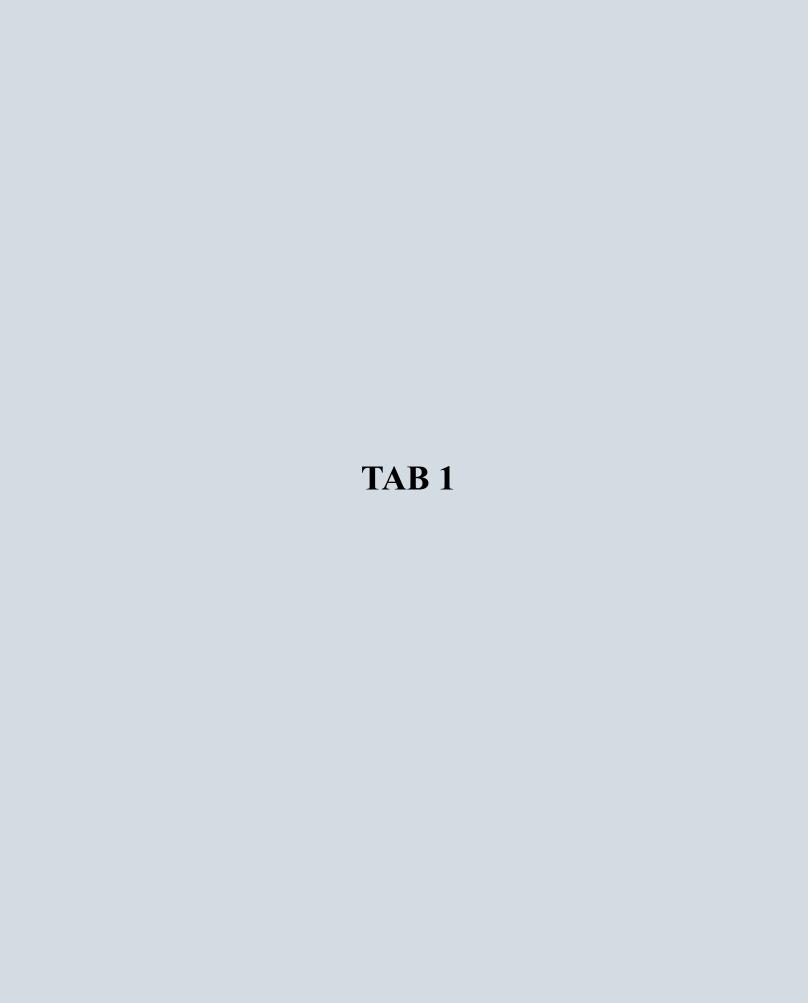
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AFFIDAVIT OF TAYLAN MCRAE-YU

- 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 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 (<u>boredapeyachtclub.com</u>), 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 identity 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 (<u>boneheads.io</u>) 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:
 - "#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";
 - 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");
- "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 consumerfacing 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 "**CIA3**" 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.
- 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"**.

- A5. 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 are the three are individuals behind the Boneheads NFT project. A screenshot of this tweet is attached as **Exhibit "AM"**.
- 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.
- Alexandra Stinson operated the Twitter handle @lexibone and the "TikTok" social media accounts under "lexiiistinson" 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"**.

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
- any many ero in ordana would be writing to take on this case. There a series of ansaccessial

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.

57.

- 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 (<u>breadcrumbs.app</u>), 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"** 0xa1e43fcb51656354931d47458eceadbc6545df57;
 - 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:
 - "BONEHEADS: Deployer" Currently holds over 1,800 NFTs. Table 2 looks at11
 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 (<u>zapper.xyz</u>) 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

4.,-

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

— *4.* — —

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.

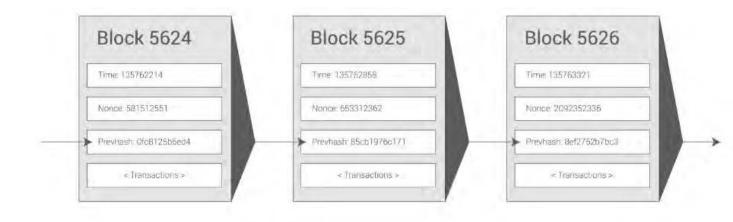


The state transition function APPLY (S, TX) -> S' can be defined roughly as follows:

- 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...n-1, setS[i+1] =

 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^{190} . 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:

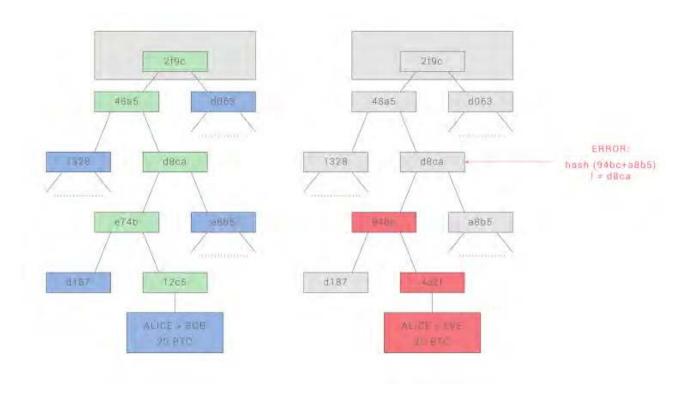
- Send 100 BTC to a merchant in exchange for some product (preferably a rapid-delivery digital good)
- 2. Wait for the delivery of the product
- 3. Produce another transaction sending the same 100 BTC to himself
- 4. Try to convince the network that his transaction to himself was the one that came first.

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 kind of identifier available is pseudorandom hash only like1LW79wp5ZBqaHW1jL5TCiBCrhQYtHagUWy. 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.

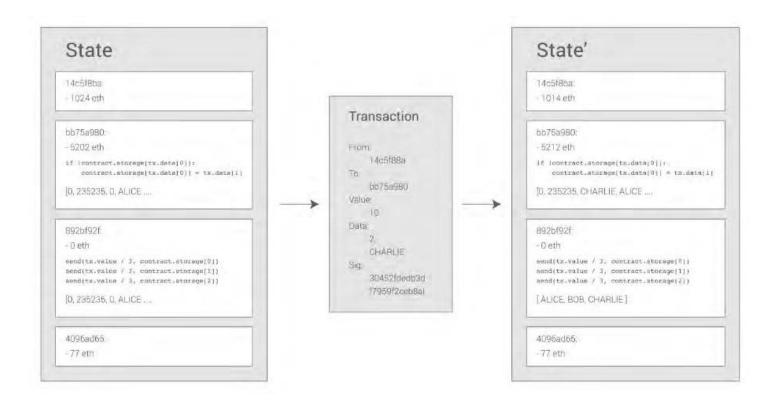
Messages and Transactions

"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) -> 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.
- 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.
- 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.
- 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

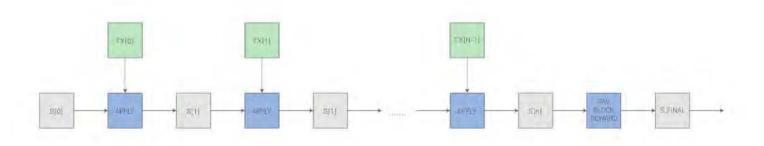
The code in Ethereum contracts is written in a low-level, stack-based bytecode language, referred to as "Ethereum virtual machine code" or "EVM code". The code consists of a series of bytes, where each byte represents an operation. In general, code execution is an infinite loop that consists of repeatedly 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 in in 0...n-1, setS[i+1] = APPLY(S[i],TX[i]). If any applications 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 (i) 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 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 lowa purchases a derivative that pays out inversely based on the precipitation in lowa, 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:

- 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 * (EMAFACTOR - 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 2⁵⁰ 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:

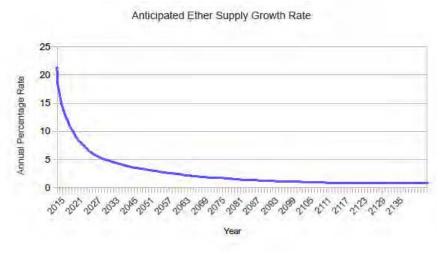
- Ether will be released in a currency sale at the price of 1337-2000 ether per BTC, a mechanism intended to fund the Ethereum organization and pay for development that has been used with success by a number of other cryptographic platforms. Earlier buyers will benefit from larger discounts. The BTC 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 2¹⁹⁰). 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 needing to process APPLY(S[i-1],TX[i]) -> 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

—— *4.*——

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

1 300k



Ad

Latest Blocks

Block 17414425 12 secs ago

Fee Recipient Fee Recipient: 0xe...

205 txns in 24 secs 0.02881 Eth

Block 17414424 36 secs ago

Fee Recipient beaverbuild

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)

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

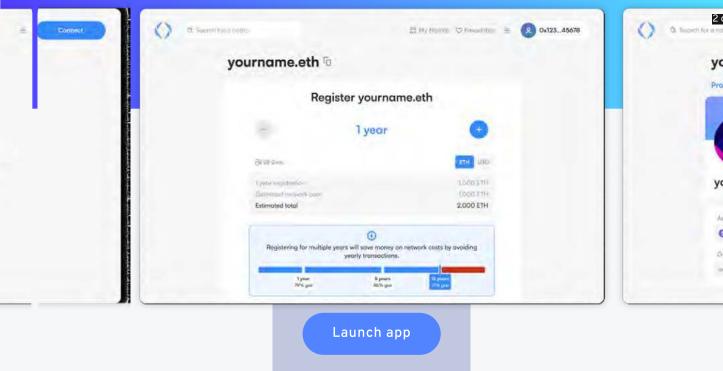
 This is Exhibit "C" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

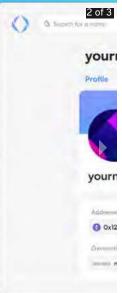
Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

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2.73m

Names

570

Integrations

697k

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Decentralised Websites

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







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Use Traditional Domains

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

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.com

.org

.10

.app

.XYZ

.art

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ENS Ecosystem@

Wallets







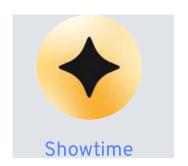


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Apps





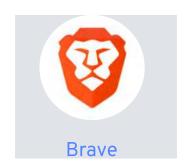




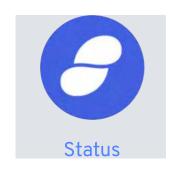
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Discuss



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Read docs

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#create-a-ticket in Discord

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Medium



press@ens.domains Bug Bounty Media Kit 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

Commissioner of Oaths in and for Ontario

Domain Name Lookup

Search by Address or Domain Name

Ч

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:
- ① 0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045
- ② Expiration Date:
- 2034.06.03 at 19:57
- ? Registrant:

 $0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045 \quad \textcircled{\square} \quad Lookup \ names \ Q$

? Controller:

+ Click to show more

Related Transactions

Transactions	Age	From	Action
0x6d90347f92d30aee0	13 hrs 5 mins ago	0x6A75aC2e5f1E6D 🗗	purchaseDomains
0xd5d554f2757ce4dc0	3 days 18 hrs ago	0x26fA93A506d751 🗗	ownerMintSubdomains

0x52763530978d3bfc9 40 days 16 hrs ago 0x946BB99a94fA3F	Transactions	Age	From	Action
0x52763530978d3bfc9 40 days 16 hrs ago 0x946BB99a94fA3F € setSubnodeOwner 0x2447736349ecd710 50 days 2 hrs ago 0x91769839f44b42 € setSubnodeRecord 0xacc9a009bc27e253 68 days 19 hrs ago 0x39c4B312F4b6c4 € grabSubdomain 0x3858d89285a1bc9e 71 days 15 hrs ago 0xDAB33093eeA9a4 € setSubnodeRecord 0x0ea3c743cef393c84 89 days 6 hrs ago 0x05bB8Dd86746E4 € buySubnode 0x733224f17e0672692 100 days 18 hrs ago 0x8953cD56cB38A7 € setSubnodeRecord 0xcfb42c399286d6a26 113 days 21 hrs ago 0x8385652f745b8A € setSubnodeRecord 0xdc96677be8a4e6a4 116 days 6 hrs ago 0x9558689f8f4652 € register 0xf744dc0d9fa52824f 145 days 16 hrs ago 0x70Fd9ed716F86e € (Unknown Function) 0x7c99f393efaa72466 160 days 8 hrs ago 0xa1bc85b537DF73 € setSubnodeRecord 0x7dfd2633eb39f67d6 160 days 8 hrs ago 0xa1bc85b537DF73 € setSubnodeRecord 0x77ba345c6eb1b280 187 days 19 hrs ago 0x82551F5ebEb40e € setSubnodeRecord 0x53033d2d50b44016 <td>0xc78814a2c4b07f9f0</td> <td>23 days 4 hrs ago</td> <td>0xd8dA6B7aA96045 🗘</td> <td>setSubnodeRecord</td>	0xc78814a2c4b07f9f0	23 days 4 hrs ago	0xd8dA6B7aA96045 🗘	setSubnodeRecord
0x2447736349ecd710 50 days 2 hrs ago 0x91769839f44b42	0x6e09164805b5e873	29 days 7 hrs ago	0x62F470c1E004a5 🚨	proveAndClaimWithRes
0xacc9a009bc27e253 68 days 19 hrs ago 0x39c4B312F4b6c4 ⊕ grabSubdomain 0x3858d89285a1bc9e 71 days 15 hrs ago 0xDAB33093eeA9a4 ⊕ setSubnodeRecord 0x0ea3c743cef393c84 89 days 6 hrs ago 0x05bB8Dd86746E4 ⊕ buySubnode 0x733224f17e0672692 100 days 18 hrs ago 0x8953cD56cB38A7 ⊕ setSubnodeRecord 0xcfb42c399286d6a26 113 days 21 hrs ago 0x8385652f745b8A ⊕ setSubnodeRecord 0xdc96677be8a4e6a4 116 days 6 hrs ago 0x95586B9fBf4652 ⊕ registerSubnode 0xf744dc0d9fa52824f 145 days 22 hrs ago 0x70Fd9ed716F86e ⊕ (Unknown Function) 0x7c99f393efaa72466 160 days 8 hrs ago 0xa1bc85b537DF73 ⊕ setSubnodeRecord 0x5d7b96e8b298bff60 160 days 8 hrs ago 0xa1bc85b537DF73 ⊕ setSubnodeRecord 0x5d7b96e8b298bff60 163 days 14 hrs ago 0x0490e3a6324656 ⊕ registerSubdomain 0x77ba345c6eb1b280 187 days 19 hrs ago 0x82551F5ebEb40e ⊕ setSubnodeRecord 0x53033d2d50b44016 197 days 2 hrs ago 0x60203B11D2A407 ⊕ setSubnodeRecord 0x7453ac87a2d7	0x52763530978d3bfc9	40 days 16 hrs ago	0x946BB99a94fA3F 🗗	setSubnodeOwner
0x3858d89285a1bc9e 71 days 15 hrs ago 0xDAB33093eeA9a4 ① setSubnodeRecord 0x0ea3c743cef393c84 89 days 6 hrs ago 0x05bB8Dd86746E4 ② buySubnode 0x733224f17e0672692 100 days 18 hrs ago 0x8953cD56cB38A7 ② setSubnodeRecord 0xdc96677be8a4e6a4 113 days 21 hrs ago 0x895586B9fBf4652 ② registerSubnode 0xdc96677be8a4e6a4 116 days 16 hrs ago 0x70Fd9ed716F86e ② register 0xf744dc0d9fa52824f 145 days 22 hrs ago 0x70Fd9ed716F86e ② (Unknown Function) 0x7c99f393efaa72466 160 days 8 hrs ago 0xa1bc85b537DF73 ② setSubnodeRecord 0x1d50169e1bc1d4a5f 160 days 8 hrs ago 0xa1bc85b537DF73 ② setSubnodeRecord 0x78fd2633eb39f67d6 163 days 14 hrs ago 0x0490e3a6324656 ② registerSubdomain 0x77ba345c6eb1b280 187 days 19 hrs ago 0x82551F5ebEb40e ② setSubnodeRecord 0x53033d2d50b44016 197 days 2 hrs ago 0x60203B11D2A407 ③ setSubnodeRecord 0x7453ac87a2d7c54d 212 days 20 hrs ago 0x5A133614792b65 ⑤ setDomain	0x2447736349ecd710	50 days 2 hrs ago	0х91769839f44b42 🚨	setSubnodeRecord
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0x733224f17e0672692 100 days 18 hrs ago 0x8953cD56cB38A7	0x3858d89285a1bc9e	71 days 15 hrs ago	0xDAB33093eeA9a4 🚨	setSubnodeRecord
0xcfb42c399286d6a26 113 days 21 hrs ago 0xB385652f745b8A	0x0ea3c743cef393c84	89 days 6 hrs ago	0x05bB8Dd86746E4 🗗	buySubnode
0xdc96677be8a4e6a4 116 days 6 hrs ago 0x95586B9fBf4652	0x733224f17e0672692	100 days 18 hrs ago	0x8953cD56cB38A7 🗗	setSubnodeRecord
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0x7c99f393efaa72466 160 days 8 hrs ago 0xa1bc85b537DF73	0xde4bfa5078c9c35f8	116 days 16 hrs ago	0x70Fd9ed716F86e 🗗	register
0x1d50169e1bc1d4a5f 160 days 8 hrs ago 0xa1bc85b537DF73	0xf744dc0d9fa52824f	145 days 22 hrs ago	0x7bF92555AD36be 🗗	{Unknown Function}
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0x7453ac87a2d7c54d 212 days 20 hrs ago 0x5A133614792b65	0x53033d2d50b44016	197 days 2 hrs ago	0x60203B11D2A407 🗘	setSubnodeRecord
, , ,	0x9f6d53fd60b4dd574	197 days 9 hrs ago	0xDDd396BF076364 🗘	claimSubdomain
0x7e959dec923808f98 215 days 5 hrs ago 0xD6dD42200D03c0 🗅 setSubnodeRecord	0x7453ac87a2d7c54d	212 days 20 hrs ago	0x5A133614792b65 🗗	setDomain
	0x7e959dec923808f98	215 days 5 hrs ago	0xD6dD42200D03c0 🗗	setSubnodeRecord
0xdf19748655ab899ae 215 days 5 hrs ago 0xD6dD42200D03c0 ☐ setSubnodeRecord	0xdf19748655ab899ae	215 days 5 hrs ago	0xD6dD42200D03c0 🚨	setSubnodeRecord

Transactions	Age	From	Action
0xa1f3e0da9a36a4797	217 days 6 hrs ago	0xb9f424D8275374 🗗	claimSubdomain
0x8ed83ef866895981e	226 days 23 hrs ago	0x384973e897f234 🗗	registerSubdomain
0x478f6421afa3e5e17	227 days 6 hrs ago	0xfAB2250a6ac1a9 🚨	setSubnodeOwner
0xb189b23c4283be8d	227 days 6 hrs ago	0xfAB2250a6ac1a9 🚨	setSubnodeRecord
0xcc55204b78686088	251 days 17 hrs ago	0x93a86f957fc647 🗗	setSubnodeRecord
0x5352611b2ecd8b96	252 days 23 hrs ago	0xE0Def7a9a9A496 🗘	setSubnodeRecord
0x988f35612df2b05c8	253 days 21 hrs ago	0xC60Bc5e92db490 🗗	setSubnodeRecord
0xa0c5a2df8fa4f8d69	256 days 16 hrs ago	0xcB357733D46eC6 🗗	register
0x6050db79f0f574e93	259 days 17 hrs ago	0x8574e313BCd156 🗗	mint
0x3eb1db026b10a072	264 days 7 hrs ago	0x16CAc431dC865D 🚨	setSubnodeRecord
0x2422b070aa5d79dc	273 days 11 hrs ago	0x0c236430FB928e 🕒	renew
0x1cb822811348639e	283 days 7 hrs ago	0x438D45edD399AB	renew
0xf54e43b7ea6ae82ed	300 days 11 hrs ago	0x754632c2431320 🗗	renew
0x0e93f22406c0a62b1	317 days 8 hrs ago	0xb96846e9714473 🚨	registerSubdomain
0x033605d543a9eca0	345 days 11 hrs ago	0x4b44F82C94107e	registerSubdomain
0xca38961269750041	351 days 2 hrs ago	0x06AD1D3E1581C9 🖰	setSubnodeRecord
0x04d6f8636feb742be	356 days 5 hrs ago	0x2a704f0F9C67a2 🗗	register
0xe4add275ed6d9c2b	382 days 11 hrs ago	0x005f774C49069F 🚨	setSubnodeRecord
0x37dcf80ab8e26f367	406 days 15 hrs ago	0xedC549133fE8d8 🚨	setSubnodeRecord
0xd486930cfc1b16206	443 days 1 hr ago	0x7c49Afe038363d 🗗	setSubnodeRecord
0x127a7c7e34e0f0a4a	555 days 1 hr ago	0xF2769659342fA6 🚨	execute
0x7a0eeacf5aeab976d	561 days 52 mins ago	0x016E8E8De72b8b	inviteInstallToken_q31n

Transactions	Age	From	Action
0xe00522bcc7c2bc53f	626 days 22 hrs ago	0xC8Fa9293F3a096 🗗	register
0xc0ff895e97eafd30e7	647 days 14 hrs ago	0x618629fС539cfЕ 🗗	claimGlyph
0x793e079fbc427cba0	728 days 4 hrs ago	0x3243EdcF0F68f2 🚨	executeMetaTx
0xe8085d999e1084f97	750 days 17 hrs ago	0xDE0f33ccFBB46d 🕒	setSubnodeRecord
0x9362caa3b26f40a8f	759 days 12 hrs ago	0x0f1C013d8b412e 🗗	setSubnodeRecord
0xbb13efab7f1f798f63	839 days 19 hrs ago	0xd8dA6B7aA96045 🗗	setResolver
0x2b36da5e623b152b	926 days 23 hrs ago	0x5247cb6cf57cВа 🚨	register
0x818d94225b89d66a	971 days 5 hrs ago	0x4124108b0A1257 🗗	executeMetaTx
0xab2cc289b49a5ccc	1038 days 4 hrs ago	0xd8dA6B7aA96045 🚨	renew
0xc3625d14c03f7512d	1075 days 2 hrs ago	0x310e21faddDAF6	create
0xa46b9c76d9ba86abf	1087 days 10 hrs ago	0x0103a4fdEF5A4F 🗘	setSubnodeRecord
0xe35c14eb31991dc3	1099 days 3 hrs ago	0x29709b0F1C5D68 🚨	createProxyWithNonce
0x356677feb564659fc	1208 days 19 hrs ago	0xA80000d1952d1c 🗗	createProxy
0x9734339fcb68fb566	1210 days 13 hrs ago	0x0904Daa3b99859 🗗	migrateSubdomain
0xc3f86218c67bee825	1214 days 18 hrs ago	0x0904Daa3b99859 🗗	migrateAll
0x230ed470cd563dce	1215 days 20 hrs ago	0xe74Ab730be29b6 🗗	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 D	ollar 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
and the state of t		

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

____ *A.R*______

Commissioner of Oaths in and for Ontario

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

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)

212.4KE (\$300.39M)

Value of Sales (24 Hours)

56.96**=** (\$106.47K)

Value of Sales (Week)

841.50E (\$1.59M)

Value of Sales (4 Weeks)

4.83KE (\$8.84M)

■ Top Punk Owners (/cryptopunks/leaderboard)

All Punk Types and Attributes (/cryptopunks/attributes)

Largest Sales

See all top sales (/cryptopunks/topsales)



(/cryptopunks/details/5822)

#5822 (/cryptopunks/details/5822)

8KE (\$23.7M) Feb 12, 2022



(/cryptopunks/details/7804)

#7804 (/cryptopunks/details/7804)

4.2KΞ (\$7.57M) Mar 11, 2021



(/cryptopunks/details/3100)

#3100 (/cryptopunks/details/3100)

4.2KE (\$7.58M)



(/cryptopunks/details/2924)







(/cryptopunks/details/4156)

#4156 (/cryptopunks/details/4156) 2.69KE (\$3.31M)

Jul 15, 2022



(/cryptopunks/details/5577)

#5577 (/cryptopunks/details/5577)

2.5KE (\$7.7M) Feb 09, 2022



(/cryptopunks/details/4464)

#4464 (/cryptopunks/details/4464)

2.5KE (\$2.62M) Jul 12, 2022



(/cryptopunks/details/4156)

#4156 (/cryptopunks/details/4156)

2.5KE (\$10.26M) Dec 09, 2021



(/cryptopunks/details/5217)

#5217 (/cryptopunks/details/5217)

2.25KΞ (\$5.45M) Jul 30, 2021



(/cryptopunks/details/8857)

#8857 (/cryptopunks/details/8857)

2KE (\$6.63M) Sep 11, 2021



(/cryptopunks/details/2140)

#2140 (/cryptopunks/details/2140)

1.6KE (\$3.76M) Jul 30, 2021



(/cryptopunks/details/7252)

#7252 (/cryptopunks/details/7252)

1.6KE (\$5.33M) Aug 24, 2021

Recent Transactions

Updated 5 seconds ago



(/cryptopunks/details/8188)

#8188 (/cryptopunks/details/8188)

Offered for 108.95= (\$203,681)



(/cryptopunks/details/1663)

#1663 (/cryptopunks/details/1663)

Transferred to 0xb7f7f6



(/cryptopunks/details/1663)



(/cryptopunks/details/1663)

#1663 (/cryptopunks/details/1663)

Transferred to 0xc385e9



#1663 (/cryptopunks/details/1663) Transferred to 0xed01f8



(/cryptopunks/details/1663)

(/cryptopunks/details/9718)

#1663 (/cryptopunks/details/1663)

Transferred to 0x00eb96



Transferred to 0xd2f9cf



(/cryptopunks/details/1864)



(/cryptopunks/details/4478)

#1864 (/cryptopunks/details/1864)

Transferred to 0xd2f9cf



#4478 (/cryptopunks/details/4478)

Transferred to 0x2be665



(/cryptopunks/details/4478)



(/cryptopunks/details/4478)

#4478 (/cryptopunks/details/4478)

Transferred to 0x7ed875

Transferred to 0x4db132



(/cryptopunks/details/4478)



(/cryptopunks/details/2276)

#4478 (/cryptopunks/details/4478) Bought for 56.96Ξ (\$106,486)

#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) 1



(/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)





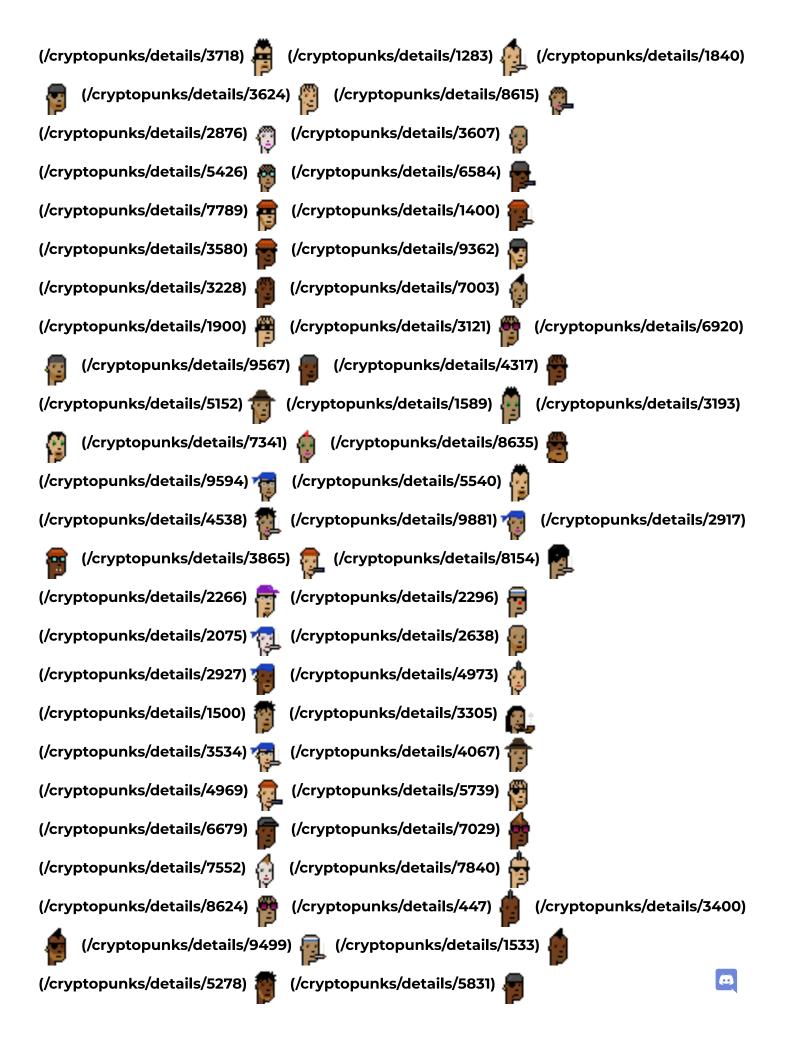
(/cryptopunks/details/7264) 🛔

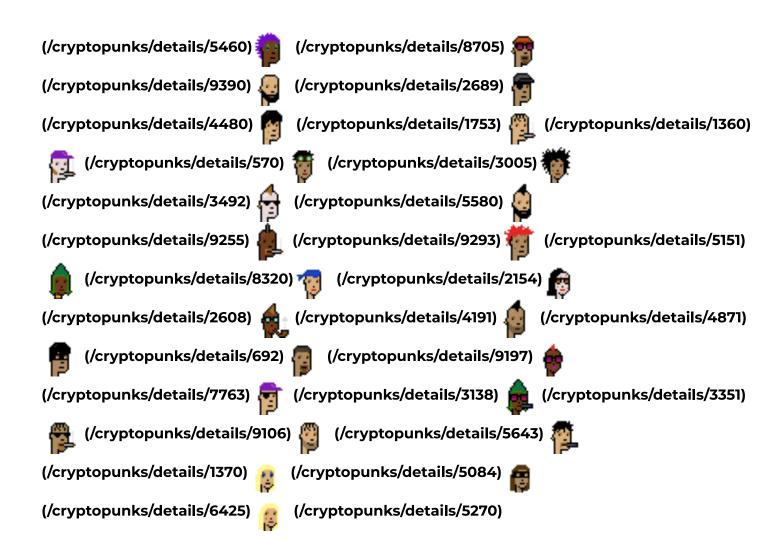


(/cryptopunks/details/8924)





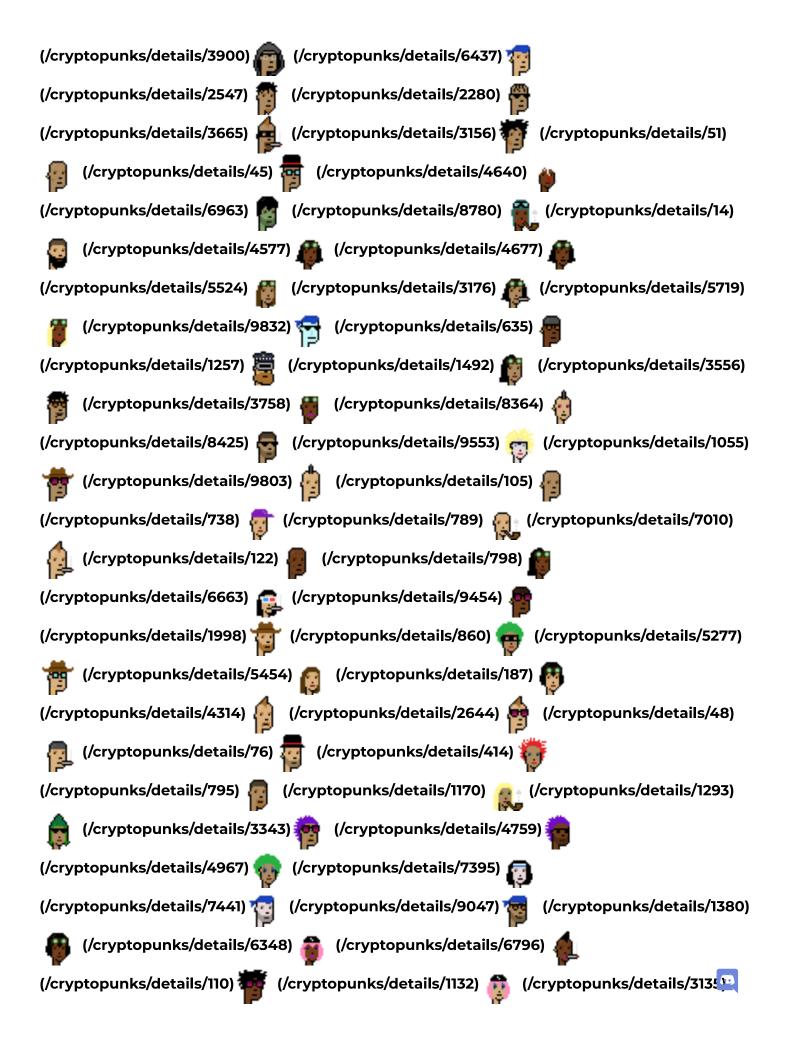


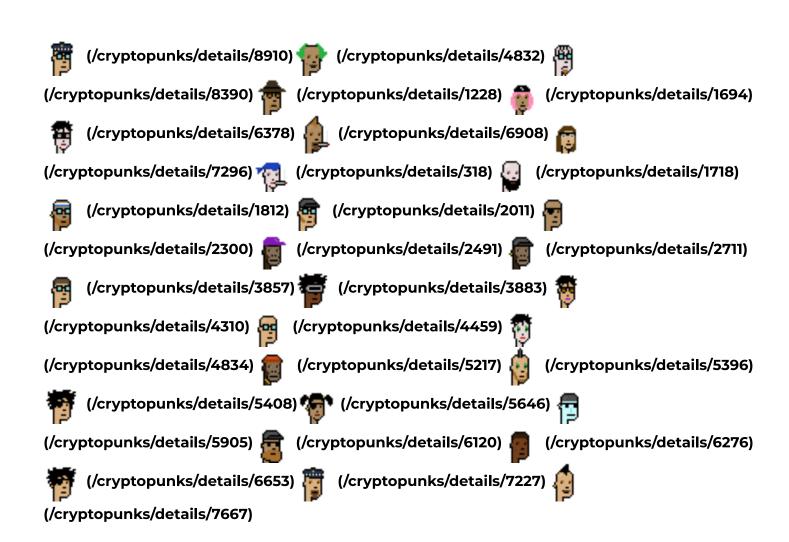


Bids

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)**.







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).





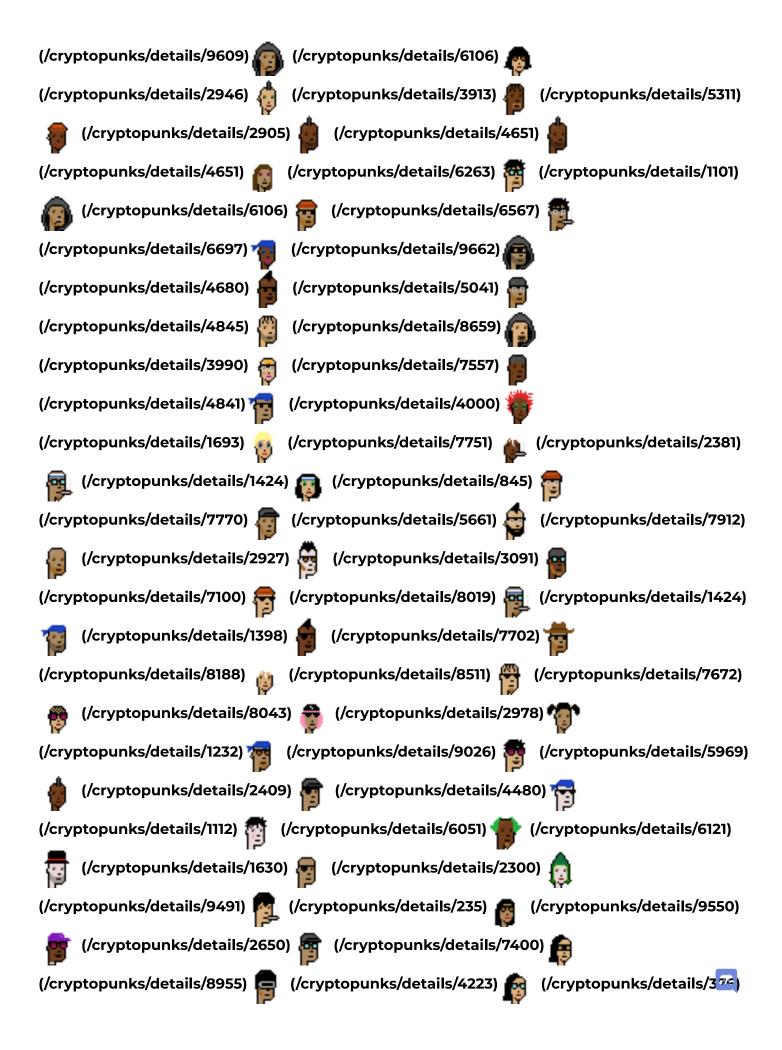
(/cryptopunks/details/5271) 🦣 (/cryptopunks/details/3913) (/cryptopunks/details/7354) 🚗

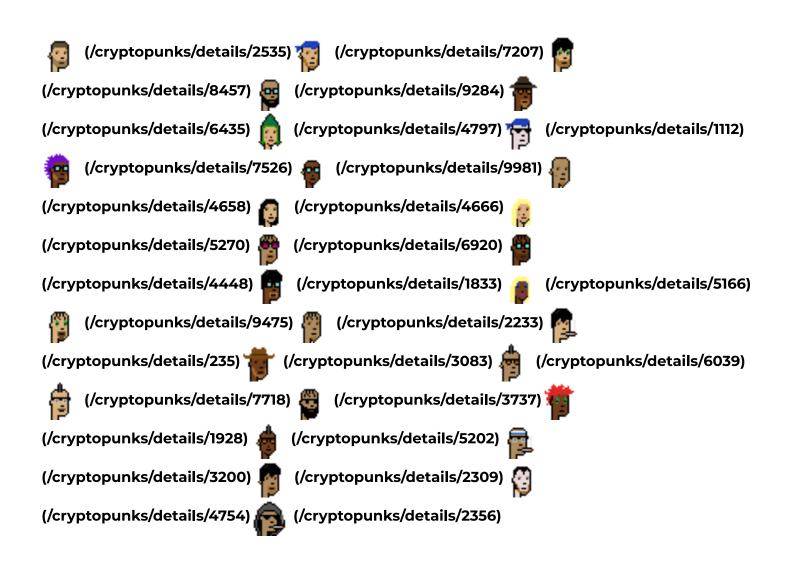












Wrapped

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).

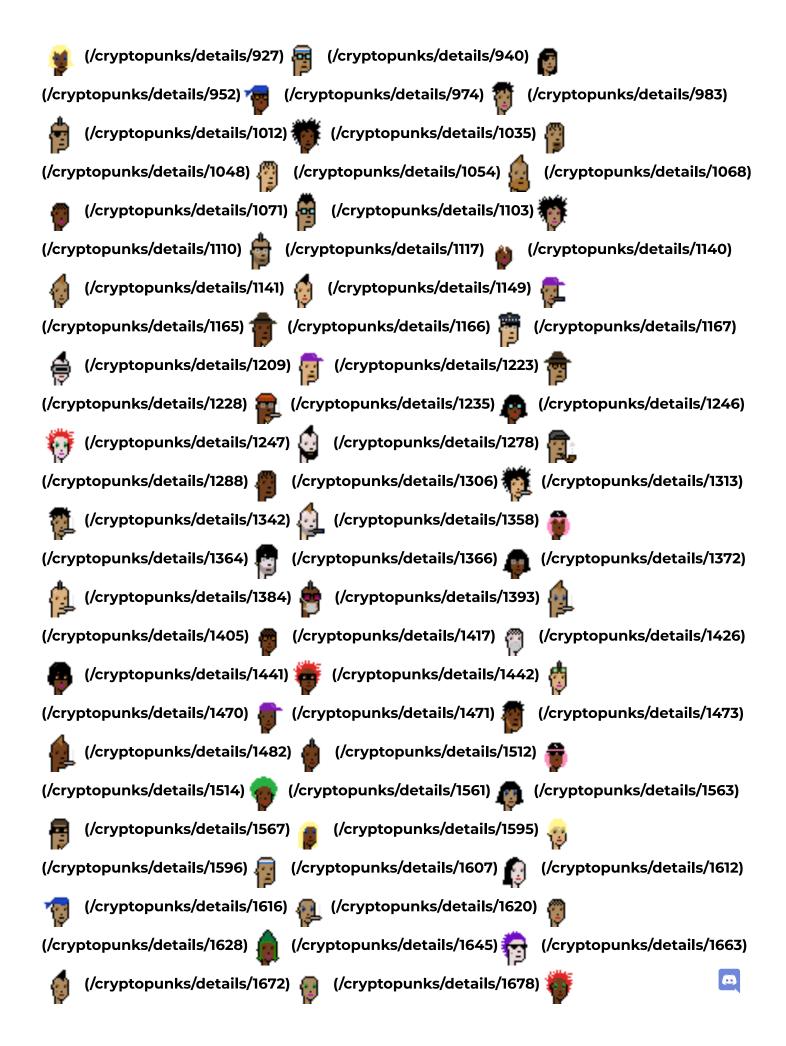




(/cryptopunks/details/750)



(/cryptopunks/details/88(7))





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) 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 eachother 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.

- 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

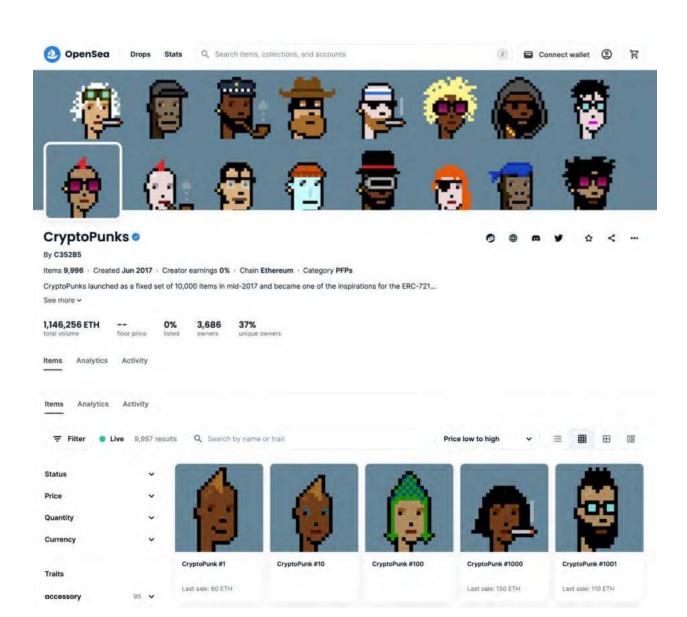
Login (/login/login) Terms (/cryptopunks/terms)

License Terms (https://licenseterms.cryptopunks.app) Privacy Policy (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

—— A.K—



This is Exhibit "H" 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

—— *4.*×—



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 <u>THE BATHROOM</u>, 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.

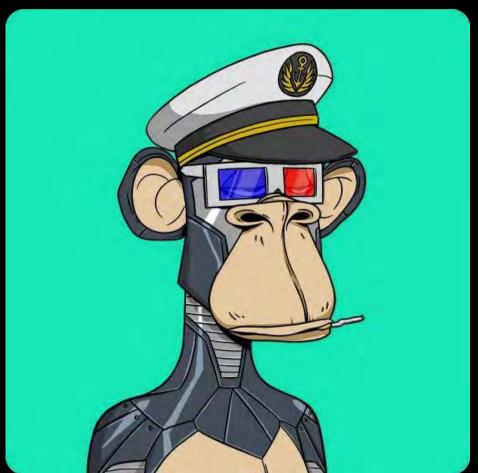
EMPEROR TOMATO KETCHUP. SPENT ALL THEIR MONEY ON FIRST PRESSES AND PET-NAT.

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









VERIFIED SMART CONTRACT ADDRF



ACHT CLUB

1<u>A7647A8aB7C2061c2E118A18a936f13D</u>

GET ON THE LIST

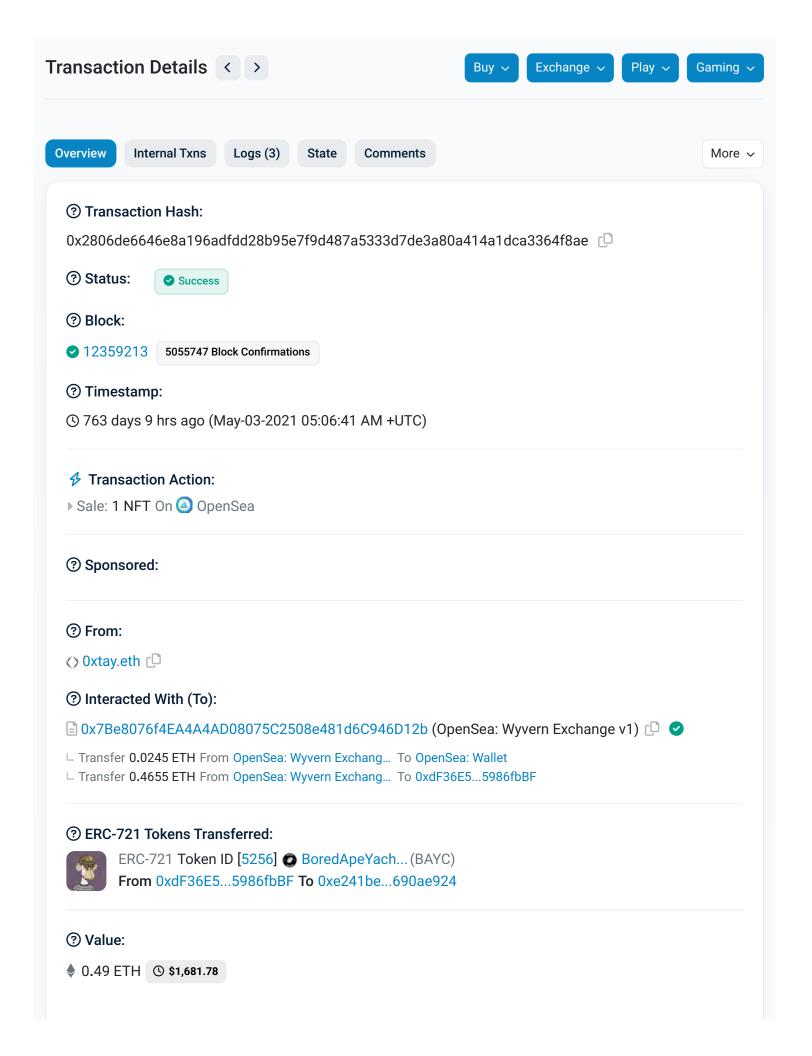
Email Address



This is Exhibit "I" 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—



Transaction Fee:			
0.009188205 ETH \$17.16			
③ Gas Price:			
39 Gwei (0.00000039 ETH)			
③ Ether Price:			
\$3,432.21 / ETH			
ৰূপ Gas Limit & Usage by Txn:			
273,242 235,595 (86.22%)			
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]: 00000000000000000000000000000000000			
View Input As ✓			
More Details: — Click to show			

? 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)

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

____ *4.k*_____



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 <u>Organgutan Outreach</u>, <u>Friends of Bonobos</u>, <u>Wright Way Rescue</u>, and <u>Wolf Conservation Center</u>.

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



nat was the inspiration behind the Bored Ape Kennel Club?	>
Il you be releasing more dogs after this?	~
ny didn't you make these profile pictures?	~
	·

VERIFIED SMART CONTRACT ADDRF'

*b24caa003E9f2f0497Ad287FDF95623

ACHT CLUB

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)

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

— M.)—



Bored Ape Chemistry Club

Analytics Activity

Items

Q Search by name or attribute Price low to high Status C 3 items Owner Price Quantity Currency M2 Mutant Serum Attributes 17.25 ETH 27.8969 ETH Last sale: 17,170 ETH Last sale: 30 WETH 1,542.069 ETH Serum Type

This is Exhibit "L" 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_____



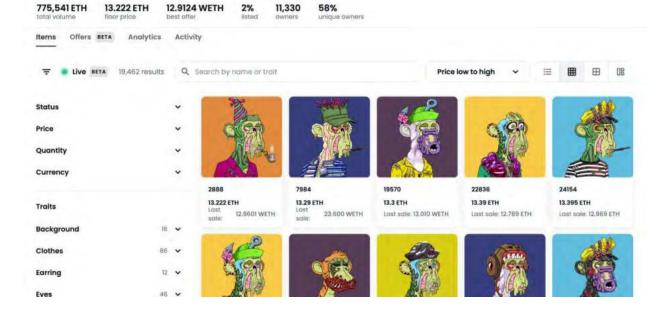
Mutant Ape Yacht Club

By YugaLabs 🥏

Items 19.5K \cdot Created Aug 2021 \cdot Creator earnings 2.5% \cdot Chain Ethereum \cdot 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 ~



This is **Exhibit "M"** 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____

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 <u>Governance</u>) 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.



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 alloted 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

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:

- \cdot 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 <u>claim page</u> 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.

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

APECOIN ALLOCATED PER NFT OR NFT PAIR

- 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

NFT

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: 0x4d224452801aced8b2f0aebe155379bb5d594381

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.R.

Commissioner of Oaths in and for Ontario

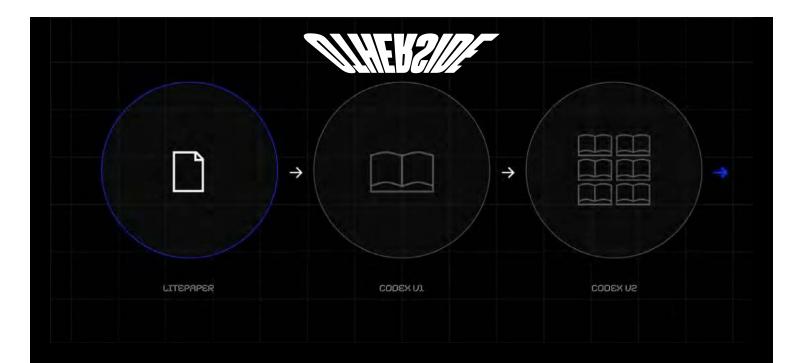


THE OTHERSIDE LITEPAPER



INTRODUCTION

WHAT IS THIS LITEPAPER?

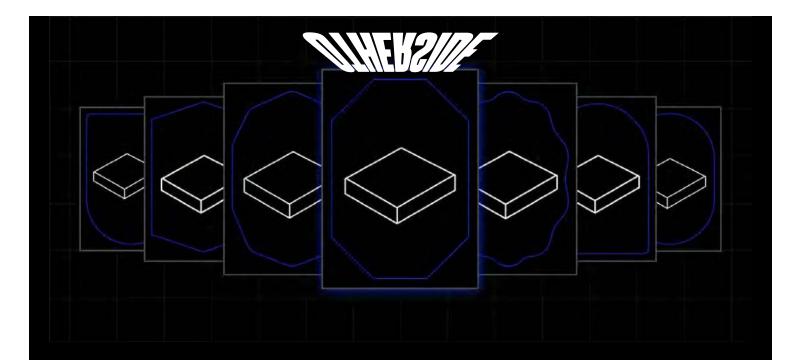


This document is the litepaper for the world-building metaverse platform known as Otherside. It is designed to communicate and explain principles of the platform, capabilities of its developers, and possibilities for community co-creation.

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 upto-date information, announcements, and decisions that shape Otherside.

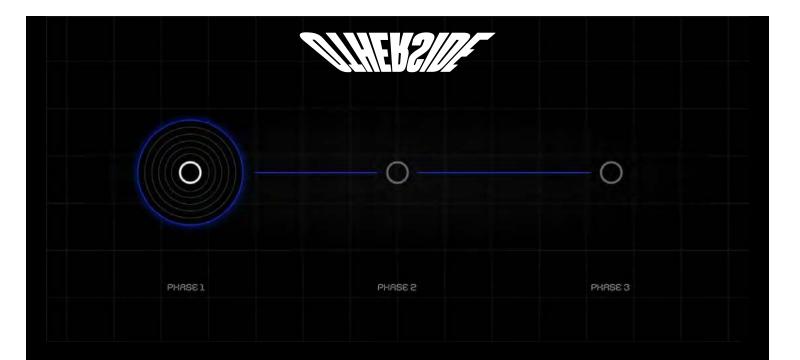
It has already been immensely inspiring to receive your support thus far and we cannot wait to continue this journey as we discover novel ways to collaborate and forge our unique path.

WHAT IS OTHERSIDE?



Otherside 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.

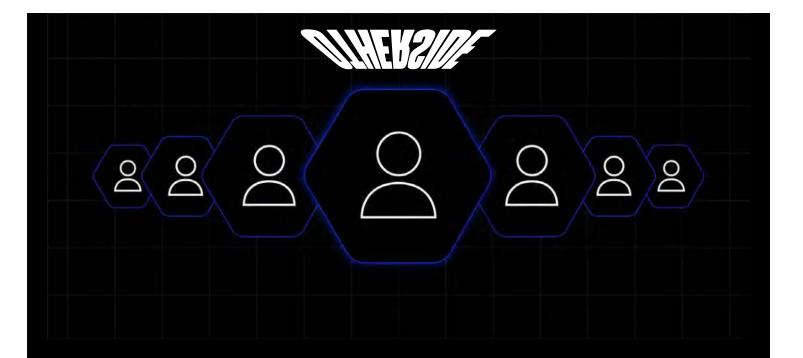
WHAT IS PHASE 1?



Phase 1 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

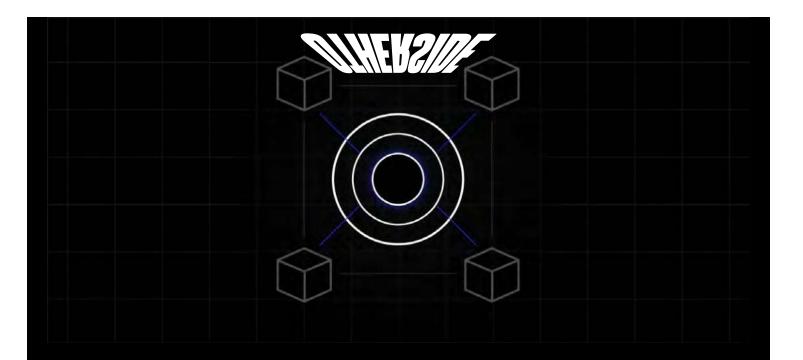
1. BUILT FOR AND BY THE COMMUNITY



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.

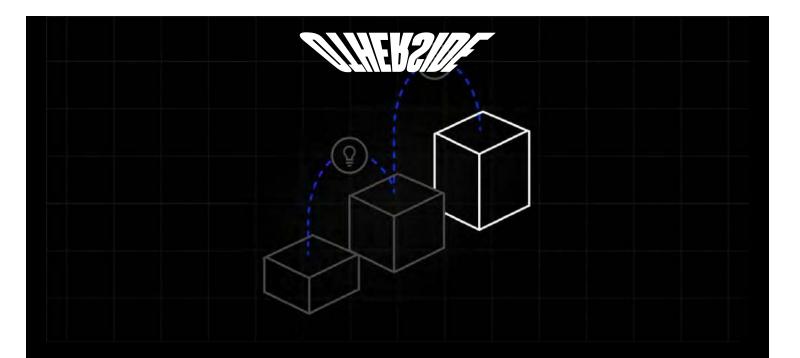
2. GENUINE OWNERSHIP AND INTEROPERABILITY



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

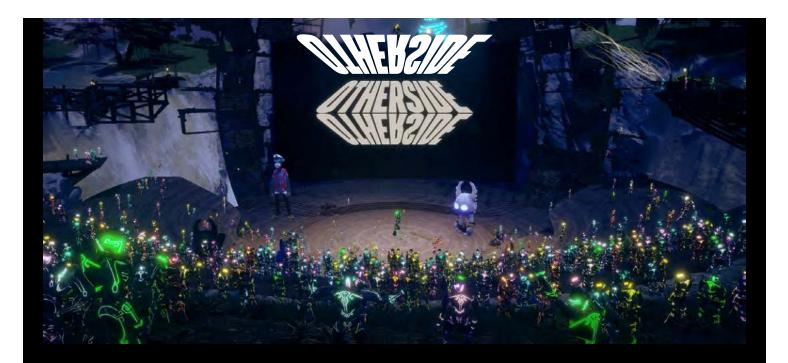


We are focused on providing real incentives and structure through a collaborative ecosystem and network of contributors and by giving Voyagers and developers the opportunity to network with peers, industry professionals, designers, engineers, and any other piece of the puzzle that they might need to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

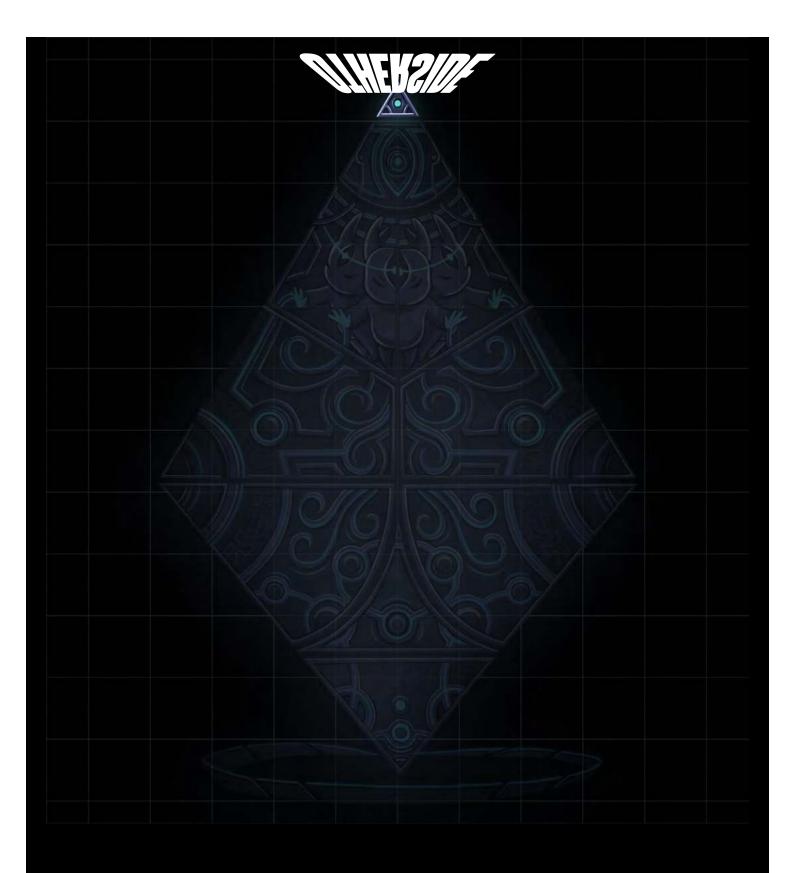
Unlike traditional development operating in secret, Yuga and Improbable take an open, transparent, and iterative approach to the development of Otherside that leads to results you can see faster. We will use your feedback to course correct, change directions as we discover things good and bad along the 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 state of properies, 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 the transference 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

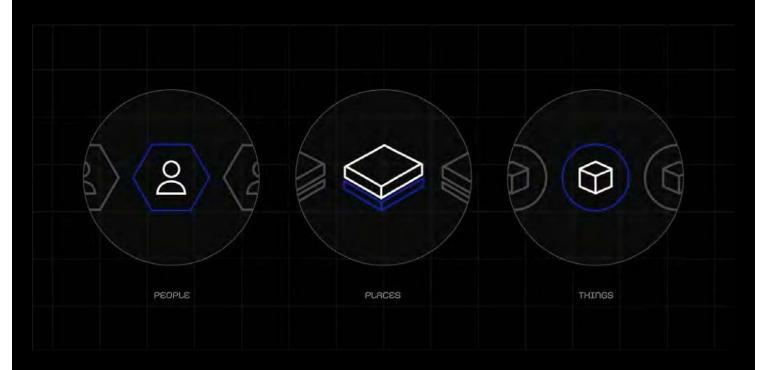
More information will be revealed as we get closer to this stage of the Voyager's Journey.

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 a section of the second o

OPEN OBJECT STANDARDS

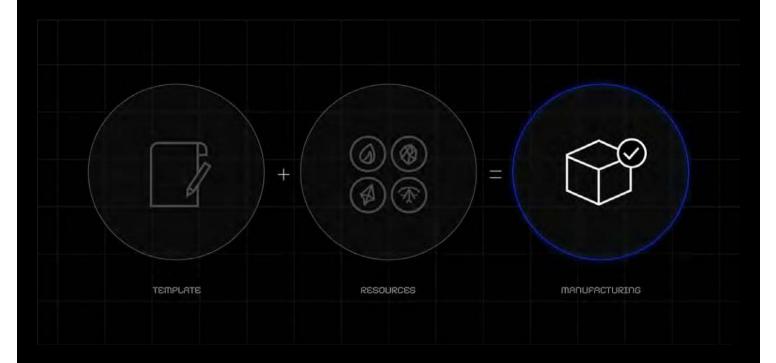
We want things made with our Creation Tools to be interoperable - they can be used anywhere within Otherside - or any other metaverse that conforms to these standards. To achieve this we're working with Improbable's M² Network to create a set of Open Object Standards that describe what objects are, what 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 gITF 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 local property of t

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



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 Notice 1000 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 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.







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

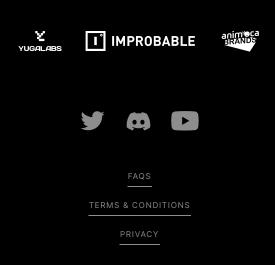
WHO IS IMPROBABLE?

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.





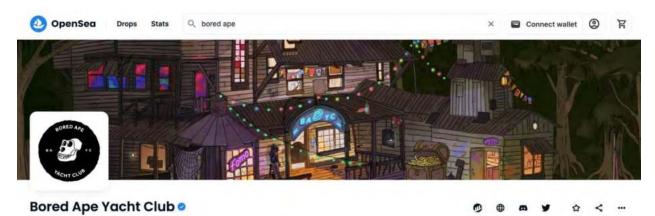
© 2023 YUGA LABS INC.

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

_____ A.K______

Commissioner of Oaths in and for Ontario



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 v

1,093,124 ETH 47.67 ETH 46.3147 WETH 2% 5,643 56% total volume floor price best offer listed owners unique owners

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

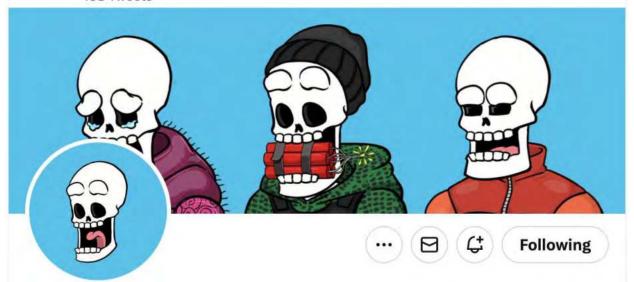
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168 Tweets



BONEHEADS

@BONEHEADS

PENDING... ** #BONEHEADSFOREVER

⊘ opensea.io/collection/bon...

☐ Joined May 2021

O Following 8,354 Followers

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BONEHEADS - Origins





By BONEHEADSSTUDIOS

415 ETH

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

0.3%

PENDING... #BONEHEADSFOREVER **

best offer 0.002 ETH

1,711

17% unique owners

Items Offers BETA Analytics Activity Status Price Quantity Currency 1803 3915 7357 9334 5039 0,002 ETH 0.025 ETH 0.025 ETH 0.04 ETH 0.065 ETH Traits Last sale: 0.035 ETH Last sale: 0.030 ETH Last sale: 0.040 ETH Last sale: 0.089 ETH Last sale: 0.090 ETH Feet Head Headwear Legs Torso

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

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_____ *A.R*______

Commissioner of Oaths in and for Ontario



https://boneheads.io/about 1/9

1/30/23, 4:59 AM 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**

https://boneheads.io/about

1/30/23, 4:59 AM BONEHEADS

EXPERIENCED INVESTORS, AND A CLEARLY DEFINED SEJECTIVE # BENEARE ADS ARE PRICED IN A MUTOR PRICED 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

https://boneheads.io/about 3/9

ACROSS CHAINS IS SOMETHING THAT WE WILL WORK

TOWARD STEADILY. SDK DEVELOPMENT ABOVEHEAD

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 OBESSED WITH THE PRIVELEGE 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 -

https://boneheads.io/about 4/9

BONEHEADS. FROM INCEPTION, #BONEHEADS HAS *BEEN A COLEAB TIVE EFFORT SPANNING MOTHER 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.

https://boneheads.io/about 5/9



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

https://boneheads.io/about 6/9

INTO PHYSICAL GRAIL GODS. THE DRIP WILL BE 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

https://boneheads.io/about 7/9

SHIFTING CULTURE, ONE PIXEL AT A TIME. BONEHEADS HAVE BEEN COUNTED OUT, BUT NEVER FOWNTA POPEHEAS 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). POSTITON 2: SENIOR**

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_____ f.k---

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https://boneheads.io/roadmap



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

https://boneheads.io/roadmap



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

https://boneheads.io/roadmap 3/5



2.4 FT SCULPTURES

2.4 FT SCULPTURES

4FT AREA RUGS

PLAYING CARDS

BOXING GLOVES

TRUCKER HATS

MINI BACKPACKS

PUFFER JACKETS

BIKER JACKETS

BOMBER JACKETS

T-SHIRTS

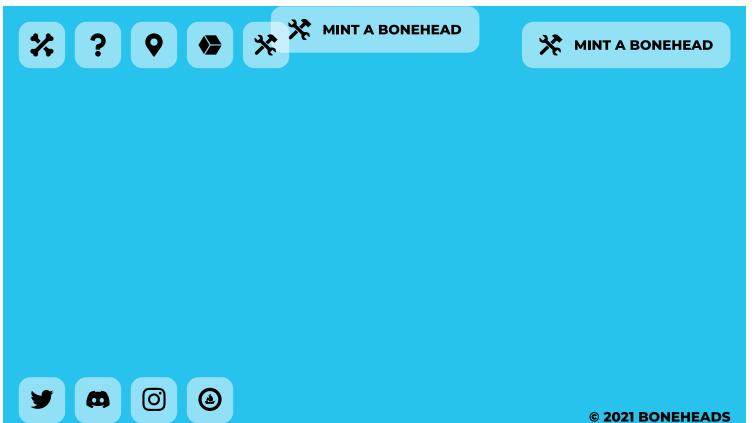
HOODIES

SLIDES

SOCKS

#BONEHEADSFOREVER

https://boneheads.io/roadmap 4/5



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5/5 https://boneheads.io/roadmap

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____ A.K____

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https://boneheads.io/benefits 1/6



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

https://boneheads.io/benefits

#BONEHEAD LACKS AN ATTRIBUTE (SUCH AS A ZEBRAATTERNO POCINT HAT), YOU WILL NO BETABLEHED

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)

https://boneheads.io/benefits





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

https://boneheads.io/benefits 4/6



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

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_____ *4.k*______

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1/13 https://boneheads.io/faq



#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?

https://boneheads.io/faq 2/13

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.

WE'RE DOING A SURPRISE DROP AND THE

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.

https://boneheads.io/faq 3/13



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.

https://boneheads.io/faq 4/13



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

https://boneheads.io/faq 5/13

NOT SEE THIS AS A "QUICK" WAY TO MAKE MONEY YOUR GORL IS TO THO MERELY BUILD HY EMITAB SELECT **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.**

https://boneheads.io/faq 6/13



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.

https://boneheads.io/faq 7/13



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.

https://boneheads.io/faq 8/13



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.

https://boneheads.io/faq 9/13



YES. PLEASE VISIT <u>BENEFITS</u> 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

https://boneheads.io/faq 10/13

WILL ALLOW YOU TO MAKE AN AVATAR WITH ALL THE POUR OF SSIBLY IMAGINE. WE MINIARCSHEADE 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.

https://boneheads.io/faq 11/13



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

https://boneheads.io/faq 12/13

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

#BONEHEADSFOREVER











© 2021 BONEHEADS

https://boneheads.io/faq 13/13

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

_____ A.K_____

Commissioner of Oaths in and for Ontario



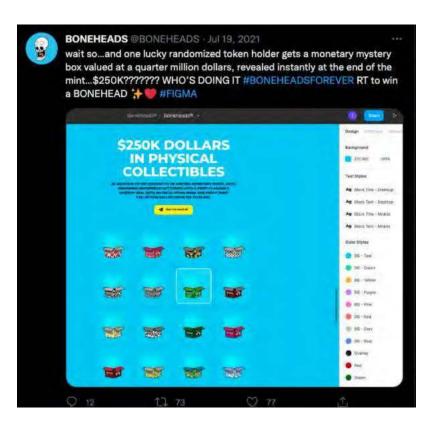
a Bonehead will get an opportunity to participate in a secondary credit sale for a chance to win \$1M 00000000

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

4.7

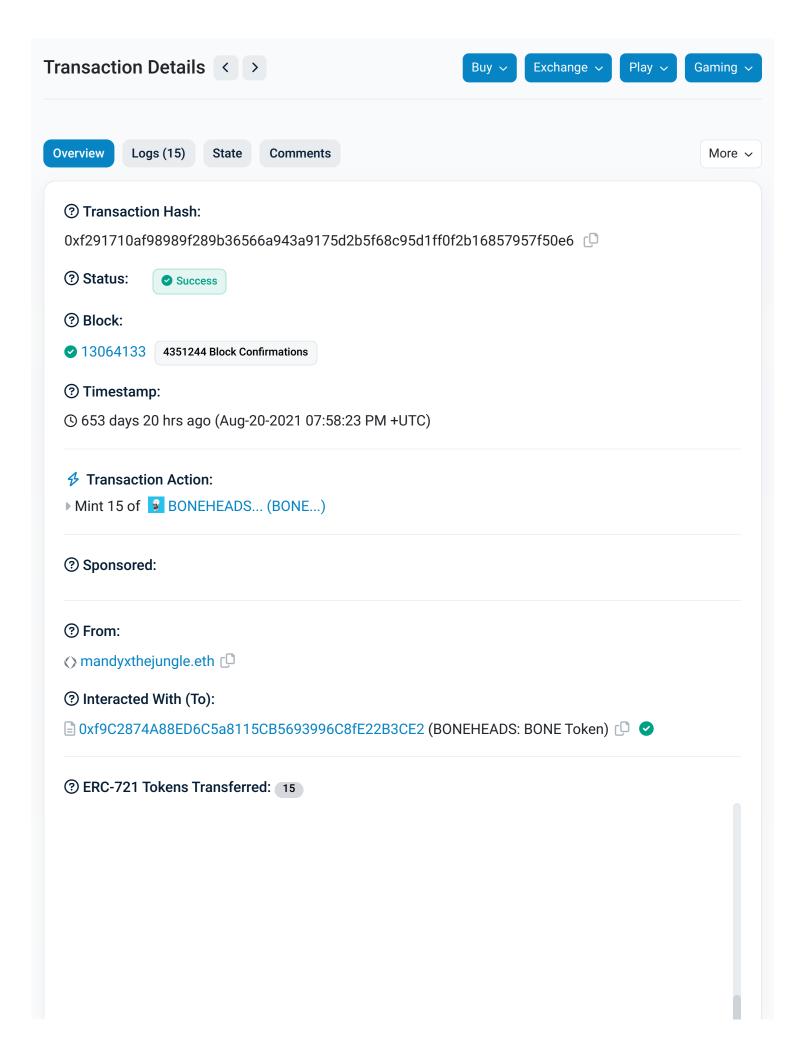
Commissioner of Oaths in and for Ontario

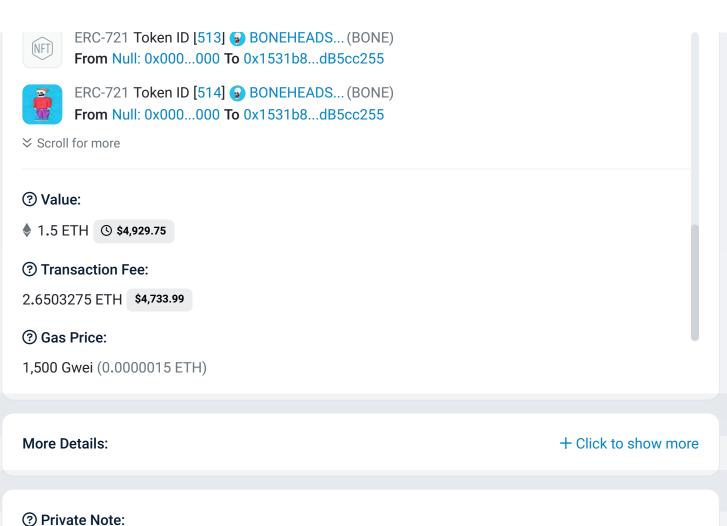


This is Exhibit "X" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

____ A.K____



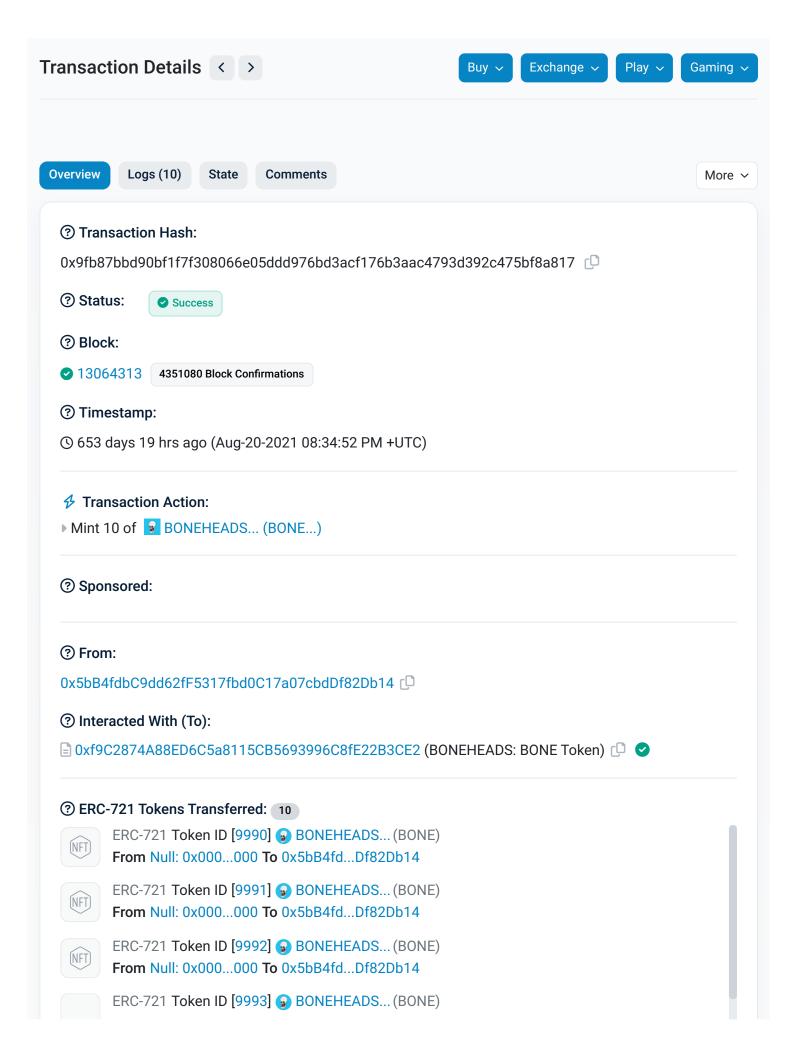


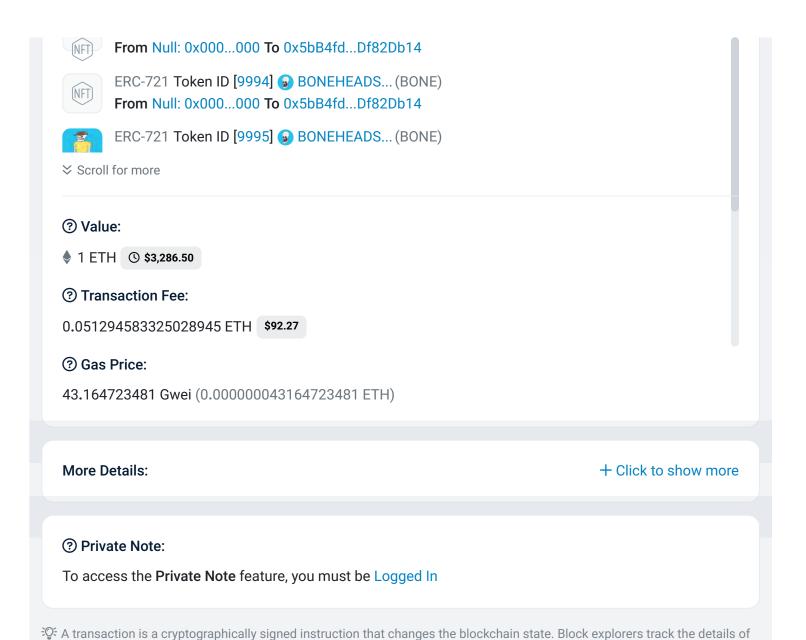
To access the Private Note feature, you must be Logged In

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

_____ f.k_____





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

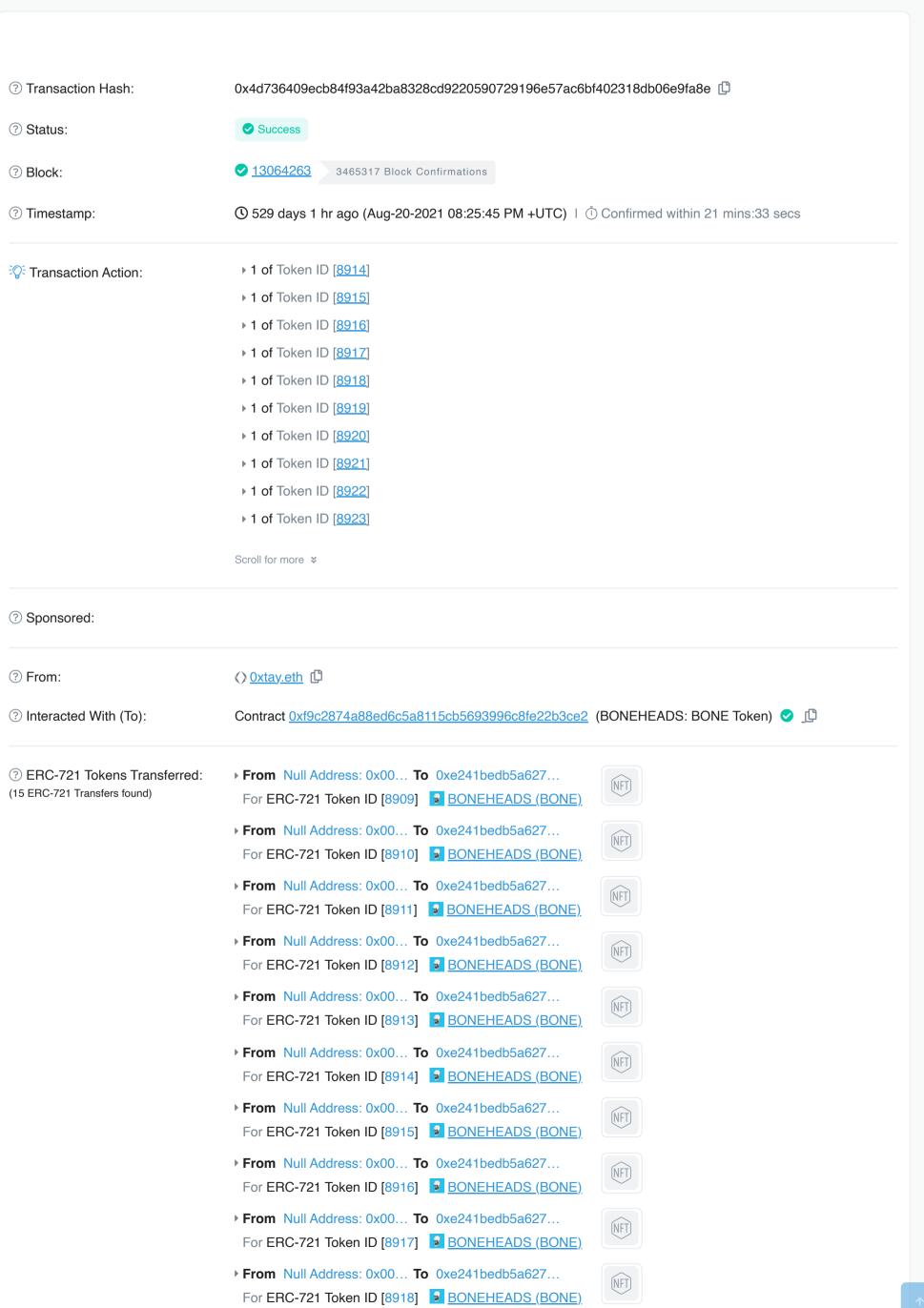
—— *4.*×—

Transaction Details

Overview Logs (1) State	Comments		
? Transaction Hash:	0x4a95f9536fafb75f29b0256bb3b4889669f3c92bde47a3ddfce95f1d0a4babf5		
③ Status:	Success		
③ Block:			
? Timestamp:	① 529 days 1 hr ago (Aug-20-2021 08:23:38 PM +UTC) Ⅰ ① Confirmed within 30 secs		
Transaction Action:	 Mint of BONEHEADS (BONE) To 0xe241bedb5a6270c5a96219a52f59c7c3690ae924 ▶ 1 of Token ID [8669] 		
? Sponsored:			
? From:	♦ Oxtay.eth □		
② Interacted With (To):	Contract 0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2 (BONEHEADS: BONE Token) ✓ ↓□		
② ERC-721 Tokens Transferred:	For ERC-721 Token ID [8669] BONEHEADS (BONE)		
∇alue:	0.1 Ether (\$328.65)		
? Transaction Fee:	0.012418157662848435 Ether (\$19.50)		
② Gas Price:	0.00000084492782095 Ether (84.492782095 Gwei)		
② Ether Price:	\$3,286.50 / ETH		
Click to see More ✓			
? Private Note:	To access the Private Note feature, you must be <u>Logged In</u>		

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



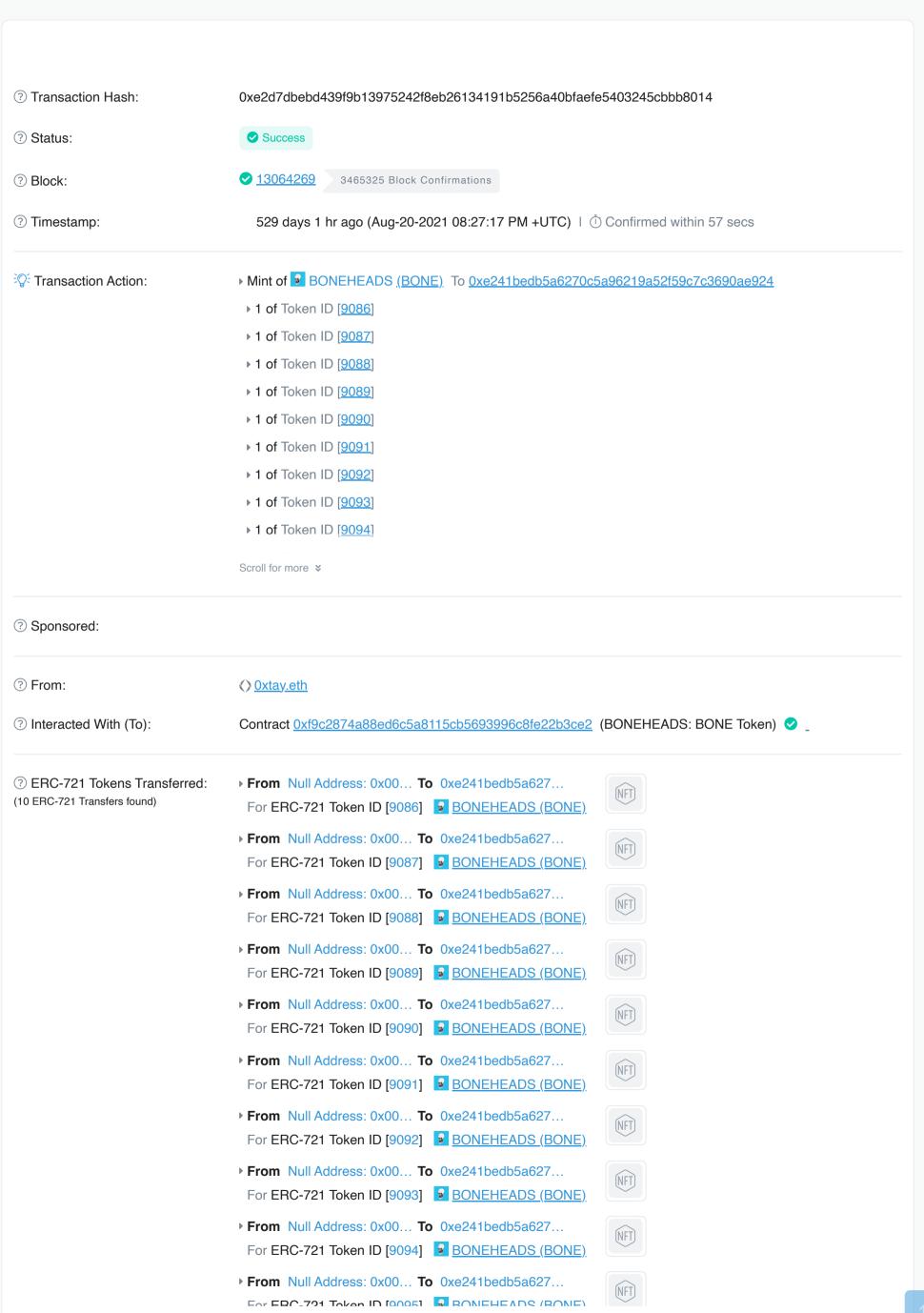
▶ From Null Address: 0x00... To 0xe241bedb5a627...

Click to see Less ↑

? Private Note: To access the Private Note feature, you must be <u>Logged In</u>

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

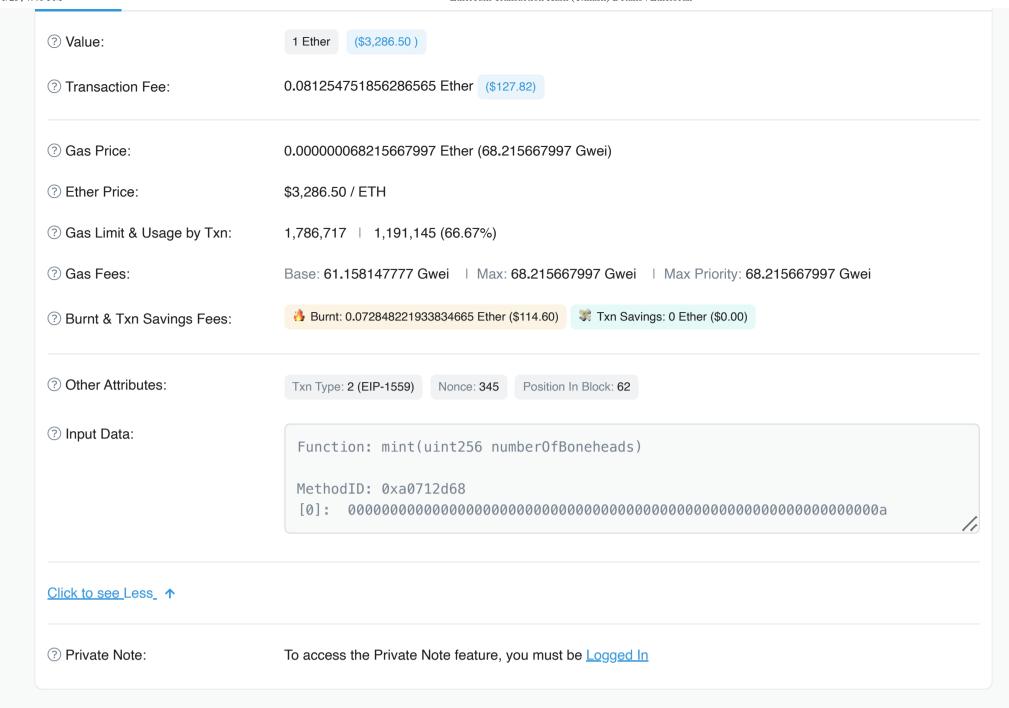


State

Comments

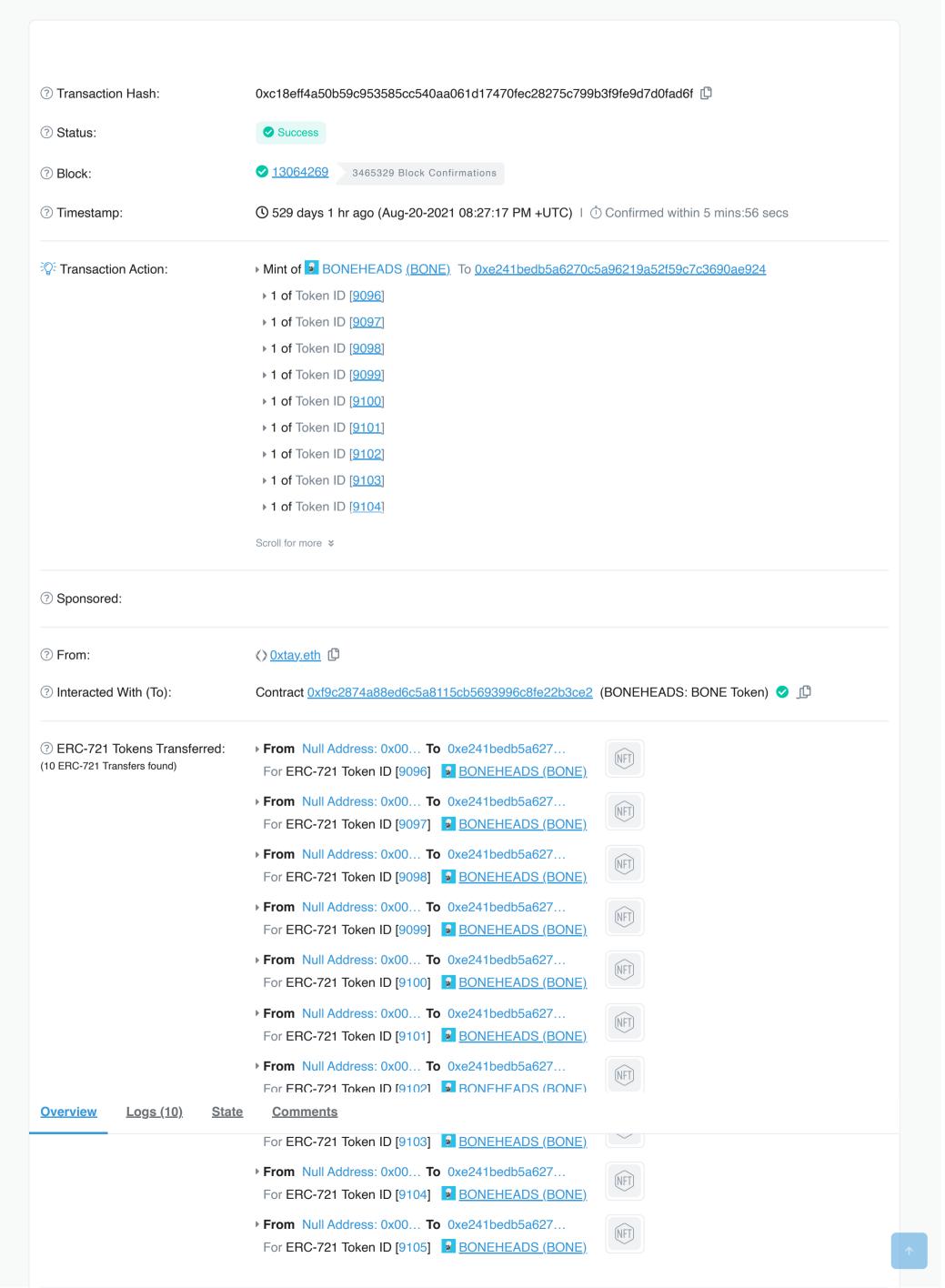
<u>Logs (10)</u>

Overview



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



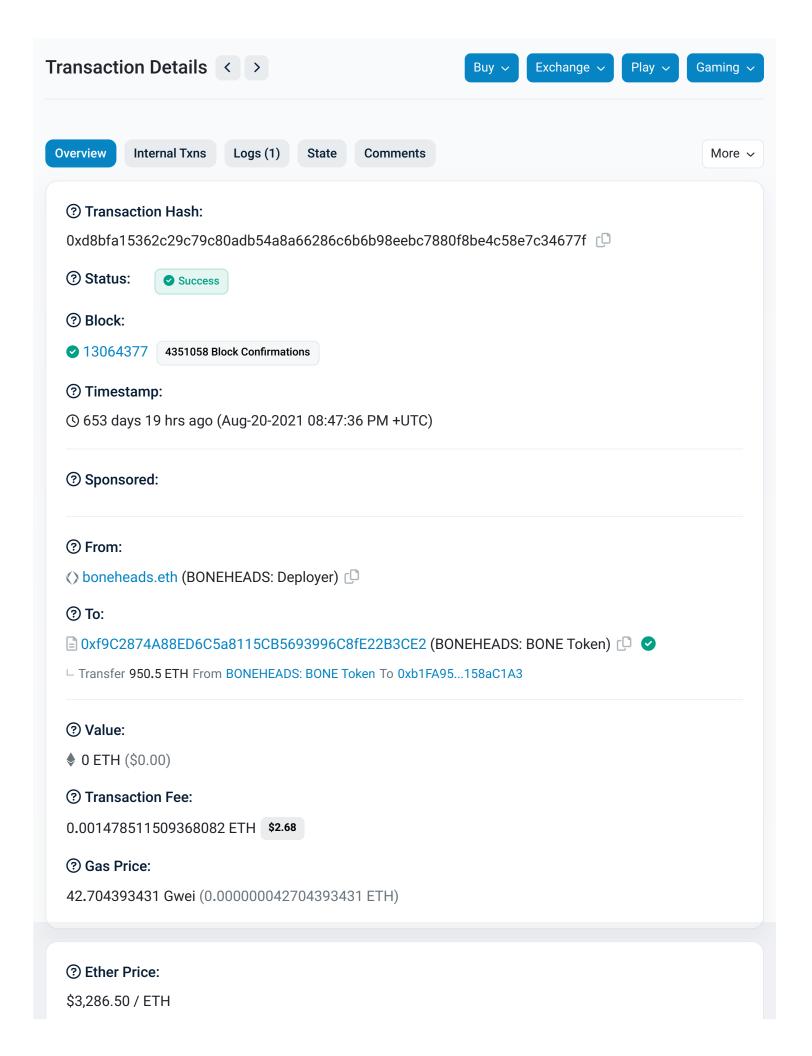
	1 Ether (\$3,286.50)
⑦ Transaction Fee:	0.112106717284648255 Ether (\$176.51)
③ Gas Price:	0.00000094116767719 Ether (94.116767719 Gwei)
③ Ether Price:	\$3,286.50 / ETH
Click to see More ↓	
? Private Note:	To access the Private Note feature, you must be <u>Logged In</u>

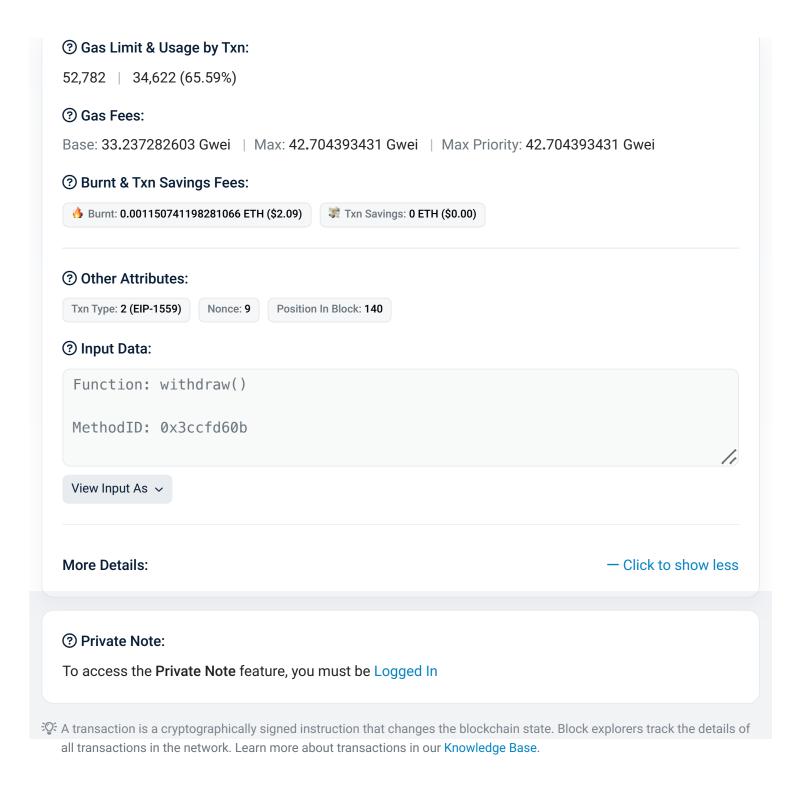
^{*}Q* A transaction is a cryptographically signed instruction from an account that changes the state of the blockchain. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

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

____ A.R____

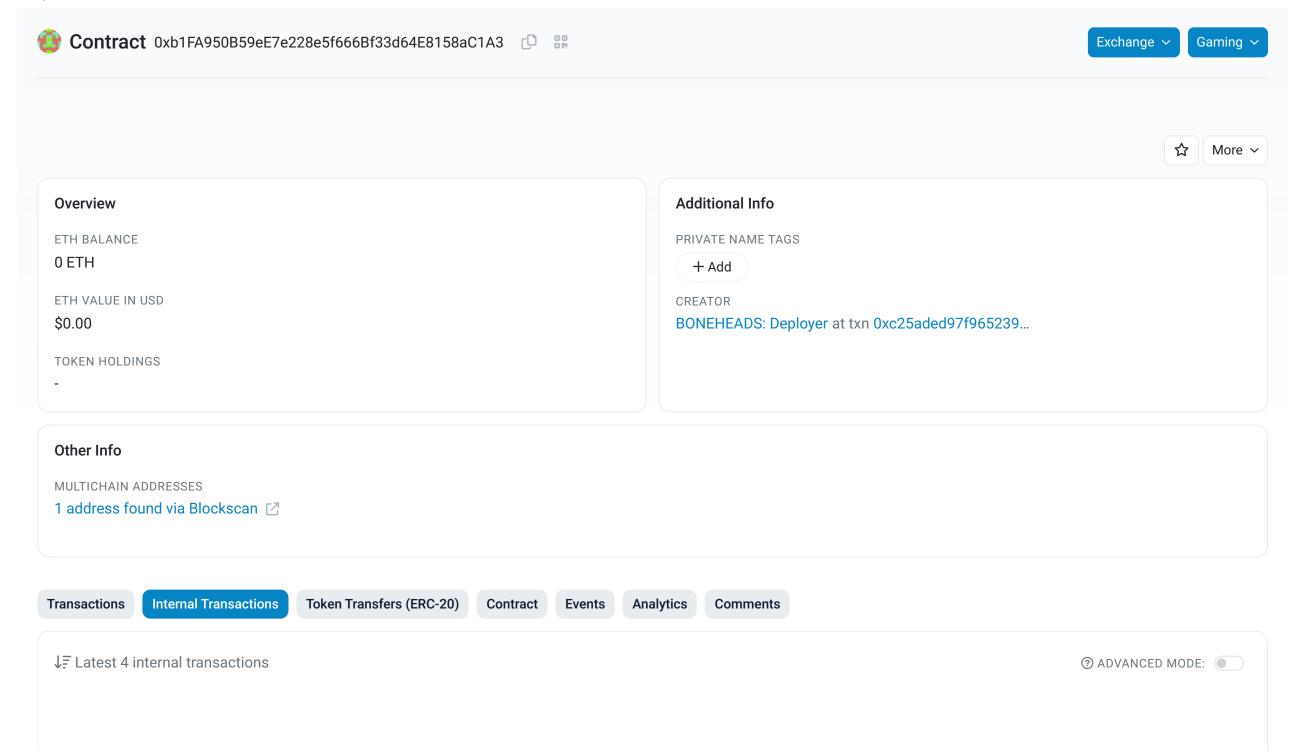




This is Exhibit "AB" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

—— *4.*×—



Parent Txn Hash	Block	Age	From		То	Value
0x409036af3e00dc32	13064418	537 days 16 hrs ago	a 0xb1FA95158aC1A3	\rightarrow	BONEHEADS: Deployer 📮	807.925 ETH
0x1eaa32ba5f1c9dbe	13064408	537 days 16 hrs ago	a 0xb1FA95158aC1A3	\rightarrow	() westcoastnft.eth [95.05 ETH
0xc0976f70fcb07ef2f	13064397	537 days 16 hrs ago	a 0xb1FA95158aC1A3	\rightarrow	()*no-op.eth [47.525 ETH
0xd8bfa15362c29c79	13064377	537 days 16 hrs ago	BONEHEADS: BONE T	\rightarrow	0xb1FA95158aC1A3 🕒	950.5 ETH

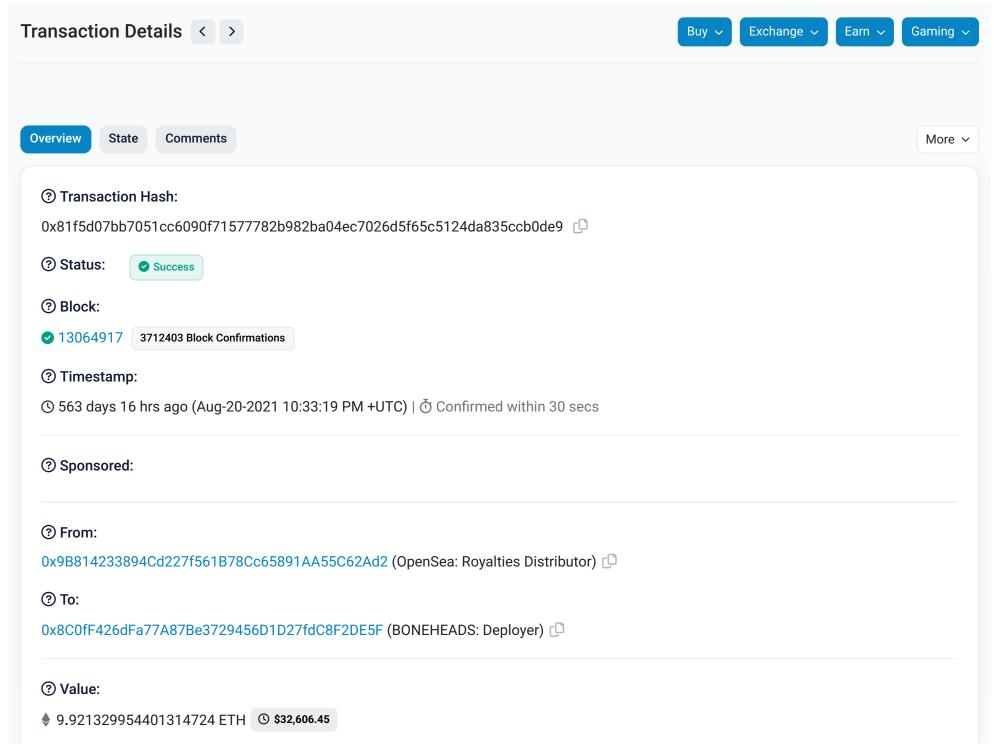
[Download: CSV Export 🕹]

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

—— *4.5*——



(?)	Transaction	Fee:
\cdot	I I WI I O W O LI O I I	

0.000756 ETH \$1.18

② Gas Price:

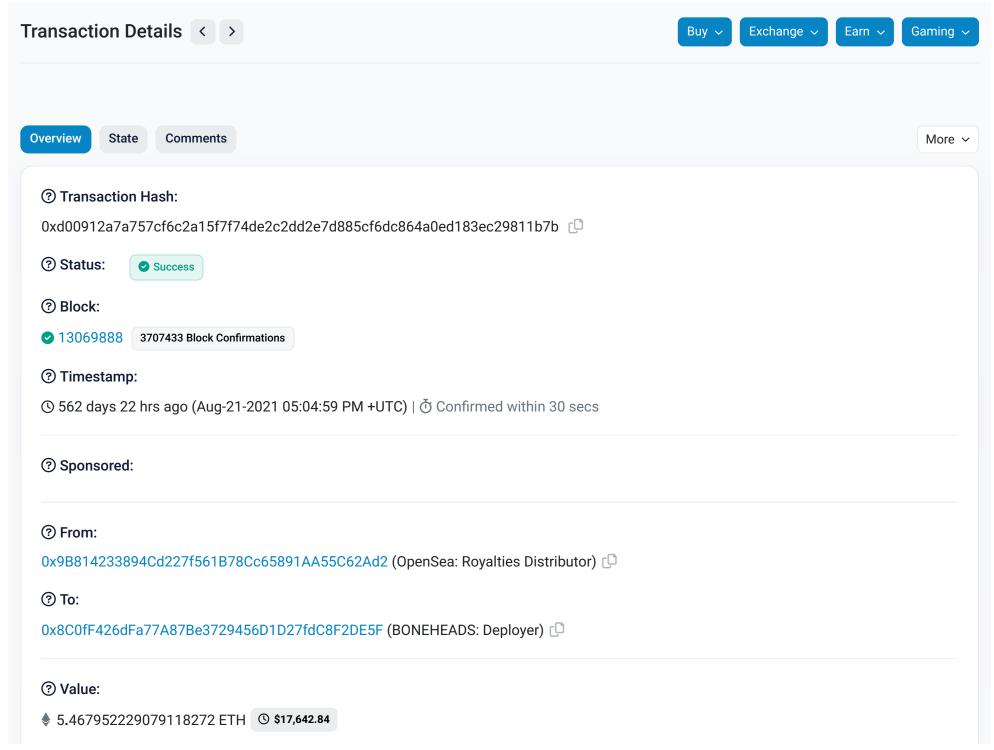
36 Gwei (0.00000036 ETH)

More Details:

+ Click to show more

? Private Note:

To access the Private Note feature, you must be Logged In



0.001281 ETH \$2.00

② Gas Price:

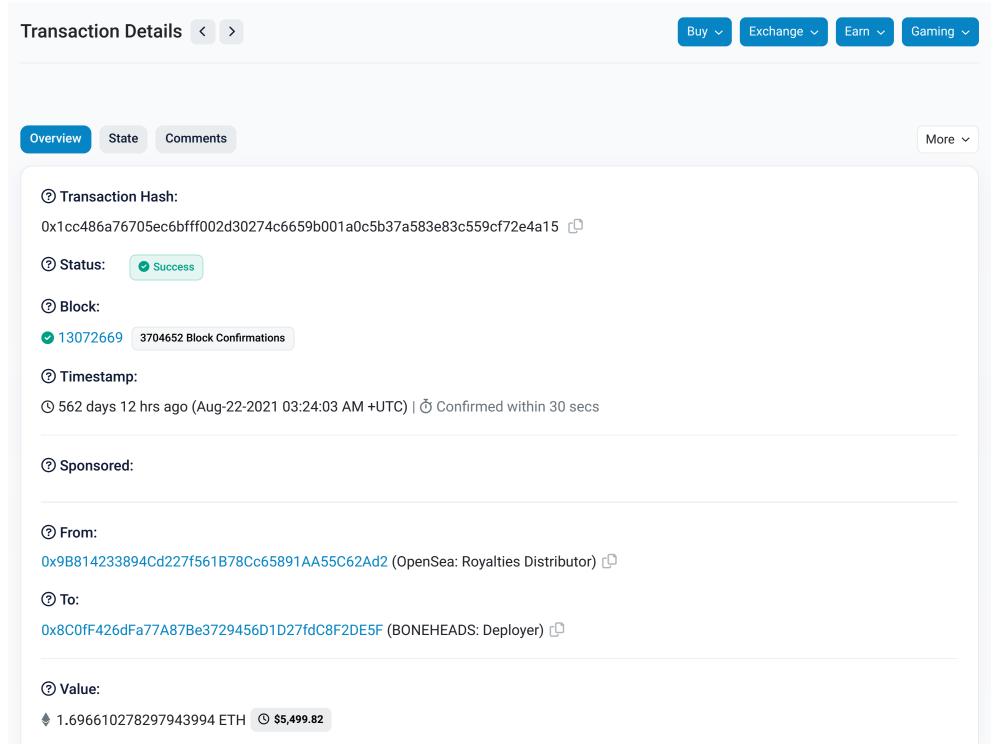
61 Gwei (0.000000061 ETH)

More Details:

+ Click to show more

? Private Note:

To access the Private Note feature, you must be Logged In



(?)	Transaction	Fee:
\cdot	I I WI I O W O LI O I I	

0.000672 ETH \$1.05

? Gas Price:

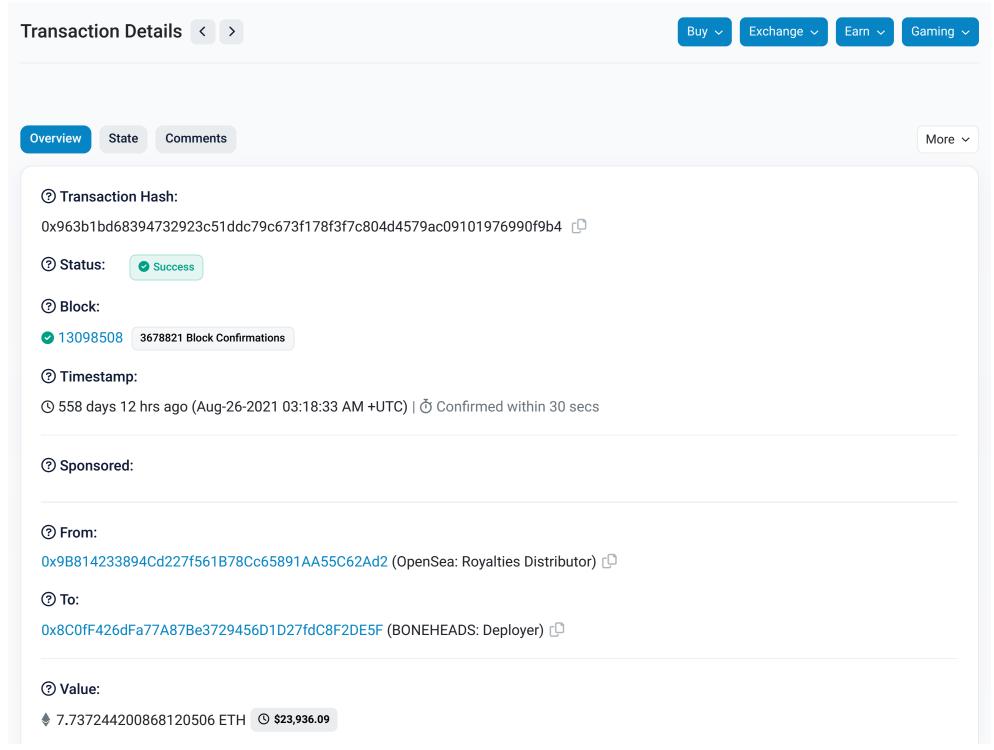
32 Gwei (0.00000032 ETH)

More Details:

+ Click to show more

? Private Note:

To access the Private Note feature, you must be Logged In



(?)	Transaction	Fee:
\cdot	Hunsaction	

0.001806 ETH \$2.81

? Gas Price:

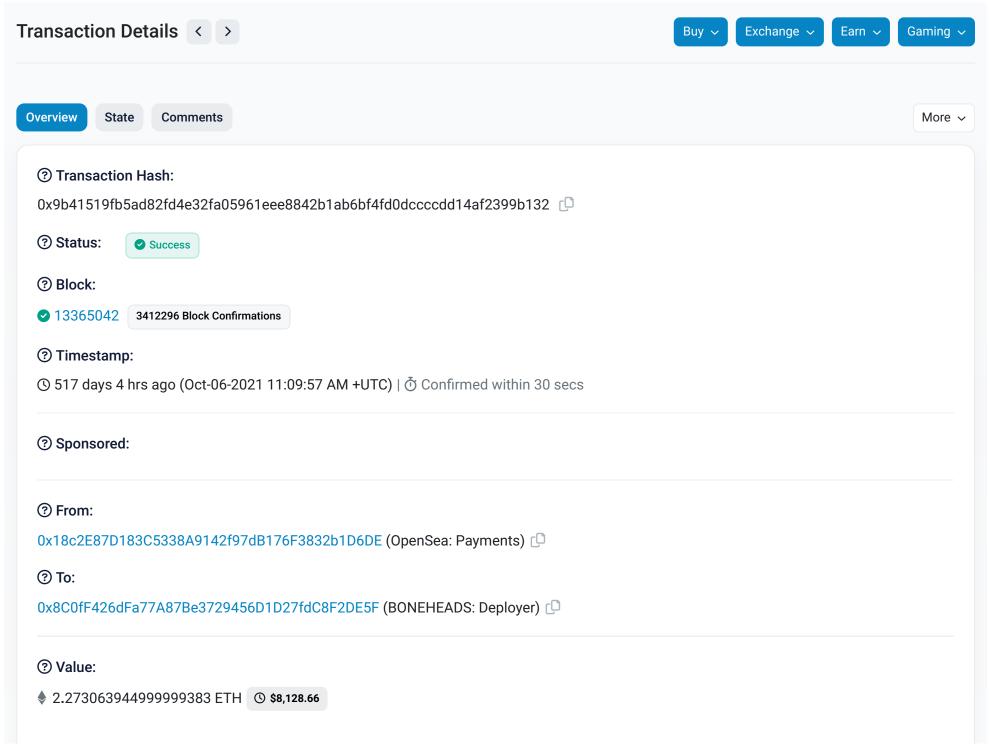
86 Gwei (0.000000086 ETH)

More Details:

+ Click to show more

? Private Note:

To access the Private Note feature, you must be Logged In



? Transact	ion	Fee:
------------	-----	------

0.002251056607464 ETH \$3.52

② 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

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

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—— *4.*×— ——



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

—— *4.*×———



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

____ A.K____



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)

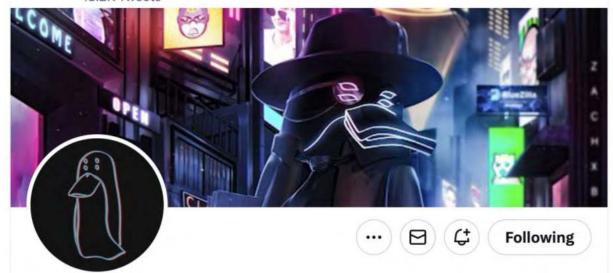
○ 1 13 4 ○ 20 III ±

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

_____ A.K_____







@zachxbt

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

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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____ A.K____





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 ② @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.





ZachXBT @ @zachxbt · Jul 14, 2022

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

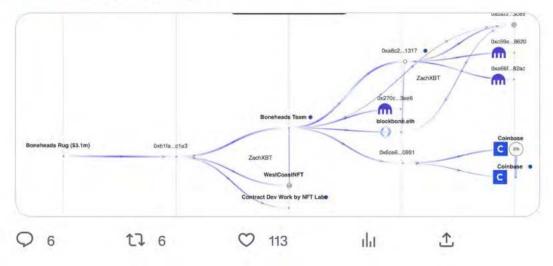
This is evidenced by zero posts on the Instagram, zero tweets in almost 6 months, Banned holders in the discord, & Discord verification bot hasn't been functional in almost 6 months





ZachXBT 🔮 @zachxbt · Jul 14, 2022

4/ A decent chunk of the proceeds from the mint were sent to @krakenfx @coinbase exchange accounts.





ZachXBT ② @zachxbt · Jul 14, 2022

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

0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F

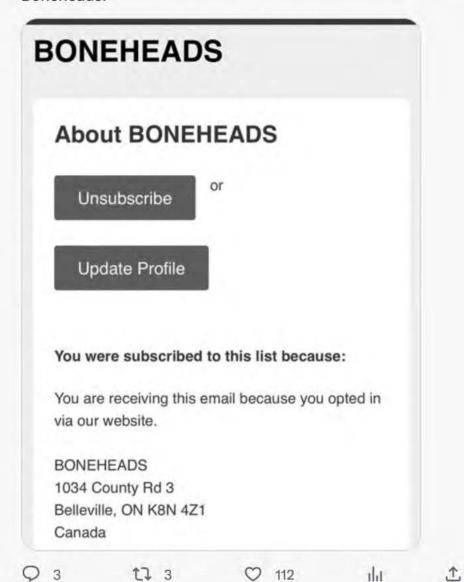
Meanwhile the team hadn't even paid @NFTLabTeam fully for contract dev work.





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.





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...





ZachXBT 🤣 @zachxbt · Jul 14, 2022

8/ The corporation 'Profitly' 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.







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.





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.



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





ZachXBT 🤣 @zachxbt · 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



This is Exhibit "AI" 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

—— *4.*×——





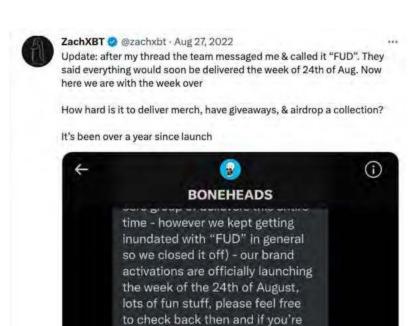
Update: To little surprise the project tweeted for the first time in ages.



This is Exhibit "AJ" 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____



willing: provide an update to your thread , that would be very fair, if you have any questions please

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£

feel free to reach out d

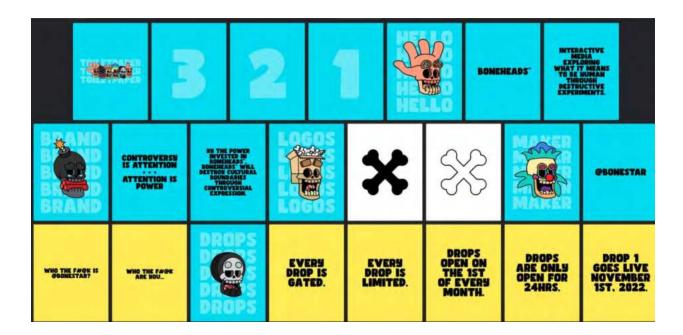
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Q 26

This is **Exhibit "AK"** 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—____



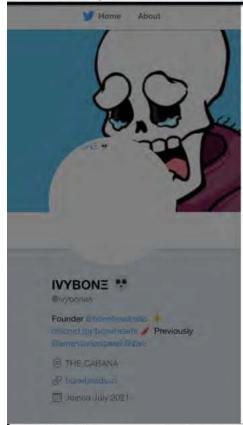
This is Exhibit "AL" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

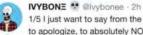
Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

_____ A.K____



https://twitter.com/ivybonee/status/1430533801713836037





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











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

















17 1

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



https://twitter.com/ivybonee/status/1430533801713836037

1 capture



first fully tokenized luxury wearables brand, then you do not understand what it means to be a BONEHEAD ...









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...









IVYBONE . @ivybonee - 2h

5/5 And to all the paper hand flippers, GTFO while you still have a chance 5/5. the PAPER HANDS PARADE IS OVER * #BONEHEADSFOREVER #DEATHTOFUD





@BONEHEADSSSS







This is Exhibit "AM" 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

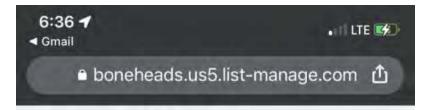
_____ A.R____



This is Exhibit "AN" 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

—— *4.*×——



BONEHEADS

About BONEHEADS

Unsubscribe

or

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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

_____ A.R____

Innovation, Sciences et Développement économique Canada consisters Canada

Form 2 Initial Registered Office Address and First Board of Directors

Canada Business Corporations Act (CBCA) (s. 19 and 106)

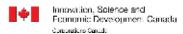
Formulaire 2 Siège social initial et premier conseil d'administration

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 : 1034 County Road 3 Belleville ON K8N 4Z1	Ivan Avramenko	
4	Members of the board of director Membres du conseil d'administ		
	Membres du conseir à administ	ration	Resident Canadian Résident Canadien
	Ivan Avramenko	12 Amber Place, Belleville ON K8P 0B5, Canada	Yes / Oui
5		relevant knowledge and that I am a ssède une connaissance suffisante et	uthorized to sign this form. que je suis autorisé(e) à signer le présent
			Original signed by / Original signé par Ivan Avramenko
			Ivan Avramenko
			4169957010
	250(1) of the CBCA).		\$5000 or to imprisonment for a term not exceeding six months or both (subsectio ommaire, est passible d'une amende maximale de 5 000 \$ et d'un
		et son auteur, sur declaration de eurpaonnte par procedure s	







Certificate of Incorporation

Certificat de constitution

Canada Business Corporations Act

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

alunas A

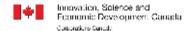
Director / Directeur

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)

	Ivan Avramenko	Ivan Avramenko		
	14ame(3) - 140m(3)	Original Signed by - Original Signe par		
	Name(s) - Nom(s)	Original Signed by - Original signé par		
Déclaration des fondateurs : J'atteste que je suis autorisé à signer et à soumettre le présent formulaire.				
None Incorporator's Declaration: I hereby certify that I am authorized to sign and submit this form.				
	r Provisions			
	tes imposées à l'activité commerciale de la soc e	CCC		
	ictions on the business the corporation may can			
_	1 Max. 10			
	bre minimal et maximal d'administrateurs			
	mum and maximum number of directors			
ıe	e			
ri	ictions sur le transfert des actions			
ri	ictions on share transfers			
: (corporation is authorized to issue an u	nlimited number of common shares.		
	gories et le nombre maximal d'actions que la so	1		
cl	classes and any maximum number of shares that	t the corporation is authorized to issue		
1(ovince ou le territoire au Canada ou est situe i	siege soeidi		
	province or territory in Canada where the regist ovince ou le territoire au Canada où est situé le			
_	CB HOLDINGS INC.	1 00 1		
	orate name omination sociale			
30	orote name			

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).

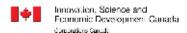
You are providing information required by the CBCA. Note that both the CBCA and the *Privacy Act* allow this information to be disclosed to the public. It will be stored in personal information bank number IC/PPU-049.



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

____ f.k___



Certificate of Incorporation

Certificat de constitution

Canada Business Corporations Act

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

Girjinie Ethier

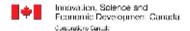
Director / Directeur

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)

L	Name(s) - Nom(s) Ivan Avramenko	Original Signed by - Original signé par Ivan Avramenko			
	Name(s) - Nom(s)	Original Signed by - Original signé par			
L					
	Déclaration des fondateurs : J'atteste que je suis autorisé à signer et à soumettre le présent formulaire.				
Γ	8 Incorporator's Declaration: I hereby certify that I am authorized to sign and submit this form.				
	None				
	7 Other Provisions Autres dispositions				
	None				
L	Limites imposées à l'activité commerciale de la soci				
Γ	Restrictions on the business the corporation may car	ry on			
	Min. 1 Max. 10				
L	5 Minimum and maximum number of directors Nombre minimal et maximal d'administrateurs				
Г	3.5' 1 1 0.1'				
	Restrictions sur le transfert des actions None				
	4 Restrictions on share transfers				
	The corporation is authorized to issue an un	nlimited number of common shares.			
L	Catégories et le nombre maximal d'actions que la so				
Γ	The classes and any maximum number of shares that	t the corporation is authorized to issue			
	ON				
	La province or territory in Canada where the registed La province ou le territoire au Canada où est situé le				
Γ		erad office is situated			
	Profitly Incorporated				
	1 Corporate name Dénomination sociale				

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.



Innovation, Sciences et Développement économique Canada Conordors Canada

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 director	ors		
	Membres du conseil d'administ	ration		
				Resident Canadian Résident Canadien
	Ivan Avramenko	12 Amber Place, Belleville ON		Yes / Oui
	TVAIT AVIAITIETIKO	K8P 0B5, Canada		res / Oui
5	Declaration: I certify that I have	relevant knowledge and that I a	m authorized to sign this	form.
	Déclaration : J'atteste que je por formulaire.	ssède une connaissance suffisant	e et que je suis autorisé(e	e) à signer le présent
				/ / Original signé par vramenko
		-	Ivan A	vramenko
				307712

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Innovation, Sciences et Développement économique Canada Carparátira Canada

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): Date de réception (AAAA-MM-JJ): 2018-10-02

1	Corporate name
	Dénomination sociale

Profitly Incorporated

2 Corporation number Numéro de la société

1102222-9

Members of the Board of Directors (new directors in bold)

Membres du conseil d'administration (les nouveaux administrateurs sont indiqués en caractère gras)

Name Start Date YYYY-MM-DD Address Resident Canadian
Nom Date d'entrée en fonction Adresse Résident Canadien
AAAA-MM-DD

Richard Michael 2018-10-02 12 Amber Place, Belleville ON Yes

Carroll K8P 0B5, Canada

Ivan Avramenko 2018-10-01 12 Amber Place, Belleville ON Yes

K8P 0B5, Canada

The following individuals are no longer directors

Les individus suivants ont cessé d'être administrateur de la société

Name End Date YYYY-MM-DD

Nom Date de fin de mandat AAAA-MM-DD

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

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.



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

Corporation number Numéro de la société

1102222-9

Members of the Board of Directors (new directors in bold)

Membres du conseil d'administration (les nouveaux administrateurs sont indiqués en caractère gras)

Start Date YYYY-MM-DD Address Resident Canadian Nom Date d'entrée en fonction Adresse Résident Canadien AAAA-MM-DD

2018-10-01 12 Amber Place, Belleville ON Yes Ivan Avramenko

K8P 0B5, Canada

The following individuals are no longer directors Les individus suivants ont cessé d'être administrateur de la société

Name End Date YYYY-MM-DD

Nom Date de fin de mandat AAAA-MM-DD

Richard Michael Carroll 2019-10-10

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

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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.



Innovation, Sciences et Développement économique Canada Carparátira Canada

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):

Corporate name				
Denomination sociale				
Profitly Incorporated	d			
Corporation number Numéro de la société				
1102222-9				
Members of the Board of Directors (new directors in bold) Membres du conseil d'administration (les nouveaux administrateurs sont indiqués en caractère gras)				
Nom Date d'e	entrée en fonction	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	
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		
	Profitly Incorporated Corporation number Numéro de la société 1102222-9 Members of the Board of Membres du conseil d'a Name Nom Date d'e AAAA-N Alexandra Stinson Ivan Avramenko The following individua Les individus suivants of Name Name	Dénomination sociale Profitly Incorporated Corporation number Numéro de la société 1102222-9 Members of the Board of Directors (new direc Membres du conseil d'administration (les nouv Name Start Date YYYY-MM-DD Nom Date d'entrée en fonction AAAA-MM-DD Alexandra Stinson 2018-10-01 Ivan Avramenko 2018-10-01 The following individuals are no longer director Les individus suivants ont cessé d'être adminis Name	Dénomination sociale Profitly Incorporated Corporation number Numéro de la société 1102222-9 Members of the Board of Directors (new directors in bold) Membres du conseil d'administration (les nouveaux administrateurs sont indiqués en car Name Start Date YYYY-MM-DD Address Nom Date d'entrée en fonction Adresse AAAA-MM-DD Alexandra Stinson 2018-10-01 1034 County Road 3, Belleville ON K8N 4Z1, Canada Ivan Avramenko 2018-10-01 12 Amber Place, Belleville ON K8P 0B5, Canada The following individuals are no longer directors Les individus suivants ont cessé d'être administrateur de la société Name End Date YYYY-MM-DD	

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.



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_____



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 <u>Corporations Canada's</u> alerts.



This information is available to the public in accordance with legislation (see <u>Public disclosure of corporate information</u>).

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

Note

Active CBCA corporations are required to <u>update this information</u> within 15 days of any change. A <u>corporation key</u> is required. If you are not authorized to update this information, you can either contact the corporation or contact <u>Corporations</u> <u>Canada</u>. We will inform the corporation of its <u>reporting obligations</u>.

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 <u>update director information</u> (names, addresses, etc.) within 15 days of any change. A <u>corporation key</u> is required. If you are not authorized to update this information, you can either contact the corporation or contact <u>Corporations Canada</u>. We will inform the corporation of its <u>reporting obligations</u>.

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 Profitly Incorporated** 2018-10-01 to Present **Certificates and Filings Certificate of Incorporation** 2018-10-01

Order copies of corporate documents

Start New Search

Return to Search Results

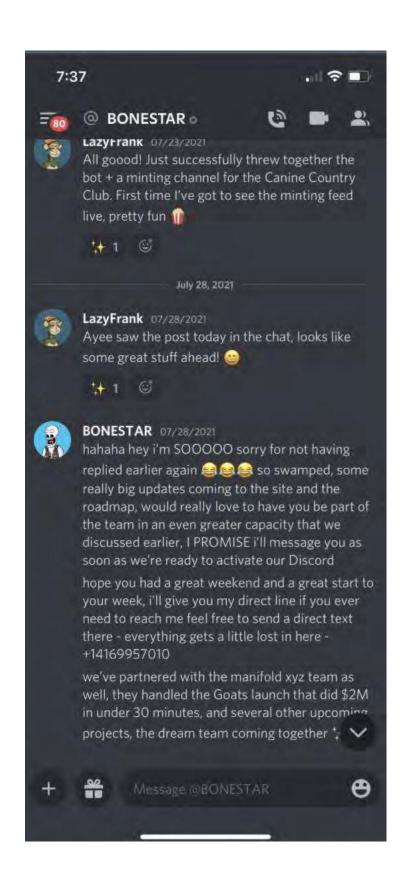
Date Modified:

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

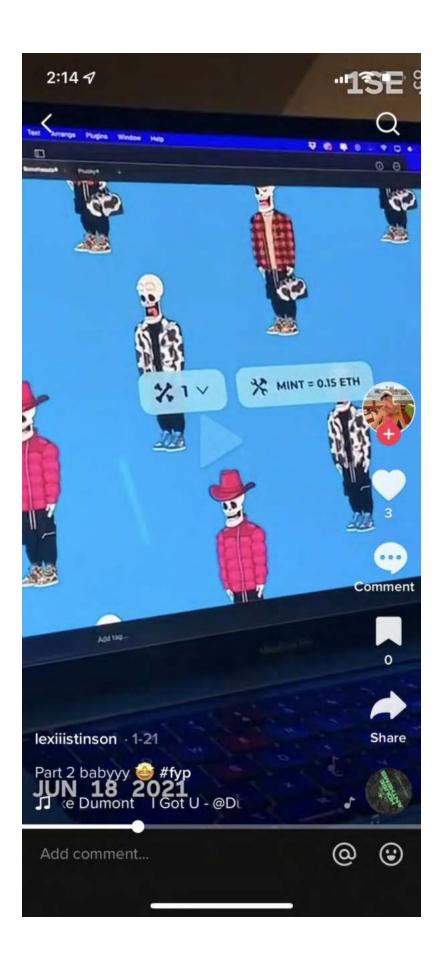
—— *4.*×——



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

_____ A.K____



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

____ A.K____



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

_____ A.R______



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

_____ A.K______



This is $\mathbf{Exhibit}$ "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

_____ *4.k*_____



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

—— *4.x*————



ENS: Ethereum Name... o

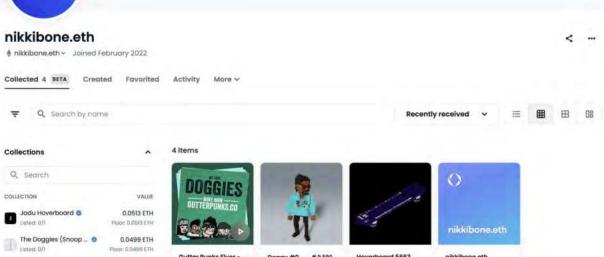
Gutter Punks - The Doggies

0.0009 ETH

Floor, 0,0009 ETH

Floor:-

Gutter Punks - T_



Doggy #0_ # 9,590 The Doggles (_ ©

Best offer: 0.0432 WETH Jadu Hoverbo... 👩

Best affer: 0.0411 WETH

nikkibone.eth ENS: Ethereu... 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___

ONTARIO **Superior Court of Justice**

Plaintiff's Claim Form 7A Ont. Reg. No.: 258/98

COURTO	Belleville Small Claims Court	SC22000002760000
WILL GOOK CLAIMS CO. U.S.	Small Claims Court	Claim No.
A CO A SCO	15 Bridge Street West Belleville ON K8P 0C7	
COR STREET CONTROL OF STREET	Address	
RIEURE DE SUMMERS	(613) 962-9106 ext: 2268	
Electronically issued:2022/07/12	Phone number	
Quinte Courthouse Plaintiff No. 1	Additional plaintiff(s) listed on attached Form 1A.	Under 18 years of age.

Last name, or name of company McRae-Yu	y		
First name	Second name	Also known as	
Taylan		Taylan 0xTAY	
Address (street number, apt., ui	nit)		
57 Monterey Drive			
City, town or village	Province	Phone no.	
Ottawa	Ontario	(343) 550-1828	
Postal code	-	Email address	
K2H 7A9	Canada	yu.taylan@gmail.com	
Representative		Law Society of Ontario no.	
Address (street number, apt., u	nit)		
City, town or village	Province	Phone no.	
Postal code		Email address	
Defendant No. 1	Additional defendant(s) lis	sted on attached Form 1A. Under 18 years of age.	
Last name, or name of company	у		
Profitly Incorperated			
First name	Second name	Also known as	
		Boneheads.io	
Address (street number, apt., ui 1034 County Rd 3	nit)		
City, town or village	Province	Phone no.	
Belleville	Ontario		
Postal code	-	Email address	
K2H 7A9	Canada		
Representative	_	Law Society of Ontario no.	
Address (street number, apt., u	nit)		
City, town or village	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. FORM 7A PAGE 2 Claim No.

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 incorperated 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 organziational funds to members.

The business has tried to obscufate 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 Incorperated 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 completly anonymous and unafiliated 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 cla	aimed)		
ADDITION	AL PAGES ARE ATTACH	ED BECAU	SE MORE ROOM WAS NEE	EDED.
The plaintiff also o	claims pre-judgment inte	erest from _	2021/08/23 (Date)	under:
one hox)	e Courts of Justice Act agreement at the rate o	f	% per year	
and post-judgmen	nt interest, and court co	sts.		
Prepared on:	07/11	, 20 22	Submitted online by: Tayla	
			(Signature of plaintiff	or representative)
Issued on:		, 20	(Signature o	
			(Signature o	of clerk)
CAUTION TO DEFENDANT:	the court within twenty (2 Claim, judgment may be	20) calendar obtained wit ole at the Sm	(Form 9A) and an Affidavit days after you have been se hout notice and enforced aga all Claims Court and on the t	erved with this Plaintiff's ainst you. Forms and self-

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:



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____

ONTARIO

Superior Court of Justice

Defence

Form 9A Ont. Reg. No.: 258/98

SC22000002760000

	Small Claims Court	Claim No.
	15 Bridge Street West Belle K8P 0C7	eville ON
	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 compan	у	
McRae-Yu		
First name	Second name	Also known as
Taylan		Taylan 0xTAY
Address (street number, apt., un	it)	
57 Monterey Drive		
City/Town	Province	Phone no.
Ottawa	Ontario	343-550-1828
Postal code	Email address	war.
K2H 7A9	vu.taylan@gmail	i.com
Representative		Law Society of Ontario no.
Address (street number, apt., un	it)	
City/Town	Province	Phone no.
Postal code	Email address	
Defendant No. 1	Additional defendant(s) liste	ed on attached Form 1A. Under 18 years of age.
Last name, or name of compan	у	
Profitly, Incorporated		
First name	Second name	Also known as
Ivan		
Address (street number, apt., un	iit)	
1034 County Road 3		
City/Town	Province	Phone no.
Belleville	Ontario	
		4

Belleville Small Claims Court

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.

PAGE 2

				Claim No.
THIS DEFENCE OF: Profitly, Incorp	IS BEING FILED Coorated - Ivan A		me(s) of defendant(s))	
and I/				
we: (Check	as many as apply)			
Dispute th	e claim made again	st me/us.		
		se the following terms	s of payment:	
	pe		commencin	30:
\$	ŗ		9	20 .
(Ar	mount)	(Week/month)		
Admit part \$	of the claim in the a	amount of	and propose the t	following terms of payment:
		(An	nount)	
	ре		commencin	9.5
\$	r		g	20
(Ar	mount)	(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?

Claim No.

Why I/we disagree with all or part of the claim: The claims brought forth in this claim are baseless and false. Profitly provides ongoing 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

pp

(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

____ *4.k*______



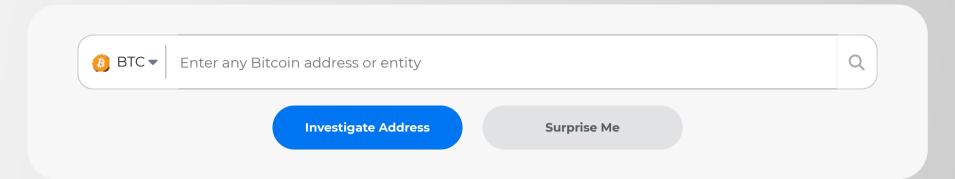
Breadcrumbs is an open blockchain analytics platform. It offers a set of tools that empowers you to trace and monitor crypto transactions.

Try Now

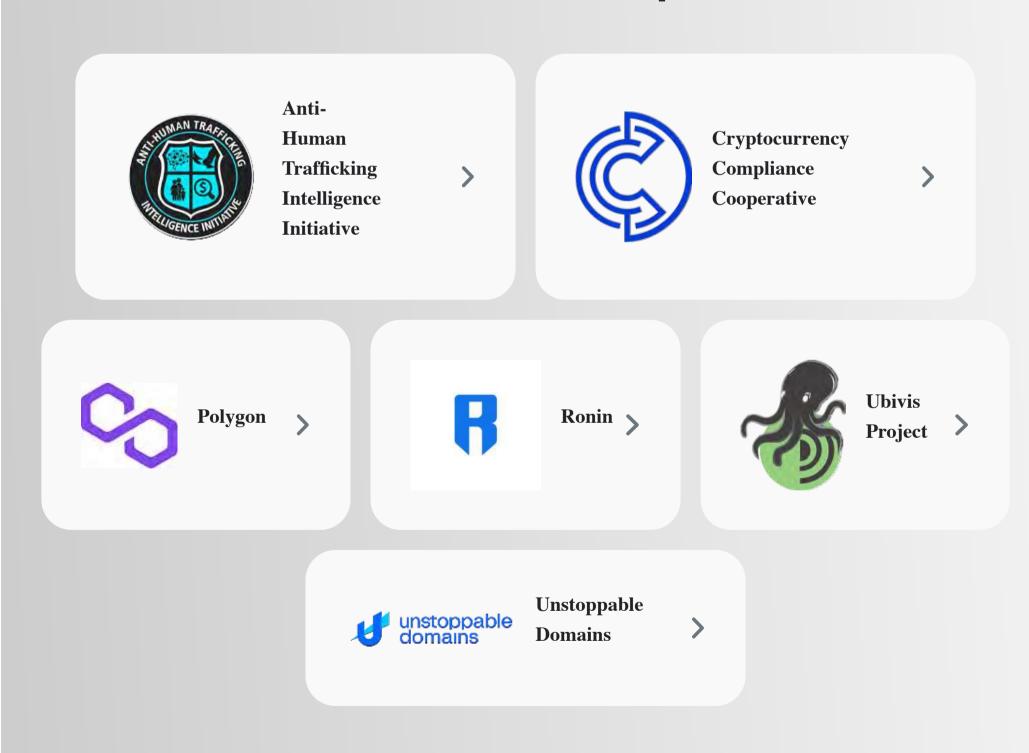


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Community Activity

Knowledge Hub New

Pricing

<u>Investigator Directory</u>

in

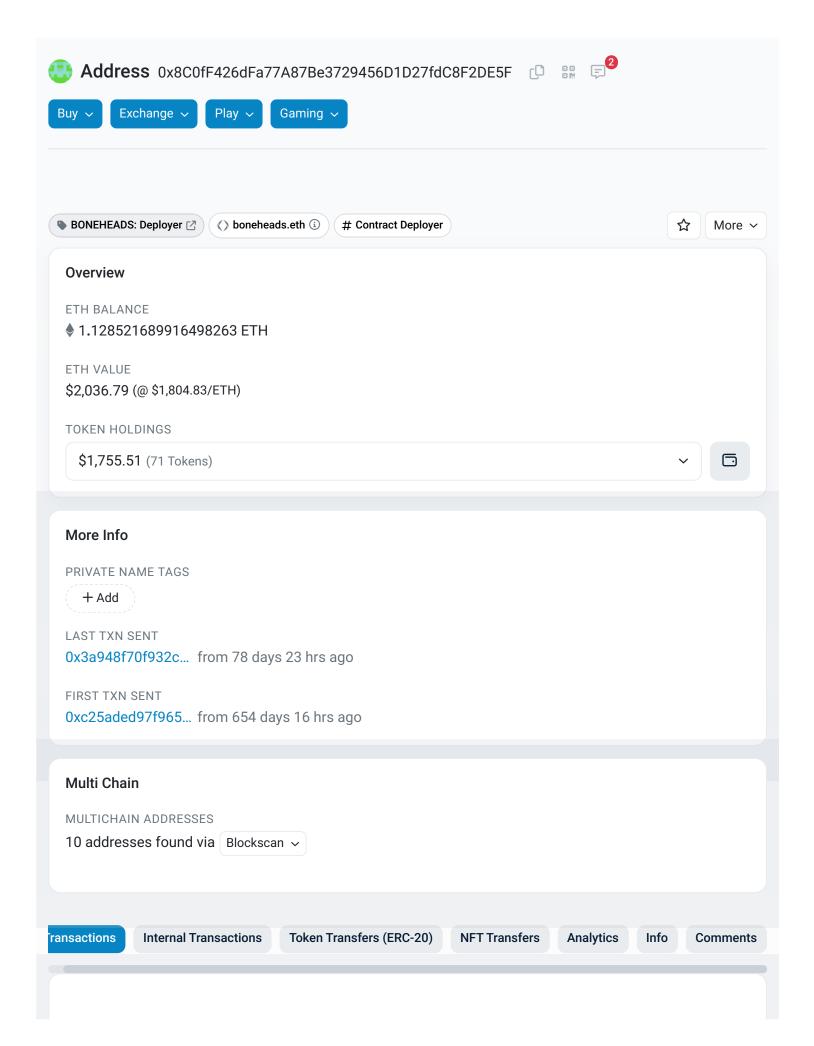
> Last Build 5/24/2023

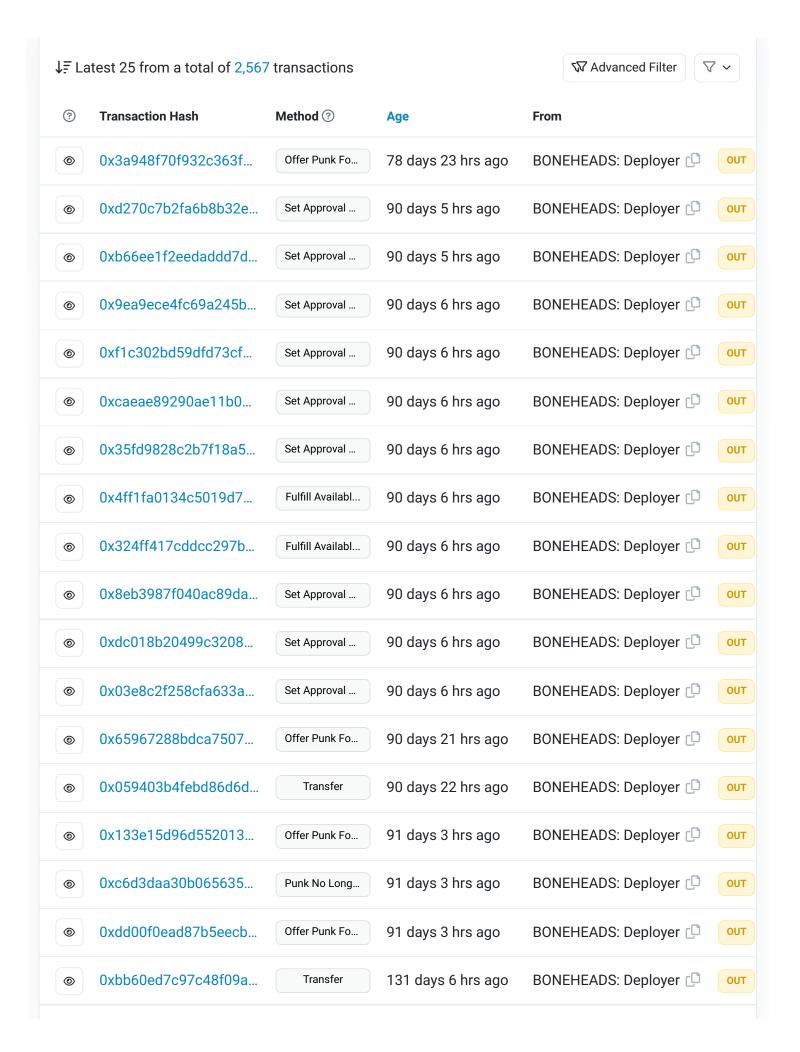


This is **Exhibit "BB"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

____ A.K____





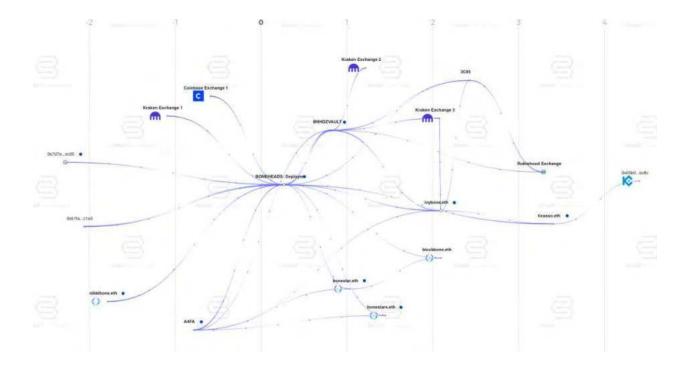
?	Transaction Hash	Method ②	Age	From
•	0x65193673a3b8169d	Approve	163 days 21 hrs ago	BONEHEADS: Deployer 🗘 OUT
•	0x2e42f539eaadaba6b	Deposit	163 days 21 hrs ago	BONEHEADS: Deployer 🗘 🛛 оит
©	0xf0d8762144150c54e	Fulfill Availabl	163 days 23 hrs ago	BONEHEADS: Deployer 🗘 OUT
©	0xff38312796bf97d65	Set 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
(4)	0x2f450832c3f2f1693	Set Approval	214 days 4 hrs ago	BONEHEADS: Deployer 🗘 OUT
		VIEW ALL T	RANSACTIONS →	
				[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

____ *4.*~____



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

_____ *4.×*______

Table 1 –	BONEHEADS TEAM: OUTGOING TRANSACTIONS*
Exhibit	Transaction Information
"BONEH	EADS: Deployer" / Boneheads.eth (0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F)
"BE"	• Receiving Address: 0x6ce6afb735ddc2d6c3ac0187a1919fc20b720991 ("Coinbase Exchange 1")
	• <u>Transactions:</u>
	o Total: 31 ETH (\$99,984.30 USD (\$126,120.19 CAD))
	■ 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
	• Notes: 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"	• Receiving Address: 0x270c21bfb99a14e41408568570c3a4f481253ee6 ("Kraken Exchange 1")
	• <u>Transactions:</u>
	o Total: 28 ETH (\$110,314.12 USD (\$138,179.47 CAD))
	■ 28 ETH (\$110,314.12 USD (\$138,179.47 CAD)) on September 3, 2021
	• Notes: Exhibit "BF" attached shows 28 ETH in volume going from the "BONEHEADS: Deployer", which is
//D C11	controlled by the Boneheads team, into "Kraken Exchange 1", centralized exchange address.
"BG"	• Receiving Address: 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 ("BNHDZVAULT").
	• Transactions:
	o Total: 1,508.885 ETH (\$6,050,411.36 USD (\$7,683,038.74 CAD))
	• 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

	• 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
	• Notes: 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"	• Receiving Address: 0xa1e43fcb51656354931d47458eceadbc6545df57 ("ivybone.eth")
	• Transactions:
	○ Total: 0.6 ETH (\$1,695.62 USD (\$2,178.02 CAD))
	• 0.6 ETH (\$1,695.62 USD (\$2,178.02 CAD)) on May 1, 2022
	• Notes: 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"	• Receiving Address: 0x3acef2d359f430cee5e205262a884d6087dda4fa ("A4FA")
	• Transactions:
	○ Total: 15 ETH (\$65,117.55 USD (\$82,549.51 CAD))
	• 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
	• Notes: 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"	• Receiving Address: 0xbaf331f090320502380ea975562c0c72e2da3c85 ("3C85")
	• Transactions:
	○ Total: 0.23346 ETH (\$1,095.56 USD (\$1,362.05 CAD))
	• 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
	• Notes: 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"	Receiving Address: 0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518 ("blockbone.eth")
	• Transactions:
	• Total: 0.0518 ETH (\$230.47 USD (\$286.19 CAD))
	• 0.0208 ETH (\$98.78 USD (\$122.85 CAD)) on November 9, 2021
	• 0.0208 ETH (\$98.78 USD (\$122.85 CAD)) on November 9, 2021

	• 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												
	• Notes: 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"	• Receiving Address: 0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147 ("ticasso.eth")												
	• Transactions:												
	○ Total: 14.25 ETH (\$43,551.75 USD (\$55,112.54 CAD))												
	■ 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 Notes: 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. ZVAULT" (0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317) Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer") Transactions: Total: 996.409 ETH (\$4,021,741.55 USD (\$5,123,642.36 CAD)) 												
	• 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												
	• Notes: 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.												
"BNHDZ	VAULT" (0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317)												
"BG"	• Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer")												
	• <u>Transactions:</u>												
	o Total: 996.409 ETH (\$4,021,741.55 USD (\$5,123,642.36 CAD))												
	■ 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												

	■ 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
	• Notes: 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"	• Receiving Address: 0xbaf331f090320502380ea975562c0c72e2da3c85 ("3C85")
	• Transactions:
	○ Total: 75.21 ETH (\$227,210.45 USD (\$285,743.94 CAD))
	• 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
	• Notes: 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"	• Receiving Address: 0xc59ef925b947473b85b85f7583d29487ee2e8620 ("Kraken Exchange 2")
	• Transactions:
	○ Total: 25.358 ETH (\$98,567.28 USD (\$123,475.23 CAD))
	• 25.358 ETH (\$98,567.28 USD (\$123,475.23 CAD)) on September 4, 2021
	• Notes: 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"	• Receiving Address: 0xe66f9e497e1b83959f319b133ecf88feaa8b82ac ("Kraken Exchange 3")
	• Transactions:
	○ Total: 94.45 ETH (\$160,008.35 USD (\$212,734.08 CAD))
	■ 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
	• Notes: 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.

"BO"	• Receiving Address: 0xf38269dae289dcf9b2d3372c26181ce473c940fc ("Robinhood Exchange")
	• <u>Transactions:</u>
	o Total: 4.78 ETH (\$14,608.64 USD (\$18,412.73 CAD))
	 4.78 ETH (\$14,608.64 USD (\$18,412.73 CAD)) on April 18, 2022
	• Notes: 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.
"BP"	• Receiving Address: 0x82ef36b1c710e4384eb20d70074bc972972d58b8 (" 58B8 ")
	• <u>Transactions:</u>
	o Total: 1 ETH (\$2,826.04 USD (\$3,630.04 CAD))
	■ 1 ETH (\$2,826.04 USD (\$3,630.04 CAD)) on May 1, 2022
	• Notes: Exhibit "BP" attached shows "58B8", which is controlled by the Boneheads team, has received 1 ETH from
	the "BNHDZVAULT" wallet.
"BQ"	• Receiving Address: 0xd697255b298cf5d90f3f0c9a0e525ba8e829c952 ("praisegod.eth")
	• <u>Transactions:</u>
	o Total: 1 ETH (\$2,826.04 USD (\$3,630.04 CAD))
	■ 1 ETH (\$2826.04 ETH (\$3,630.04 CAD))) on May 1, 2022
	• Notes: Exhibit "BQ" attached shows "praisegod.eth", which is controlled by the Boneheads team, has received 1
	ETH from the "BNHDZVAULT" wallet.
"A4FA" (0x3acef2d359f430cee5e205262a884d6087dda4fa)
"BA"	• Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer")
	• <u>Transactions:</u>
	o Total: 1.17804 ETH (\$3,339.76 USD (\$4,198.62 CAD))
	• 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
	• Notes: 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
"DC"	the Boneheads team.
"BG"	• Receiving Address: 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 ("BNHDZVAULT").
	• <u>Transactions:</u>
	o Total: 0.45 ETH (\$763.13 USD (\$987.10 CAD))

• 0.45 ETH (\$763.13 USD (\$987.10 CAD)) on August 25, 2022
• Notes: 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
• Receiving Address: 0xa1e43fcb51656354931d47458eceadbc6545df57 ("ivybone.eth")
• <u>Transactions:</u>
o Total: 0.8838 ETH (\$2,497.68 USD (\$3,208.26 CAD))
• 0.8838 ETH (\$2,497.68 USD (\$3,208.26 CAD)) on May 1, 2022
• Notes: 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.
• Receiving Address: 0x0bc42633195913892c48a224a846ddae067898ed ("bonestar.eth")
• <u>Transactions:</u>
o Total: 0.15 ETH (\$648.59 USD (\$803.40 CAD))
■ 0.15 ETH (\$648.59 USD (\$803.40 CAD)) on October 30, 2021
• Notes: 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.
• Receiving Address: 0xea415b3b5e02b2259019763e2e81c48668b80f0e ("bonestars.eth")
• Transactions:
O Total: 0.03 ETH (\$129.72 USD (\$160.68 CAD))
• 0.03 ETH (\$129.72 USD (\$160.68 CAD)) on October 30, 2021
• Notes: 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.
eth" (0xa1e43fcb51656354931d47458eceadbc6545df57)
• Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer")
• Transactions:
○ Total: 0.02935 ETH (\$127.09 USD (\$158.25 CAD))
• 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

	• Notes: 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"	• Receiving Address: 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 ("BNHDZVAULT").
	• <u>Transactions:</u>
	o Total: 37.53 ETH (\$79,951.01 USD (\$102,690.92 CAD))
	■ 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.
	• Notes: 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"	• Receiving Address: 0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147 ("ticasso.eth")
	• Transactions:
	○ Total: 1.25 ETH (\$4,682.68 USD (\$5,697.62 CAD))
	■ 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
	• Notes: 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"	• Receiving Address: 0xe66f9e497e1b83959f319b133ecf88feaa8b82ac ("Kraken Exchange 3")
	• <u>Transactions:</u>
	o Total: 15.25 ETH (\$23,880.13 USD (\$31,510.41 CAD)
	■ 15.25 ETH (\$23,880.13 USD (\$31,510.41 CAD)) on March 6, 2023.
	• Notes: Exhibit "BN" attached shows a total of 15.25 ETH have been sent from the cryptocurrency wallet address
"2COE" (C	"ivybone.eth", which is controlled by the Boneheads team, to "Kraken Exchange 3", a centralized exchange.
	xbaf331f090320502380ea975562c0c72e2da3c85)
"BJ"	• Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer")
	• <u>Transactions:</u> Total: 0.339 FTH (\$1.043.36 USD (\$1.334.91 CAD))
	 Total: 0.338 ETH (\$1,043.26 USD (\$1,334.81 CAD)) 0.00417 ETH (\$19.75 USD (\$24.56 CAD)) on November 9, 2021
	- 0.00417 E111 (\$15.75 USD (\$24.50 CAD)) OII NOVEIHUEL 9, 2021

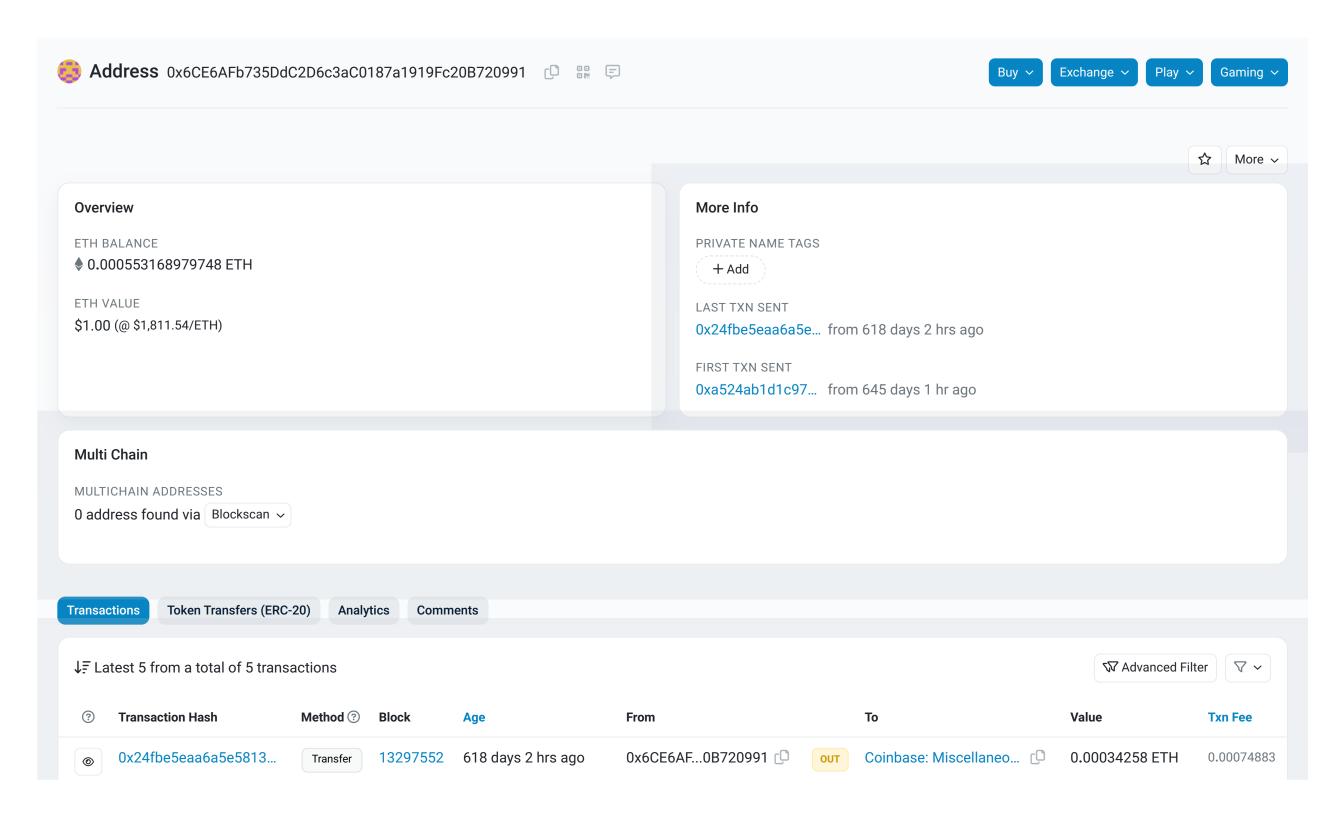
	• 0.21 ETH (\$911.72 USD (\$1,155.78 CAD)) on November 23, 2021
	• 0.08636 ETH (\$111.79 USD (\$154.47 CAD)) on October 12, 2022
	• Notes: Exhibit "BJ" attached shows a total of 0.338 ETH have been sent from the cryptocurrency wallet address
	"3C85", which is controlled by the Boneheads team, to the "BONEHEADS: Deployer" wallet, also controlled by the
	Boneheads team.
"BG"	• Receiving Address: 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 ("BNHDZVAULT").
	• <u>Transactions:</u>
	o Total: 22 ETH (\$35,399.10 USD (\$45,979.89 CAD))
	■ 22 ETH (\$35,399.10 USD (\$45,979.89 CAD)) on August 19, 2022
	• Notes: 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"	• Receiving Address: 0xa1e43fcb51656354931d47458eceadbc6545df57 ("ivybone.eth")
	• Transactions:
	o Total: 2.3 ETH (\$6499.89 USD (\$8,349.09 CAD))
	■ 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
	• Notes: 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"	• Receiving Address: 0xf38269dae289dcf9b2d3372c26181ce473c940fc ("Robinhood Exchange")
	• <u>Transactions:</u>
	o Total: 72.877 ETH (\$220,516.21 USD (\$277,308.80 CAD))
	■ 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
	• Notes: 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.et	th" (0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147)
"BL"	• Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer")
	• <u>Transactions:</u>
	o Total: 0.10 ETH (\$246.19 USD (\$311.14 CAD))

	• 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
	• Notes: 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"	• Receiving Address: 0x05B0e921728378b1a7CB2bfaBf68558E6AE4bc8c ("BC8C")
	• <u>Transactions:</u>
	o Total: 3 ETH (\$12,870.30 USD (\$15,937.29 CAD))
	■ 3 ETH (\$12,870.30 USD (\$15,937.29 CAD)) on October 31, 2021
	• Notes: 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 tab	le 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

____ A.R____



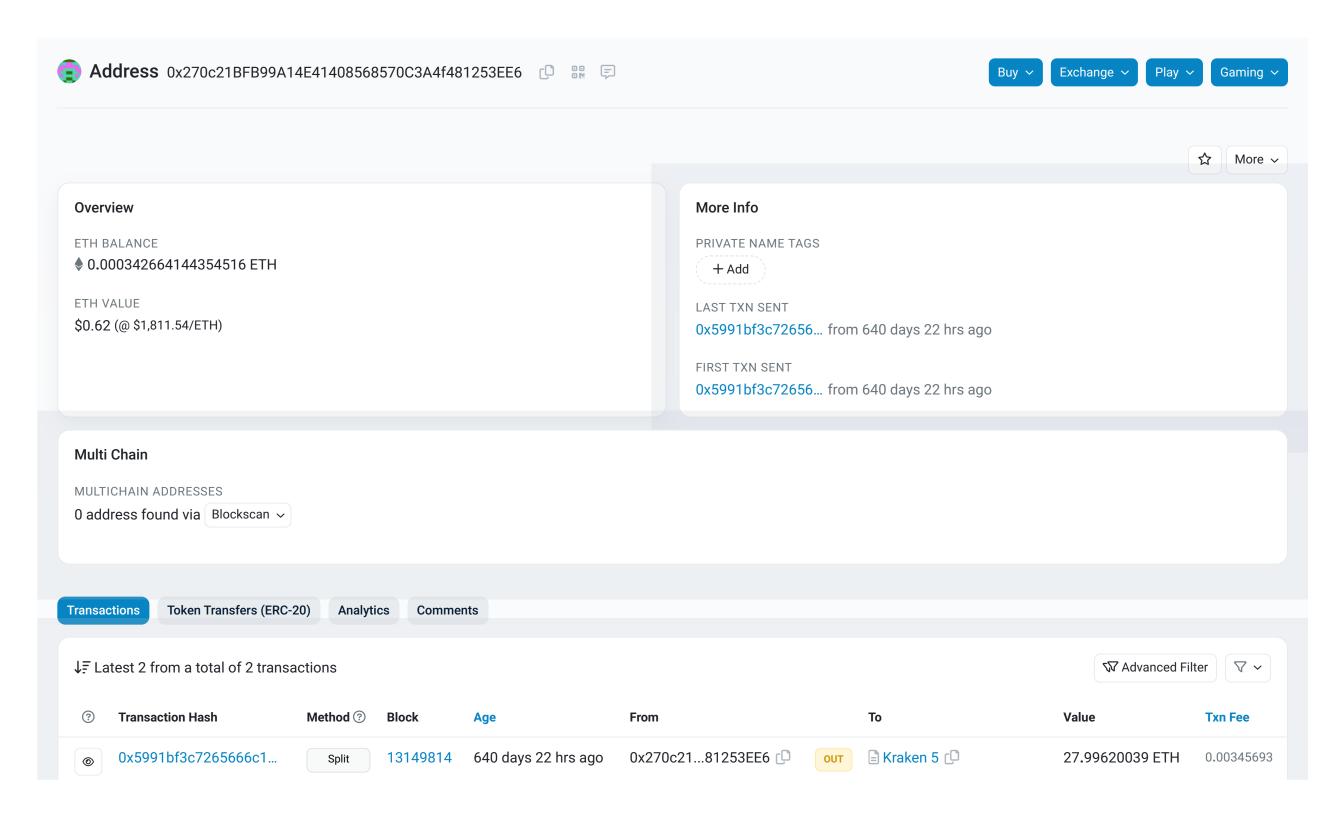
?	Transaction Hash	Method ?	Block	Age	From		То	Value	Txn Fee
•	0xc2bffc7197abcf3dd1	Transfer	13123271	645 days 58 mins ago	0x6CE6AF0B720991 🗗	OUT	Coinbase 3 📮	29.99823513 ETH	0.00232441
•	0xc53a9e0ab970a8a6	Transfer	13123257	645 days 1 hr ago	BONEHEADS: Deployer 🗅	IN	0x6CE6AF0B720991 🕒	30 ETH	0.00272539
•	0xa524ab1d1c9755e1	Transfer	13123256	645 days 1 hr ago	0x6CE6AF0B720991 🚨	OUT	Coinbase 3 🖰	0.995359 ETH	0.00243686
•	0x543b3ad5d289cef80	Transfer	13123252	645 days 1 hr ago	BONEHEADS: Deployer 🗘	IN	0x6CE6AF0B720991	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

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?	Transaction Hash	Method ?	Block	Age	From	То	Value	Txn Fee
•	0xb8d7e06ab943b757	Transfer	13149810	640 days 22 hrs ago	BONEHEADS: Deployer 🗘 🔃 IN	0x270c2181253EE6 🗗	28 ETH	0.00180475
								[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 "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

7.7

Transactions

For 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317

tot	al of 123 transactions found						First \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	ge 1 of 2 > Last	∇ ∨
?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fe
©	0x175b117ea8fe8df96	Transfer	16968779	63 days 10 hrs ago	0xa8c2bCf7281317 🚨	OUT	🖹 0xE66F9eAa8b82aC 🚨	25 ETH	0.0015
©	0x9ba311d1d7529745	Transfer	16819831	84 days 8 hrs ago	Union Chain 🕛	IN	0xa8c2bCf7281317	18.99800831 ETH	0.0014
©	0x78cd2835c372a3ebf	Transfer	16798614	87 days 8 hrs ago	Union Chain 🕛	IN	0xa8c2bCf7281317 🚨	5.9977616 ETH	0.0008
©	0x9909fd1078ebb7721	Transfer	16772253	91 days 1 hr ago	0xa8c2bCf7281317 🚨	OUT	0x516Aa4793A275c 🗗	6 ETH	0.0008
©	0x878c67c8d85a8495	Transfer	16772237	91 days 1 hr ago	<> ivybone.eth □	IN	0xa8c2bCf7281317 🚨	6 ETH	0.0006
©	0x489b02f345822b18e	Transfer	16772215	91 days 1 hr ago	0xa8c2bCf7281317 🚨	OUT	0x84fC065509B3C3 🗗	19 ETH	0.0007
©	0xf32a7b11d525dfa5f	Transfer	16772166	91 days 1 hr ago	Kraken 4 🖰	IN	0xa8c2bCf7281317 🚨	15.2465 ETH	0.0008
©	0xa11d002637552c36	Transfer	16772128	91 days 1 hr ago	<>ivybone.eth □	IN	0xa8c2bCf7281317	3.6 ETH	0.0009
©	0x048c40aa4b6763da	Transfer	16727282	97 days 9 hrs ago	0xa8c2bCf7281317 🚨	OUT	Centre: USD Coin	0 ETH	0.0012
©	0x9c30ddfdc8b68f24d	Transfer	16727245	97 days 9 hrs ago	0xa8c2bCf7281317 📮	OUT	Apecoin: APE Token 🚨	0 ETH	0.0010

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fe
o	0xf9cfeb1ef43236f6e0	Transfer	16484521	131 days 9 hrs ago	0xa8c2bCf7281317 🚨	OUT	🖹 0xE66F9eAa8b82aC 🗅	8 ETH	0.0009
o	0xbb60ed7c97c48f09a	Transfer	16484473	131 days 9 hrs ago	() boneheads.eth [IN	0xa8c2bCf7281317 📮	8 ETH	0.0004
o	0x06529b13954949d3	Transfer	15891262	214 days 5 hrs ago	0xa8c2bCf7281317 🚨	OUT	■ Centre: USD Coin 🚨	0 ETH	0.0014
o	0x42a1857738dc6a7c	Transfer	15891260	214 days 5 hrs ago	0xa8c2bCf7281317 🚨	OUT	🖹 0xE66F9eAa8b82aC 📮	12.5 ETH	0.001
o	0x1f9ed35db2d691efb	Transfer	15890672	214 days 7 hrs ago	♦ boneheads.eth □	IN	0xa8c2bCf7281317 📮	12.5 ETH	0.000
o	0xb72bbb8d97fb04a20	Set Approval	15725020	237 days 10 hrs ago	0xa8c2bCf7281317 🗗	OUT	RTFKT SKIN VIAL: Token	0 ETH	0.001
o	0x523305351ddb676a	Set Approval	15724982	237 days 11 hrs ago	0xa8c2bCf7281317 🗗	OUT	RTFKT: CloneX Token	0 ETH	0.001
o	0x645d8086c64afb7a9	Transfer	15640212	249 days 7 hrs ago	0xa8c2bCf7281317 🚨	OUT	🖹 0xE66F9eAa8b82aC 📮	14.75 ETH	0.001
o	0x19a350762fb9d52a0	Transfer	15575428	258 days 8 hrs ago	0xa8c2bCf7281317 🕒	OUT	🖹 0xE66F9eAa8b82aC 📮	5 ETH	0.001
o	0xa79596441abd5783	Transfer	15409569	284 days 9 hrs ago	0xa8c2bCf7281317 🕒	OUT	🖹 0xE66F9eAa8b82aC 📮	4.2 ETH	0.001
o	0xbee5790a39100731f	Transfer	15409444	284 days 10 hrs ago	⟨⟩ ivybone.eth □	IN	0xa8c2bCf7281317 📮	0.2 ETH	0.000
o	0x975e17f1739b504ac	Transfer	15409444	284 days 10 hrs ago	0x3acEf287dda4fa 🗗	IN	0xa8c2bCf7281317 📮	0.45 ETH	0.000
o	0x4e4e3ad99b9342d6	Transfer	15368935	290 days 20 hrs ago	0xbAF331E2Da3C85	IN	0xa8c2bCf7281317 🚨	22 ETH	0.000
o	0x6d5ae51637196ecc	Transfer	14832026	378 days 1 hr ago	0xa8c2bCf7281317 🗗	OUT	🗐 0xE66F9eAa8b82aC 📮	25 ETH	0.00

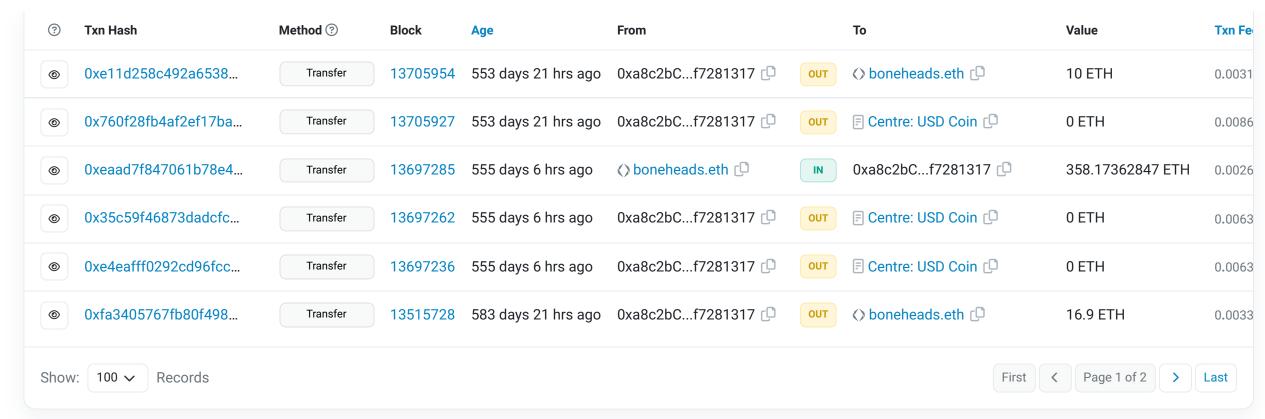
?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fe
•	0x4d2e9795daf0ca61f	Transfer	14831654	378 days 3 hrs ago	0x8F507cB053F470 🗗	IN	0xa8c2bCf7281317 🚨	0.08 ETH	0.0004
•	0x33401d4a7c714109	Transfer	14831652	378 days 3 hrs ago	0xe55382E93d453F	IN	0xa8c2bCf7281317 📮	0.08 ETH	0.0004
•	0xc68d766e32fb73fdc	Transfer	14831652	378 days 3 hrs ago	0х9441531aA9708С 🗘	IN	0xa8c2bCf7281317 🚨	0.08 ETH	0.0004
•	0x184ed12a3bb2dfeb6	Transfer	14831649	378 days 3 hrs ago	0x90fA1d48133E64 🗗	IN	0xa8c2bCf7281317 📮	0.08 ETH	0.0005
•	0x99610ee568a088bc	Transfer	14831606	378 days 3 hrs ago	<> ivybone.eth □□	IN	0xa8c2bCf7281317 🗗	23.25 ETH	0.0005
•	0xc3fc00dbaf1fbbb67f	Transfer	14712528	397 days 5 hrs ago	0x82eF36972D58B8 🗗	IN	0xa8c2bCf7281317 🗗	0.05 ETH	0.0010
•	0x9936a7a2bdd8d324	Migrate Token	14691001	400 days 15 hrs ago	0xa8c2bCf7281317 🗗	OUT	RTFKT: MNLTH Token	0 ETH	0.0132
•	0x9fb0a28e72f17b2ed	Migrate Token	14690996	400 days 15 hrs ago	0xa8c2bCf7281317 🗗	OUT	RTFKT: MNLTH Token	0 ETH	0.0161
•	0xe63fd2320ed57e1c4	Migrate Token	14690990	400 days 15 hrs ago	0xa8c2bCf7281317 🚨	OUT	RTFKT: MNLTH Token	0 ETH	0.0178
•	0xb979c94c7e2369d5	Transfer	14690094	400 days 18 hrs ago	0x82eF36972D58B8 🗗	IN	0xa8c2bCf7281317 📮	0.95 ETH	0.0054
•	0xda4c9a4bab0ff76fa	Transfer	14689965	400 days 18 hrs ago	<> praisegod.eth □□	IN	0xa8c2bCf7281317 🗗	0.92 ETH	0.0087
•	0x0ccfbc1bc784e94d6	Transfer	14689600	400 days 20 hrs ago	0xa8c2bCf7281317 🗗	OUT	⟨⟩ ivybone.eth □	5 ETH	0.0814
•	0x2b5808a710b4ab0bf	Transfer	14688873	400 days 22 hrs ago	0xa8c2bCf7281317 🗗	OUT	Apecoin: APE Token	0 ETH	0.0078
•	0x3308cd7fcc6180290	Transfer	14688785	400 days 23 hrs ago	0xa8c2bCf7281317 🕒	OUT	() prismo.eth [1 ETH	0.0026

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fe
•	0x3c63e11f81d114b85	Transfer	14688785	400 days 23 hrs ago	0xa8c2bCf7281317 🗘	OUT	0x82eF36972D58B8 🗗	1 ETH	0.0025
•	0x473451b6a5c8ade4f	Transfer	14688785	400 days 23 hrs ago	0xa8c2bCf7281317 🚨	OUT	() praisegod.eth [1 ETH	0.0024
•	0x8b29044903eb4569	Transfer	14688760	400 days 23 hrs ago	0xa8c2bCf7281317 🚨	OUT	0x15F8218e60e907 📮	1 ETH	0.0021
•	0xac50709ac1cccec4f	Transfer	14688683	400 days 23 hrs ago	0xa8c2bCf7281317 🚨	OUT	() prismo.eth 📮	0.02 ETH	0.0012
•	0x770e2e97aab4af9b4	Transfer	14688624	400 days 23 hrs ago	0xa8c2bCf7281317 🚨	OUT	Apecoin: APE Token	0 ETH	0.0031
•	0xab51a99e98c63545	Transfer	14688620	400 days 23 hrs ago	0xa8c2bCf7281317 🚨	OUT	Apecoin: APE Token	0 ETH	0.0036
•	0x070c56f5706834644	Transfer	14688619	400 days 23 hrs ago	0xa8c2bCf7281317 🚨	OUT	Apecoin: APE Token	0 ETH	0.0035
•	0x8be56bef915496326	Transfer	14688604	400 days 23 hrs ago	0xa8c2bCf7281317 🚨	OUT	Apecoin: APE Token	0 ETH	0.0039
•	0x105a52ac22e5c253	Swap	14686919	401 days 6 hrs ago	0xa8c2bCf7281317 🚨	OUT	🗏 Metamask: Swap Router 🚨	45 ETH	0.0125
•	0x9eb7ce89447beb94	Swap	14681409	402 days 3 hrs ago	0xa8c2bCf7281317 🚨	OUT	🗏 Metamask: Swap Router 🚨	0 ETH	0.0248
•	0x103f75a9d082da3eb	Approve	14681409	402 days 3 hrs ago	0xa8c2bCf7281317 📮	OUT	E Centre: USD Coin	0 ETH	0.0035
•	0x6ce2fc714264dc3f3	Transfer	14612936	412 days 21 hrs ago	0xa8c2bCf7281317 📮	OUT	E Centre: USD Coin	0 ETH	0.0015
•	0xdfb3707089c5793d9	Transfer	14610338	413 days 7 hrs ago	0xa8c2bCf7281317 📮	OUT	0xF3826973С940fc 🗗	4.78 ETH	0.0008
•	0xa5e3a0a2add812d9	Transfer	14502129	430 days 4 hrs ago	0xa8c2bCf7281317 📮	OUT	0xbAF331E2Da3C85 🗗	20.210302634 ETH	0.0016

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fe
•	0x9a060aae05b80740f	Transfer	14472233	434 days 20 hrs ago	♦ boneheads.eth □	IN	0xa8c2bCf7281317 🗗	29.7 ETH	0.0008
•	0x14635f720e6420e48	Transfer	14425178	442 days 4 hrs ago	0xa8c2bCf7281317 🚨	OUT	0xbAF331E2Da3C85 🗗	55 ETH	0.0007
•	0x5d155146a0348ab9f	Swap	14418134	443 days 6 hrs ago	0xa8c2bCf7281317 🚨	OUT	F Metamask: Swap Router	100 ETH	0.0045
•	0x5a56aee30fdc61289	Transfer	14411929	444 days 5 hrs ago	() boneheads.eth	IN	0xa8c2bCf7281317 🗗	168 ETH	0.0012
•	0xa2351c4f29cff1b1fc	Transfer	14411905	444 days 5 hrs ago	0xa8c2bCf7281317 🚨	OUT	E Centre: USD Coin	0 ETH	0.0044
©	0x259191734e25f9076	Transfer	14402123	445 days 18 hrs ago	♦ boneheads.eth □	IN	0xa8c2bCf7281317 🗗	0.1 ETH	0.0004
•	0xd034f5fe3afa15531	Transfer	14402111	445 days 18 hrs ago	0xa8c2bCf7281317 🚨	OUT	♦ boneheads.eth □	104.919081832 ETH	0.0006
•	0x4c1b130e04a24248	Cancel Order_	14325502	457 days 16 hrs ago	0xa8c2bCf7281317 🚨	OUT	F OpenSea: Wyvern Exch	0 ETH	0.0018
•	0xcda370a2afcdb2c3a	Set Approval	14325455	457 days 16 hrs ago	0xa8c2bCf7281317 🚨	OUT	RTFKT: CloneX Token	0 ETH	0.0011
©	0x365b715b6533658e	Transfer	14271307	466 days 2 hrs ago	0xa8c2bCf7281317 🚨	OUT	E Centre: USD Coin	0 ETH	0.0046
•	0x390584e6ae74b662	Transfer	14260254	467 days 19 hrs ago	0xa8c2bCf7281317 📮	OUT	E Centre: USD Coin	0 ETH	0.0066
•	0xc3a653eaa975f2536	Transfer	14260204	467 days 19 hrs ago	0xa8c2bCf7281317 📮	OUT	E Centre: USD Coin	0 ETH	0.0067
•	0xc0ca526380c1f335f	Transfer	14257997	468 days 3 hrs ago	0xa8c2bCf7281317 📮	OUT	E Centre: USD Coin	0 ETH	0.0081
•	0xd8296a68c169b28a	Transfer	14230733	472 days 9 hrs ago	0xa8c2bCf7281317 📮	OUT	Centre: USD Coin	0 ETH	0.0090

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fe
•	0x5700b9af0059e7487	Transfer	14220223	474 days ago	0xa8c2bCf7281317 🚨	OUT	E Centre: USD Coin	0 ETH	0.0038
•	0xf2a98f3e518cd5182	Transfer From	14198187	477 days 9 hrs ago	0xa8c2bCf7281317 🚨	OUT	Bored Ape Yacht Club:	0 ETH	0.0058
•	0x167d8f8baf07ad403	Transfer From	14198179	477 days 9 hrs ago	0xa8c2bCf7281317 🚨	OUT	Bored Ape Yacht Club:	0 ETH	0.0066
•	0xb76a27cd5719b0c9	Set Approval	14198177	477 days 9 hrs ago	0xa8c2bCf7281317 🚨	OUT	Bored Ape Yacht Club:	0 ETH	0.0025
•	① 0x7a8e7719951c9e7b	Register Proxy	14198170	477 days 9 hrs ago	0xa8c2bCf7281317 🕒	OUT	🖹 OpenSea: Registry 📮	0 ETH	0.0013
•	0xa89b0c1294e7f5a25	Register Proxy	14198170	477 days 9 hrs ago	0xa8c2bCf7281317 🕒	OUT	🖹 OpenSea: Registry 📮	0 ETH	0.0223
•	0xf767549f5e7d8ed3b	Transfer	14198158	477 days 10 hrs ago	♦ boneheads.eth □	IN	0xa8c2bCf7281317 🚨	0.5 ETH	0.0011
•	0x160d84e9c5f6aad00	Transfer	14149395	484 days 22 hrs ago	0xa8c2bCf7281317 🚨	OUT	() boneheads.eth [0.017667352 ETH	0.0012
•	0x46e981b6c8630c37	Transfer	14066508	497 days 18 hrs ago	0xa8c2bCf7281317 🚨	OUT	() boneheads.eth [1.01 ETH	0.0021
•	0xe751c51f3633cf07a	Transfer	13957062	514 days 16 hrs ago	0xa8c2bCf7281317 🚨	OUT	() boneheads.eth [2.1 ETH	0.0027
•	0x8a8e513dee5792b5	Transfer	13927916	519 days 4 hrs ago	0xa8c2bCf7281317 🚨	OUT	() boneheads.eth [150 ETH	0.0038
•	0x017730d211d481f1	Transfer	13894342	524 days 9 hrs ago	0xa8c2bCf7281317 🚨	OUT	() boneheads.eth [20 ETH	0.0019
•	0xb1520ffcebd9e574e	Transfer	13741255	548 days 5 hrs ago	0xa8c2bCf7281317 🚨	OUT	() boneheads.eth 📮	65 ETH	0.0026
•	0x74f8863e7e86b102d	Transfer	13725275	550 days 19 hrs ago	() boneheads.eth 🚨	IN	0xa8c2bCf7281317 📮	238 ETH	0.0018

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fe
•	0x771e4fff4ab5ac71f9	Transfer	13723255	551 days 3 hrs ago	0xa8c2bCf7281317 🚨	OUT	■ Centre: USD Coin	0 ETH	0.0131
•	0x6aac03c3e5751afb2	Transfer	13718737	551 days 20 hrs ago	0xa8c2bCf7281317 🚨	OUT	() boneheads.eth [236 ETH	0.0064
•	0xc71caf7061f808a26	Transfer	13714726	552 days 11 hrs ago	() boneheads.eth 🚨	IN	0xa8c2bCf7281317 🚨	1 ETH	0.0017
•	0xd426ec3c37d69d8fe	Transfer	13714718	552 days 11 hrs ago	() boneheads.eth 🚨	IN	0xa8c2bCf7281317 📮	34 ETH	0.0016
•	0x093dbf92c46d1edcc	Transfer	13713012	552 days 18 hrs ago	0xa8c2bCf7281317 🗗	OUT	<> boneheads.eth □	11.257751843 ETH	0.0028
•	0x497ef0205750de5e6	Transfer	13712927	552 days 18 hrs ago	0xa8c2bCf7281317 🚨	OUT	<>> boneheads.eth ☐□	23.573869588 ETH	0.0029
•	0x283e72d624830f952	Transfer	13709799	553 days 6 hrs ago	♦ boneheads.eth □	IN	0xa8c2bCf7281317 🚨	236 ETH	0.0030
•	0x323be1195bf403d19	Transfer	13709739	553 days 6 hrs ago	0xa8c2bCf7281317 🚨	OUT	⟨⟩ boneheads.eth □	0.339137431 ETH	0.0037
©	0x191d964bd04258b0	Transfer	13709732	553 days 6 hrs ago	0xa8c2bCf7281317 🚨	OUT	Centre: USD Coin	0 ETH	0.0108
(4)	0x8d7d38f994f20bbc2	Transfer	13709720	553 days 7 hrs ago	♦ boneheads.eth □	IN	0xa8c2bCf7281317 🚨	0.353745335 ETH	0.0028
©	0xa360f47046957f9ef	Transfer	13706448	553 days 19 hrs ago	0xa8c2bCf7281317 🚨	OUT	♦ boneheads.eth □	240.529347267 ETH	0.0029
•	0x827fd462b259f23c8	Transfer	13706018	553 days 21 hrs ago	0xa8c2bCf7281317 🚨	OUT	♦ boneheads.eth □	50 ETH	0.0035
•	0x2a79f4bc6438f3bef	Transfer	13705986	553 days 21 hrs ago	0xa8c2bCf7281317 🚨	OUT	⟨⟩ boneheads.eth □	55 ETH	0.0033
(1)	0x57b1b372a0ae6d2a	Transfer	13705965	553 days 21 hrs ago	0xa8c2bCf7281317 🕒	OUT	() boneheads.eth	2.763907394 ETH	0.0032



[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 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317

tota	al of 123 transactions found						First	Page 2 of 2 > La	ıst
?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
9	0xb43a290a7fedddbf0	Transfer	13475306	590 days 5 hrs ago	♦ boneheads.eth □	IN	0xa8c2bCf7281317 🕒	5.45 ETH	0.00161
9	0x816c70444ce99a19	Transfer	13475301	590 days 5 hrs ago	♦ ivybone.eth □	IN	0xa8c2bCf7281317 🕒	4.5 ETH	0.00183
9	0x2309b9b00b08f918	Transfer	13170160	637 days 19 hrs ago	0xa8c2bCf7281317 🗗	OUT	() boneheads.eth [7 ETH	0.00178
9	0x3cd983a69f3c61b33	Transfer	13166724	638 days 7 hrs ago	0xa8c2bCf7281317 🗗	OUT	■ Centre: USD Coin 🗅	0 ETH	0.01319
9	0xc638ddf3df7d4492d	Transfer	13164136	638 days 17 hrs ago	0xa8c2bCf7281317 🗗	OUT	E Centre: USD Coin	0 ETH	0.00780
9	0x8f810983287651d7c	Transfer	13164075	638 days 17 hrs ago	0xa8c2bCf7281317 🗗	OUT	E Centre: USD Coin	0 ETH	0.00879
9	0x50377ccfc2638e69b	Transfer	13164042	638 days 17 hrs ago	0xa8c2bCf7281317 🗗	OUT	E Centre: USD Coin	0 ETH	0.00761
•	0x4455db4ea2a570e8	Exact Input	13164042	638 days 17 hrs ago	0xa8c2bCf7281317 🗗	OUT	🗏 Uniswap V3: Router 🕒	15 ETH	0.01857
>	0x76ee71ef8c970d8bc	Exact Input Si	13163876	638 days 18 hrs ago	0xa8c2bCf7281317 🗗	OUT	■ Uniswap V3: Router 🕒	20 ETH	0.01221
D	0x656cec90ba84f8103	Exact Input	13163628	638 days 19 hrs ago	0xa8c2bCf7281317 📮	OUT	🗐 Uniswap V3: Router 📮	50 ETH	0.01786

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
(a)	0xd0cc787d66048d72	Exact Input	13163628	638 days 19 hrs ago	0xa8c2bCf7281317 🗗	OUT	🗏 Uniswap V3: Router 🚨	50 ETH	0.02091393
•	0xcd063410d1bf1cbc8	Exact Input	13163628	638 days 19 hrs ago	0xa8c2bCf7281317 🕒	OUT	🗐 Uniswap V3: Router 🚨	50 ETH	0.01879515
•	0x88d380a4091a2878	Exact Input Si	13163622	638 days 19 hrs ago	0xa8c2bCf7281317 🕒	OUT	🗐 Uniswap V3: Router 🚨	50 ETH	0.01297215
•	0xf5eae6cb6f2b83600	Exact Input Si	13163619	638 days 19 hrs ago	0xa8c2bCf7281317 🕒	OUT	🗐 Uniswap V3: Router 🚨	50 ETH	0.01335495
•	0x3400c340147be99c	Exact Input Si	13163494	638 days 19 hrs ago	0xa8c2bCf7281317 🗗	OUT	🗄 Uniswap V3: Router 🗅	46 ETH	0.0315365
•	0x15d08f1ce6130db91	Exact Input	13163431	638 days 19 hrs ago	0xa8c2bCf7281317 🗗	OUT	🗄 Uniswap V3: Router 🚨	46 ETH	0.02906775
•	0x9c2ad07717e796f42	Exact Input	13163419	638 days 20 hrs ago	0xa8c2bCf7281317 🗗	OUT	🗐 Uniswap V3: Router 🚨	0.5 ETH	0.02059349
•	0x5780bcfd00dfcab7a	Transfer	13156688	639 days 20 hrs ago	0xa8c2bCf7281317 🗗	OUT	0xC59Ef9Ee2e8620 📮	25.358124104 ETH	0.0029715
•	0xe1c1ccae0e2f71945	Transfer	13153164	640 days 9 hrs ago	() boneheads.eth [IN	0xa8c2bCf7281317 🗗	63.046296156 ETH	0.00922627
•	0xecf25c48b96da5d03	Transfer	13150694	640 days 18 hrs ago	() boneheads.eth [IN	0xa8c2bCf7281317 🗗	65.533204363 ETH	0.00250977
•	0xa3d3f3dc5e377ef96	Transfer	13150662	640 days 19 hrs ago	() boneheads.eth 📮	IN	0xa8c2bCf7281317 🚨	262.115640178 ETH	0.00191234
©	0xfa5589312c39484a8	Transfer	13150658	640 days 19 hrs ago	() boneheads.eth 📮	IN	0xa8c2bCf7281317 🚨	26.211564017 ETH	0.00210737
•	0x2681983d4a854f97	Transfer	13150413	640 days 20 hrs ago	() boneheads.eth 📮	IN	0xa8c2bCf7281317 🚨	0.3 ETH	0.00407257
Show	: 100 ✔ Records						F	irst Page 2 of 2	> Last

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

Transactions

For 0xa1e43fcb51656354931d47458eceadbc6545df57 () ivybone.eth

tota	al of 98 transactions found						First < Page 1	of 1 > Last	∇ ∨
?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn F
©	0x878c67c8d85a8495	Transfer	16772237	91 days 1 hr ago	() ivybone.eth	OUT	0xa8c2bCf7281317 🚨	6 ETH	0.000
©	0x53654a7ced14b833	Withdraw	16772234	91 days 1 hr ago	() ivybone.eth	OUT	■ Wrapped Ether 🗅	0 ETH	0.001
©	0x2838954fe4d41736c	0x0000000	16772230	91 days 1 hr ago	() ivybone.eth	OUT	■ Seaport 1.4 🕩	0 ETH	0.005
©	0x8dab76739bb14d6b	Match Advanc	16772224	91 days 1 hr ago	() ivybone.eth	OUT	Seaport 1.4 📮	0 ETH	0.008
©	0xe59b9bbadbb41cbd	Match Advanc	16772220	91 days 1 hr ago	() ivybone.eth	OUT	■ Seaport 1.4 🗅	0 ETH	0.010
©	0xa11d002637552c36	Transfer	16772128	91 days 2 hrs ago	() ivybone.eth	OUT	0xa8c2bCf7281317 🚨	3.6 ETH	0.000
©	0xbfd5254f7cced9030	Swap	16772100	91 days 2 hrs ago	() ivybone.eth	OUT	🗏 Metamask: Swap Router 🚨	0 ETH	0.007
©	0xcc096356f7c94c60c	Transfer	16772092	91 days 2 hrs ago	⟨⟩ ivybone.eth □	OUT	🖹 0xE66F9eAa8b82aC 📮	15.25 ETH	0.002
©	0x069fd7dd5178e1d0a	Withdraw	16772075	91 days 2 hrs ago	<>ivybone.eth □	OUT	■ Wrapped Ether □	0 ETH	0.001
©	0x2555687f70804278	Match Advanc	16772056	91 days 2 hrs ago	⟨⟩ ivybone.eth □	OUT	■ Seaport 1.4 🕩	0 ETH	0.014

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn F
o	0x50663c3444865a98f	Set Approval	16771995	91 days 2 hrs ago	() ivybone.eth	OUT	The Otherside: OTHR T	0 ETH	0.002
o	0x0e9e8927ff89723db	Transfer	16727253	97 days 9 hrs ago	() ivybone.eth 📮	OUT	E Centre: USD Coin	0 ETH	0.001
o	0x0a03e3c68232c10e	Swap	16727250	97 days 9 hrs ago	() ivybone.eth [OUT	🗏 Metamask: Swap Router 🚨	0 ETH	0.004
o	0x8e9ed63d940dcf2e5	Withdraw	15778878	229 days 22 hrs ago	() ivybone.eth	OUT	■ Wrapped Ether □	0 ETH	0.000
o	0x7eabbbc9a1cc8d93	Fulfill Advanc	15778858	229 days 22 hrs ago	() ivybone.eth 🕒	OUT	■ Seaport 1.1 🗗	0 ETH	0.003
o	0xcf8081fdfe31d0d8d	Approve	15778857	229 days 22 hrs ago	() ivybone.eth [OUT	■ Wrapped Ether	0 ETH	0.00
o	0xab0b8255c5142002	Cancel	15778855	229 days 22 hrs ago	() ivybone.eth 🕒	OUT	Seaport 1.1 🗗	0 ETH	0.000
o	0xfa158aad50f740825	Set Approval	15778849	229 days 22 hrs ago	() ivybone.eth [OUT	Non Fungible Tools Lif	0 ETH	0.00
o	0xc0d4f0fd5bc50dea8	Transfer	15732233	236 days 10 hrs ago	() ivybone.eth	OUT	Apecoin: APE Token	0 ETH	0.00
o	0xbee5790a39100731f	Transfer	15409444	284 days 10 hrs ago	() ivybone.eth	OUT	0xa8c2bCf7281317 🗗	0.2 ETH	0.000
o	0x99610ee568a088bc	Transfer	14831606	378 days 3 hrs ago	() ivybone.eth 🕒	OUT	0xa8c2bCf7281317 🗗	23.25 ETH	0.00
o	0x337fea71b92a5c3bf	Transfer	14713787	397 days 44 mins ago	() praisegod.eth [IN	<>ivybone.eth ☐	0.071285111 ETH	0.00
o	0x007dd57e73c525aaf	Transfer	14693578	400 days 5 hrs ago	0x15F8218e60e907 🚨	IN	⟨⟩ ivybone.eth □	0.99015533 ETH	0.00
o	0x9a44b33fda84c16af	Transfer	14692668	400 days 8 hrs ago	() prismo.eth 📮	IN	() ivybone.eth [0.63 ETH	0.00

?	Txn Hash	Method ③	Block	Age	From		То	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
•	① 0xafb056aba65c5fd8e	Atomic Match_	14690066	400 days 18 hrs ago	⟨⟩ ivybone.eth □	OUT	OpenSea: Wyvern Exch	0 ETH	0.017
•	① 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		То	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	0xbAF331E2Da3C85 🗘	IN	() ivybone.eth 📮	0.1 ETH	0.005
•	0x3b0ad277f49128a95	Transfer	14689999	400 days 19 hrs ago	0x3acEf287dda4fa 🚨	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	0xbAF331E2Da3C85 🚨	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
•	① 0x59d7546c1fd95d4d4	Atomic Match_	14689963	400 days 19 hrs ago	⟨⟩ ivybone.eth □	OUT	OpenSea: Wyvern Exch	0 ETH	0.023
•	① 0x531274bccdf64b1af	Atomic Match_	14689963	400 days 19 hrs ago	() ivybone.eth	OUT	OpenSea: Wyvern Exch	0 ETH	0.023
•	① 0x46efcf0e9a9839f15	Atomic Match_	14689960	400 days 19 hrs ago	<> ivybone.eth □	OUT	OpenSea: Wyvern Exch	0 ETH	0.023
•	① 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		То	Value	Txn F
©	0x5416865985cdbcf17	Atomic Match_	14689917	400 days 19 hrs ago	() ivybone.eth [OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.073
©	0x245e19c8434621a4	Atomic Match_	14689839	400 days 19 hrs ago	() ivybone.eth [OUT	OpenSea: Wyvern Exch	0 ETH	0.096
©	① 0x98ef37c9ac489a948	Atomic Match_	14689838	400 days 19 hrs ago	() ivybone.eth [OUT	OpenSea: Wyvern Exch	0 ETH	0.026
©	0x604d504361abb253	Atomic Match_	14689834	400 days 19 hrs ago	() ivybone.eth 📮	OUT	OpenSea: Wyvern Exch	0 ETH	0.088
©	0xd9dafa292d041f2b8	Atomic Match_	14689816	400 days 19 hrs ago	() ivybone.eth	OUT	OpenSea: Wyvern Exch	0 ETH	0.116
©	① 0x4fd81029e567db8fd	Atomic Match_	14689814	400 days 19 hrs ago	() ivybone.eth	OUT	OpenSea: Wyvern Exch	0 ETH	0.035
©	0xb03baaa2a82ba508	Atomic Match_	14689812	400 days 19 hrs ago	() ivybone.eth [OUT	OpenSea: Wyvern Exch	0 ETH	0.123
©	① 0x056482ff88c7be962	Atomic Match_	14689810	400 days 19 hrs ago	() ivybone.eth 📮	OUT	OpenSea: Wyvern Exch	0 ETH	0.034
©	0xeac6a5df214c392ae	Atomic Match_	14689809	400 days 19 hrs ago	() ivybone.eth [OUT	OpenSea: Wyvern Exch	0 ETH	0.111
©	0x229ccaf4fd19efeddd	Atomic Match_	14689804	400 days 19 hrs ago	() ivybone.eth [OUT	OpenSea: Wyvern Exch	0 ETH	0.102
©	0x7e590a64b12bc55c	Atomic Match_	14689802	400 days 19 hrs ago	() ivybone.eth	OUT	OpenSea: Wyvern Exch	0 ETH	0.109
•	0x328b15f8b5eba6206	Approve	14689781	400 days 19 hrs ago	() ivybone.eth	OUT	Apecoin: APE Token	0 ETH	0.021
©	0x0ccfbc1bc784e94d6	Transfer	14689600	400 days 20 hrs ago	0xa8c2bCf7281317 🚨	IN	<>ivybone.eth □	5 ETH	0.081
©	0xca0fe7fe03e32ad99f	Transfer From	14220224	474 days 12 mins ago	() ivybone.eth 📮	OUT	Jadu Hoverboard: Hov	0 ETH	0.005

?	Txn Hash	Method ②	Block	Age	From		То	Value	Txn F
•	0x8ddc9ad29c6aa86d	Transfer	14220216	474 days 13 mins ago	♦ boneheads.eth □	IN	() ivybone.eth [0.05 ETH	0.001
©	0x31b62909367d51d8	Transfer	13672211	559 days 6 hrs ago	() ivybone.eth 🚨	OUT	() boneheads.eth [0.007378601 ETH	0.002
©	0x33e7b33d39e9b59a	Transfer	13583883	573 days 5 hrs ago	() ivybone.eth 📮	OUT	■ Index Protocol: INDEX	0 ETH	0.008
©	0x01f5628d7d2da9f82	Transfer	13583883	573 days 5 hrs ago	() ivybone.eth 🚨	OUT	F Index Protocol: Metave	0 ETH	0.008
©	0x964b1e2165c73e89	Transfer	13583848	573 days 5 hrs ago	⟨⟩ ivybone.eth □	OUT	E ENS: ENS Token	0 ETH	0.006
•	0x167e74e535828a39	Claim Tokens	13583811	573 days 5 hrs ago	⟨⟩ ivybone.eth □	OUT	E ENS: ENS Token	0 ETH	0.025
©	0xa425cdcaf57580f12	Set Owner	13583480	573 days 6 hrs ago	() ivybone.eth 🚨	OUT	ENS: Registry with Fall	0 ETH	0.004
©	0x4a0fd2984c718ed70	Transfer	13583471	573 days 6 hrs ago	() boneheads.eth [IN	() ivybone.eth	0.063057136 ETH	0.003
©	0x64c9b72b46a3adf84	Transfer	13515555	583 days 22 hrs ago	() ivybone.eth 🕛	OUT	() boneheads.eth [0.021985147 ETH	0.003
•	0xbd6adcffb87ead797	Transfer From	13515539	583 days 22 hrs ago	⟨⟩ ivybone.eth □	OUT	Bored Ape Yacht Club:	0 ETH	0.016
©	0x816c70444ce99a19	Transfer	13475301	590 days 6 hrs ago	⟨⟩ ivybone.eth □	OUT	0xa8c2bCf7281317 📮	4.5 ETH	0.001
•	0x90e3424705346524	Safe Transfer	13475289	590 days 6 hrs ago	⟨⟩ ivybone.eth □	OUT	E ENS: Base Registrar Im	0 ETH	0.004
©	0x2e48a877248c57b3	Safe Transfer	13475289	590 days 6 hrs ago	() ivybone.eth 📮	OUT	ENS: Base Registrar Im	0 ETH	0.006
©	0xafc7bcf45f835707a	Commit	13475287	590 days 6 hrs ago	⟨⟩ ivybone.eth □	OUT	ENS: Old ETH Registrar	0 ETH	0.003

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn F
o	① 0x6beed38e88edf85f2	Mint	13475283	590 days 6 hrs ago	♦ ivybone.eth □	OUT	Doodles: DOODLE Token	0.615 ETH	0.001
o	① 0x6e717385d97e920d	Mint	13439224	595 days 21 hrs ago	⟨⟩ ivybone.eth □	OUT	Doodles: DOODLE Token	0.615 ETH	0.002
o	① 0xbfce3358ea4663fb5	Mint	13439224	595 days 21 hrs ago	⟨⟩ ivybone.eth □	OUT	Doodles: DOODLE Token	0.615 ETH	0.002
o	① 0x1ad4705cc6efc935b	Mint	13439224	595 days 21 hrs ago	<> ivybone.eth ☐	OUT	Doodles: DOODLE Token	0.615 ETH	0.002
o	① 0x61a6b4d8b3089a36	Mint	13439224	595 days 21 hrs ago	<> ivybone.eth ☐	OUT	Doodles: DOODLE Token	0.615 ETH	0.002
o	0xf6bff1f236c20d0871	Transfer	13439104	595 days 21 hrs ago	<> ivybone.eth ☐	SELF	⟨⟩ ivybone.eth □	0 ETH	0.09
o	0xd39a60ba0d1515ad	Transfer	13439038	595 days 22 hrs ago	<> ivybone.eth ☐	OUT	() ticasso.eth 📮	0.25 ETH	0.00
o	0x481230f1faf35045c	Transfer	13439035	595 days 22 hrs ago	⟨⟩ ivybone.eth □	OUT	() ticasso.eth 📮	1 ETH	0.00
o	0x5e34200ab1511d1a	Register With	13430122	597 days 7 hrs ago	<> ivybone.eth ☐	OUT	E ENS: Old ETH Registrar	0.014085245 ETH	0.01
o	0xacba75b532338390	Commit	13430106	597 days 7 hrs ago	⟨⟩ ivybone.eth □	OUT	E ENS: Old ETH Registrar	0 ETH	0.003
o	0x4e4ebf2e01cb70542	Transfer	13430095	597 days 7 hrs ago	♦ boneheads.eth □	IN	⟨⟩ ivybone.eth □	5 ETH	0.00
o	0xdb9f3bc894eedba25	Multiplex Batc	13418452	599 days 3 hrs ago	⟨⟩ ivybone.eth □	OUT	🖹 0x: Exchange Proxy 🚨	13.222 ETH	0.05
o	0xb810ed2984c9682d	Transfer	13418433	599 days 3 hrs ago	♦ boneheads.eth □	IN	() ivybone.eth	13.257851962 ETH	0.003
o	0x86cf70972738e467c	Approve	13416627	599 days 10 hrs ago	() ivybone.eth [OUT	■ Uniswap V2: MVI	0 ETH	0.00

?	Txn Hash	Method ?	Block	Age	From		То	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	: 100 V Records						First	Page 1 of 1 > L	Last
								[Download: CSV Ex	port 🚣]

[💱] 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

—— *4.5*——

For 0x3acef2d359f430cee5e205262a884d6087dda4fa

tot	al of 48 transactions found						First	Page 1 of 1 > La	st ∇ ~
?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
•	0x757c0b9e94e4b180	Transfer	15732243	236 days 11 hrs ago	0x3acEf287dda4fa 🚨	OUT	() boneheads.eth [0.076975721 ETH	0.0003556
©	0x9b2e09c0e31b76c7	Withdraw	15732236	236 days 11 hrs ago	0x3acEf287dda4fa 🚨	OUT	■ Wrapped Ether	0 ETH	0.0006157
©	0x975e17f1739b504ac	Transfer	15409444	284 days 10 hrs ago	0x3acEf287dda4fa 🚨	OUT	0xa8c2bCf7281317 🗗	0.45 ETH	0.0002905
©	0x282e34cc8fe251d0e	Transfer	15230840	312 days 12 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.04196 ETH	0.000294
©	0x637abdd3e3feaad93	Transfer	15116589	330 days 5 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.058955922 ETH	0.000573
©	0xf385e1ad25fa03f09	Transfer	14818070	380 days 9 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.0407995 ETH	0.000520
©	0x80687ccfcdeb6a037	Transfer	14730155	394 days 10 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.0504 ETH	0.000741
©	0xda282833689878eb	Transfer	14700469	399 days 4 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.02311 ETH	0.0016729
•	0x3b0ad277f49128a95	Transfer	14689999	400 days 19 hrs ago	0x3acEf287dda4fa 🚨	OUT	() ivybone.eth 📮	0.88381078 ETH	0.004959
©	0xb56affb1100017a4f	Withdraw	14689989	400 days 19 hrs ago	0x3acEf287dda4fa 🚨	OUT	■ Wrapped Ether	0 ETH	0.008096

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0x514d41c8a60743b5	Transfer	14615582	412 days 11 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.032765 ETH	0.00072138
•	0xc87f7219fb5310ec6	Transfer	14547482	423 days 3 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.0267895 ETH	0.00106733
•	0xe978cd01b4aa234b	Transfer	14516927	427 days 21 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.03815 ETH	0.00172432
•	0xbd1894484b99109c	Transfer	14422910	442 days 13 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.0344595 ETH	0.00039289
•	0x2de4cb49033ba833	Transfer	14390671	447 days 14 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.055735 ETH	0.00055287
•	0xcbe5c059ecfc72abe	Transfer	14339714	455 days 12 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.03208 ETH	0.00071895
•	0xdb705ab6fbfe1ed83	Transfer	14313303	459 days 14 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.1735455 ETH	0.00063712
•	0x45aa01a443553f82b	Transfer	14265106	467 days 2 hrs ago	0x3acEf287dda4fa 🚨	OUT	() boneheads.eth [0.124347308 ETH	0.00352797
•	0x9c5282cff7c47fcd48	Transfer	14259194	467 days 23 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.02745 ETH	0.001848
•	0xfbcd2ee93d3d26fc8	Transfer	14218961	474 days 5 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.0302995 ETH	0.00317749
•	0xda471a682eca9da7	Transfer	14180037	480 days 5 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.069955 ETH	0.00215503
•	0xe34ae6fc88d6878d8	Transfer	14128680	488 days 4 hrs ago	0x3acEf287dda4fa 🚨	OUT	() boneheads.eth [0.060003665 ETH	0.0044462
•	0x879bbbe1f62361ad7	Transfer	14112695	490 days 15 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.0646245 ETH	0.00160607
•	0x46458afaa62f1d3bc	Transfer	14045195	501 days 2 hrs ago	0x3acEf287dda4fa 🚨	OUT	♦ boneheads.eth □	0.918691399 ETH	0.00415268

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0xff09b88edffdb770d3	Transfer	14039482	501 days 23 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🕛	0.459295 ETH	0.00214504
©	0xd2bdbb17d7f91261	Transfer	13981751	510 days 21 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.461265 ETH	0.00481281
©	0x9917e6ad33613386	Deposit	13955698	514 days 22 hrs ago	0x3acEf287dda4fa 🚨	OUT	■ Wrapped Ether	0.504586576 ETH	0.00719634
©	0x56113f51399e2e68a	Transfer	13931111	518 days 17 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.514339472 ETH	0.00159055
©	0xb63521d9cc620931	Transfer	13894239	524 days 10 hrs ago	0x3acEf287dda4fa 🚨	OUT	♦ boneheads.eth □	0.056505701 ETH	0.00139563
©	0xbc82c3a641db772d	Transfer	13893954	524 days 11 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.03690012 ETH	0.00218919
©	0x4028f243005c9ad64	Transfer	13867416	528 days 14 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.0211 ETH	0.00087081
©	0x209760eea5fe3d4cd	Transfer	13857863	530 days 1 hr ago	0x3acEf287dda4fa 🚨	OUT	() boneheads.eth [0.188620132 ETH	0.0022528
©	0x0473cc0d5db96ea4	Transfer	13808502	537 days 16 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🕛	0.02209 ETH	0.00155646
©	0xd6840143f14dec1a6	Transfer	13777654	542 days 11 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.03646 ETH	0.00159398
•	0x802758c3b478b19c	Transfer	13735443	549 days 5 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 📮	0.049769 ETH	0.0018783
(9)	0x3888d4b9837340d5	Transfer	13685123	557 days 6 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa	0.08223 ETH	0.00233103
(a)	0xd966e8e238d45977	Transfer	13672198	559 days 7 hrs ago	0x3acEf287dda4fa 🚨	OUT	() boneheads.eth	2.420333592 ETH	0.00291026
©	0x61d03992de04cba6f	Buy	13667775	559 days 23 hrs ago	0x3acEf287dda4fa 🚨	OUT	■ BaboonBet: BBET Token	5 ETH	2.24448418

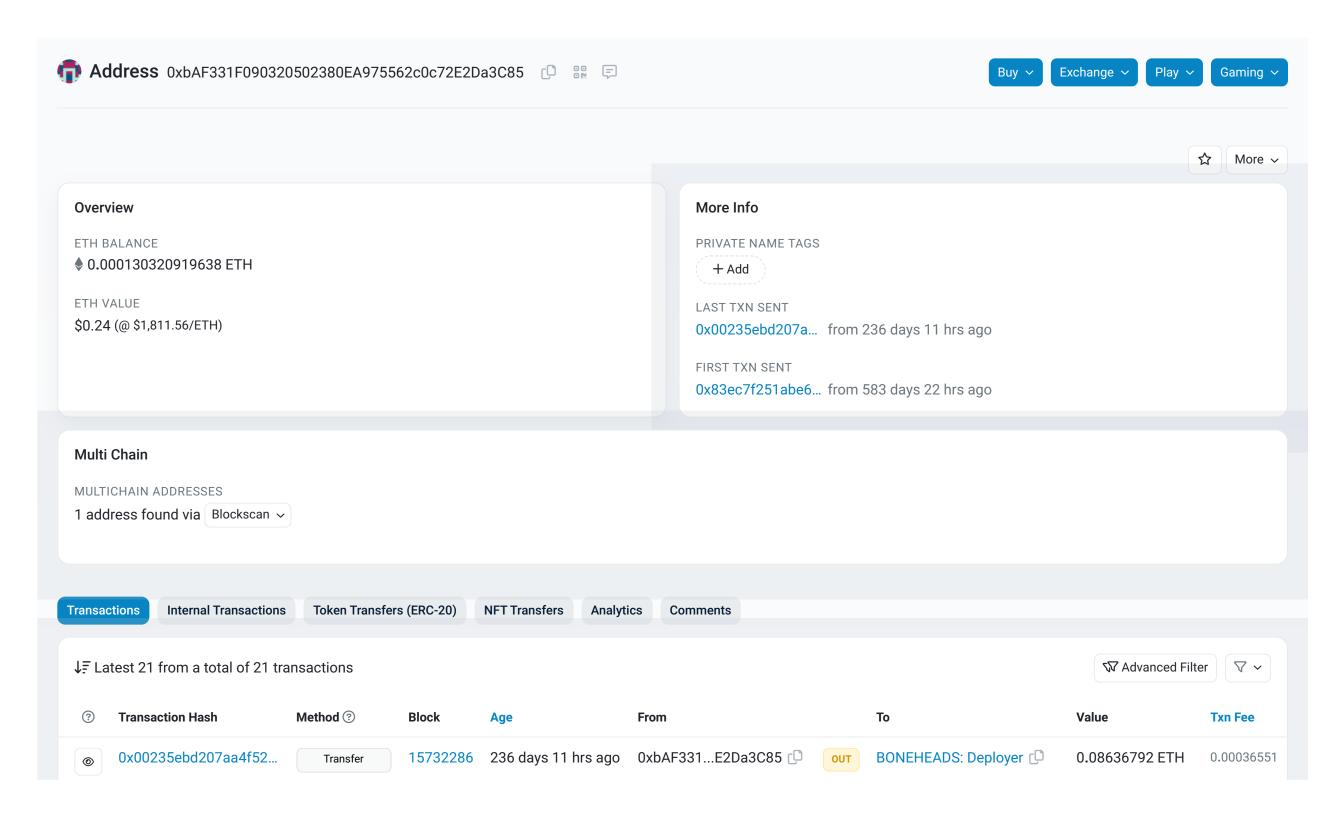
?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
•	0x1369a96357017c73	Buy	13667770	559 days 23 hrs ago	0x3acEf287dda4fa 🚨	OUT	■ BaboonBet: BBET Token □	2.5 ETH	0.86836873
•	0xe337cc80f3d736615	Transfer	13667757	559 days 23 hrs ago	() boneheads.eth 🕛	IN	0x3acEf287dda4fa 🚨	10 ETH	0.00324263
©	0x6ca0ea405ede1927	Buy	13667710	560 days 8 mins ago	0x3acEf287dda4fa 🚨	OUT	■ BaboonBet: BBET Token □	2.5 ETH	1.13157211
•	0xffe319aa32d464059	Transfer	13667705	560 days 9 mins ago	() boneheads.eth 🕛	IN	0x3acEf287dda4fa 🚨	5 ETH	0.00339943
•	0xdef743b07e48f4ead	Transfer	13629913	565 days 23 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.16708 ETH	0.003024
•	0x14e42d6e734edd8c	Transfer	13589095	572 days 10 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.1951 ETH	0.00278955
•	0x92840dc5c86f24aec	Transfer	13537574	580 days 12 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	0.0952 ETH	0.00280348
•	0xec460e0490702527	Transfer	13515619	583 days 23 hrs ago	0x3acEf287dda4fa 🚨	OUT	() bonestars.eth 🕛	0.03 ETH	0.0026574
•	0x3a38f2697d282338	Transfer	13515604	583 days 23 hrs ago	0x3acEf287dda4fa 🚨	OUT	() bonestar.eth [0.15 ETH	0.00278139
•	0xc5c751c2234b2034	Transfer	13499328	586 days 12 hrs ago	0x0B7a43A4173B22 🗗	IN	0x3acEf287dda4fa 🚨	1.39619995 ETH	0.0020229
Show	7: 50 V Records						Firs	Page 1 of 1	> Last

³ 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

____ A.R____



?	Transaction Hash	Method ?	Block	Age	From		То	Value	Txn Fee
©	0x466da17442f94a013	Bulk Transfer	15732283	236 days 11 hrs ago	0xbAF331E2Da3C85 🗗	OUT	OpenSea: Transfer H	0 ETH	0.00630209
©	0x8be77df9daf53b370	Set Approval	15732281	236 days 11 hrs ago	0xbAF331E2Da3C85	OUT	Doodles: GBOX Token	0 ETH	0.00086376
©	0x4e4e3ad99b9342d6	Transfer	15368935	290 days 21 hrs ago	0xbAF331E2Da3C85 🕒	OUT	0xa8c2bCf7281317 🚨	22 ETH	0.00017457
©	0x4c8a5c6c27b9c841	Bid	15052639	340 days 3 hrs ago	0xbAF331E2Da3C85 🕒	OUT	Doodles: GBOX Token	5 ETH	0.00128056
©	0xdede71aa49bf7df29	Transfer	14870432	371 days 20 hrs ago	0xF3826973C940fc 🚨	IN	0xbAF331E2Da3C85	8 ETH	0.0007917
©	0x038780b173dde936	Transfer	14870363	371 days 20 hrs ago	0xF3826973C940fc 🚨	IN	0xbAF331E2Da3C85	18.6 ETH	0.00084
©	0x1044bc6158626635	Transfer	14870230	371 days 21 hrs ago	0xF3826973C940fc 🗘	IN	0xbAF331E2Da3C85	0.05318243 ETH	0.0009576
•	0x4d404fcea9a7f5309	Transfer	14690001	400 days 19 hrs ago	0xbAF331E2Da3C85 🕒	OUT	() ivybone.eth 📮	0.1 ETH	0.00527207
©	0xb98fb44dad5c00c7f	Transfer	14689993	400 days 19 hrs ago	0xbAF331E2Da3C85 🕒	OUT	() ivybone.eth [2.2 ETH	0.00511087
•	0x7519c63617ee2a23	Transfer	14502137	430 days 5 hrs ago	0xbAF331E2Da3C85 🕒	OUT	0xF3826973C940fc	20.17750438 ETH	0.00143066
©	0xa5e3a0a2add812d9	Transfer	14502129	430 days 5 hrs ago	0xa8c2bCf7281317 🚨	IN	0xbAF331E2Da3C85	20.21030263 ETH	0.00162457
©	0xa0e9d63bdd91640d	Transfer	14425392	442 days 4 hrs ago	0xbAF331E2Da3C85 🕒	OUT	0xF3826973C940fc	25.85 ETH	0.00057413
©	0x185fa63d7408849d	Transfer	14425388	442 days 4 hrs ago	0xbAF331E2Da3C85 🕒	OUT	0xF3826973C940fc	25.85 ETH	0.00051945
•	0x0cb80ca03beb2d77f	Transfer	14425370	442 days 4 hrs ago	0xbAF331E2Da3C85 🗗	OUT	0xF3826973C940fc	1 ETH	0.00070343

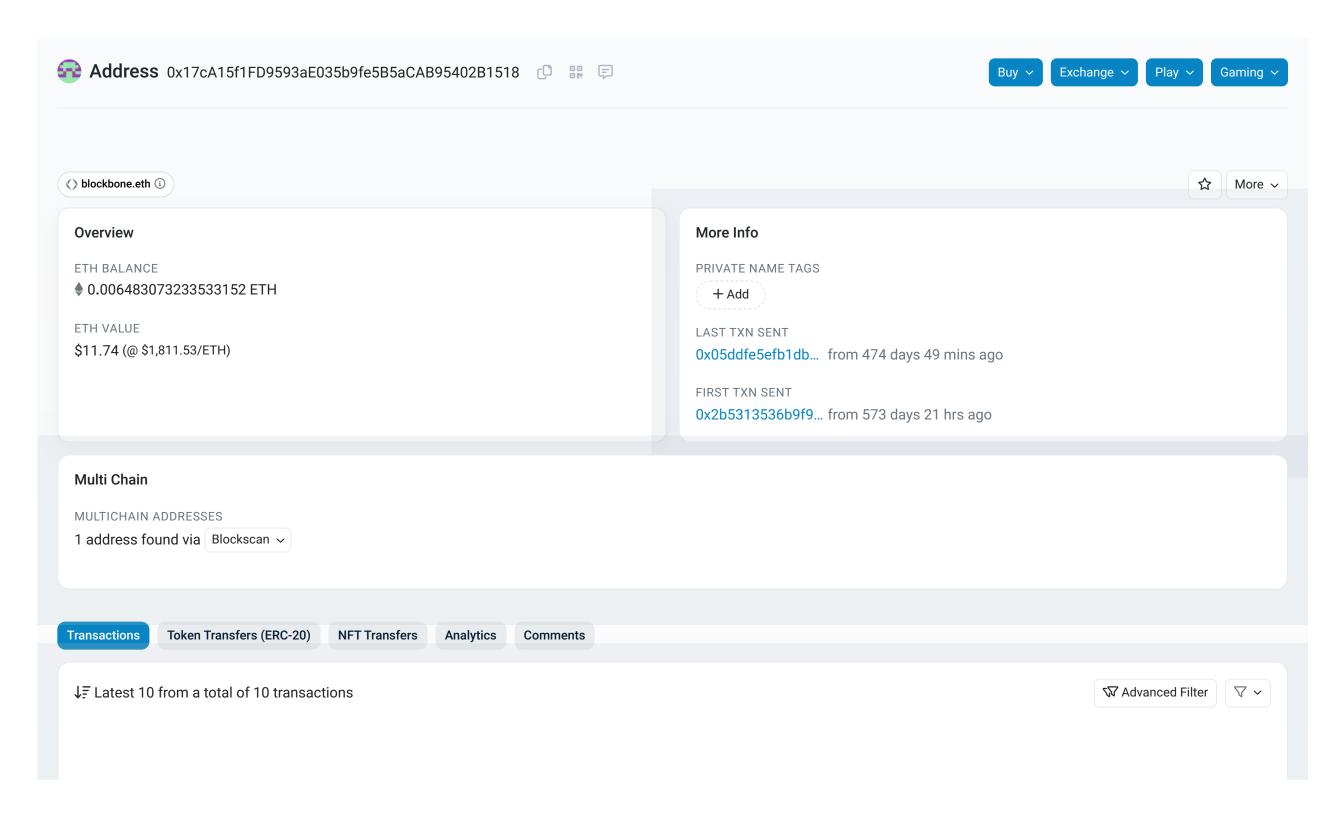
?	Transaction Hash	Method ?	Block	Age	From		То	Value	Txn Fee
©	0x14635f720e6420e48	Transfer	14425178	442 days 5 hrs ago	0xa8c2bCf7281317 🚨	IN	0xbAF331E2Da3C85	55 ETH	0.0007238
©	0xc2a4d39fbbdfac95fc	Transfer	13672205	559 days 7 hrs ago	0xbAF331E2Da3C85	OUT	BONEHEADS: Deployer 🕛	0.21001781 ETH	0.00275758
©	0x2bed9188aad5b88fe	Transfer	13583428	573 days 7 hrs ago	BONEHEADS: Deployer 🗅	IN	0xbAF331E2Da3C85	0.21053606 ETH	0.00322067
©	0xd1ec087330798020	Transfer	13579791	573 days 21 hrs ago	0xbAF331E2Da3C85	OUT	BONEHEADS: Deployer 🕛	0.004173 ETH	0.00334901
©	0x83ec7f251abe6c6c8	Transfer From	13515802	583 days 22 hrs ago	0xbAF331E2Da3C85	OUT	Mutant Ape Yacht Cl	0 ETH	0.01294398
©	0xbf06da00a28690e1f	Transfer	13515788	583 days 22 hrs ago	BONEHEADS: Deployer 📮	IN	0xbAF331E2Da3C85	0.0229629 ETH	0.00366898
								[Download	d: 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

____ A.K____



?	Transaction Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0x05ddfe5efb1dba1e6	Transfer From	14220269	474 days 49 mins ago	() blockbone.eth [OUT	🖹 Jadu Hoverboard: H	0 ETH	0.00383031
•	0xae59c802cbdadfdfd	Transfer	14220260	474 days 50 mins ago	BONEHEADS: Deployer 🗅	IN	() blockbone.eth 🕛	0.01 ETH	0.00101658
•	0x3f0c71c4c18548dcd	Transfer	13672203	559 days 7 hrs ago	() blockbone.eth	OUT	BONEHEADS: Deployer 🗅	0.09876659 ETH	0.00285832
•	0xb3a3f0eb8a14152ed	Set Name	13583584	573 days 7 hrs ago	() blockbone.eth	OUT	ENS: Old Reverse Re	0 ETH	0.02108805
•	0xadbeca42ed9bd3c3	Transfer	13583547	573 days 7 hrs ago	<> blockbone.eth ☐	OUT	() bonestar.eth [0.03147015 ETH	0.00389289
•	0x91e10e9047d38e93	Transfer	13583532	573 days 7 hrs ago	<> bonestar.eth □□	IN	() blockbone.eth 🕛	0.13954942 ETH	0.00397629
•	0x2a51373fe7908203b	Set Addr	13583512	573 days 7 hrs ago	<> blockbone.eth ☐	OUT	ENS: Public Resolver 2	0 ETH	0.00693386
•	0xa89b7a7dd409b9fc3	Transfer	13583505	573 days 7 hrs ago	BONEHEADS: Deployer 🗅	IN	() blockbone.eth 🚨	0.02101635 ETH	0.00314671
•	0x2b5313536b9f943bc	Transfer From	13579842	573 days 21 hrs ago	() blockbone.eth	OUT	Bored Ape Yacht Clu	0 ETH	0.0161161
•	0x142d1abe24ab9fc4f	Transfer	13579803	573 days 21 hrs ago	BONEHEADS: Deployer 🚨	IN	() blockbone.eth 🕛	0.0208736 ETH	0.00353307

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

_____ A.K____

For 0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147 () ticasso.eth

tota	al of 218 transactions found						First < Page	1 of 3 > Last	∇ ∨
?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
©	0xf5c1dd9d94dacda99	Claim	14905434	366 days 3 hrs ago	() ticasso.eth 🗗	OUT	Fear City: FEARCITY To	0.1554 ETH	0.00652
©	0xbd22b5898fbc126fa	Multicall	14900490	366 days 23 hrs ago	() ticasso.eth 📮	OUT	🗏 Uniswap V3: Router 2 🚨	0 ETH	0.00759
©	0x7d13c7eb9dbe8aafd	Approve	14900487	366 days 23 hrs ago	<> ticasso.eth ☐	OUT	Apecoin: APE Token	0 ETH	0.0031
©	0x2af88b05ce62e7857	Transfer	14900457	366 days 23 hrs ago	0x15F8218e60e907 🗗	IN	() ticasso.eth 🚨	0.020897641 ETH	0.0014
©	0x8fb53182adebd2196	Swap	14693689	400 days 5 hrs ago	<> ticasso.eth □	OUT	■ Metamask: Swap Router	0.27 ETH	0.0074
©	0xf46e7e7e57680a659	Withdraw	14472120	434 days 21 hrs ago	() ticasso.eth 📮	OUT	■ Wrapped Ether 🗅	0 ETH	0.0011
©	0xcbec20d813e6705d	Transfer	14316470	459 days 3 hrs ago	0xDf3285177a83b3 🚨	IN	() ticasso.eth 🚨	0.045 ETH	0.0006
©	0x56379e13153c4473	Transfer	14316467	459 days 3 hrs ago	0x15F8218e60e907 🗗	IN	⟨⟩ ticasso.eth □	0.04 ETH	0.00088
©	0x8a3e6880f834f32ba	Multicall	14308530	460 days 8 hrs ago	<> ticasso.eth □	OUT	🗏 Uniswap V3: Router 2 🚨	0.08 ETH	0.01157
©	0xb523a2ab2c408a89	Set Approval	14288926	463 days 9 hrs ago	() ticasso.eth [OUT	The Doggies: TD Token	0 ETH	0.0011

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
©	0xe58e261031144f4d7	Transfer From	14275977	465 days 9 hrs ago	<> ticasso.eth □	OUT	🖹 Jadu Hoverboard: Hov 🚨	0 ETH	0.00739
•	0xd13a51b1c63b1b9d	Transfer	14275889	465 days 10 hrs ago	<> ticasso.eth □	OUT	0xDf3285177a83b3 🗗	0.05 ETH	0.00084
•	0xcbacc10d4fae1a125	Transfer	14275888	465 days 10 hrs ago	<> ticasso.eth □	OUT	0x15F8218e60e907 📮	0.05 ETH	0.00094
•	0xb7c1c111d38493af5	Transfer	14275883	465 days 10 hrs ago	♦ boneheads.eth □	IN	() ticasso.eth 🚨	0.1 ETH	0.00102
•	0x210749569ac602fd0	Transfer	14271303	466 days 3 hrs ago	<> ticasso.eth □	OUT	The Sandbox: SAND To	0 ETH	0.0021
•	0x92f96c46f1b692d9c	Transfer From	14265747	466 days 23 hrs ago	<> ticasso.eth □	OUT	■ The Doggies: TD Token 🗅	0 ETH	0.0057
•	0x27b74eb64dbb51e4	Approve And	14265005	467 days 2 hrs ago	<> ticasso.eth □	OUT	The Sandbox: SAND To	0 ETH	0.1533
•	0xe592d1e2195598e8f	Transfer	14264891	467 days 2 hrs ago	<> ticasso.eth □	OUT	0xDf3285177a83b3 🗗	0.4 ETH	0.0016
©	0xaf7fa061046c09749	Transfer	14264887	467 days 2 hrs ago	() ticasso.eth 📮	OUT	0x15F8218e60e907 📮	0.38 ETH	0.0017
•	0x39db809ad1e2a6c7	Transfer	14264885	467 days 2 hrs ago	<> ticasso.eth □	OUT	The Sandbox: SAND To	0 ETH	0.0041
©	0xf206c2792022d7cff	Transfer	14264884	467 days 2 hrs ago	<> ticasso.eth □	OUT	The Sandbox: SAND To	0 ETH	0.0036
•	0xbdd88a6930b7b93a	Transfer	14264872	467 days 3 hrs ago	♦ boneheads.eth □	IN	⟨⟩ ticasso.eth □	1 ETH	0.0017
•	0xd162b98423d3f12fe	Transfer	14258840	468 days 1 hr ago	0x15F8218e60e907 🗗	IN	() ticasso.eth 🚨	0.1 ETH	0.0023
o	0x2c438411f9461429f	Approve And	14258421	468 days 2 hrs ago	() ticasso.eth 📮	OUT	The Sandbox: SAND To	0 ETH	0.0773

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
©	0x4d855c39e857caf37	Transfer	14258033	468 days 4 hrs ago	() ticasso.eth [OUT	0x15F8218e60e907 🕛	0.2 ETH	0.00487
©	0x5efc6a9cbb2153b16	Atomic Match_	14258019	468 days 4 hrs ago	() ticasso.eth [OUT	🖹 OpenSea: Wyvern Exch 🚨	0.85 ETH	0.02270
•	0xa28b66bdd18ec769	Transfer	14257908	468 days 4 hrs ago	() ticasso.eth 🚨	OUT	The Sandbox: SAND To	0 ETH	0.00433
•	0x3a78e9d54d266452	Approve	14244971	470 days 4 hrs ago	() ticasso.eth 🚨	OUT	■ Wrapped Ether □	0 ETH	0.00147
•	0xbc6b8036f0e7e651d	Set Approval	14244847	470 days 5 hrs ago	() ticasso.eth 🚨	OUT	E Crypto.Chicks: CCH To	0 ETH	0.00426
•	0xe852926563585e45	Set Approval	14244741	470 days 5 hrs ago	() ticasso.eth 🚨	OUT	🖹 Adam Bomb Squad: AB 🚨	0 ETH	0.00238
•	0x46905ad0320742f8	Transfer From	14220363	474 days 28 mins ago	() ticasso.eth 🚨	OUT	Jadu Hoverboard: Hov	0 ETH	0.00521
•	0xfed34c425621c72e2	Atomic Match_	14220354	474 days 29 mins ago	() ticasso.eth 🚨	OUT	OpenSea: Wyvern Exch	0.92 ETH	0.01924
•	0x8d17a1e51b4121cb	Atomic Match_	14220317	474 days 39 mins ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch	0.9 ETH	0.02244
•	0xb51089a51afd4b8b2	Transfer	14220312	474 days 41 mins ago	() boneheads.eth 🖰	IN	() ticasso.eth 🚨	2 ETH	0.00153
•	0x6657eb13099b0588	Set Approval	14220121	474 days 1 hr ago	() ticasso.eth 🚨	OUT	E 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	0.00969
•	① 0xa92fc4553b3d3ca98	Cancel Order_	14166393	482 days 8 hrs ago	() ticasso.eth 📮	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.005149
•	0x832e7be78867568f6	Cancel Order_	14166393	482 days 8 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0 ETH	0.00810

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0xc26d2039cd2980bd	Cancel Order_	14166391	482 days 8 hrs ago	♦ ticasso.eth □	OUT	🗏 OpenSea: Wyvern Exch 🚨	0 ETH	0.008830
•	0xb244f763c09d7aa55	Cancel Order_	14122408	489 days 3 hrs ago	⟨⟩ ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.01222
©	0x2e8c1561f4d654d5a	Cancel Order_	14110528	490 days 23 hrs ago	⟨⟩ ticasso.eth 🚨	OUT	🗐 OpenSea: Wyvern Exch 🚨	0 ETH	0.00590
©	0xc105a0c3b7f526a66	Cancel Order_	14102558	492 days 5 hrs ago	⟨⟩ ticasso.eth 📮	OUT	🗐 OpenSea: Wyvern Exch 🚨	0 ETH	0.00630
©	0x7c750f083268ac371	Cancel Order_	14099134	492 days 18 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.00762
•	0x580b7f35de2d1bec5	Atomic Match_	14096422	493 days 3 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.29 ETH	0.03119
©	0x182cf8c3013f831ec	Atomic Match_	14096421	493 days 3 hrs ago	<> ticasso.eth □	OUT	🗐 OpenSea: Wyvern Exch 🚨	0.278 ETH	0.02703
©	0xf37e9eb8fbc0a69cd	Atomic Match_	14096418	493 days 4 hrs ago	⟨⟩ ticasso.eth 📮	OUT	🗐 OpenSea: Wyvern Exch 🚨	0.279 ETH	0.02421
•	0x868a4aa9c897d8dfe	Atomic Match_	14096417	493 days 4 hrs ago	⟨⟩ ticasso.eth 🚨	OUT	🗐 OpenSea: Wyvern Exch 🚨	0.278 ETH	0.02212
•	0x93c781cd8abeca59	Atomic Match_	14096412	493 days 4 hrs ago	<> ticasso.eth □	OUT	🗐 OpenSea: Wyvern Exch 🚨	0.27 ETH	0.02088
•	0x97f0708a3c569b7ce	Atomic Match_	14096400	493 days 4 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.269 ETH	0.02970
•	0xccc70211b21cb4b0	Set Approval	14095205	493 days 8 hrs ago	<> ticasso.eth □	OUT	🗏 ZombieFrens: ZFREN T 🚨	0 ETH	0.00860
©	0x69852809aeaac5df9	Mint	14095155	493 days 8 hrs ago	⟨⟩ ticasso.eth 📮	OUT	🗏 ZombieFrens: ZFREN T 🚨	0 ETH	0.07692
•	0xe79917e8b14d1f357	Cancel Order_	14092454	493 days 18 hrs ago	⟨⟩ ticasso.eth 📮	OUT	🖹 OpenSea: Wyvern Exch	0 ETH	0.00846

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	① 0x91e48f276522f08a4	Cancel Order_	14092449	493 days 18 hrs ago	⟨⟩ ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.00545
•	0x74cfce844e5177bd3	Atomic Match_	14086067	494 days 18 hrs ago	⟨⟩ ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.39 ETH	0.01538
•	0xc3a0a0d613353f626	Atomic Match_	14086058	494 days 18 hrs ago	⟨⟩ ticasso.eth 🚨	OUT	OpenSea: Wyvern Exch	0.38 ETH	0.01752
•	0x43c4859aff77aca22	Atomic Match_	14085969	494 days 18 hrs ago	⟨⟩ ticasso.eth 🚨	OUT	OpenSea: Wyvern Exch	0.339 ETH	0.01845
•	① 0xb97b5c8584b8805d	Cancel Order_	14085772	494 days 19 hrs ago	<> ticasso.eth □	OUT	OpenSea: Wyvern Exch	0 ETH	0.00618
•	0xd2041c93dc395edb	Cancel Order_	14085771	494 days 19 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.00866
•	0x5e268eeaf174e4b8f	Cancel Order_	14085771	494 days 19 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.00866
•	0x5c75f32b810f4458a	Atomic Match_	14085303	494 days 21 hrs ago	⟨⟩ ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.325 ETH	0.02007
•	0xa730a8ae560ac3f5e	Transfer	14085114	494 days 21 hrs ago	♦ boneheads.eth □	IN	() ticasso.eth 🚨	0.15 ETH	0.00303
•	0xb97fe894fcf6664ca3	Transfer	14078410	495 days 23 hrs ago	<> ticasso.eth □	OUT	♦ boneheads.eth □	0.05 ETH	0.00384
•	0x8aa98b86665db574	Atomic Match_	14078289	495 days 23 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.275 ETH	0.02325
•	0xe7e64eece09f7ed73	Atomic Match_	14078278	495 days 23 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.26 ETH	0.021304
•	0xd70ae2a5363ecab5	Atomic Match_	14078265	495 days 23 hrs ago	⟨⟩ ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.25 ETH	0.02128
•	0x09d266e6b650bbdd	Atomic Match_	14078261	495 days 23 hrs ago	⟨⟩ ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.25 ETH	0.02173

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
©	0x263d5997da4a55bb	Atomic Match_	14078239	495 days 23 hrs ago	<> ticasso.eth □	OUT	OpenSea: Wyvern Exch	0.25 ETH	0.02115
•	0xbb757efed31ad5360	Multicall	14078171	495 days 23 hrs ago	() ticasso.eth 🚨	OUT	🗐 Uniswap V3: Router 2 🚨	0 ETH	0.016110
•	0x650c71d5fe93e51c9	Approve	14078167	495 days 23 hrs ago	() ticasso.eth 🚨	OUT	E LooksRare: LOOKS Tok	0 ETH	0.00558
•	0x8eac6b8ac9e617c1	Withdraw All	14078155	495 days 23 hrs ago	() ticasso.eth 🚨	OUT	E LooksRare: Fee Sharing	0 ETH	0.01624
(6)	0xcd8dab52400cd791	Multicall	14078057	496 days 14 mins ago	<> ticasso.eth □	OUT	🗄 Uniswap V3: Router 2 🚨	0 ETH	0.01518
©	0x7ecb29eedbecf09ed	Approve	14078055	496 days 15 mins ago	<> ticasso.eth □	OUT	The OpenDAO: SOS To	0 ETH	0.00573
•	0xc1a789139fe7c3a00	Leave	14077991	496 days 29 mins ago	<> ticasso.eth □	OUT	The OpenDAO: Staking	0 ETH	0.00777
©	0xc4bce54675744bb6	Set Approval	14077532	496 days 2 hrs ago	() ticasso.eth 🚨	OUT	Crypto.Chicks: CCH To	0 ETH	0.004950
©	① 0x867e1f845f38f2a57	Set Approval	14077523	496 days 2 hrs ago	() ticasso.eth 🚨	OUT	Crypto.Chicks: CCH To	0 ETH	0.00485
(6)	0x21f090b3a6f119152	Transfer	14077155	496 days 3 hrs ago	⟨ ticasso.eth □	OUT	() boneheads.eth [0.05 ETH	0.00489
(6)	0x552f4ad87fb4b786b	Multicall	14076452	496 days 5 hrs ago	<> ticasso.eth □	OUT	🗏 Uniswap V3: Router 2 🚨	0 ETH	0.01860
•	0xf6a9eb365a616847a	Multicall	14076419	496 days 6 hrs ago	<> ticasso.eth □	OUT	🗄 Uniswap V3: Router 2 🚨	0.35 ETH	0.02265
•	0xddc23a423806ae3df	Approve	14076282	496 days 6 hrs ago	() ticasso.eth 🚨	OUT	F Virtue Poker: VPP Token	0 ETH	0.00851
•	0x062c23cad84c822e	Multicall	14076216	496 days 6 hrs ago	() ticasso.eth 🚨	OUT	🗐 Uniswap V3: Router 2 📮	0 ETH	0.02144

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0x570529973879e791	Approve	14076213	496 days 6 hrs ago	⟨⟩ ticasso.eth □	OUT	Polkacity: POLC Token	0 ETH	0.00952
(a)	0xdca5565b8f816bd2e	Atomic Match_	14066535	497 days 18 hrs ago	⟨⟩ ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.195 ETH	0.01592
(6)	0x8c503dfd0ffdf1ad10	Withdraw	14066525	497 days 18 hrs ago	⟨⟩ ticasso.eth 📮	OUT	■ Wrapped Ether □	0 ETH	0.00313
(6)	0xc09bb6c0f182b8fc3	Harvest	14066500	497 days 19 hrs ago	⟨⟩ ticasso.eth 📮	OUT	E LooksRare: Fee Sharing	0 ETH	0.01659
(a)	0xd26e981f904b1d0a6	Set Name	14046299	500 days 22 hrs ago	<> ticasso.eth ☐	OUT	ENS: Old Reverse Regis	0 ETH	0.02194
©	0xe4d82750da5f1e764	Register With	14046296	500 days 22 hrs ago	<> ticasso.eth ☐	OUT	ENS: Old ETH Registrar	0.018726685 ETH	0.04686
(6)	0xdc0ba783b18745a6	Commit	14046269	500 days 22 hrs ago	<> ticasso.eth ☐	OUT	ENS: Old ETH Registrar	0 ETH	0.00973
(6)	0x47fd3cdbd1627e3ce	Withdraw	14024515	504 days 6 hrs ago	⟨⟩ ticasso.eth 📮	OUT	■ Wrapped Ether □	0 ETH	0.003519
(a)	0x01cf67316adeec314	Match Ask Wi	13993142	509 days 3 hrs ago	⟨⟩ ticasso.eth 📮	OUT	E LooksRare: Exchange	0.134 ETH	0.03426
(a)	0x2315954ebc93ad75	Mint	13992442	509 days 6 hrs ago	<> ticasso.eth ☐	OUT	🖹 Stapleverse Feed Clan: 🚨	0.1 ETH	0.01860
•	0x07bb11d37cef9867f	Multicall	13992435	509 days 6 hrs ago	<> ticasso.eth ☐	OUT	🗏 Uniswap V3: Router 2 🚨	0 ETH	0.02123
•	0x6925d65834f528a0	Approve	13992430	509 days 6 hrs ago	<> ticasso.eth ☐	OUT	F Phantasma: Old SOUL	0 ETH	0.00615
©	0x52ae7572590f3c335	Multicall	13992408	509 days 6 hrs ago	⟨⟩ ticasso.eth 📮	OUT	🗐 Uniswap V3: Router 2 🚨	0 ETH	0.01925
•	0x7a19841ee257221a	Approve	13992360	509 days 6 hrs ago	⟨⟩ ticasso.eth 🗗	OUT	Polkadomain: NAME T	0 ETH	0.00757

?	Txn Hash	Method ?	Block	Age	From	То		Value	Txn Fee
•	0xb4810b72b4ddc478	Deposit	13989575	509 days 16 hrs ago	⟨⟩ ticasso.eth □	E Looks	Rare: Fee Sharing 🗅	0 ETH	0.02054
•	0x76ceed9e9c48aae57	Approve	13979635	511 days 5 hrs ago	() ticasso.eth 🚨	E Looks	Rare: LOOKS Tok 🗗	0 ETH	0.01108
•	0xb902592fea269d80b	Claim	13978854	511 days 8 hrs ago	() ticasso.eth 🚨	E Looks	Rare: Airdrop 🖰	0 ETH	0.02873
•	0xd7f0531a80acf5351	Set Approval	13978830	511 days 8 hrs ago	() ticasso.eth 🗘	©UT	Society Bots: RS 🗘	0 ETH	0.01348
•	0x2284d29f6a4407db	Enter	13956298	514 days 19 hrs ago	⟨ ticasso.eth □	The Op	penDAO: Staking 🗗	0 ETH	0.01439
•	0xc60956eadaae6492	Approve	13956006	514 days 20 hrs ago	⟨⟩ ticasso.eth □	DUT ☐ The Op	penDAO: SOS To	0 ETH	0.008432
Show	7: 100 V Records						First	Page 1 of 3	> Last

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.

For 0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147 () ticasso.eth

tota	al of 218 transactions found	First \ \ \ \ Page 2	2 of 3 > Last	∇ ∨					
?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0xd3f809d5eb9d81bf1	Mint Single	13942380	516 days 23 hrs ago	() ticasso.eth 📮	OUT	■ 0xC4e60084A59246 🗗	0 ETH	0.0148
•	0xdf0c2ac95effe29b54	Claim	13876095	527 days 5 hrs ago	() ticasso.eth 📮	OUT	The OpenDAO: SOS To	0 ETH	0.0037
•	0x2599e9e7c2585690	Swap	13616657	568 days 2 hrs ago	<> ticasso.eth ☐	OUT	F Metamask: Swap Router	0.1 ETH	0.032
•	0x5cffac4bfde321ed8e	Approve	13574364	574 days 17 hrs ago	<> ticasso.eth ☐	OUT	Polkacity: POLC Token	0 ETH	0.004
o	0x50cf91694a5fc1e13	Transfer	13565586	576 days 2 hrs ago	<> ticasso.eth ☐	OUT	Atari: ATRI Token	0 ETH	0.002
•	0x89fc4a2c16840dd99	Transfer	13553956	577 days 22 hrs ago	() ticasso.eth 📮	OUT	F Velas: VLX Token 🕛	0 ETH	0.006
o	0x2f36dfeb6c1007b6b	Swap Exact E	13553899	577 days 22 hrs ago	() ticasso.eth 📮	OUT	🗐 Uniswap V2: Router 2 🚨	0.17 ETH	0.015
9	0xdf4438fd2c49a8346	Exact Input Si	13545396	579 days 6 hrs ago	<> ticasso.eth ☐	OUT	🗐 Uniswap V3: Router 🚨	0.29 ETH	0.022
9	① 0xc047e960e53855da	Swap Exact E	13544861	579 days 8 hrs ago	<> ticasso.eth ☐	OUT	🗄 Uniswap V2: Router 2 🚨	0.3 ETH	0.005
o	0xef36a26c820c8489b	Set Approval	13542329	579 days 18 hrs ago	() ticasso.eth [OUT	Wicked Monsters: WM	0 ETH	0.005

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
©	0x2bad46a170c4dd0a	Mint Free	13542317	579 days 18 hrs ago	() ticasso.eth 🚨	OUT	■ Wicked Monsters: WM	0 ETH	0.0477414
•	0x5f76d4ecf6a1150c2	Swap Exact E	13542298	579 days 18 hrs ago	() ticasso.eth 🚨	OUT	🗏 Uniswap V2: Router 2 🚨	0.7 ETH	0.015983
•	0xf14db15d4090f88c7	Multicall	13541761	579 days 20 hrs ago	() ticasso.eth 🚨	OUT	🗏 Uniswap V3: Router 🚨	0 ETH	0.020641
•	0xb1ee795a81f9bd6b1	Approve	13541758	579 days 20 hrs ago	() ticasso.eth 🚨	OUT	F UFO Gaming: UFO Token	0 ETH	0.007122
•	0xc2ac29e77bb6bab8	Swap Exact E	13540944	579 days 23 hrs ago	<> ticasso.eth ☐	OUT	🗄 Uniswap V2: Router 2 🚨	0.45 ETH	0.019257
©	① 0xd997707317089ba7	Swap Exact E	13540898	579 days 23 hrs ago	<> ticasso.eth ☐	OUT	Uniswap V2: Router 2	0.45 ETH	0.006588
•	0x99bf49f92726339cc	Transfer	13540535	580 days 1 hr ago	KuCoin 4 📮	IN	⟨⟩ ticasso.eth □	0.4016594 ETH	0.004465
•	0x24214be0a98c8295	Approve	13539162	580 days 6 hrs ago	() ticasso.eth 🚨	OUT	🖹 0x34B6F5dBef2bCd 📮	0 ETH	0.008765
©	0x6ae353a7421cc494	Mint For User	13539156	580 days 6 hrs ago	() ticasso.eth 🚨	OUT	🖹 0x34B6F5dBef2bCd 🚨	0 ETH	0.015578
•	0x6a1289214600ebeaf	Swap Exact E	13527237	582 days 3 hrs ago	<> ticasso.eth □ □	OUT	🗏 Uniswap V2: Router 2 🚨	0.45 ETH	0.012218
©	0xf43a4df6a2e2741cf	Transfer	13526400	582 days 6 hrs ago	<> ticasso.eth □	OUT	0x05B0e96AE4bc8c	3 ETH	0.003485
•	① 0x86c5f45d3fb4e97bf	Swap Exact E	13526384	582 days 6 hrs ago	<> ticasso.eth □	OUT	Uniswap V2: Router 2	3 ETH	0.005201
•	① 0x5e504e29804be9ac	Swap Exact E	13526363	582 days 6 hrs ago	() ticasso.eth 🚨	OUT	F Uniswap V2: Router 2 🚨	3 ETH	0.005049
©	① 0x9d914c4475bb1a93	Swap Exact E	13523268	582 days 18 hrs ago	() ticasso.eth [OUT	■ Uniswap V2: Router 2 🚨	3 ETH	0.003905

		Method ?	Block	Age	From		То	Value	Txn Fee
•	0x7724ce43fc452c20e	Transfer	13522970	582 days 19 hrs ago	0x39Cc8bD518770e 🗗	IN	() ticasso.eth 🚨	0.5 ETH	0.0026722
©	0xa9f31d54f6df81497f	Swap Exact E	13522457	582 days 21 hrs ago	() ticasso.eth 🚨	OUT	🗐 Uniswap V2: Router 2 🚨	0.63 ETH	0.0148459
©	0xb2348a5e1815bd20	Set Approval	13522300	582 days 21 hrs ago	() ticasso.eth 🚨	OUT	The Doge Pound: DOG	0 ETH	0.0074920
©	0x295f6a063cb1ab8f6	Swap Exact E	13522224	582 days 22 hrs ago	() ticasso.eth 🚨	OUT	🗐 Uniswap V2: Router 2 🚨	0.75 ETH	0.0139877
©	0xaa1dda048b4fa09b0	Swap Exact E	13522065	582 days 22 hrs ago	() ticasso.eth 🚨	OUT	🗄 Uniswap V2: Router 2 🚨	0.25 ETH	0.0158090
©	0x30c8f8eeb349243e9	Set Approval	13515192	584 days 52 mins ago	() ticasso.eth 🚨	OUT	RoaringLeaders: ROAR	0 ETH	0.0060575
©	0xcaeb368ed5e77052	Transfer	13502456	586 days 44 mins ago	0x39Cc8bD518770e 🗗	IN	() ticasso.eth 🚨	0.16 ETH	0.0032635
©	0xc80c276dd8a1ecb0	Transfer	13490426	587 days 22 hrs ago	() ticasso.eth 🚨	OUT	0x39Cc8bD518770e 🗗	0.16 ETH	0.0017765
©	0x88cedb4ebecc658fc	Transfer	13490312	587 days 22 hrs ago	() ticasso.eth 🚨	OUT	0x39Cc8bD518770e 🗗	0.16 ETH	0.0026064
©	0x3b4ad3eca165cdb2	0xd42d47ae	13456862	593 days 3 hrs ago	() ticasso.eth 🚨	OUT	■ Bored Mummy Hallowe	0 ETH	0.0126532
©	① 0xe50cfb5e1239830de	Mint	13439224	595 days 22 hrs ago	() ticasso.eth 🚨	OUT	Doodles: DOODLE Token	0.615 ETH	0.0024268
©	① 0x47baf47a103f99c59	Mint	13439224	595 days 22 hrs ago	() ticasso.eth 🚨	OUT	Doodles: DOODLE Token	0.615 ETH	0.0024018
©	0xd39a60ba0d1515ad	Transfer	13439038	595 days 22 hrs ago	() ivybone.eth [IN	() ticasso.eth 🚨	0.25 ETH	0.0019309
©	0x481230f1faf35045c	Transfer	13439035	595 days 22 hrs ago	() ivybone.eth [IN	() ticasso.eth 📮	1 ETH	0.0019395

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0xbffd81ffe82063ce27	Mint By Signa	13426816	597 days 20 hrs ago	🗘 ticasso.eth 📮	OUT	■ 0x46f10162e72A37 🗅	0 ETH	0.0057410
•	0xc5d13c33cd264228f	Register And	13414140	599 days 20 hrs ago	() ticasso.eth 📮	OUT	Immutable X: Registrati 🗘	0.4 ETH	0.0107061
•	0xcfd3f4968811d29bf	Set Approval	13413409	599 days 23 hrs ago	() ticasso.eth 📮	OUT	🗏 ZombieToadz: BRAINZ 🚨	0 ETH	0.0058582
•	0xcbb355427ef26b14b	Safe Mint	13381935	604 days 22 hrs ago	() ticasso.eth 📮	OUT	F INFAMOUSSKULLZ: IN	0.18 ETH	0.0251935
•	0xdcbbf69fd2f89dff15	Atomic Match_	13381701	604 days 23 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.087 ETH	0.0177823
•	0xbb4e72343a0a979f7	Atomic Match_	13376465	605 days 18 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.06 ETH	0.0153649
©	0xd31bf30caaccbf014	Atomic Match_	13376415	605 days 18 hrs ago	<> ticasso.eth □	OUT	PopenSea: Wyvern Exch	0.125 ETH	0.0206801
©	0xb28ef01b5b54420df	Atomic Match_	13376375	605 days 19 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.128 ETH	0.0200711
©	0x379e406797efe453b	Atomic Match_	13376305	605 days 19 hrs ago	() ticasso.eth 📮	OUT	🖹 OpenSea: Wyvern Exch	0.0555 ETH	0.0150834
•	0x0fb995cbb5f603847	Atomic Match_	13376103	605 days 20 hrs ago	<> ticasso.eth ☐	OUT	🖹 OpenSea: Wyvern Exch	0.115 ETH	0.0203602
•	① 0x875074a52d06ec52	Atomic Match_	13376073	605 days 20 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.1099 ETH	0.0053337
•	0x8875d02df183038b	Atomic Match_	13376043	605 days 20 hrs ago	<> ticasso.eth ☐	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.1 ETH	0.0183476
•	0xfbd398ac96283ebe6	Atomic Match_	13376011	605 days 20 hrs ago	⟨⟩ ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.109 ETH	0.0155836
•	0xd78ac1f118bbdba25	Set Approval	13353864	609 days 7 hrs ago	⟨⟩ ticasso.eth 🗗	OUT	🗏 ZombieToadz: BRAINZ 🚨	0 ETH	0.0038185

	?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
② 0x5ca1aa9f3c946b979 Swap 13344001 610 days 20 hrs ago ♦ ticasso.eth □ OUT ☑ Metamask: Swap Router □ 0 ② 0x0e640147a2cc40a5 Approve 13344001 610 days 20 hrs ago ♦ ticasso.eth □ OUT ☑ Wrapped Ether □ 0 ③ 0xd785aa6e607deb91 Cancel Order 13342234 611 days 3 hrs ago ♦ ticasso.eth □ OUT ☑ OpenSea: Wyvern Exch ☑ 0 ⑤ 0x1c51ae6a5e577201 Cancel Order 13342232 611 days 3 hrs ago ♦ ticasso.eth □ OUT ☑ OpenSea: Wyvern Exch ☑ 0 ⑥ 0x4a8a142b43a3ba7d Set Approval 13337222 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☑ OpenSea: Wyvern Exch ☑ 0 ⑥ 0x5e6d2b30aec5ece6 Atomic Match. 13337214 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☑ OpenSea: Wyvern Exch ☑ 0 ⑥ 0xae10dc3a8e5aa15b Atomic Match. 13337017 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☑ OpenSea: Wyvern Exch ☑ 0 ⑥ 0xae1c7cb84656aa4c8 Atomic Match.	©	0x04578adf5da2e7b97	Cancel Order_	13350875	609 days 18 hrs ago	⟨) ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.0047271
⑥ 0x0e640147a2cc40a5 Approve 13344001 610 days 20 hrs ago ◇ ticasso.eth □ our □ Wrapped Ether □ 0 ⑥ 0xd785aa6e607deb91 Cancel Order 13342234 611 days 3 hrs ago ◇ ticasso.eth □ our □ OpenSea: Wyvern Exch □ 0 ⑥ 0x1c51ae6a5e577201 Cancel Order 13342232 611 days 3 hrs ago ◇ ticasso.eth □ our □ OpenSea: Wyvern Exch □ 0 ⑥ 0x4a8a142b43a3ba7d Set Approval 13337222 611 days 22 hrs ago ◇ ticasso.eth □ our □ OpenSea: Wyvern Exch □ 0 ⑥ 0x5e6d2b30aec5ece6 Atomic Match 13337214 611 days 22 hrs ago ◇ ticasso.eth □ our □ OpenSea: Wyvern Exch □ 0 ⑥ 0xae10dc3a8e5aa15b Atomic Match 13337116 611 days 22 hrs ago ◇ ticasso.eth □ our □ OpenSea: Wyvern Exch □ 0 ⑥ 0xa1e7cb84656aa4c8 Atomic Match 13337017 611 days 23 hrs ago ◇ ticasso.eth □ our □ OpenSea: Wyvern Exch □ 0 ⑥ 0x1195e5a132307b4c Atomic Match 13336987 611 days 23 hrs ago ◇ ticasso.eth □ our □ OpenSea: Wyvern Exch □ 0	©	0xfe3eaea689341d187	Atomic Match_	13344025	610 days 20 hrs ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.09 ETH	0.0111821
⑥ ① 0xd785aa6e607deb91 Cancel Order_ 13342234 611 days 3 hrs ago ◇ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x1c51ae6a5e577201 Cancel Order_ 13342232 611 days 3 hrs ago ◇ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x4a8a142b43a3ba7d Set Approval 13337222 611 days 22 hrs ago ◇ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x5e6d2b30aec5ece6 Atomic Match 13337214 611 days 22 hrs ago ◇ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0xae10dc3a8e5aa15b Atomic Match 13337017 611 days 22 hrs ago ◇ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x1195e5a132307b4c Atomic Match 13336987 611 days 23 hrs ago ◇ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0	©	0x5ca1aa9f3c946b979	Swap	13344001	610 days 20 hrs ago	() ticasso.eth 🚨	OUT	F Metamask: Swap Router	0 ETH	0.0059331
③ 0x1c51ae6a5e577201 Cancel Order_ 13342232 611 days 3 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x4a8a142b43a3ba7d Set Approval 13337222 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x5e6d2b30aec5ece6 Atomic Match. 13337214 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0xae10dc3a8e5aa15b Atomic Match. 13337116 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0xa1e7cb84656aa4c8 Atomic Match. 13337017 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x1195e5a132307b4c Atomic Match. 13336987 611 days 23 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0	©	0x0e640147a2cc40a5	Approve	13344001	610 days 20 hrs ago	() ticasso.eth 🚨	OUT	■ Wrapped Ether 🗅	0 ETH	0.0020095
③ 0x4a8a142b43a3ba7d Set Approval 13337222 611 days 22 hrs ago ♦ ticasso.eth □ OUT Bored Mummy Waking □ 0 ⑥ 0x5e6d2b30aec5ece6 Atomic Match 13337214 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0xae10dc3a8e5aa15b Atomic Match 13337116 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0xa1e7cb84656aa4c8 Atomic Match 13337017 611 days 22 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0 ⑥ 0x1195e5a132307b4c Atomic Match 13336987 611 days 23 hrs ago ♦ ticasso.eth □ OUT ☐ OpenSea: Wyvern Exch □ 0	©	① 0xd785aa6e607deb91	Cancel Order_	13342234	611 days 3 hrs ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.0023469
Image: Compact of the compac	©	0x1c51ae6a5e577201	Cancel Order_	13342232	611 days 3 hrs ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.0038355
	©	0x4a8a142b43a3ba7d	Set Approval	13337222	611 days 22 hrs ago	⟨) ticasso.eth □	OUT	Bored Mummy Waking 🚨	0 ETH	0.0025012
	©	0x5e6d2b30aec5ece6	Atomic Match_	13337214	611 days 22 hrs ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.25 ETH	0.0119964
© 0x1195e5a132307b4c Atomic Match_ 13336987 611 days 23 hrs ago ⟨⟩ ticasso.eth □	©	0xae10dc3a8e5aa15b	Atomic Match_	13337116	611 days 22 hrs ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.195 ETH	0.0127715
	©	0xa1e7cb84656aa4c8	Atomic Match_	13337017	611 days 22 hrs ago	⟨) ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.2 ETH	0.0173052
© 0x8ca8082cf9819ca44 Atomic Match_ 13336978 611 days 23 hrs ago () ticasso.eth (Out F OpenSea: Wyvern Exch (O.	©	0x1195e5a132307b4c	Atomic Match_	13336987	611 days 23 hrs ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.1997 ETH	0.0140356
	©	0x8ca8082cf9819ca44	Atomic Match_	13336978	611 days 23 hrs ago	() ticasso.eth 🚨	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.19 ETH	0.0169264
© 0x19bb8ce9b73b967d Cancel Order_ 13336610 612 days 43 mins ago () ticasso.eth 🗘 Out 🗐 OpenSea: Wyvern Exch 🗘 0	©	0x19bb8ce9b73b967d	Cancel Order_	13336610	612 days 43 mins ago	() ticasso.eth 🚨	OUT	OpenSea: Wyvern Exch	0 ETH	0.0057385
© 0x25d2a071c8236207 Atomic Match_ 13323134 614 days 3 hrs ago () ticasso.eth () OUT (F) OpenSea: Wyvern Exch () 0.	©	0x25d2a071c8236207	Atomic Match_	13323134	614 days 3 hrs ago	() ticasso.eth 🚨	OUT	OpenSea: Wyvern Exch	0.1498 ETH	0.0155652

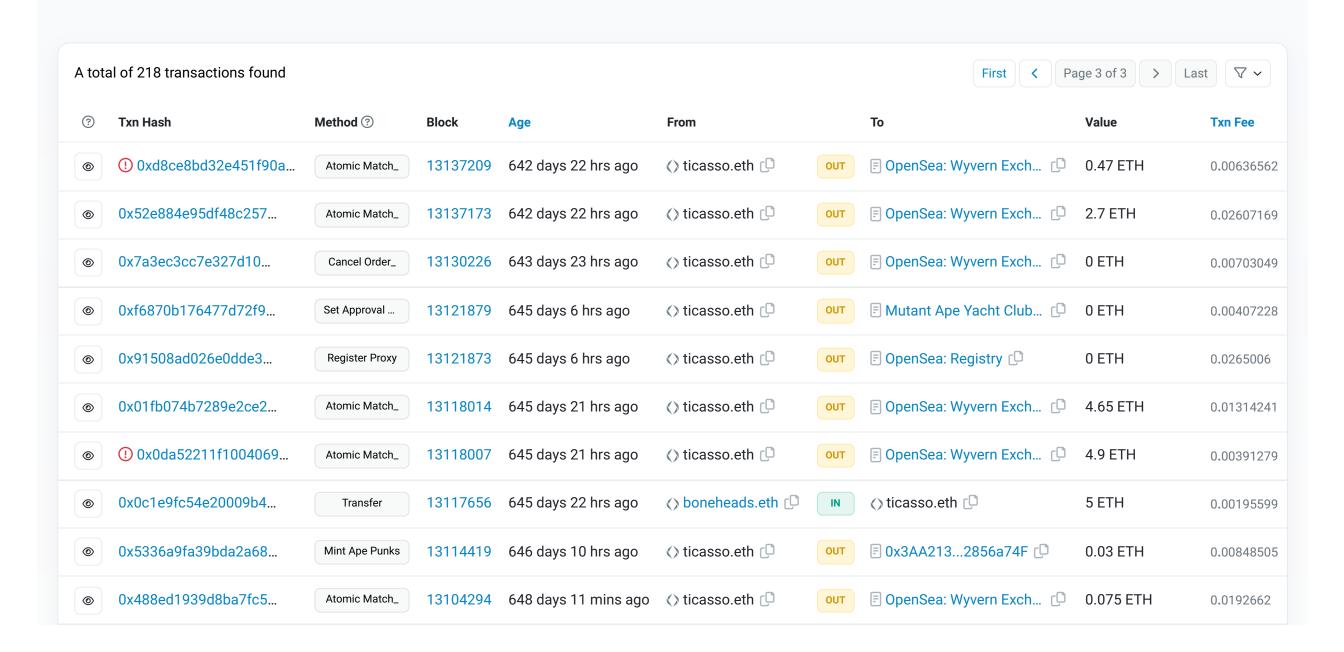
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©	0xe9cc499bf068afa23	Atomic Match_	13323065	614 days 3 hrs ago	♦ ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.11 ETH	0.0222853
•	0x1379491f46054c70f	Atomic Match_	13321605	614 days 8 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.395 ETH	0.0248556
•	0x4b01323340f2d508e	Atomic Match_	13314983	615 days 9 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.18 ETH	0.0213593
©	① 0x5f0227df8c9a507c3	Atomic Match_	13314977	615 days 9 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.18 ETH	0.0066997
©	0x23dac7db6ad00eac	Set Approval	13314664	615 days 10 hrs ago	<> ticasso.eth ☐	OUT	Canine Cartel: CARTEL	0 ETH	0.0037378
•	0x0b3cdcd4be3f2b64f	Atomic Match_	13314563	615 days 11 hrs ago	<> ticasso.eth ☐	OUT	OpenSea: Wyvern Exch	0.75 ETH	0.0160906
•	0xb6448f6a2cbc42078	Atomic Match_	13310558	616 days 2 hrs ago	<> ticasso.eth □	OUT	OpenSea: Wyvern Exch	0.05 ETH	0.0158946
•	0xdcce2fdd0e64f1722	Set Approval	13310512	616 days 2 hrs ago	() ticasso.eth 📮	OUT	Adam Bomb Squad: AB	0 ETH	0.0030273
•	0xb9c9d6089f1fec55c	Atomic Match_	13308917	616 days 8 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	1.45 ETH	0.0242372
•	0x43f5faf1c63d021ef3	Atomic Match_	13308753	616 days 8 hrs ago	<> ticasso.eth □	OUT	OpenSea: Wyvern Exch	1.5 ETH	0.0161760
©	0xd394c485fee773de7	Set Approval	13306119	616 days 18 hrs ago	<> ticasso.eth □	OUT	■ Wicked Ape Bone Club: □	0 ETH	0.0022430
•	0x97143b9fa6cc69650	Atomic Match_	13306100	616 days 18 hrs ago	<> ticasso.eth ☐	OUT	OpenSea: Wyvern Exch	0.61 ETH	0.0108805
•	0x829340958dd768b6	Atomic Match_	13305810	616 days 20 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.0169857
•	0x58cdc7b345b9c65fa	Atomic Match_	13305751	616 days 20 hrs ago	<> ticasso.eth ☐□	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.18 ETH	0.0151117

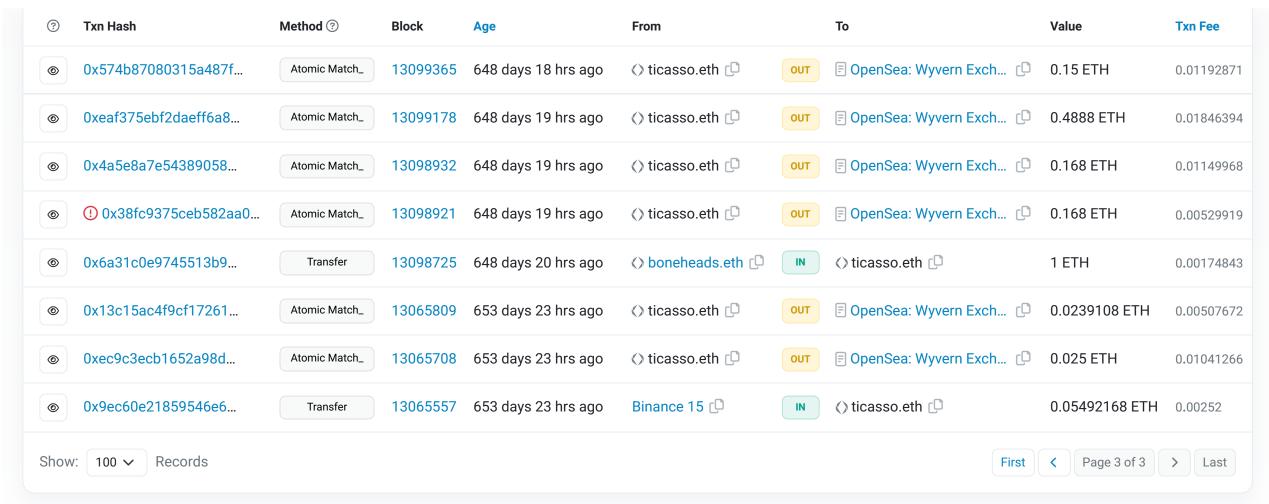
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•	0xe4220e8bd075116b	Atomic Match_	13305580	616 days 20 hrs ago	<> ticasso.eth □	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.1 ETH	0.0177282
•	0x201f4a388a4739672	Approve	13305520	616 days 21 hrs ago	<> ticasso.eth □	OUT	■ Wrapped Ether 🗅	0 ETH	0.0029583
©	0x5c0a17ee6bf7cb990	Set Approval	13305516	616 days 21 hrs ago	<> ticasso.eth □	OUT	■ The Ninja Hideout: TN	0 ETH	0.0031476
©	0x76e9cde2f2117a48d	Mint Public Sa	13303993	617 days 2 hrs ago	<> ticasso.eth □	OUT	The Ninja Hideout: TN	0.15 ETH	0.0525022
©	0x095deccc07af3ddd4	Presale Mint	13302623	617 days 7 hrs ago	<> ticasso.eth □	OUT	■ 0x345dfAEe952c7F 🚨	0.207 ETH	0.0353566
©	0x517a8b2dfd54ebd0e	Transfer	13302592	617 days 7 hrs ago	♦ boneheads.eth □	IN	() ticasso.eth 📮	5 ETH	0.0013554
©	0x20489e03b6fb7b550	Set Approval	13252270	625 days 2 hrs ago	<> ticasso.eth □	OUT	The Doge Pound: PUP	0 ETH	0.0030127
©	0xdd615c8bcd62cfb8f	Set Approval	13214760	630 days 22 hrs ago	<> ticasso.eth □	OUT	■ Wicked Hound Bone Cl	0 ETH	0.0041648
©	0x9c3e09f3b93eb04d4	Mint Free	13214650	630 days 22 hrs ago	<> ticasso.eth □	OUT	■ Wicked Hound Bone Cl	0 ETH	0.0151652
©	0x2e7c45b2ffcbb1d48	Atomic Match_	13172925	637 days 9 hrs ago	⟨ ticasso.eth □	OUT	OpenSea: Wyvern Exch	0.2 ETH	0.0152753
•	0x61382c6838abb3f32	Atomic Match_	13172897	637 days 9 hrs ago	⟨ ticasso.eth □	OUT	OpenSea: Wyvern Exch	0.1999 ETH	0.0179642
•	① 0x86b2668fbcad43bc6	Atomic Match_	13172886	637 days 9 hrs ago	⟨ ticasso.eth □	OUT	OpenSea: Wyvern Exch	0.199 ETH	0.0072254
•	0xfb132eb796ced1e1d	Atomic Match_	13172873	637 days 9 hrs ago	⟨⟩ ticasso.eth □	OUT	OpenSea: Wyvern Exch	0.199 ETH	0.0296438
©	0x71c5afa2fe0d5bfe95	Atomic Match_	13169146	637 days 23 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.159 ETH	0.0197555

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
•	0x5388d6af6b1e01e9f	Atomic Match_	13144194	641 days 20 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.795 ETH	0.0151086
•	0x915bd2d5915cf761f	Mint Puppy	13142709	642 days 1 hr ago	() ticasso.eth 📮	OUT	The Doge Pound: PUP	0 ETH	0.0211545
©	0x5cca79b829b134bf5	Atomic Match_	13137594	642 days 20 hrs ago	() ticasso.eth 📮	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.5 ETH	0.0190185
©	① 0x3f321489c323d410b	Atomic Match_	13137586	642 days 20 hrs ago	() ticasso.eth 📮	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.4899 ETH	0.0058383
©	0x8d2a082da763081cf	Atomic Match_	13137367	642 days 21 hrs ago	() ticasso.eth 📮	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.472 ETH	0.0258808
•	0xb9b84f7aef084f467	Atomic Match_	13137215	642 days 22 hrs ago	() ticasso.eth 📮	OUT	OpenSea: Wyvern Exch	0.4777 ETH	0.0227842
Show	r: 100 ✔ Records						First	Page 2 of 3	Last

[💱] 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.

For 0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147 (ticasso.eth)



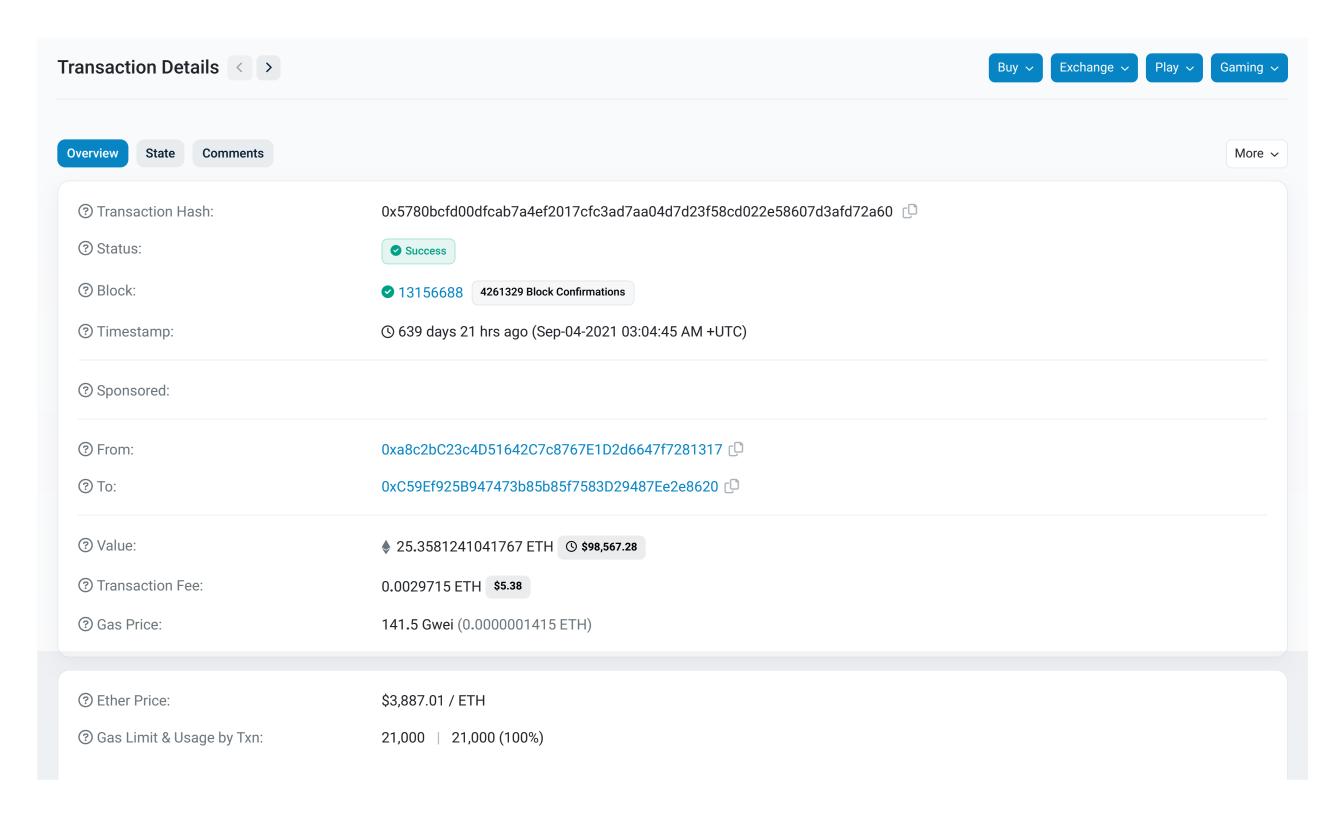


A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

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

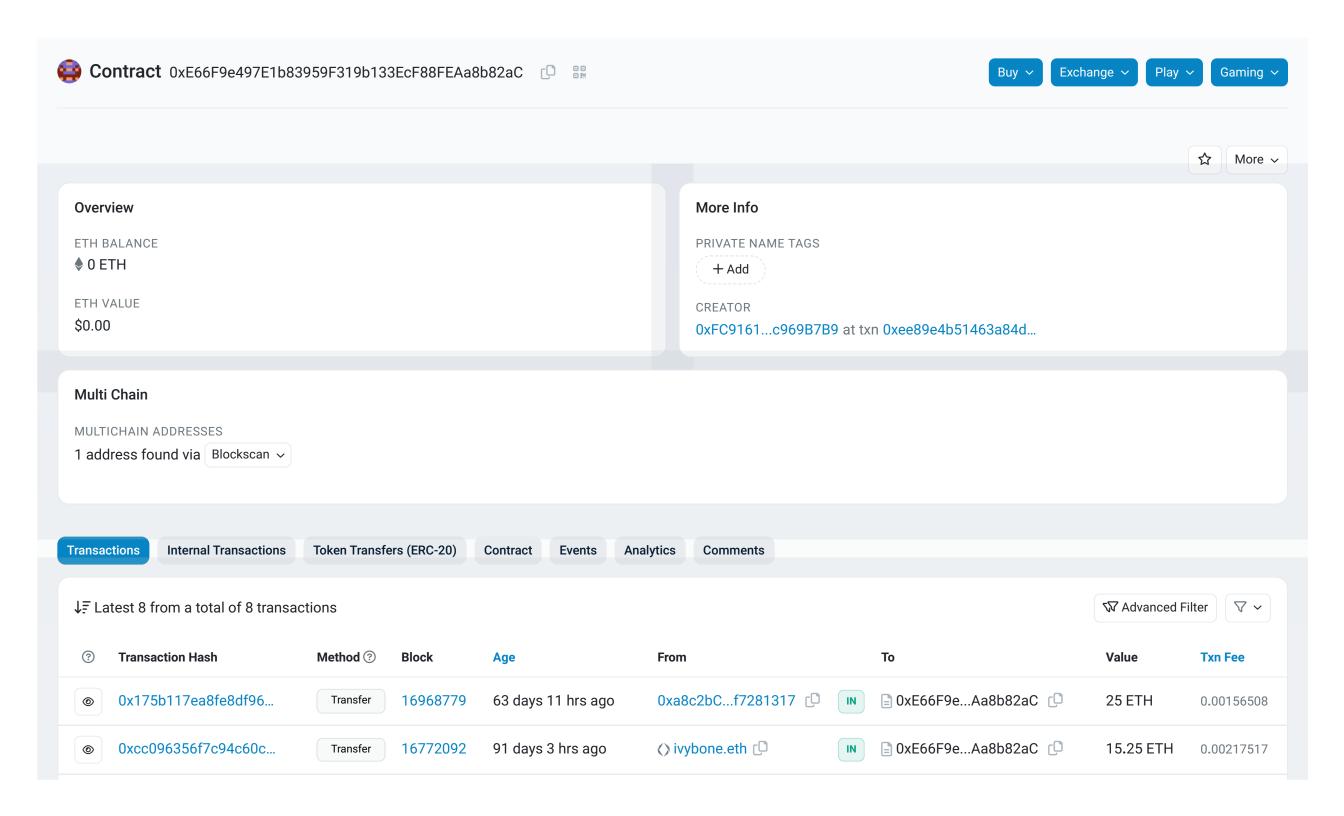


③ Gas Fees:	Base: 93.692548673 Gwei
③ Burnt Fees:	Burnt: 0.001967543522133 ETH (\$3.56)
③ Other Attributes:	Txn Type: 0 (Legacy) Nonce: 0 Position In Block: 12
③ Input Data:	0x
More Details:	— Click to show less
③ Private Note:	To access the Private Note feature, you must be Logged In
A transaction is a cryptographically signed instru	uction 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

____ *4.k*______



?	Transaction Hash	Method ?	Block	Age	From	То	Value	Txn Fee
©	0xf9cfeb1ef43236f6e0	Transfer	16484521	131 days 10 hrs ago	0xa8c2bCf7281317 🕛 🔃	■ 0xE66F9eAa8b82aC	8 ETH	0.00091281
•	0x42a1857738dc6a7c	Transfer	15891260	214 days 6 hrs ago	0xa8c2bCf7281317 🕛 🔃	■ 0xE66F9eAa8b82aC 🚨	12.5 ETH	0.0012625
©	0x645d8086c64afb7a9	Transfer	15640212	249 days 8 hrs ago	0xa8c2bCf7281317 🕛 🔃	■ 0xE66F9eAa8b82aC 🚨	14.75 ETH	0.00162606
•	0x19a350762fb9d52a0	Transfer	15575428	258 days 10 hrs ago	0xa8c2bCf7281317 🗘 🔃	■ 0xE66F9eAa8b82aC 🚨	5 ETH	0.00152397
•	0xa79596441abd5783	Transfer	15409569	284 days 10 hrs ago	0xa8c2bCf7281317 🚨 🔃	■ 0xE66F9eAa8b82aC	4.2 ETH	0.00149907
•	0x6d5ae51637196ecc	Transfer	14832026	378 days 3 hrs ago	0xa8c2bCf7281317 🚨 🔃	■ 0xE66F9eAa8b82aC 🚨	25 ETH	0.00134966

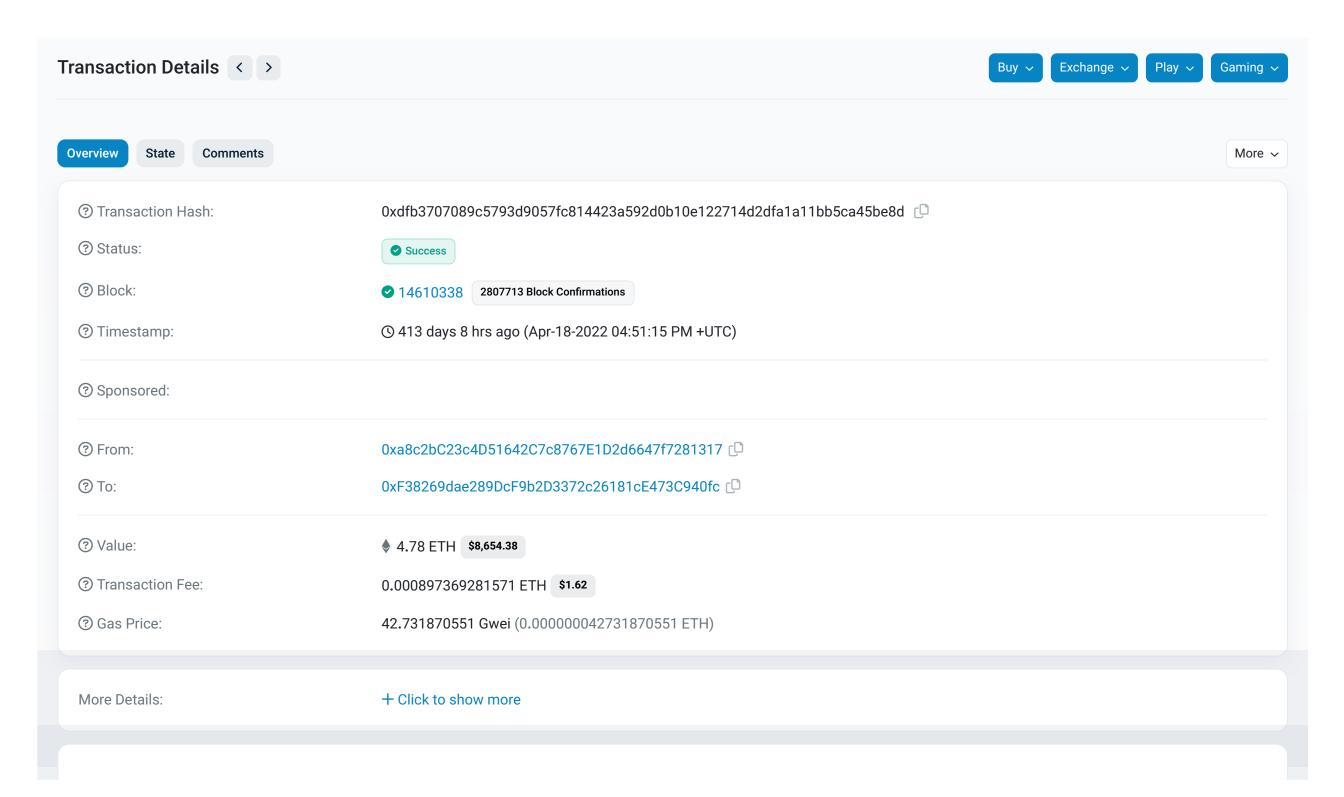
[Download: CSV Export 🚣]

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 "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

_____ A.K____



? Private Note:	To access the Private Note feature, you must be Logged In
O Private Note.	To access the Private Note realtire, 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

_____ *4.k*______

Transactions

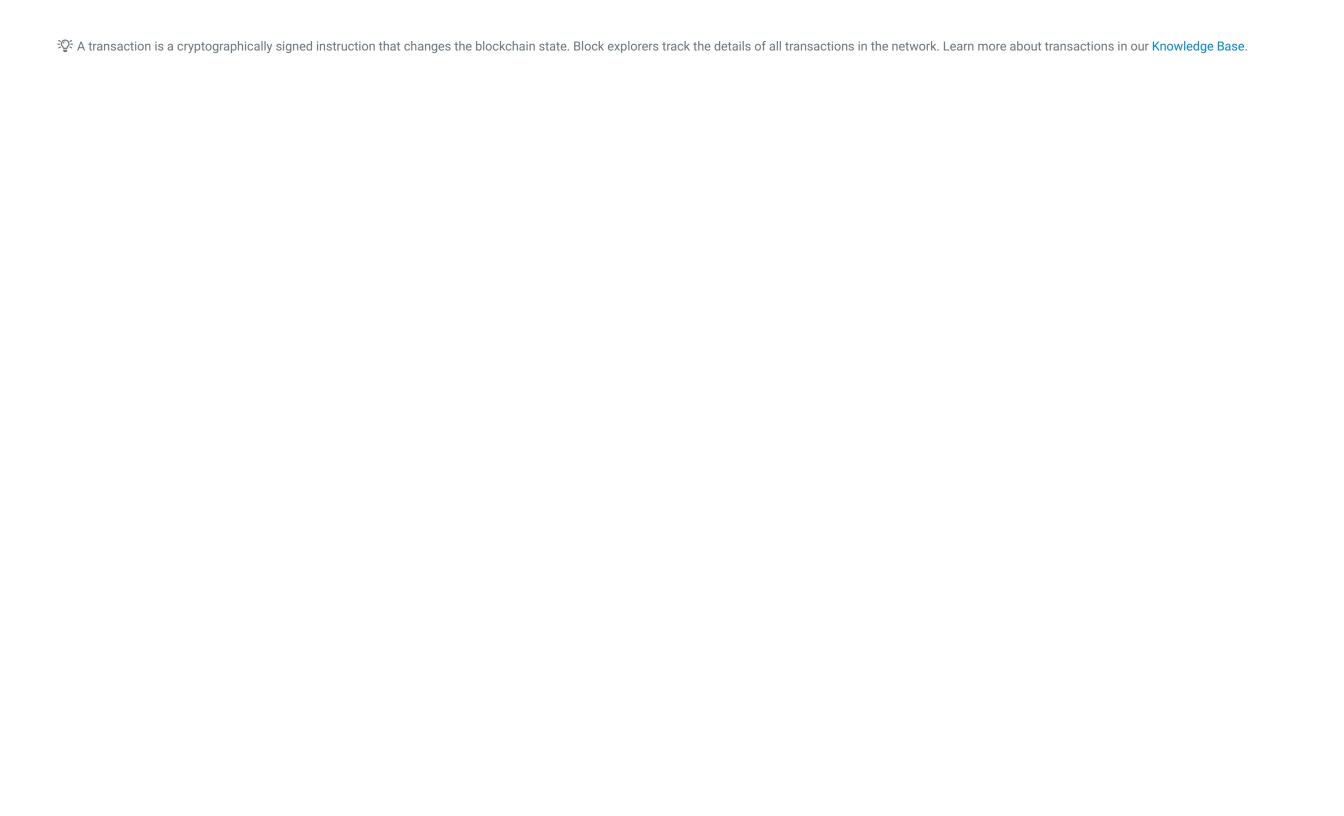
For 0x82ef36b1c710e4384eb20d70074bc972972d58b8

tota	al of 64 transactions found						First	of 2 > Last	∇ ∨
?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
©	0x11b3da070f02cee6d	Transfer	14891924	368 days 9 hrs ago	0x82eF36972D58B8 🗗	OUT	E Centre: USD Coin	0 ETH	0.0049
©	0x3600065637994c6a	Swap	14793369	384 days 9 hrs ago	0x82eF36972D58B8 🗗	OUT	E Metamask: Swap Router	0 ETH	0.0096
•	0x2f953fe606d0bf315	Transfer	14793354	384 days 9 hrs ago	() grooves.eth [IN	0x82eF36972D58B8 🗗	0.008 ETH	0.0009
©	0x74365f4834f1e7853	Approve	14793313	384 days 9 hrs ago	0x82eF36972D58B8 🗗	OUT	Apecoin: APE Token	0 ETH	0.0016
©	0xc3fc00dbaf1fbbb67f	Transfer	14712528	397 days 6 hrs ago	0x82eF36972D58B8 🗗	OUT	0xa8c2bCf7281317 📮	0.05 ETH	0.0010
•	0xaeb9a3756ccd0409	Transfer	14712522	397 days 6 hrs ago	() grooves.eth 📮	IN	0x82eF36972D58B8 🗗	0.012 ETH	0.0010
•	0xb979c94c7e2369d5	Transfer	14690094	400 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	0xa8c2bCf7281317 📮	0.95 ETH	0.0054
•	0xc25061626ced24f2c	Transfer	14690080	400 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	Apecoin: APE Token	0 ETH	0.0124
•	① 0xae0f2e022de03dcf7	Mint Lands	14689636	400 days 21 hrs ago	0x82eF36972D58B8 🗗	OUT	The Otherside: OTHR T	0 ETH	0.0495
©	0x3c63e11f81d114b85	Transfer	14688785	401 days 33 mins ago	0xa8c2bCf7281317 📮	IN	0x82eF36972D58B8	1 ETH	0.002

?	Txn Hash	Method ?	Block	Age	From		То	Value	Txn Fee
9	0xf0e6340e191bdb2da	Approve	14688744	401 days 42 mins ago	0x82eF36972D58B8 📮	OUT	Apecoin: APE Token	0 ETH	0.0048
9	0x0bf2a8b46b1808e68	Transfer	14688739	401 days 43 mins ago	() boneheads.eth [IN	0x82eF36972D58B8 📮	0.02 ETH	0.0017
9	0xec1f6422c53816f7e	Transfer	13857385	530 days 3 hrs ago	0x82eF36972D58B8 🗗	OUT	() grooves.eth [0.015 ETH	0.0019
9	0xd76e29c5836cbf8f8	Transfer	13834344	533 days 17 hrs ago	0x82eF36972D58B8 🗗	OUT	() grooves.eth [0.02 ETH	0.0009
D	0x0cbb64f2cce70d7b7	Transfer From	13834261	533 days 17 hrs ago	0x82eF36972D58B8 🗗	OUT	Superlative Apes: SLAP	0 ETH	0.0021
9	0xd10270af0248d5c8c	Atomic Match_	13820882	535 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	OpenSea: Wyvern Exch	0.055 ETH	0.0119
D	0x86d4ceff5b5b4143d	Transfer From	13820811	535 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	🖹 Adam Bomb Squad: AB 🚨	0 ETH	0.0061
D	0xe6331840c31f0456b	Atomic Match_	13820800	535 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	OpenSea: Wyvern Exch	0.245 ETH	0.0150
9	0xa97a5fc9bc504721a	Stake	13820771	535 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	■ 0xB63cac607a8020 🗅	0 ETH	0.0048
9	0xa86a1122fdac8a8c5	Swap ETH For	13820742	535 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	SushiSwap: Router	0.09744279 ETH	0.0069
9	0x74bef1942b62c0d83	Approve	13820719	535 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	OlympusDAO: OHM To	0 ETH	0.0038
9	0x71f9883a22e5f6cb9	Transfer Toke	13814425	536 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	F Wormhole: Portal Toke	0 ETH	0.0056
9	0xe54ee6bad0bedd3a	Approve	13814422	536 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	E Centre: USD Coin	0 ETH	0.0036
D	0x8b0c6a1723afd76bd	Swap	13814405	536 days 19 hrs ago	0x82eF36972D58B8 🗗	OUT	Metamask: Swap Router 📮	0.08 ETH	0.0115

?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0x55e6d29350c5b692	Transfer	13813602	536 days 22 hrs ago	0x51496e2725fB61 🗗	IN	0x82eF36972D58B8 📮	0.5 ETH	0.00148
•	0x25b3eca90948bcf4a	Deposit ETH	13813587	536 days 22 hrs ago	0x82eF36972D58B8 📮	OUT	☐ zkSync ☐	0.02 ETH	0.00494
•	0x79182b2aeef4b01ff	Transfer	13807925	537 days 19 hrs ago	0x82eF36972D58B8 📮	OUT	() arthurfleck.eth [1.1 ETH	0.00199
•	0xb37fa69b9121689eb	Withdraw	13807915	537 days 19 hrs ago	0x82eF36972D58B8 📮	OUT	■ Wrapped Ether □	0 ETH	0.00243
•	0xd312a64e89c24851	Deposit	13807479	537 days 21 hrs ago	0x82eF36972D58B8 🗗	OUT	■ Wrapped Ether □	1.1 ETH	0.00402
•	0x336aa01c85f564f84	Transfer	13807477	537 days 21 hrs ago	0x51496e2725fB61 🗘	IN	0x82eF36972D58B8 📮	1 ETH	0.00223
©	0xcdf793e3ea8f5922e	Wrap And Tra	13794258	539 days 22 hrs ago	0x82eF36972D58B8 🗗	OUT	Wormhole: Portal Toke	0.02 ETH	0.00626
•	0xf42e48691a22c2fc5	Transfer	13794209	539 days 22 hrs ago	() grooves.eth [IN	0x82eF36972D58B8	0.25 ETH	0.00196
•	0x058e0ede9371f1006	Transfer	13094612	649 days 12 hrs ago	0x82eF36972D58B8 🗗	OUT	() grooves.eth [0.014 ETH	0.00109
•	0xb63784ca9666c207f	Transfer	13073144	652 days 20 hrs ago	0x82eF36972D58B8 📮	OUT	() grooves.eth [0.18 ETH	0.00045
•	0x9f265776755a5b4cf	Transfer From	13073138	652 days 20 hrs ago	0x82eF36972D58B8 🗗	OUT	BONEHEADS: BONE To	0 ETH	0.00199
©	0x436fd87a9fb5b75a3	Transfer From	13073119	652 days 20 hrs ago	0x82eF36972D58B8 🗗	OUT	BONEHEADS: BONE To	0 ETH	0.00170
©	0x8381875280aa003b	Transfer From	13073108	652 days 20 hrs ago	0x82eF36972D58B8 🗗	OUT	BONEHEADS: BONE To	0 ETH	0.00216
•	0xca7eea4b6959b34e	Transfer From	13073099	652 days 20 hrs ago	0x82eF36972D58B8 🗗	OUT	BONEHEADS: BONE To	0 ETH	0.00209

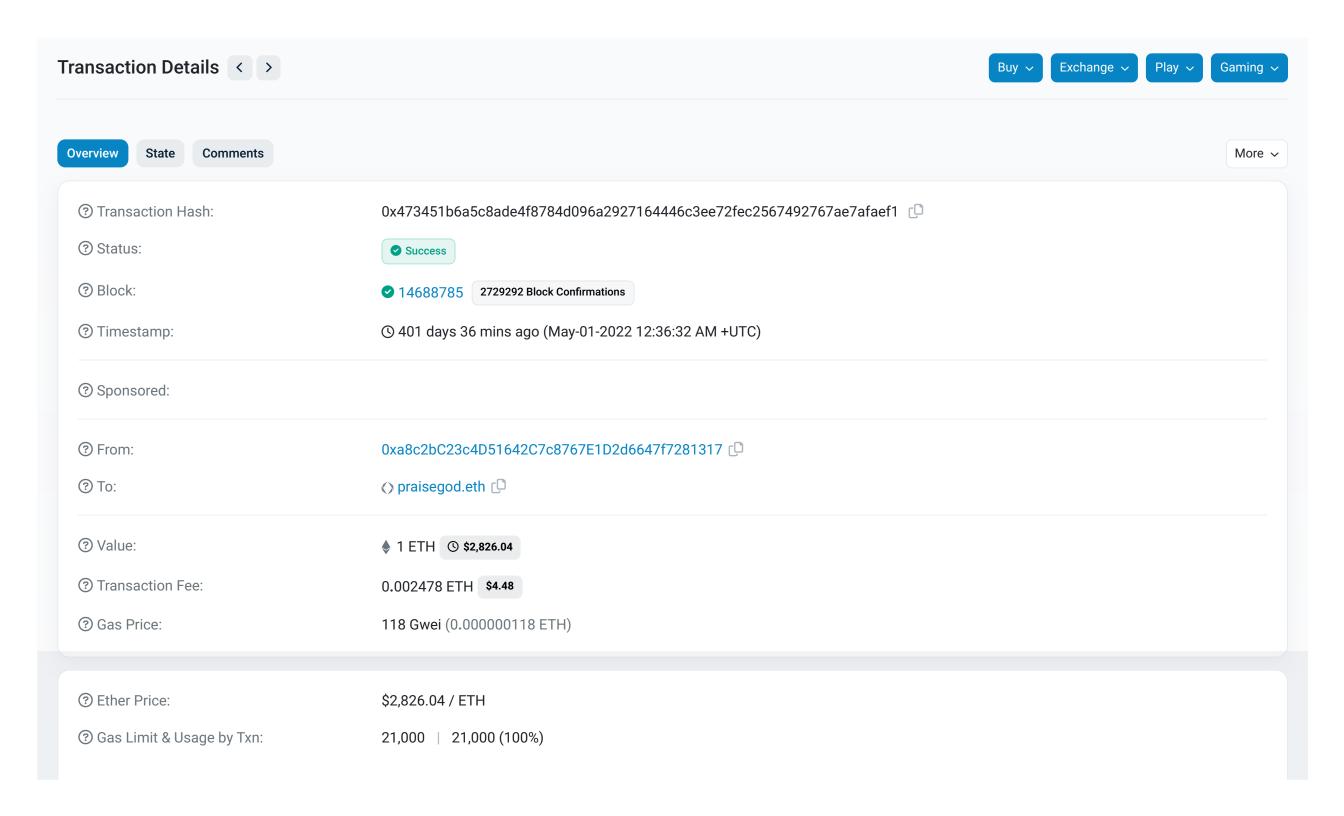
?	Txn Hash	Method ③	Block	Age	From		То	Value	Txn Fee
©	0x56d2fe2d4db999d17	Transfer	13073097	652 days 20 hrs ago	Coinbase 3 🗅	IN	0x82eF36972D58B8 🚨	0.19957099 ETH	0.00059
•	0xbdcbbd04b7549c45	Transfer From	13073082	652 days 20 hrs ago	0x82eF36972D58B8	OUT	BONEHEADS: BONE To	0 ETH	0.00164
•	0x010ef3a9c08ee9343	Transfer	13073053	652 days 20 hrs ago	() grooves.eth [IN	0x82eF36972D58B8 🚨	0.006898489 ETH	0.00052
(4)	0x02b59202c1fe7e041	Transfer	13070709	653 days 4 hrs ago	0x82eF36972D58B8	OUT	() grooves.eth [0.007560131 ETH	0.00100
•	0x037688f13f8cc5202	Atomic Match_	13070630	653 days 5 hrs ago	0x82eF36972D58B8 🗗	OUT	🖹 OpenSea: Wyvern Exch 🚨	0.12 ETH	0.00626
©	0xfcf181f0ba7ef99cdf	Transfer	13070602	653 days 5 hrs ago	Coinbase 5 📮	IN	0x82eF36972D58B8	0.12 ETH	0.00099
•	0x4b67307d4e0d501e	Atomic Match_	13069797	653 days 8 hrs ago	0x82eF36972D58B8 🕒	OUT	F OpenSea: Wyvern Exch	0.11 ETH	0.01236
•	0xe4f60430f1a9671e8	Withdraw	13069780	653 days 8 hrs ago	0x82eF36972D58B8 🕒	OUT	F Wrapped Ether	0 ETH	0.00177
•	0xbf3b5ad808600461	Transfer	13069632	653 days 9 hrs ago	Coinbase 4 📮	IN	0x82eF36972D58B8	0.0088 ETH	0.00101
•	0x0f6488a662dbdf9b1	Cancel Order_	13068704	653 days 12 hrs ago	0x82eF36972D58B8 🗗	OUT	🖹 OpenSea: Wyvern Exch 🚨	0 ETH	0.00180
•	0x95c4e382ab0366de	Deposit	13068693	653 days 12 hrs ago	0x82eF36972D58B8 🗗	OUT		0.06 ETH	0.00064
(6)	0x5505e906bbf830f08	Approve	13066422	653 days 21 hrs ago	0x82eF36972D58B8	OUT	■ Wrapped Ether	0 ETH	0.00061
Show	: 50 V Records						First	Page 1 of 2	Last



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

_____ A.K_____

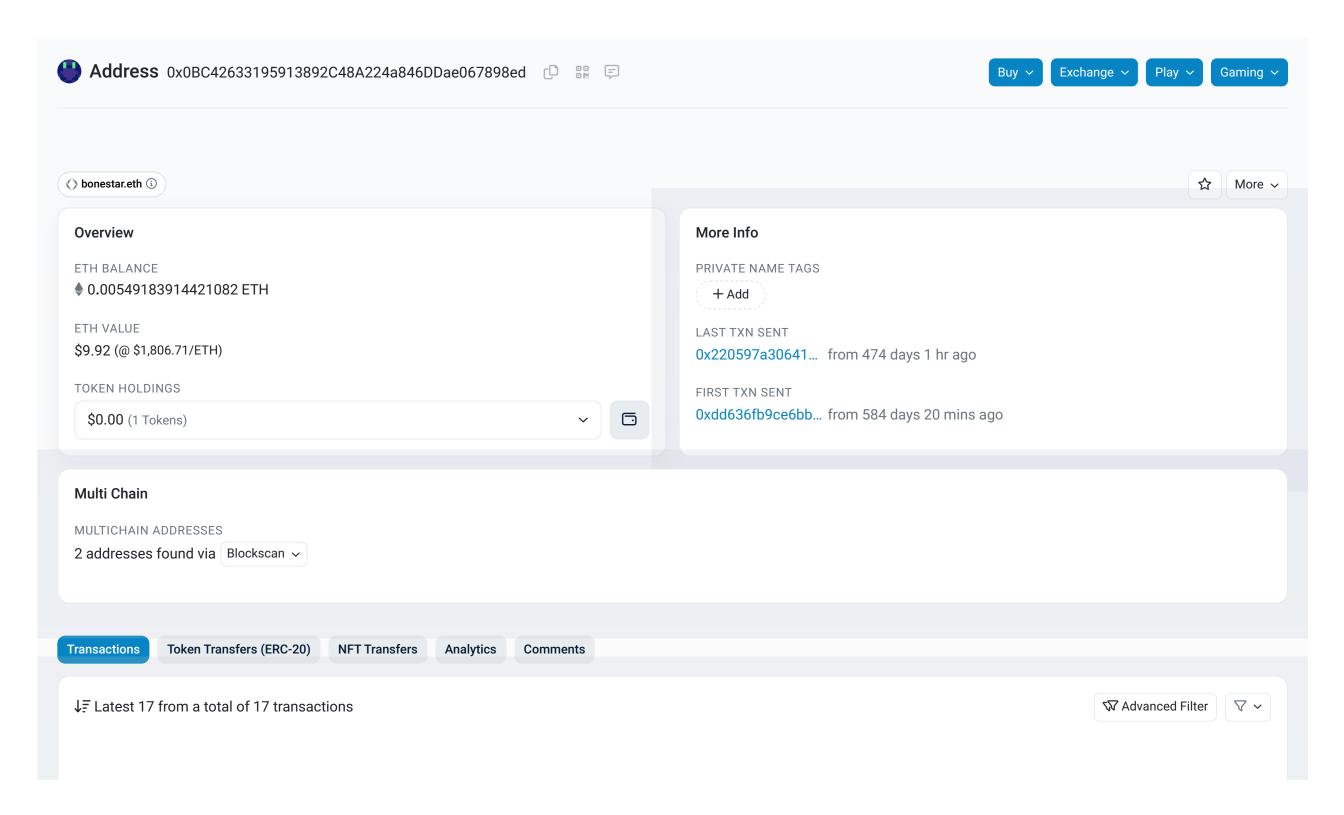


③ Gas Fees:	Base: 102.320533594 Gwei
② Burnt Fees:	♣ Burnt: 0.002148731205474 ETH (\$3.89)
③ Other Attributes:	Txn Type: 0 (Legacy) Nonce: 66 Position In Block: 53
③ Input Data:	0x
More Details:	— Click to show less
? Private Note:	To access the Private Note feature, you must be Logged In
₹Q: A transaction is a cryptographically signed instru	ction 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

____ A.K___



?	Transaction Hash	Method ?	Block	Age	From		То	Value	Txn Fee
9	0x220597a30641bc1d	Transfer From	14220253	474 days 1 hr ago	<> bonestar.eth □	OUT	Jadu Hoverboard: H	0 ETH	0.0047477
9	0x407f050240fb55ee4	Transfer	14220232	474 days 1 hr ago	BONEHEADS: Deployer 🗅	IN	() bonestar.eth 📮	0.01 ETH	0.00110579
9	0x1ab2efbb5ce55252b	Transfer	13999176	508 days 5 hrs ago	<> bonestar.eth □□	OUT	BONEHEADS: Deployer 🗗	0.0141765 ETH	0.0029778
9	0x49cc4e270581c009	Transfer From	13999165	508 days 5 hrs ago	<> bonestar.eth □□	OUT	Bored Ape Yacht Clu	0 ETH	0.0132184
9	0x1aa83b9c10fff45ef6	Transfer	13999157	508 days 5 hrs ago	BONEHEADS: Deployer 📮	IN	() bonestar.eth 📮	0.03056514 ETH	0.0033770
9	0x224df8f3b4a7266ed	Transfer	13673131	559 days 4 hrs ago	<> bonestar.eth □	OUT	BONEHEADS: Deployer 🗗	0.00903088 ETH	0.0024720
9	0x9f15b58134084370e	Transfer	13583848	573 days 7 hrs ago	<> bonestar.eth □	OUT	ENS: ENS Token	0 ETH	0.0060332
o	0x15afd853e17ae65d4	Claim Tokens	13583799	573 days 7 hrs ago	<> bonestar.eth □□	OUT	ENS: ENS Token	0 ETH	0.0267664
o	0x0ec9c695f89b7f35d	Transfer	13583797	573 days 7 hrs ago	BONEHEADS: Deployer 📮	IN	() bonestar.eth 📮	0.02096308 ETH	0.0031437
o	0xde064647342ff2a8e	Set Name	13583578	573 days 8 hrs ago	<> bonestar.eth □	OUT	ENS: Old Reverse Re	0 ETH	0.0092905
o	0xfefec0847b85da65a	Set Name	13583560	573 days 8 hrs ago	<> bonestar.eth □□	OUT	ENS: Old Reverse Re	0 ETH	0.0221864
o	0xadbeca42ed9bd3c3	Transfer	13583547	573 days 8 hrs ago	<> blockbone.eth □	IN	() bonestar.eth 📮	0.03147015 ETH	0.0038928
o	0x91e10e9047d38e93	Transfer	13583532	573 days 8 hrs ago	<> bonestar.eth □□	OUT	() blockbone.eth [0.13954942 ETH	0.0039762
	0x5f71717013da60d6c	Transfer	13583530	573 days 8 hrs ago	BONEHEADS: Deployer 📮	IN	() bonestar.eth 📮	0.04197456 ETH	0.0040973

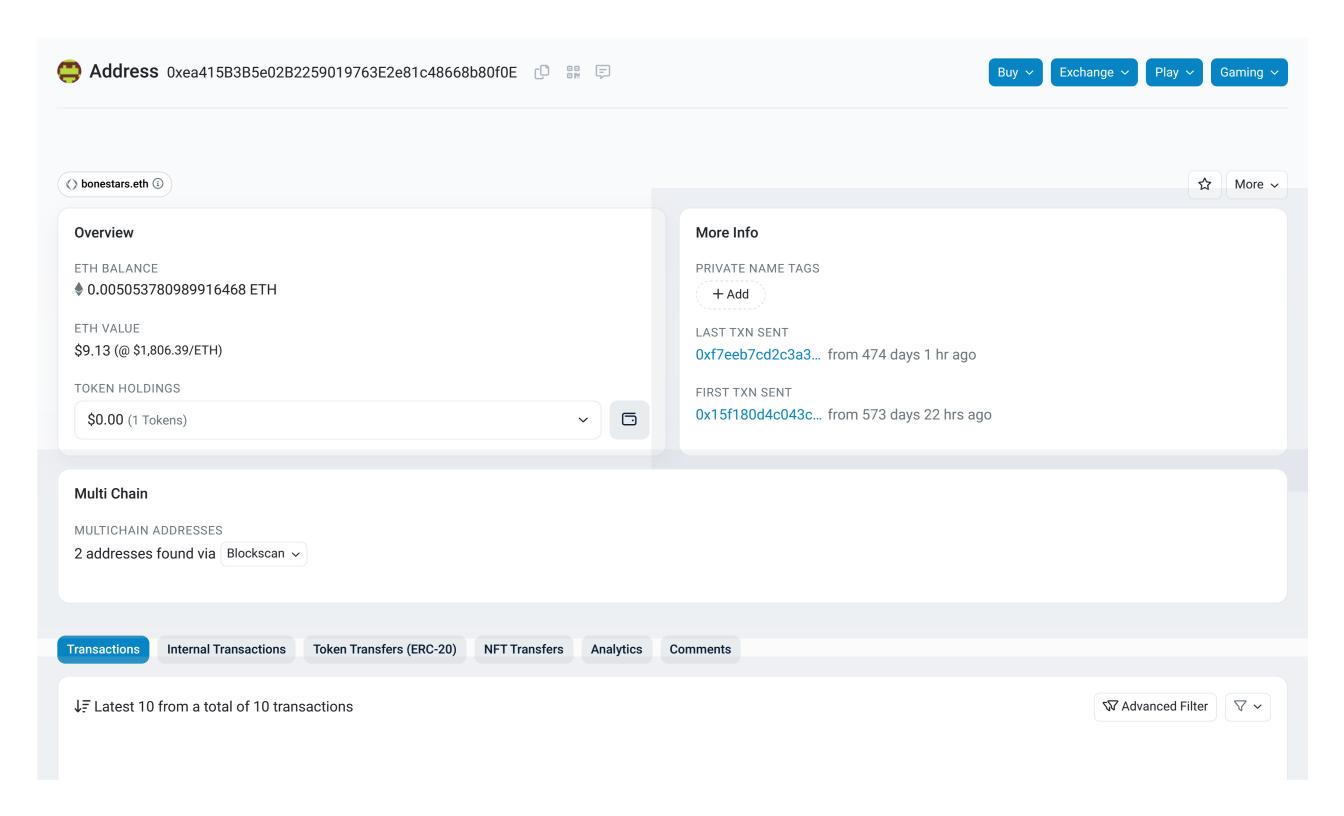
?	Transaction Hash	Method ③	Block	Age	From		То	Value	Txn Fee
©	0xbe890c3856534f79d	Transfer From	13579656	573 days 22 hrs ago	() bonestar.eth [OUT	Bored Ape Yacht Clu	0 ETH	0.0192293
©	0xdd636fb9ce6bb88b4	Set Addr	13515606	584 days 20 mins ago	() bonestar.eth 📮	OUT	ENS: Public Resolver 2	0 ETH	0.00582586
•	0x3a38f2697d282338	Transfer	13515604	584 days 21 mins ago	0x3acEf287dda4fa	IN	♦ 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

_____ A.R____



?	Transaction Hash	Method ③	Block	Age	From		То	Value	Txn Fee
•	0xf7eeb7cd2c3a3edaa	Transfer From	14220277	474 days 1 hr ago	♦ bonestars.eth □	OUT	🖹 Jadu Hoverboard: H 🗘	0 ETH	0.0049843
•	0x4fcdc18e7b711d660	Transfer	14220271	474 days 1 hr ago	BONEHEADS: Deployer 🚨	IN	() bonestars.eth [0.01 ETH	0.0011613
•	0x86f015a4e343cc1c5	Transfer	13672205	559 days 8 hrs ago	() bonestars.eth 🗅	OUT	BONEHEADS: Deployer 🗅	0.0963219 ETH	0.00275758
•	0xe84d42f4ba39e8279	Set Name	13583457	573 days 8 hrs ago	() bonestars.eth 🚨	OUT	ENS: Old Reverse Re	0 ETH	0.02438028
•	0x296a5feaa370b7816	Register With	13583450	573 days 8 hrs ago	<> bonestars.eth □	OUT	ENS: Old ETH Registr	0.03471468 ETH	0.04854378
©	0x97c14d43312167ed	Commit	13583422	573 days 8 hrs ago	<> bonestars.eth □	OUT	ENS: Old ETH Registr	0 ETH	0.00885163
•	0x6b5d3d9d57440b23	Transfer	13583412	573 days 8 hrs ago	BONEHEADS: Deployer 🚨	IN	♦ bonestars.eth □	0.21014186 ETH	0.00372284
•	0x515a1e318be8da8ff	Transfer	13579797	573 days 22 hrs ago	() bonestars.eth 🚨	OUT	BONEHEADS: Deployer 🗅	0.00730275 ETH	0.00332518
•	0x15f180d4c043c9659	Transfer From	13579717	573 days 22 hrs ago	() bonestars.eth 🚨	OUT	Bored Ape Yacht Clu	0 ETH	0.01706184
•	0xec460e0490702527	Transfer	13515619	584 days 19 mins ago	0x3acEf287dda4fa	IN	() bonestars.eth 🕛	0.03 ETH	0.0026574

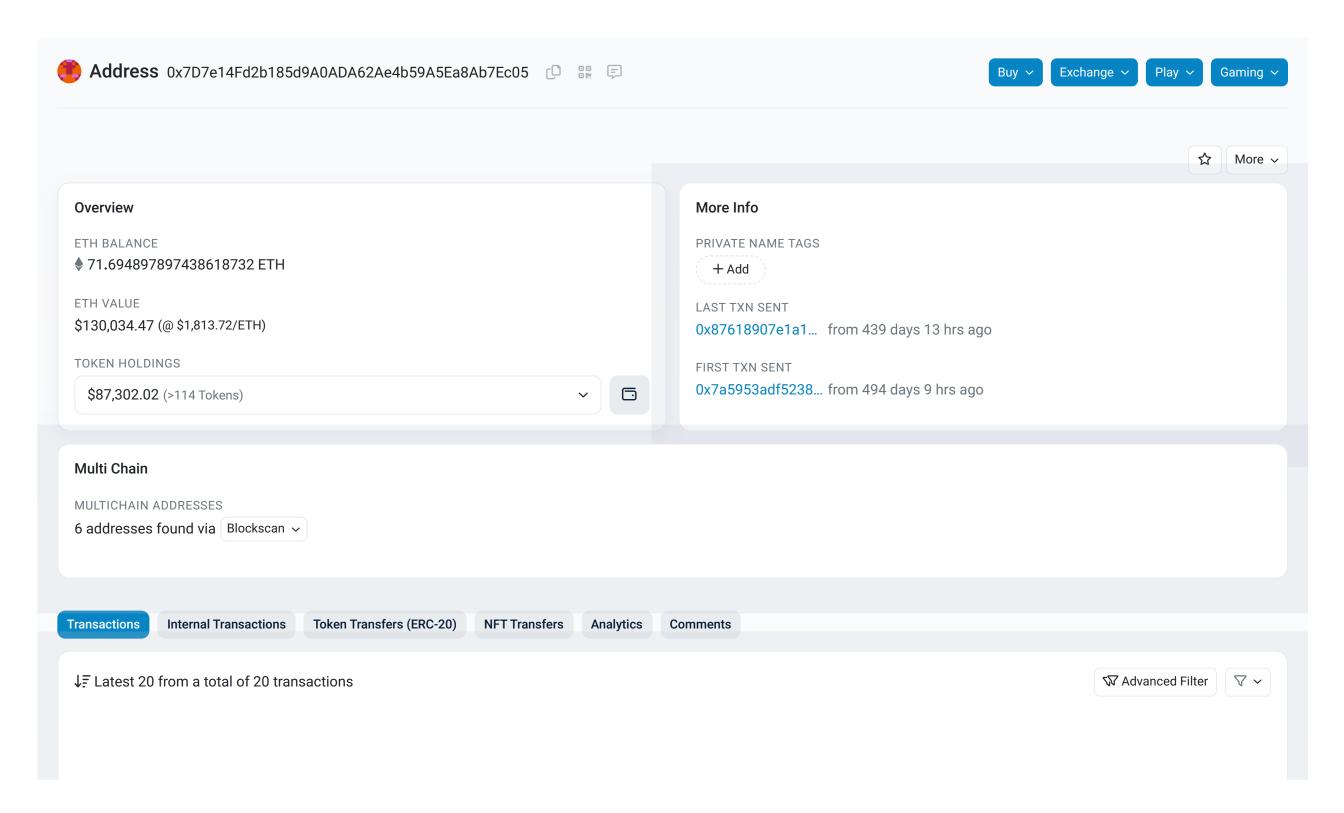
[Download: CSV Export 🚣]

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 "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

_____ *4.k*______



?	Transaction Hash	Method ?	Block	Age	From		То	Value	Txn Fee
9	0x87618907e1a120ae	Transfer	14442701	439 days 13 hrs ago	0x7D7e148Ab7Ec05 🗘	OUT	BONEHEADS: Deployer 🗗	30 ETH	0.00029135
9	0x430030ad65ee7e0e	Swap	14413242	444 days 3 hrs ago	0x7D7e148Ab7Ec05 🗅	OUT	Metamask: Swap Ro	30 ETH	0.01074153
o	0x78bb940661b85bc6	Swap	14411018	444 days 12 hrs ago	0x7D7e148Ab7Ec05	OUT	Metamask: Swap Ro	0 ETH	0.02080182
9	0xcaf119cbd20152a45	Approve	14411018	444 days 12 hrs ago	0x7D7e148Ab7Ec05 🕒	OUT	Apecoin: APE Token	0 ETH	0.00235853
9	0x30b66154f501d971e	Cancel Order_	14406704	445 days 4 hrs ago	0x7D7e148Ab7Ec05	OUT	OpenSea: Wyvern Ex	0 ETH	0.00432431
o	0xbbcc6e7a162911e2	Cancel Order_	14406642	445 days 4 hrs ago	0x7D7e148Ab7Ec05 🚨	OUT	OpenSea: Wyvern Ex	0 ETH	0.00399253
9	0x011dedb1bddb7496	Cancel Order_	14404641	445 days 12 hrs ago	0x7D7e148Ab7Ec05 🚨	OUT	OpenSea: Wyvern Ex	0 ETH	0.00850371
9	0x9e1724664c987906	Cancel Order_	14404637	445 days 12 hrs ago	0x7D7e148Ab7Ec05 🚨	OUT	OpenSea: Wyvern Ex	0 ETH	0.00777403
9	0x9dff406d4fe311428	Cancel Order_	14404630	445 days 12 hrs ago	0x7D7e148Ab7Ec05 🗘	OUT	OpenSea: Wyvern Ex	0 ETH	0.00745404
9	0x9bdea44a0481f48cf	Claim Tokens	14404077	445 days 14 hrs ago	0x7D7e148Ab7Ec05 🕒	OUT	① 0x025C6d4B205a1F	0 ETH	0.03162163
9	0x7e6b2f02404c933d8	Cancel Order_	14400077	446 days 4 hrs ago	0x7D7e148Ab7Ec05	OUT	OpenSea: Wyvern Ex	0 ETH	0.00363483
o	0x0302be3fe087bb927	Transfer	14329533	457 days 4 hrs ago	0xfcFa78A74CCd2b	IN	0x7D7e148Ab7Ec05	1.93668683 ETH	0.00099929
o	0x1a98ebdfed429b27b	Transfer	14286189	463 days 21 hrs ago	0x7D7e148Ab7Ec05	OUT	0xfcFa78A74CCd2b	0.1227554 ETH	0.00062756
o	0x0a2c93748ae136fe4	Transfer	14252602	469 days 2 hrs ago	0x7D7e148Ab7Ec05 🗗	OUT	0xab8e87a9664dEe 🚨	0.02 ETH	0.00192908

?	Transaction Hash	Method ?	Block	Age	From		То	Value	Txn Fee
•	0xa141b5847eb826cd	Cancel Order_	14109836	491 days 4 hrs ago	0x7D7e148Ab7Ec05 🗘	OUT	🖹 OpenSea: Wyvern Ex 🗘	0 ETH	0.0085234
©	0x4dec3b771d44d821	Atomic Match_	14098384	492 days 22 hrs ago	0x7D7e148Ab7Ec05	OUT	OpenSea: Wyvern Ex	0.26 ETH	0.0210625
•	0x80ed1838ef76df38d	Cancel Order_	14098335	492 days 22 hrs ago	0x7D7e148Ab7Ec05	OUT	OpenSea: Wyvern Ex	0 ETH	0.0077808
•	0x999b73da6ee6d9a2	Set Approval	14088892	494 days 9 hrs ago	0x7D7e148Ab7Ec05	OUT	Bored Ape Yacht Clu	0 ETH	0.006339
•	0x7a5953adf5238046d	Register Proxy	14088886	494 days 9 hrs ago	0x7D7e148Ab7Ec05	OUT	OpenSea: Registry 🗗	0 ETH	0.050820
©	0xfdd8f7d3130e64984	Transfer	14084662	495 days 1 hr ago	BONEHEADS: Deployer 🚨	IN	0x7D7e148Ab7Ec05	0.5 ETH	0.002682

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

1 able 2 – E	BONEHEADS TEAM: SELECT NFT PURCHASES				
Exhibit	Information				
"BONEHE	EADS: Deployer" (0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F)				
"BV"	Collection: CryptoPunks				
	• Quantity: 1				
	• Purchase Price:				
	o Total: 64 ETH (\$204,574.08 USD (\$258,581.63 CAD))				
	 Cryptopunk #5183 - 64 ETH (\$204,574.08 USD (\$258,581.63 CAD)) on January 7, 2022. 				
"BW"	• Collection: The Doggies (Snoop Dogg)				
	• Quantity: 17				
	• Purchase Price:				
	 Total: 19.7099 ETH + 1,500 SAND (\$56,385.78 USD (\$70,659.13 CAD)) 				
	■ 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 (\$570.00 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 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 (\$470.08 USD (\$501.04 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"	• Collection: Inhabitants: Generative Identities (Metahero)				
	• Quantity: 25				
	• Purchase Price:				
	• Total: 102.63 ETH (\$456,548.54 USD (\$581,551.53 CAD))				

	■ 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
"BY"	Collection: NounPunks.eth
	• Quantity: 30
	Purchase Price:
	o Total: 11.14871 ETH (\$39,430.47 USD (\$50,301.45 CAD))
	■ 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

	■ 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
"BZ"	• <u>Collection:</u> Bloot (not for Weaks)
	• Quantity: 12
	• <u>Purchase Price:</u>
	o Total: 16.9588 ETH (\$65,919.00 USD (\$82,576.73 CAD))
	■ 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

	■ 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
"CA"	Collection: Jadu Hoverboard
	• Quantity: 7
	Purchase Price:
	o Total: 5.945 ETH (\$17,339.53 USD (\$22,505.95 CAD))
	■ 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
"CB"	Collection: GEVOLs
	• Quantity: 12
	• <u>Purchase Price</u> :
	o Total: 5.468 ETH (\$19,554.04 USD (\$24,622.44 CAD))
	■ 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

	■ 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"	Collection: Pixel Vault Founder's DAO
	• Quantity: 2
	• <u>Purchase Price</u> :
	o Total: 7.729 ETH (\$33,253 USD (\$42,324.41 CAD))
	Pixel Vault #5109 – 3.88 ETH (\$16,710.31 USD (\$21,268.88 CAD))on November 28, 2021
// CD **	■ Pixel Vault #845 – 3.849 ETH (\$16,542.69 USD (\$21,055.53 CAD)) on November 28, 2021
"CD"	Collection: Larva Chads
	• Quantity: 1
	• Purchase Price:
	O Total: 0.75 ETH (\$2,554.86 USD (\$3,252.08 CAD))
"CE"	Larva Chad #2848 – 0.75 ETH (\$2,554.86 USD (\$3,252.08 CAD)) on January 6, 2022
"CE"	Collection: Adam Bomb Squad
	• Quantity: 1
	• Purchase Price:
	• Total: 1 ETH (\$2,425.83 USD (\$3,091.96 CAD))
"CF"	 ABS #24913 – 1 ETH (\$2,425.83 USD (\$3,091.96 CAD)) on January 27, 2022 Collection: MEV Army
Cr	 Collection: MEV Army Quantity: 80
	 Purchase Price: Total: 31.3942 ETH (\$76,054.01 USD (\$96,460.83 CAD))
	 Notes: 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.
"BNHDZ	VAULT" (0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317)
"CG"	Collection: CLONE X – X TAKASHI MURAKAMI
	• Quantity: 3
	Purchase Price:
	○ Total: 31.9105 ETH (\$81,277.00 USD (\$103,758.21 CAD))
	■ CloneX #19303 – 16.9105 ETH (\$43,071.55 USD (\$54,985.14 CAD)) on January 28, 2022

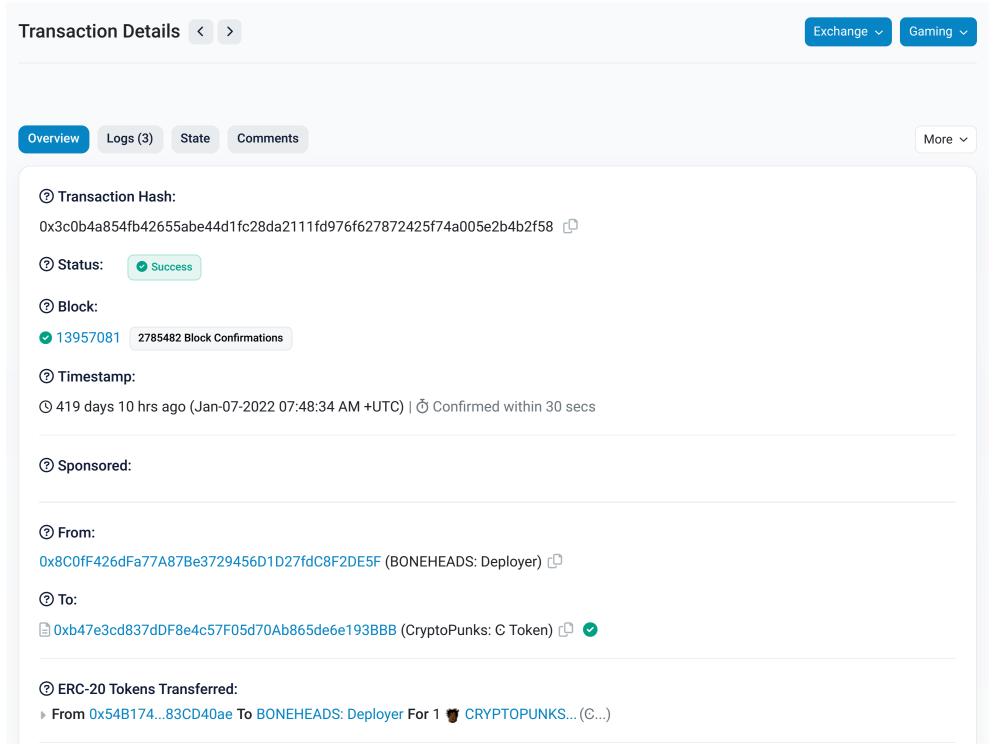
CloneX #3768 – 15 ETH (\$38,205.45 USD (\$48,773.07 CAD)) on January 28, 2022 ■ CloneX #4959 – 0 ETH "ivvbone.eth" (0xa1e43fcb51656354931d47458eceadbc6545df57) "CH" Collection: Otherdeed for Otherside Quantity: 14 Purchase Price: o Total: 36.66 ETH + 15,407 APE Tokens (\$347,593.31 USD (\$446,483.60 CAD)) #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

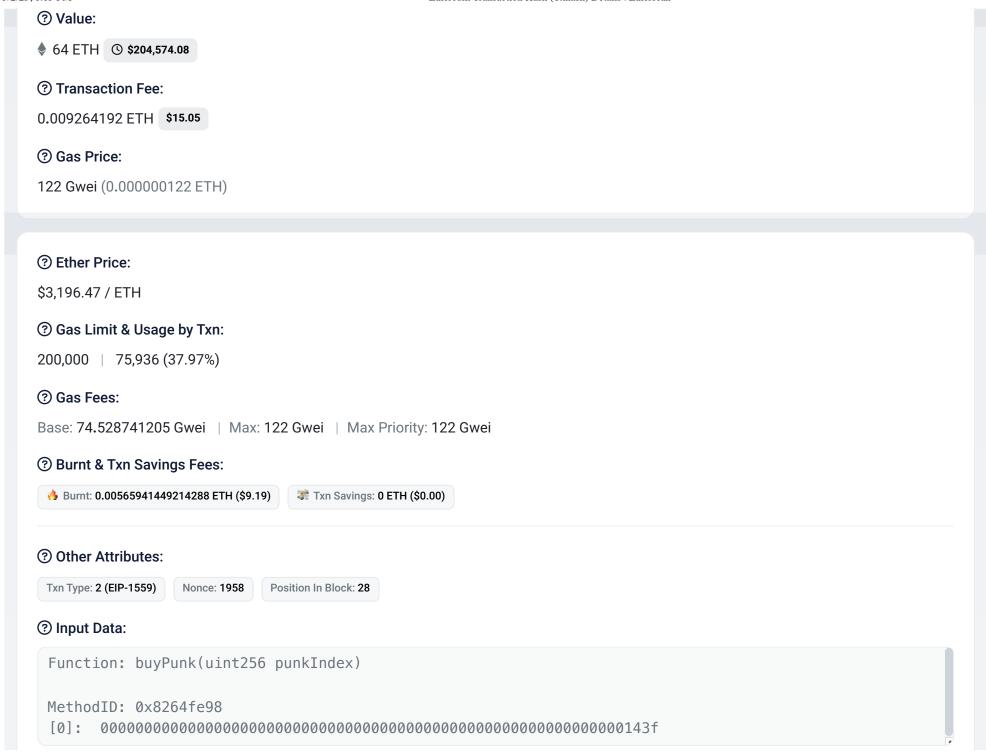
#60022 – 1,100 APE Tokens (\$17,419.99 USD (\$22,375.97 CAD)) on May 1, 2022

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

____ A.R____





View Input As ✓ 🔒 Decode Input Data	
More Details:	— Click to show les
?) Private Note:	
To access the Private Note feature, you must be Logged In	

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

_____ A.K______



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BONEHEADSSTUDIOS

♦ boneheads.eth ➤ Joined August 2021

Collected 1.9K BETA Created 10.0K Favorited Activity More V

₹ Q Search by no	Q. Search by name or attribute				Highest las	≡	=	Ħ	OB		
Body Accessory	n	~		The Doggles (Snoop Dogg) X	Clear all						
Eyes	23	~	ITEM 17		FLOOR PRICE	BEST OFFER	LISTING	PRICE	COST	Ď.	
Eyes	23	~		Doggy #9275 The Doggles (Snoop Dogg)	0.0676 ETH	0.2703 WETH	= Not I	sted	8.895	56 ETH	
Hair	14	~		Doggy #5492 The Doggles (Snoop Dogg)	0.0676 ETH	0.0719 WETH	■ 3 ETH		5.0153 ETH		
łat	20	~		Doggy #4008 The Doggies (Snoop Dogg)	0.0676 ETH	0.0533 WETH	Not listed		2.7091 ETH		
Head		~		Doggy #3791 The Doggles (Snoop Dogg)	0.0676 ETH	0.0533 WETH	• 1 ETH		1.4123	ETH	
eft Hand Accessory		·	Doggy #5634 The Doggies (Snoop Dogg)		0.0676 ETH	0.0533 WETH	■ 0.25 ETH		0.614	8 ETH	
Mouth Accessory		~		Doggy #6969 The Doggles (Snoop Dogg)	0.0676 ETH	0.0533 WETH		Not listed		0.6086 ETH	
Pants	16	~		Doggy #0879 The Doggles (Snoop Dogg) 👨	0.0676 ETH	0.0533 WETH	■ Not I	sted	0.550	5 ETH	
shoes	18	~		Doggy #7706 The Doggles (Snoop Dogg) 🧔	0.0676 ETH	0.0533 WETH	Not I	sted			
pecial Edition	3	~		Doggy #1084 The Doggles (Snoop Dogg)	0.0676 ETH	0.0533 WETH	= Not I	sted			
Special Snoop	19	~		Doggy #6984 The Doggies (Snoop Dogg)	0.0676 ETH	0.0533 WETH	- Not I	sted	-		

Hat	20	~	4	Doggy #8867 The Doggles (Snoop Dogg)	0.0676 ETH	0.0533 WETH	 Not listed
Head	2	~	1	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	~	A	Doggy #9202	0.0676 ETH	0.0533 WETH	- Not listed
Pants	16	~	I	The Doggles (Snoop Dogg)			
Shoes	18	~	4	Doggy #1736 The Doggles (Snoop Dogg)	0.0676 ETH	0.0533 WETH	Not listed
Special Edition	3	~	P.	Doggy #6499 The Doggles (Snoop Dogg)	0.0676 ETH	0.0533 WETH	 Not listed
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

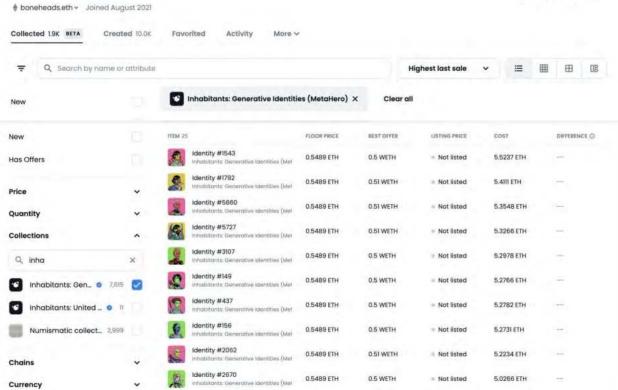
____ A.K____

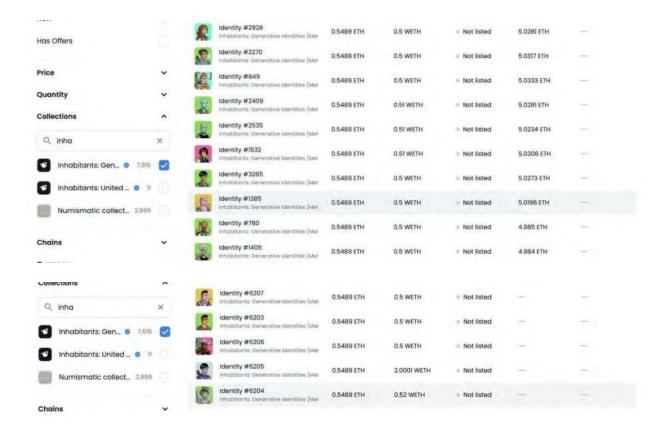


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BONEHEADSSTUDIOS



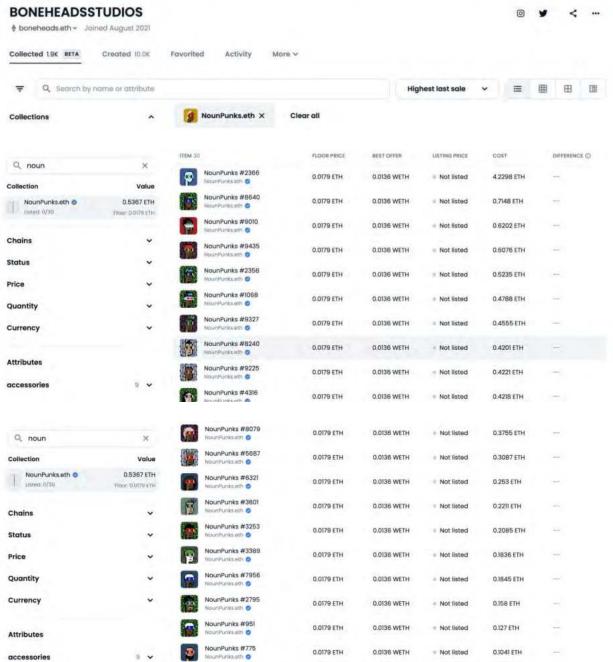


This is Exhibit "BY" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

____ *4.k*______







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

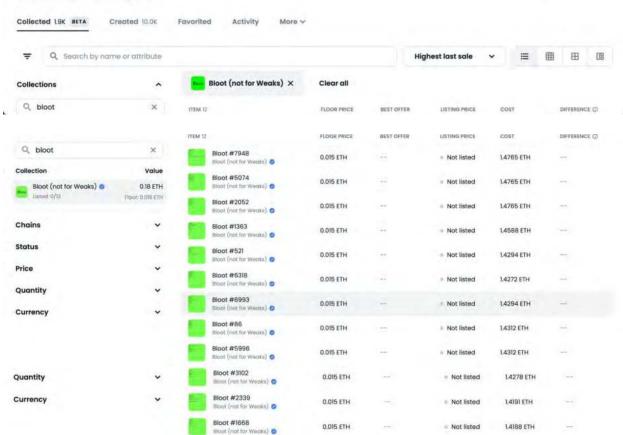
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BONEHEADSSTUDIOS

♦ boneheads.eth > Joined August 2021

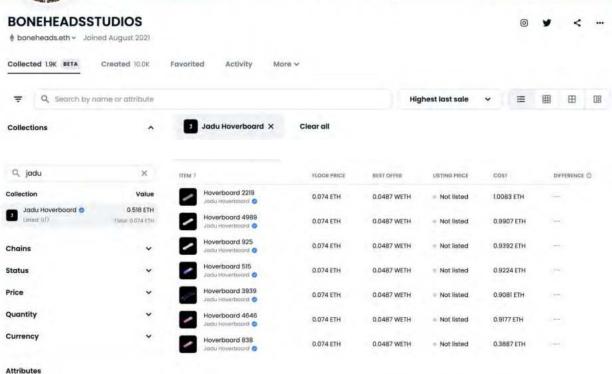


This is **Exhibit "CA"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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___





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

____ f.k____

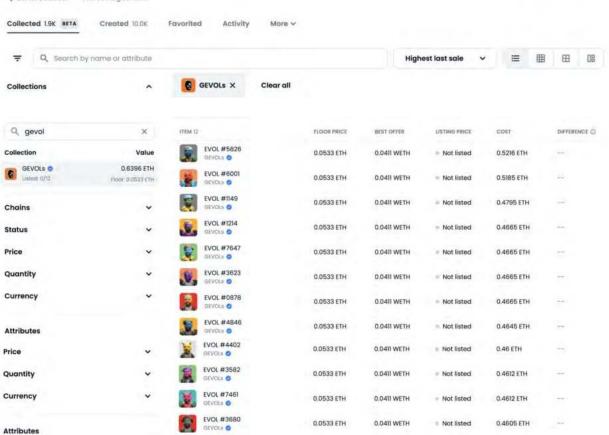


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BONEHEADSSTUDIOS

♦ boneheads.eth ~ Joined August 2021

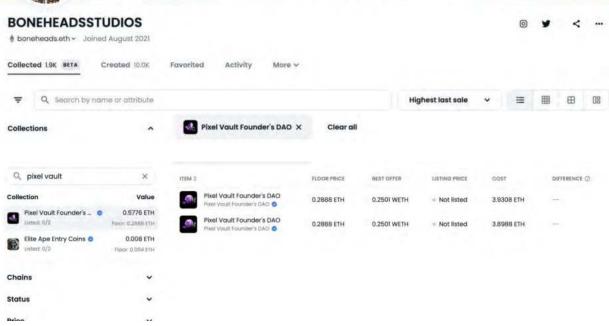


This is Exhibit "CC" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

—— *4.*×— ——



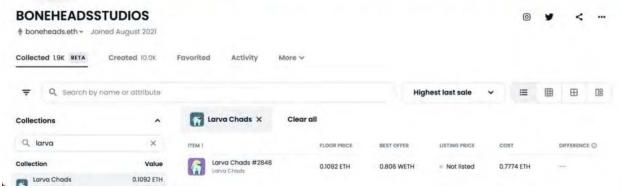


This is Exhibit "CD" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

____ *A.R*_____



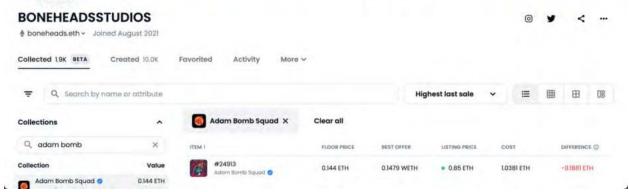


This is Exhibit "CE" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

____ A.K____





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

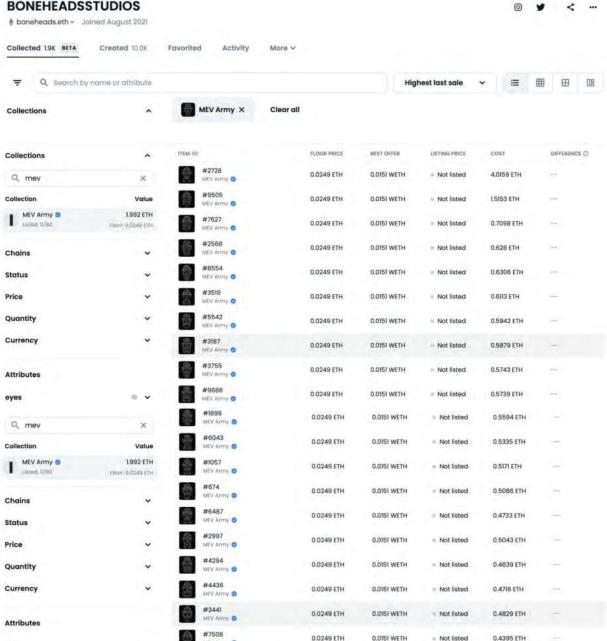
Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

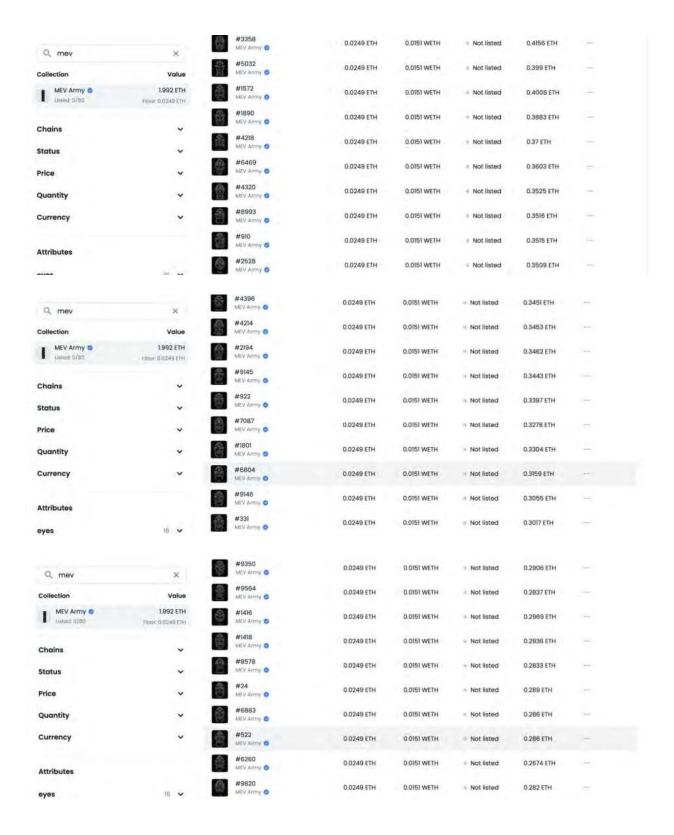
____ *4.k*_____

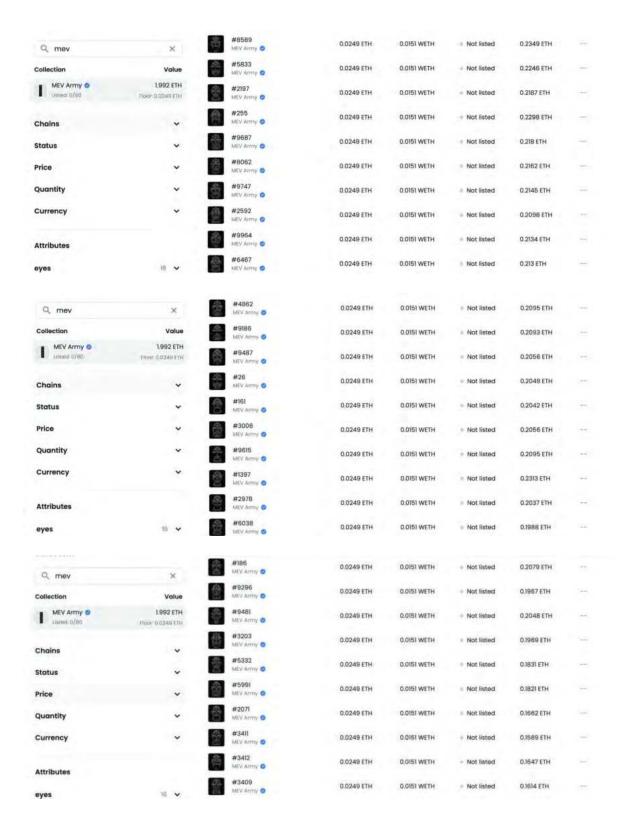


BONEHEADSSTUDIOS

eyes





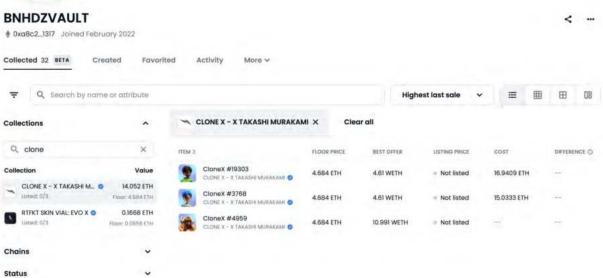


This is **Exhibit "CG"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

____ *4.k*_____





This is Exhibit "CH" 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

—— *4.5*——



ivybone.eth

♦ ivybone.eth > Joined October 2021

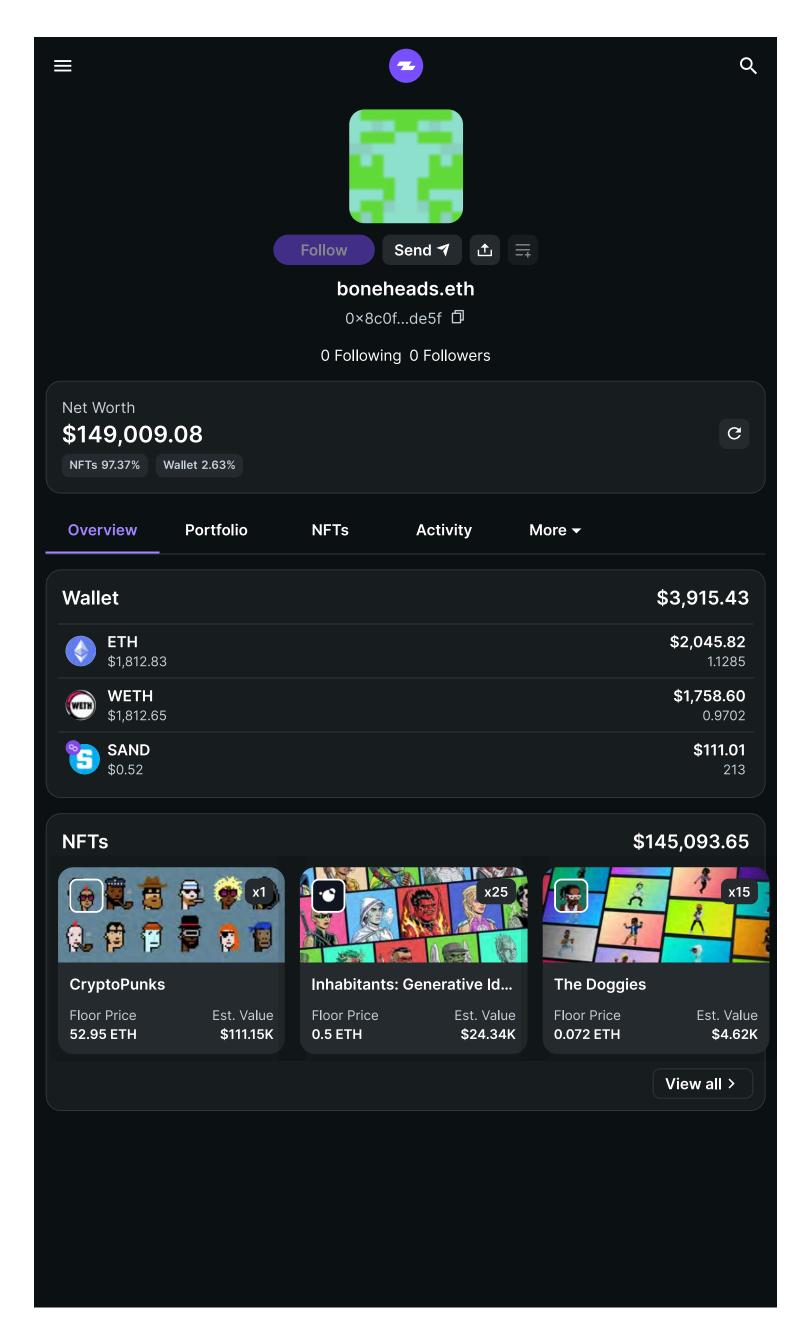
Activity Collected 14 BETA Created Favorited More ~ Q Search by name ≡ ⊞ EB 08 Highest last sale DIFFEBENCE ① STEM NO FLOOR PRICE BEST OFFER LISTING PRICE COST Collections #11716 1.8249 ETH 2.3011 WETH Not listed 18.6856 ETH Q clone × 1.824 ETH 1.7585 WETH Not listed 1B.0117 ETH Q Search #14381 1,824 ETH 1.7585 WETH 3,000 APE Not listed Collection Value Otherdeed for Otherside Otherdeed for Otherside

listed: 0/13 23.712 ETH 1.7585 WETH 1,368 APE 1.824 ETH Not listed ENS: Ethereum Name... 💿 < 0.0001 ETH #73727 1.824 ETH 1.7585 WETH 1,250 APE Not listed verdeed for Otherside O FROM: 4 0.0001 ETH Story Of Meta Penguin Cards 1.824 ETH 1.7585 WETH 1,250 APE Bored Meta Penguin Lab #65722 1.824 ETH 1.7585 WETH 1,260 APE Otherdeed for Otherside O #81119 The Great Metroverse Genesis 1.824 ETH 14.1 WETH Not listed 1,389 APE #78273 Otherdeed for Otherside 🥏 Shinny Meta Penguin Lab 1.824 ETH 1.7585 WETH 1,200 APE #82865 Otherdoed for Otherside © The Dour Darcel Origin 1.824 ETH 1.7585 WETH Not listed 1,150 APE #69026 Otherdeed for Otherside © Bored Meta Penguin Lab 1.824 ETH 2.4 WETH Not listed 1,250 APE #77827 1.824 ETH 2.1071 WETH Not listed 1,190 APE The Great Metroverse Genesis #60022 1.824 ETH 1.7585 WETH Not listed 1,100 APE Shinny Meta Penguin Lab Linted: 0/1 ivybone.eth ENS: Etheraum Name Service ② The Dour Darcel Origin 0.000000001 ETH

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

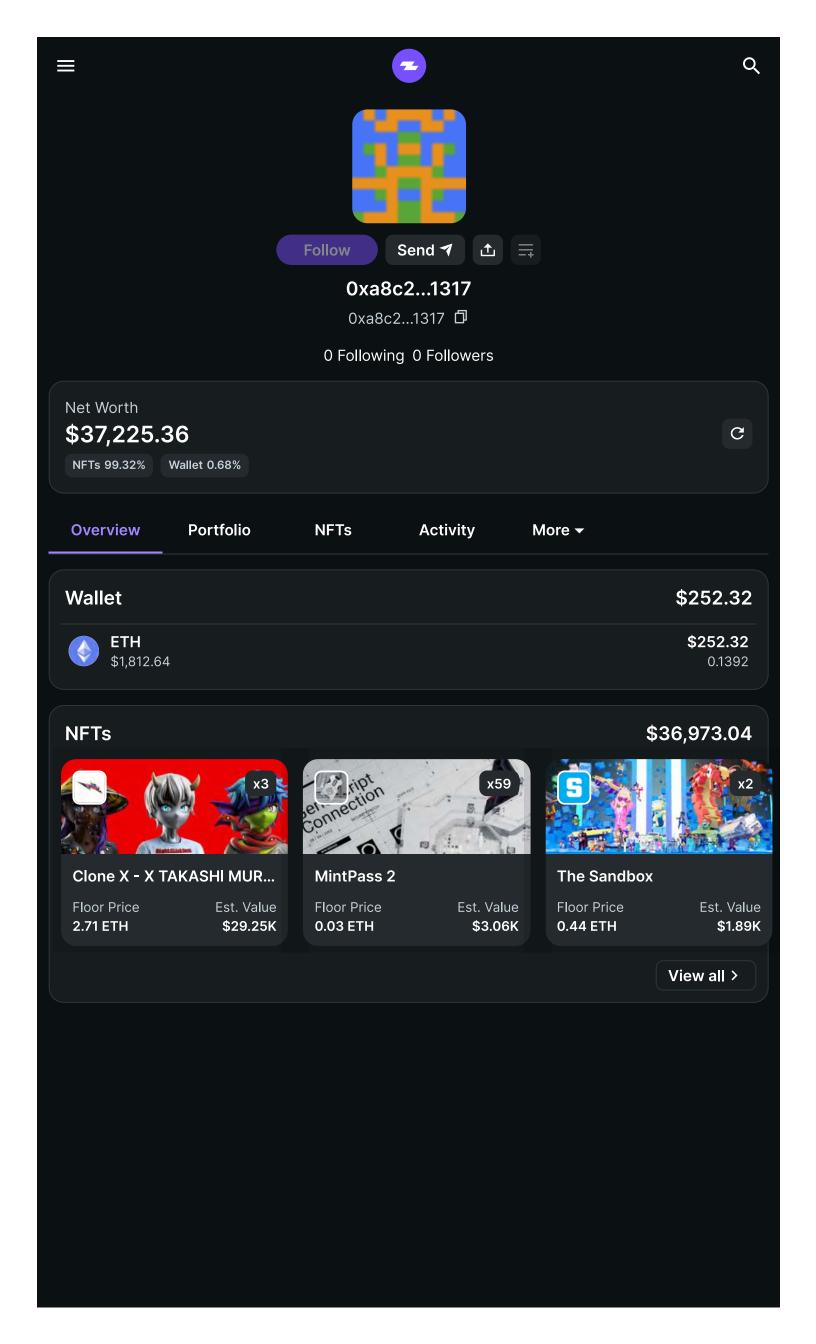
Declared before me remotely at the City of Toronto, Ontario and the affiant stated as being located in the City of Ottawa, Ontario on June 6, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely



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

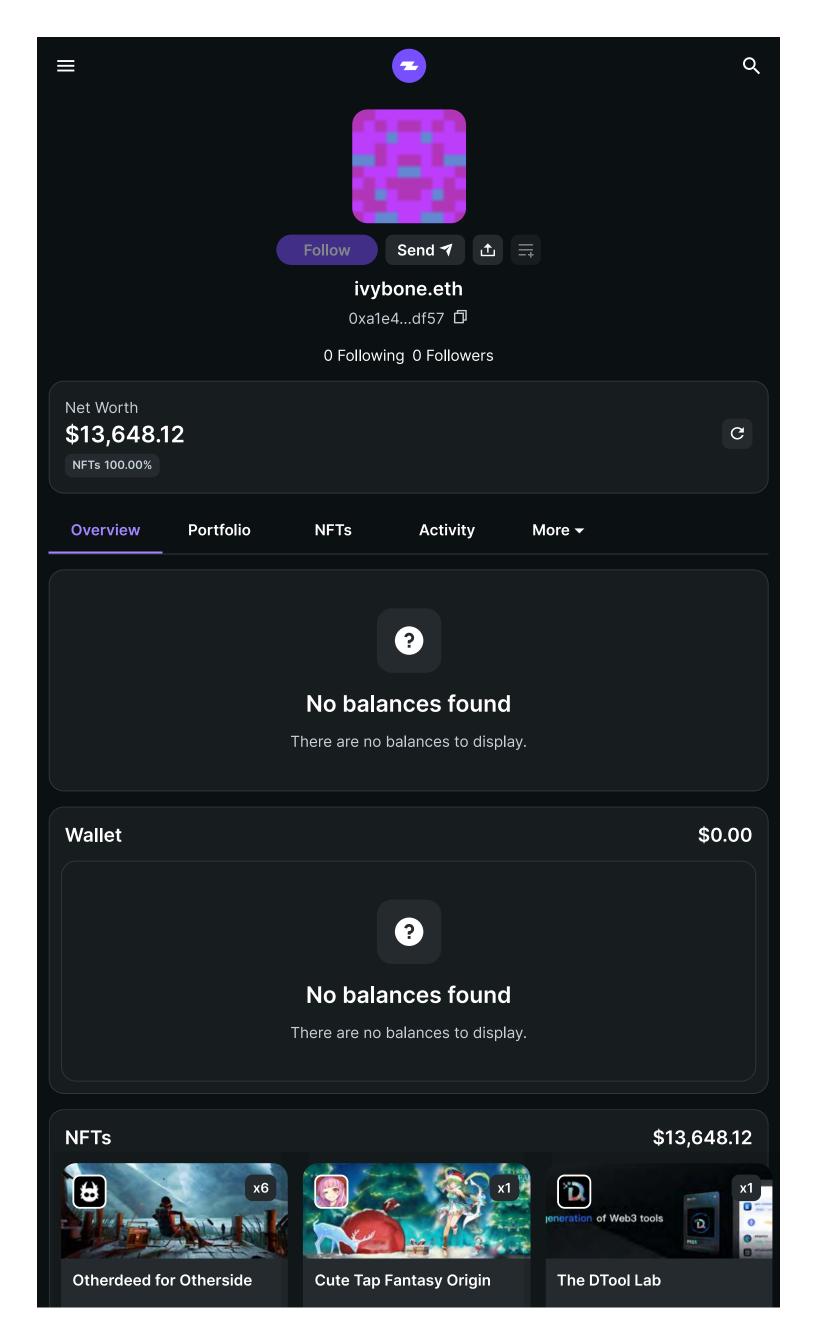
—— *4.*×—



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

_____ *4.k*______



Floor Price Est. Value Floor Price Est. Value Floor Price St. Value Floor Price St. Value St. Va

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

—— *4.*×—

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

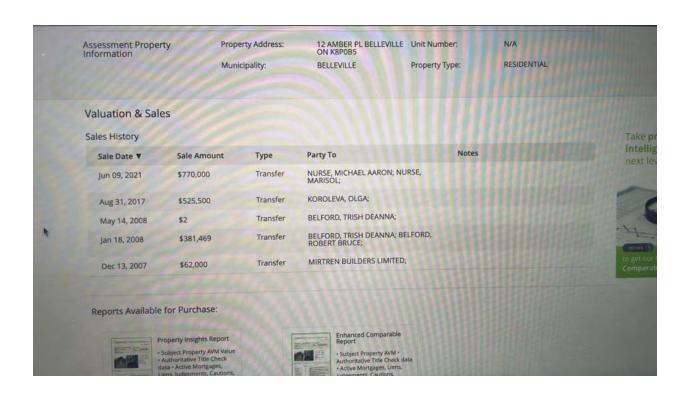
- Be careful when sending cryptocurrency. Once the transaction is completed, it is unlikely to be reversed.
- As proceeds of crime and anti-money laundering regimes around the world create regulatory frameworks that treat businesses dealing in crypto currencies as money service businesses, Canadians 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 (<u>www.aretheyregistered.ca</u>).
- Prior to investing, ask for information on the investment. Research the team behind the offering and analyze the feasibility of the project.
- Be weary 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 <u>online reporting system</u> 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

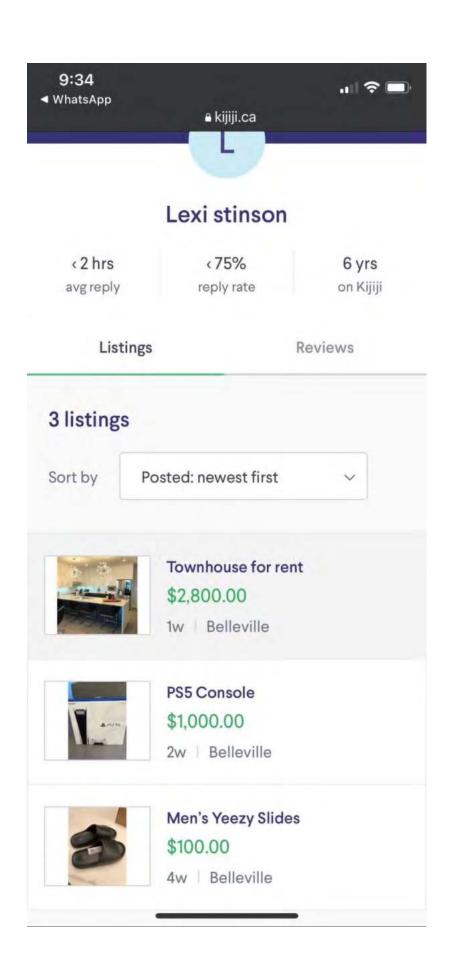
Commissioner of Oaths in and for Ontario



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

____ f.k____



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

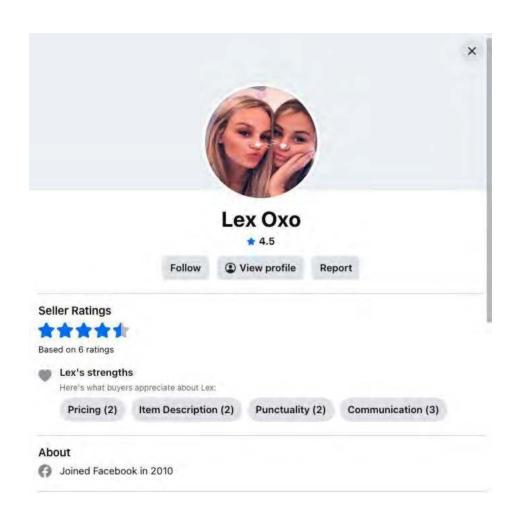
Matheson Group Realty

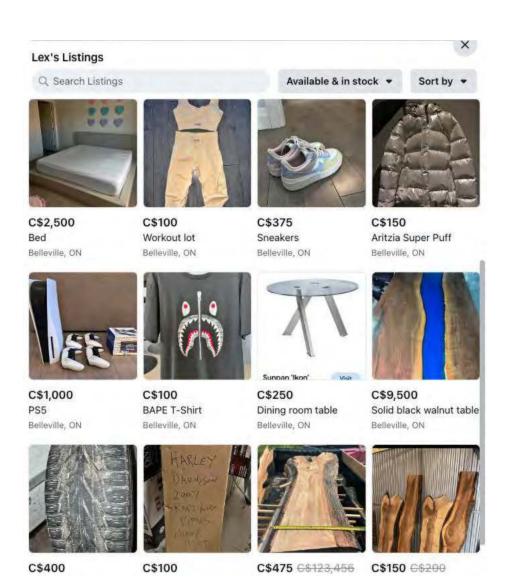


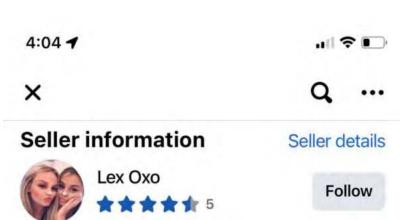
This is Exhibit "CO" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

—— *4.*×—







Joined Facebook in 2010



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



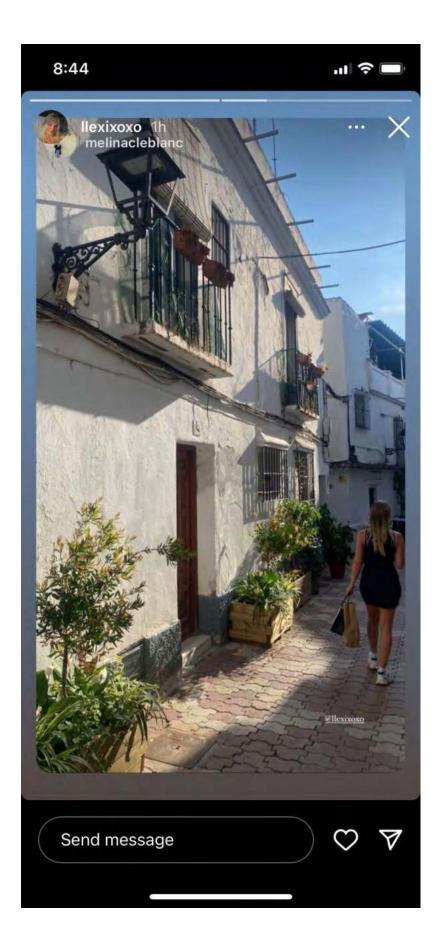
This is Exhibit "CP" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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

—— *4.*×————

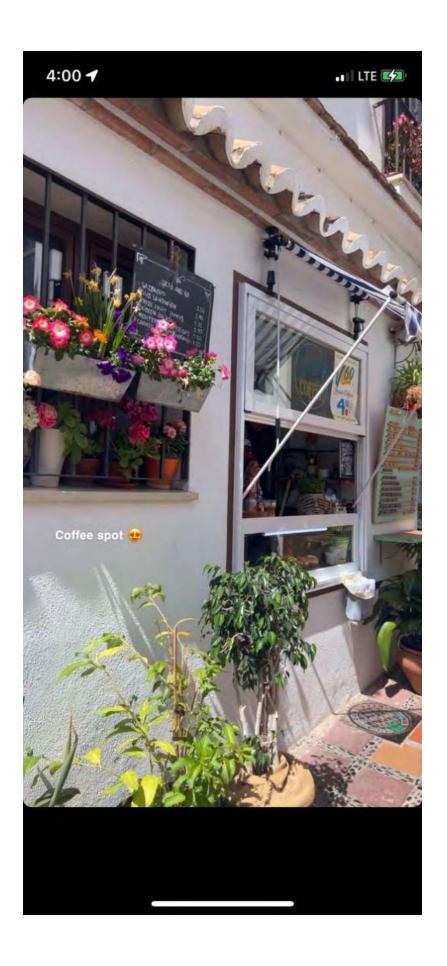








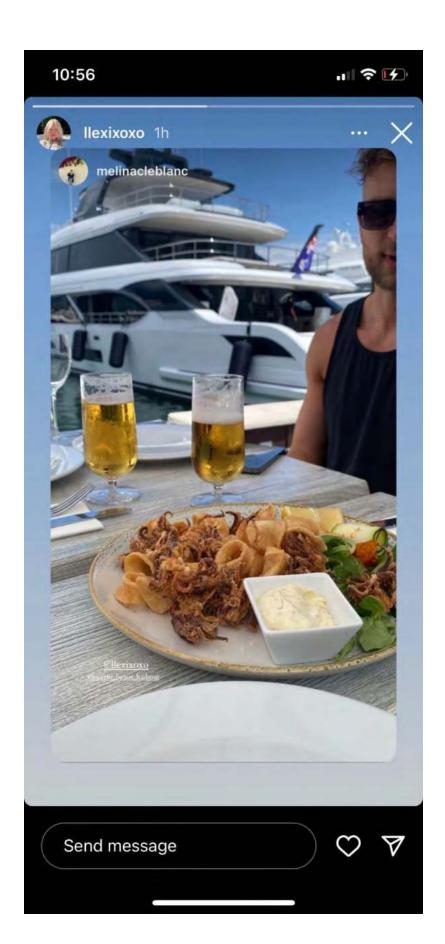




This is **Exhibit "CQ"** to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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____



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

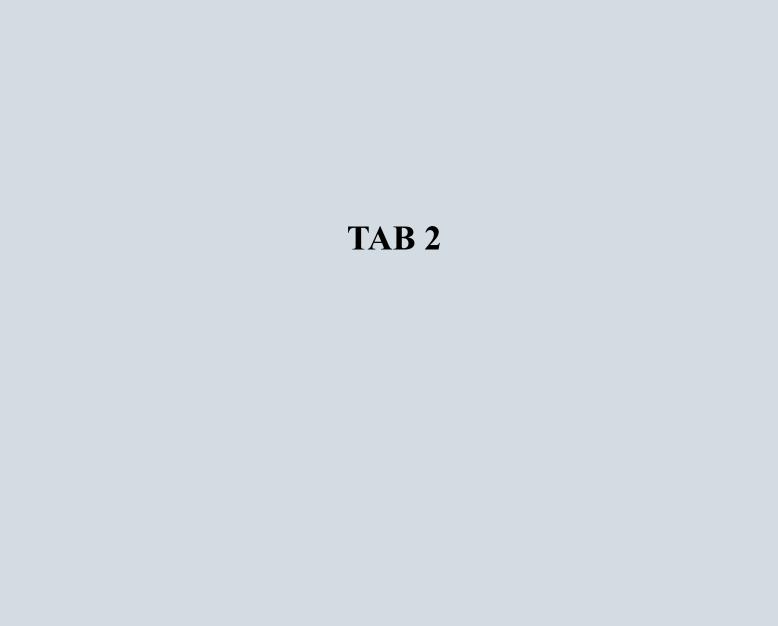
Suites of Somerset 52 Bayswater Ave., Suite 1505 Ottawa, ON K1Y 4K3

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

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

SUPPLEMENTARY AFFIDAVIT OF TAYLAN MCRAE-YU (SWORN SEPTEMBER 22, 2023)

- 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 member representative in this matter, 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.
- 2. This Affidavit ("Supplementary Affidavit") supplements the Affidavit ("McRae-Yu Affidavit") I swore on June 6, 2023. I have reviewed the pleadings and motion records in respect of this matter in advance of swearing the Supplementary Affidavit.

Alexandra Stinson

3. The Affidavit of Ivan Avramenko (Sworn September 21, 2023) ("Avramenko Affidavit") states at paragraph 5 that Alexandra Stinson ("Alexandra") was not a co-founder of the Boneheads non-fungible token (NFT) project.

- 4. In the McRae-Yu Affidavit, paragraphs 50 61 (Exhibit "AM" "AZ"), I outlined both the experience I had and the extensive due diligence I conducted to determine the identity of the Boneheads team. I further stated at paragraph 63 of the McRae-Yu Affidavit that "I understand the seriousness of an allegation of fraud and do not make it lightly" and only named Alexandra in this suit after satisfying myself that she was indeed a member of the Boneheads team.
- 5. Attached as Exhibit "CR" hereto are screenshots from the Discord showing that Alexandra Stinson ("Lexi") was understood to be one of the co-founders of the Boneheads NFT. Exhibit "CR" also shows that only three Discord users had the Discord role of "BONETHRONE" (@BONESTAR#4967, @lexibone#1296, @nikkibone#7858) which was the administrator role in Discord. Administrators are generally the people who create Discord servers. They establish the rules for participating, can invite people to join, and oversee their community. They have broad administrative control, and can bring in moderators to manage community members. Alexandra was an Administrator since the Boneheads Discord channel creation in or around July 21, 2021.
- 6. At paragraph 15, the Avramenko Affidavit states that "Alexandra has never been involved in the development or conceptualization of the Boneheads project, nor has she ever been paid for Boneheads related work".
- 7. Based on Exhibit "BD" (Table 1) to the McRae-Yu Affidavit, I summarized the movement of funds from the Boneheads NFT mint into centralized exchanges. Specifically, the first row of transactions in Table 1, corresponding to Exhibit "BE" to the McRae-Yu Affidavit, shows two transactions going into the Ethereum cryptocurrency address 0x6ce6afb735ddc2d6c3ac0187a1919fc20b720991 ("Coinbase Exchange 1"). This address received:
 - i. 1 ETH (approximately \$3,225.30 USD (\$4,068.39 CAD)) on August 29, 2021; and

- ii. 30 ETH (approximately \$96,759.00 USD (\$122,051.80 CAD)) on August 29, 2021.
- 8. The Coinbase Exchange was served with the Honourable Justice Hooper's Mareva Injunction Order dated June 15, 2023 (the "Mareva Order"). As per the Mareva Order, the Coinbase Exchange provided disclosure pertaining to the Coinbase Exchange 1 address which is attached hereto as Exhibit "CS". This disclosure confirms that the owner of the Coinbase Exchange 1 address is "Alexandra Stinson", with a listed address at 1034 County Road 3 in Belleville, ON, K8N 4Z1, who received 1 ETH (\$3,246.72 USD) and 30 ETH (\$97,290.30 USD) on August 29, 2021.
- 9. At paragraphs 60-61 of the McRae-Yu Affidavit, I outlined how I initially pursued this matter in Small Claims Court in Belleville, Ontario. Profitly Incorporated / Ivan Avramenko responded to this claim and stated, as shown in Exhibit "AZ" to the McRae-Yu Affidavit, that "Profitly provides ongoing marketing services for the digital community known as "BONEHEADS"." Alexandra Stinson is one of two Directors for Profitly Incorporated and thus, would have been involved in providing marketing services for Boneheads.
- 10. In response to ZachXBT's Twitter thread, which I outlined in paragraphs 43 48 (Exhibits "AG" "AL") of the McRae-Yu Affidavit, the Boneheads team stated on Discord on July 15, 2022, that "the doxxed individuals are not the founders, they helped with marketing the project in the early stages of the launch...". A screenshot of this Discord message is attached hereto as Exhibit "CT".
- 11. Alexandra was a co-founder of the Boneheads team and she directly received, at minimum, an excess of \$100,000 USD immediately following the mint from Boneheads NFT proceeds. This directly contradicts the claims made in the Avramenko Affidavit.

Further Dissipation

- 12. In paragraph 71 of the McRae-Yu Affidavit, I detailed how approximately \$943,678.20 CAD were moved from Boneheads accounts into centralized exchanges. As outlined in Exhibit "CU" hereto, on June 12, 2023, the Boneheads team moved an additional 8.5 ETH (\$14,812.27 USD (approximately \$19,823.26 CAD0) in funds as follows:
 - 0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317 ("BNHDZVAULT") moved 8.5
 ETH to 0xE66F9e497E1b83959F319b133EcF88FEAa8b82aC ("Kraken Exchange 3").
- 13. This brings the total amount that the Boneheads team has moved to centralized cryptocurrency exchanges to approximately \$963,501.46 CAD.
- 14. I would like to emphasize that this movement of funds took place before the Boneheads team was served with the Statement of Claim and Mareva Order and was not in contravention of the Mareva Order.

Full and Frank Disclosure

15. The Avramenko Affidavit states that I failed to make full and frank disclosure for four reasons: (1) Bonehead Roadmap (paragraphs 47-51 of the Avramenko Affidavit); (2) Boneheads Giveaways (paragraph 52 of the Avramenko Affidavit); (3) The Plaintiff's Unconscionable Behavior (paragraphs 53-56); and (4) The Plaintiff did not incur a loss (paragraphs 57-59 of the Avramenko Affidavit). I have dealt extensively with matters related to the Boneheads Roadmap, giveaways, and losses that myself and class members incurred in the McRae-Yu Affidavit. I would like to address the comments alleging I engaged in unconscionable behavior.

- 16. At paragraph 16 of the Avramenko Affidavit, Mr. Avramenko states "The Plaintiff has embarked on a smear campaign against Boneheads. In fact, I am worried that the Plaintiff's unsubstantiated allegations are what will cause damage to other Bonehead NFT purchasers as a whole." At paragraphs 53-56 of the Avramenko Affidavit, Mr. Avramenko states that I engaged in unconscionable behavior.
- 17. At paragraph 38 of the McRae-Yu Affidavit, I disclosed that many members of the Discord channel, including myself, were banned/booted because we expressed concern with the Boneheads teams' behavior following the mint. I specifically deny that I engaged in a smear campaign.
- 18. In addition, I specifically deny that "bad" behavior on Discord disentitles one from the utility associated with their NFT for two reasons: (1) Holders of Boneheads NFT did not need to be on Discord to access utility (such as that promised on the website); and (2) It is impossible in many cases to tie an identity to ownership of a token resulting in a practical problem with the argument pertaining to enforcement.
- 19. In addition, I have attached Exhibits "CV" "CY" hereto, showing Discord and Twitter activity, which demonstrate that the Boneheads team were routinely accused of being a rug pull, that the Boneheads team wore rug pull allegations as a badge of honour, believed these allegations would generate further marketing. In fact, the Boneheads team stated they were in fact "trying to get sued", as follows:
 - Exhibit "CV" In response to numerous allegations of being a rug pull, on October 2,
 2021, the Boneheads team stated on Twitter, "so if this wasn't a rug then...what was it?
 best answer wins a BONEHEAD giveaway winner announced...like never?";
 - ii. Exhibit "CW" In response to ZACHXBT's Twitter thread on the Boneheads NFT, on July 14, 2022, the Boneheads team joked about the rug pull and the free publicity it

- would provide and then again induced consumers to purchase more NFTs by stating a "10 Characters 10 seasons" would officially launch on the Boneheads anniversary in August 2022. No such release ever took place;
- iii. Exhibit "CX" On September 11, 2022, the Boneheads team stated in Discord "our first getting sued attempt", presumably in response to the Plaintiff's Claim in Small Claims Court I had served them with. On September 12, 2022, the Boneheads team stated in Discord "we're trying to get sued"; and
- iv. Exhibit "CY" On November 4, 2022, the Boneheads team showed an image in Discord displaying "NETFLIX AND BONE". When asked whether this was a collaboration with Netflix, the Boneheads team stated in Discord that they had filed a trademark registration and "we don't need permission from Netflix, if they have a problem they can suit us".

Damage:

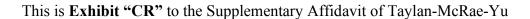
- 20. I specifically deny the allegations that my actions caused damage to Boneheads NFT or to holders. I believe all damage is by the Boneheads teams' own hand.
- 21. I admit that on July 7, 2023, the ZachXBT Twitter account released a Tweet as reproduced in paragraph 70 of the Avramenko. I am not ZachXBT nor an agent or affiliate of ZachXBT, and do not control nor review any of the content posted on the ZachXBT account. I am not a publisher of any content and deny that comments made were defamatory in nature.
- 22. Any actions that I have taken have been to get justice for Boneheads NFT purchasers like myself.
- 23. I swear this affidavit in support of this motion for and for no other improper purpose.

SWORN BEFORE ME remotely before me at the City of Ottawa, Ontario on September 22, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

Notary Public in and for the Province of Ontario

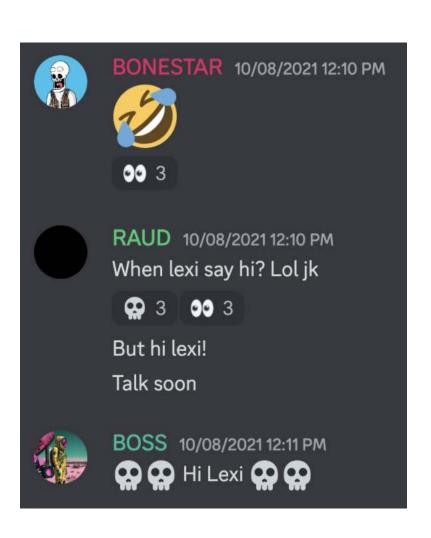
Sohaib Mohammad (LSO: 80696K)

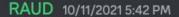
Taylan McRae-Yu



Sworn remotely before me at the City of Ottawa, Ontario on September 22, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)





https://twitter.com/raudskeggnft/status/1447693904027947011?s=21

raudbone (@RaudskeggNFT)

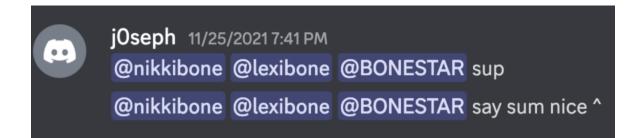
@BONEHEADS @ivybonee @nikkibonee @lexiibone My Bonehead is very sad they forgot their pants. But I know they'll be stoked with their fresh pair from the 2D metadata refresh coming in a few weeks! Then freezing metadata!!Then @opensea verification!!! #BONEHEADSFOREVER 🥎 📆 😱





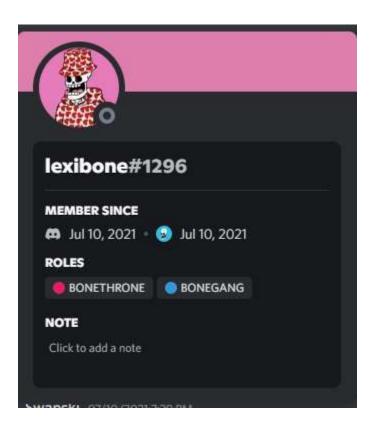
Twitter • 10/11/2021 5:41 PM

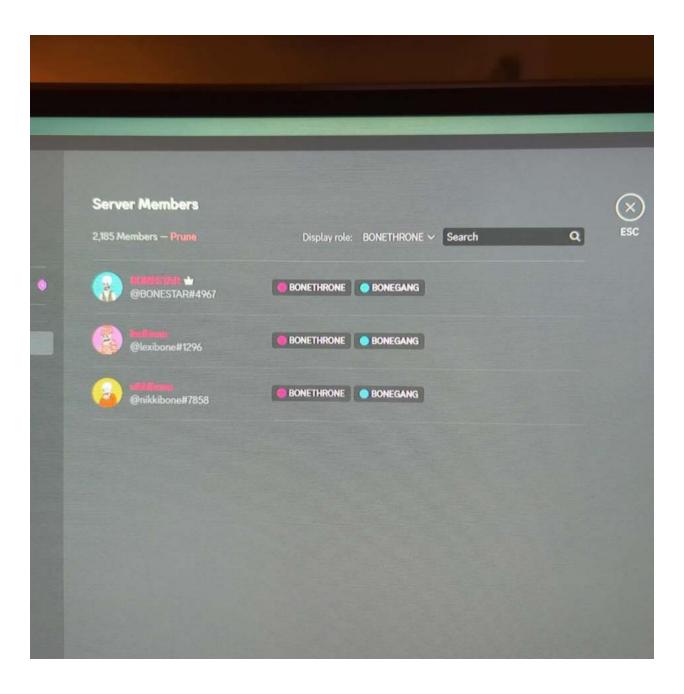


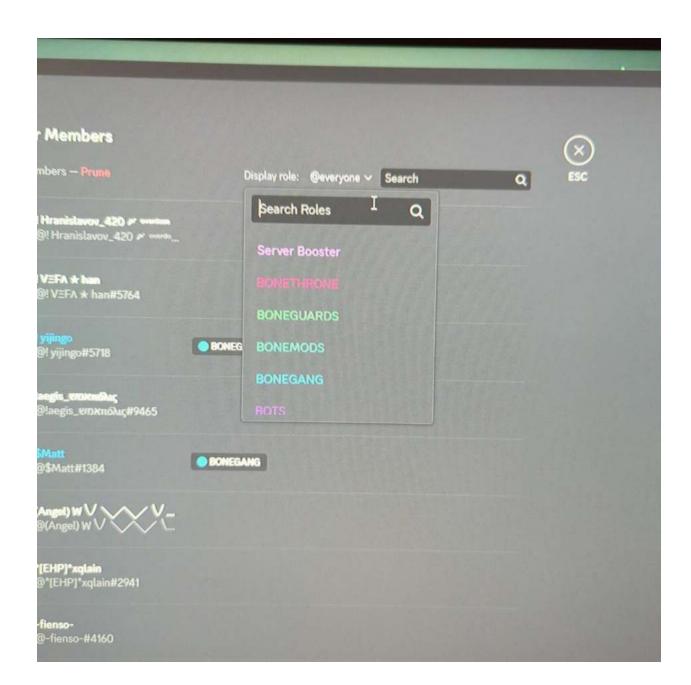


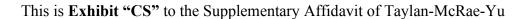


groovybone 12/24/2021 8:56 PM
Spending Christmas in my apt with the gf because my sister and brother in law are in town staying with my parents and my brother in law just tested positive smh Hope everyone has a great holiday and call your loved ones 🍑 🛕 y'all too @BONESTAR @nikkibone @lexibone









Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)

per



100 Pine Street Suite 1250 San Francisco, CA 94111 Phone: 1-888-908-7930

06/19/2023

Account Summary

Account Name	Balance on
BAT Wallet	0.0000 BAT
BCH Wallet	0.0000 BCH
BTC Wallet	0.00012715 BTC
CVC Wallet	0.0000 CVC
DAI Wallet	0.0000 DAI
DNT Wallet	0.0000 DNT
ETC Wallet	0.0000 ETC
ETH Wallet	0.0000 ETH
ETH2 Wallet	0.0000 ETH2
GNT Wallet	0.0000 GNT
LOOM Wallet	0.0000 LOOM
LTC Wallet	0.0000 LTC
Loan Collateral	0.0000 BTC
MANA Wallet	0.0000 MANA
MKR Wallet	0.0000 MKR
USDC Wallet	0.0000 USDC
ZEC Wallet	0.0000 ZEC
ZRX Wallet	0.0000 ZRX

Transaction History

Date	Account	Transaction	Amount	Amount (USD)	Balance
08/30/2021	ETH Wallet	You sent Ethereum to 0xC59Ef925B947473b85b85f7583D29487Ee2e8620	-30.68825271 ETH	-\$100,018.23 USD	0.0000 ETH
08/30/2021	ETH Wallet	You sent Ethereum to 0xC59Ef925B947473b85b85f7583D29487Ee2e8620	-0.31443547 ETH	-\$1,017.51 USD	30.68825271 ETH
08/29/2021	ETH Wallet	You received Ethereum from an external account	30.0000 ETH	\$97,290.30 USD	31.00268818 ETH
08/29/2021	ETH Wallet	You received Ethereum from an external account	1.0000 ETH	\$3,246.72 USD	1.00268818 ETH

Account Information Alexandra Stinson lexistinson9@gmail.com ON, CA

Date	Account	Transaction	Amount	Amount (USD)	Balance		
08/19/2021	ETH Wallet	You sent Ethereum to Ox8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F	-0.08701201 ETH	-\$352.94 CAD	0.00268818 ETH		
06/21/2021	ETH Wallet	You sent Ethereum to 0x04a0764d425843ae6Cca084758C151732439d9C8					
05/10/2021	ETH Wallet	You purchased Ethereum	0.09814782 ETH	\$490.47 CAD	0.2148572 ETH		
05/10/2021	BTC Wallet	You sold Bitcoin	-0.00710286 BTC	0.09814782 ETH	0.00012715 BTC		
05/07/2021	ETH Wallet	You purchased Ethereum	0.11458034 ETH	\$489.94 CAD	0.11670938 ETH		
05/07/2021	BTC Wallet	You sold Bitcoin	-0.00712802 BTC	0.11458034 ETH	0.00723001 BTC		
05/02/2021	ETH Wallet	You sent Ethereum to 0x04a0764d425843ae6Cca084758C151732439d9C8	-0.0513121 ETH	-\$188.29 CAD	0.00212904 ETH		
05/02/2021	BTC Wallet	You sold Bitcoin	-0.00284651 BTC	0.05344114 ETH	0.01435803 BTC		
05/02/2021	ETH Wallet	You purchased Ethereum	0.05344114 ETH	\$196.10 CAD	0.05344114 ETH		
03/03/2018	BTC Wallet	You received Bitcoin from Coinbase	0.000879 BTC	\$10.00 USD	0.01720454 BTC		
03/03/2018	BTC Wallet	You purchased Bitcoin	0.01632554 BTC	\$250.00 CAD	0.01632554 BTC		

ID Verification Attempts

Insufficient information for manual verification. Please have the user fill out their personal details first, and make sure they're in an eligible country.

Status	First Name	Last Name	Address1	Address2	Address Components	City	State	ZIP/Postcode	Country	DOB	SSN	Country- Specific Information	Document	KYC UUID	When	Informational Only? 6	Vendor	Vendor Reference
Success	Alexandra	Stinson	1034 County Road 3		street, number: 1034 route: County Rad 3 County Rd 3) locatly, potitical: Belleville administrative, eme level, 2, political: Prince Edward County administrative, eme level, 2, political: Ordano (DN) country, political: Conada (CA) postal, code: KRN 421 street, number: 1034 route: County Rad 3) (County Ra	Believille	ON	K8N 421	Canada	("year"->1988, "modth"->6, "day"=>10)		{ canadian_state*; CA*, *Calan_state*; *CoN*, *postCode*; *KBN 4Z1*)		181410e7- 1833-5a2e 628e- b7990e199ca9	2021- 07-20 1:48 PM UTC	No	trulico	0

ID:	60f6d4a415eccc197f05b996				
Created at:	2021-07-20 6:50 AM PDT				
Status:	Completed	-			
Type:	Passport				
Source:	Web React (File)				
Image type:	JPEG/?				
Vendor:	Au10tix MRZ				
Name:	Alexandra Stinson				
DOB:	1998-06-10				
Address:					
Location:	No state / Canada				
ID number:	AJ074108				
Gender:	F				
Admin flag:		~]			
Raw vendor	data				
Retry with J	umio + address extraction				
Supporting Document	60f6d4a415eccc197f05b99a				
CAMA CAMA	Typers S				

ID:	5a9b4a64c9ad2a02c996205d				
Created at:	2018-03-03 5:22 PM PST				
Status:	Completed				
Type:	Driver's License				
Source:	Web React (Webcam)				
Image type:	JPEG/JPEG				
Vendor:	Jumio				
Name:	Alexandra Stinson				
DOB:	1998-06-10				
Address:					
Location:	ON / Canada				
ID number:	S82610190985610				
Gender:	Unavailable				
Admin flag:		~			
Raw vendor	data				
Retry with Ju	umio + address extraction				
Supporting Document	5ba750d30e94ff0001de2854				





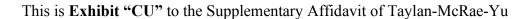
This is Exhibit "CT" to the Supplementary Affidavit of Taylan-McRae-Yu

Sworn remotely before me at the City of Ottawa, Ontario on September 22, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)



BONESTAR 07/15/2022.4:47 PM and the doxxed individuals are not the founders, they helped with marketing the project in the early stages of the launch, since we tried to do as much as we could on a bootstrapped basis - most of our partners were paid in percentages of the mint



Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)







Overview **Internal Txns** Logs (1) State Comments More ~ ? Transaction Hash: 0xab71cd81b5ae51196c9b2484644b9b0991e0903dd2d8269cfd96a2a9b6271f62 ? Status: Success ? Block: **2** 17465096 713204 Block Confirmations ? Timestamp: ① 100 days 12 mins ago (Jun-12-2023 04:16:35 PM +UTC) | ♂ Confirmed within 3 secs ② Sponsored: ? From: 0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317 ② To: 🖹 0xE66F9e497E1b83959F319b133EcF88FEAa8b82aC 🗗 🔮 └ Transfer 8.5 ETH From 0xE66F9e...Aa8b82aC To Kraken 4 ? Value: ♦ 8.5 ETH ③ \$14,812.27 ? Transaction Fee: 0.001998146121115677 ETH () \$3.48 ? Gas Price: 40.120999159 Gwei (0.000000040120999159 ETH)

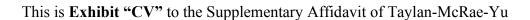
More Details:

+ 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.



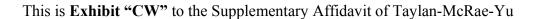
Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)





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

11:41 PM · Oct 2, 2021



Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)

per

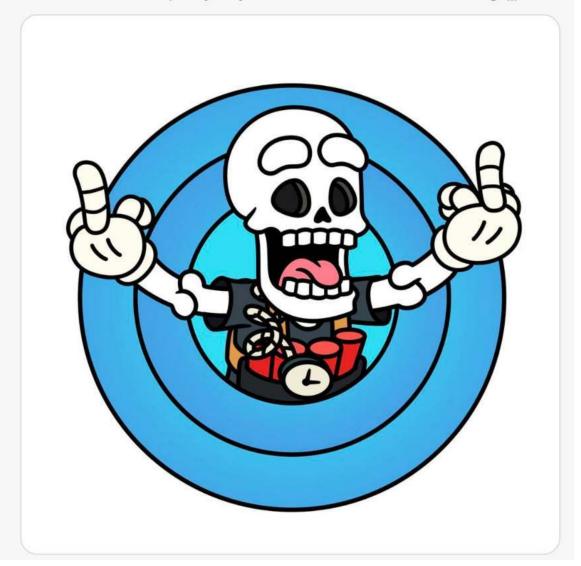


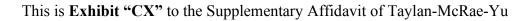
BONESTAR @0xBONESTAR · Jul 14, 2022

wen biggest NFT rug account tweets and provides free publicity • • • • • cats outtttttaaa the bag BH's, BONNIVERSARY week it all officially begins

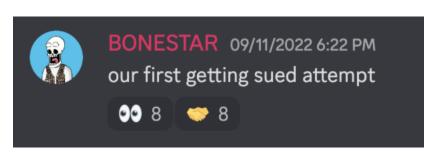
10 Characters - 10 Seasons, if you were in our secret BONEHEAD

FOREVERS over this past year you would have known this all along • •





Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)





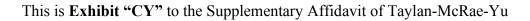
BONESTAR 09/11/2022 11:59 PM correct ^^



groovybone 09/12/2022 12:51 AM I'm confused lmao



BONESTAR 09/12/2022 8:16 AM we're trying to get sued



Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)

per





BONESTAR 11/04/2022 12:07 PM

TM means a trademark registration has been filed



we don't need permission from Netflix, if they have a problem they can suit us



Court File No.: CV-23-00092340-00CP	
Profitly Incorporated et. al.,	Defendants
	alla
Taylan McRae-Yu	Plaintiff

ONTARIO SUPERIOR COURT OF JUSTICE

Proceeding commenced at OTTAWA

Proceeding under the Class Proceedings Act, 1992

SUPPLEMENTARY AFFIDAVIT OF TAYLAN MCRAE-YU (SWORN SEPTEMBER 22, 2023)

DELAWYER PROFESSIONAL CORPORATION

52 Bayswater Ave., Suite 1505

Ottawa, ON K1Y 4K3

SOHAIB MOHAMMAD

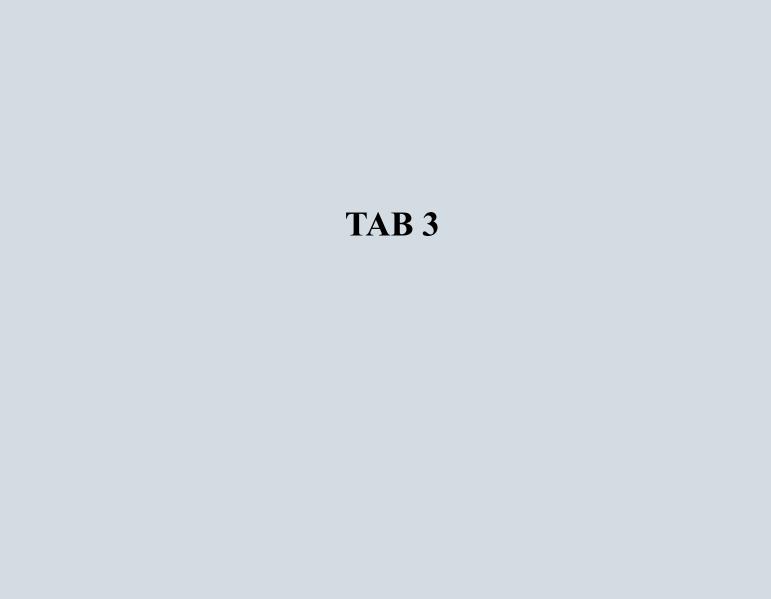
TSO#: 80696K

Tel: (647)-535-8706

Email: sohaib@delawyer.io

Lawyer for the Plaintiff,

Taylan McRae-Yu



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

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

AFFIDAVIT OF DOMINIC SIMPSON

- I, Dominic ("Dom") Simpson, of the City of Peoria, in the State of Illinois, in the United States of America, MAKE OATH AND SAY:
- 1. I am a prospective class member in this matter. Where I have made statements based on information and belief, I have stated the source of the information and believe it to be true.
- 2. I have reviewed the following documents in this matter: (1) The Statement of Claim; (2) The Statement of Defence and Counterclaim; (3) The Reply and Defence to Counterclaim; and (4) The Moving Party's Motion Record dated September 1, 2023.

Background

- 3. I presently work as a Desktop Engineer for the Peoria County Government. In this capacity, I have the unique responsibility of working directly with esteemed judges and attorneys.
- 4. I purchased a total of 28 Boneheads non-fungible tokens (NFTs) between August 20, 2021 until November 25, 2022. The total cost of these NFTs was approximately \$6,896 USD including transaction fees. Attached as Exhibit "A" hereto is a document outlining my Boneheads NFT

purchases which includes relevant details such as the Boneheads NFT number and the associated transaction ID corresponding with the URL where transactions can be verified.

- 5. I have been a member of the Boneheads Discord since before the mint on August 20, 2021. I have always been respectful and acted with integrity on the Boneheads Discord.
- 6. On October 12, 2021, I received a direct message from the Boneheads team asking me if I wanted to be voluntary moderator for the Boneheads Discord. I agreed. Attached as Exhibit "B" hereto is a screenshot from Discord showing this direct message exchange. I am the Discord user "Prismo" in Exhibit "B". I refer to "BONESTAR" as the Boneheads team for the purposes of this Affidavit.
- 7. Because of my role as a volunteer moderator in the Boneheads Discord, I have relevant knowledge which I believe contradicts many of the claims made in the Affidavit of Ivan Avramenko dated September 1, 2021 ("Avramenko Affidavit").
- 8. I disagree with paragraph 24 of the Avramenko Affidavit, that changes "were well received by the Boneheads Discord Community" for the reasons which I will outline below.
- 9. I disagree with paragraph 50 of the Avramenko Affidavit, that there "were never any dates, timelines or pricing attached to any of the listed items with the Roadmap. Boneheads Discords users understood this" for the reasons which I will outline below.
- 10. I disagree with paragraphs 53 and 54 of the Avramenko Affidavit. There were dozens of customers of the Boneheads NFT who were banned from the Discord channel. Many of these individuals were banned because they expressed their frustration with non-delivery of the roadmap items. In some cases, individuals were banned from the Discord simply because they sold or liquidated their Boneheads NFTs.

2D Reveal / Metadata Refresh Event (October 31, 2021)

- 11. Once the Boneheads NFT minted out, a lot of customers were upset because their Boneheads NFT art was incomplete. For example, many of the Boneheads NFTs did not have a full "outfit" on, such as shoes or pants.
- 12. In response, the Boneheads team announced on their website that the complete collection was going to be revealed in October 2021. A screenshot of this from the Boneheads website is attached hereto as Exhibit "C". This was referred to as the "2D Event" or "Metadata Refresh" event. The Boneheads team stated that the 2D Event would include a website where Boneheads NFT holders could upgrade the clothing on their Boneheads NFT.
- 13. On October 7, 2021, the Boneheads team created a separate Discord chat channel referred to as "Boneheads Forever". Attached hereto as Exhibit "D" is a screenshot where the Boneheads team stated that the Boneheads Forever channel was created for "the most active/top holders" of the Boneheads NFT.
- 14. On October 7, 2021, the Boneheads team stated in the Boneheads Forever channel that the 2D Event would take place on October 31, 2021. This was also stated on Twitter on October 12, 2021. Screenshots from the Boneheads Forever Discord showing these messages are attached hereto as Exhibit "E".
- 15. On October 8, 2021, the Boneheads team stated in the Boneheads Forever channel that the team was "hustling our faces right now" and that "the arts done" and that they wanted "a tsunami" at the same time as the "2D refresh day". A screenshot from the Boneheads Forever Discord showing this is attached hereto as Exhibit "F".
- 16. On October 10, 2021, a Discord user by the name of "JP" asked what was next after the 2D Event. In response, the Boneheads team stated, among other things, "we're going to have a

- \$100K ETH giveaway contest, with a physical component, initiates shortly after 2D reveal". This Discord exchange from the Boneheads Forever channel is attached hereto as Exhibit "G".
- 17. On October 11, 2021, a Discord user by the name of "Raud" shared a Tweet on his Twitter account where he tagged the founders of Boneheads (@ivybonee @nikkibonee and @lexiibone), and stated how excited he was for the "2D metadata refresh". A screenshot of this from the Boneheads Forever Discord is attached hereto as Exhibit "H".
- 18. On October 12, 2021, a Discord user by the name of "Smokeypot" asked how the new website was coming along in respect of the 2D Event. Attached as Exhibit "I" is a screenshot from the Boneheads Forever Discord showing the Boneheads teams' response stating the website was forthcoming with details about how the website would look.
- 19. On October 12, 14, and 15 of 2021, the Boneheads team provided more information regarding the 2D Event including "the ability to buy the kaws style limited edition collectible toys + the drip" and other comments about NFT rarity. Screenshots of these Discord messages from the Boneheads Forever channel are attached hereto as Exhibit "J".
- 20. On October 21, 2021, in advance of the anticipated October 31, 2021 metadata refresh, the Boneheads team released a series of messages on the Boneheads Forever Discord which are attached hereto as Exhibit "K". Among these messages, the Boneheads team stated "if you guys only knew what was in the works, and how big this is going to be" in respect of the 2D Event. After this, the Boneheads team ceased all communication on the Boneheads Forever Discord and did not return until November 9, 2021.
- 21. In the period leading up to the October 31, 2021 2D Event, there was significant anticipation from community members. A number of customers were making large purchases of

Boneheads NFTs. Attached as Exhibit "L" hereto are some of the messages on the Boneheads Forever channel pertaining to these purchases during this time.

- 22. Attached hereto as Exhibit "M" is a graph depicting secondary market sales of Boneheads NFTs on the Opensea marketplace taken from the "analytics" sections of the Opensea page for Boneheads. The largest peak on Exhibit "M" corresponds to sales that took place in October 2021, because of the anticipation leading to the 2D event.
- 23. Following the non-delivery of the 2D Event as promised by the Boneheads team, some of the members of the Boneheads Forever Discord, including "bulg", a holder of over 50 Boneheads NFTs, liquidated his entire Boneheads NFT holdings. Attached as Exhibit "N" is a Boneheads Forever Discord channel screenshot of this, with "bulg" corresponding to the Discord user "ND".
- 24. On November 9, 2021, there was a Ethereum Name Service (ENS) airdrop for holders of ENS domain names. The Boneheads team made an appearance in the Boneheads Forever channel to state they had received 1,000 tokens from the ENS airdrop. This message from the Boneheads Forever Discord is attached as Exhibit "O". After this, the Boneheads teams again disappeared from the Boneheads Forever channel until November 25, 2021.
- 25. Many community members were frustrated with the non-delivery of the 2D Event and ongoing delay. Others continued to believe that they delay was intentional and part of the Boneheads teams' master plan. I have attached a series of messages from the Boneheads Forever channel as Exhibit "P". These messages show member frustration during this time with the lack of updates from the Boneheads team, including the fact that Boneheads NFTs were being sold on the secondary market for \$0.
- 26. On November 25, 2021, the Boneheads team returned to the Boneheads Forever channel. In usual fashion, the Boneheads team stated they were working in "stealth" mode for "maximum

impact until we're ready", and that "we're not dropping anything or any updates until our internal timelines". These exchanges from the Boneheads Forever Discord are highlighted as Exhibit "Q". In addition, Exhibit "Q" shows that the Boneheads team teased images of Boneheads and stated "we just got ahold of the bonestar.com domain, and the @BONESTAR IG handle...".

- 27. It is important for me to point out that the 2D Event never took place. Consumers like myself continued to be duped into believing that something "big" was coming and that "diamond hand" holders would be rewarded for their wait. The Boneheads team would come on the Discord server every few months, make a few updates here and there regarding things they were working on or building, and then disappear. Each of these instances, including many which included specific dates for deliverables, led to a wave of Boneheads NFT purchases and the same general pattern would play out amongst consumers. Those who expressed frustration or dissent would be banned from Discord or referred to as people who were causing "FUD" (FUD is a common term used in cryptocurrency which stands for "Fear Uncertainty and Doubt").
- 28. For example, attached as Exhibit "R" shows screenshots from the Boneheads Forever Discord for the user "JP" being banned from Discord on December 11, 2021. JP is the same Discord user who had previously expressed concern about the lack of delivery (as shown in Exhibit "Q").
- 29. I dedicate the remainder of my Affidavit to the ongoing nature of promises made by the Boneheads team on the Discord Forever channel. As of the date that I am swearing this Affidavit, the Boneheads team has not delivered a single item of utility.

January 2022 ETH Giveaway

30. On December 30, 2021, the Boneheads team came on Discord and stated "almost at 3K attributes". This was the first message the Boneheads team put in the Boneheads Forever channel

since November 25, 2021. This again led to a wave of consumer purchases. I have attached screenshots from the Boneheads Forever Discord showing this as Exhibit "S" hereto.

- 31. In January 2022, the Boneheads team became more active on Discord and made a number of statements regarding development that they were working on including how forging would work and that a portion of future sales would be given as a kickback to Boneheads NFT holders. The Boneheads team further stated on January 28, 2022 that "reveal will occur within Q1, that's a certainty" and "100% before Q1 over". Screenshots of some of these statements made on the Boneheads Forever Discord are attached hereto as Exhibit "T".
- 32. In addition, I have attached a series of Boneheads Forever channel screenshots hereto as Exhibit "U" corresponding to two giveaways. The Boneheads team had made 10 ETH from the LooksRare token airdrop, which was a new NFT marketplace that had opened up. The Boneheads team gave a portion of this airdrop back to Boneheads Forever channel members who signed up on an Excel sheet. I received 0.2481 ETH from this giveaway. It is important for me to emphasize that this giveaway was not part of any roadmap. Many of the Boneheads Forever members, including myself, used the ETH from this giveaway to purchase more Boneheads NFTs, as shown in my Boneheads NFT purchase history in Exhibit "A".
- 33. Also shown in Exhibit "U" is a giveaway organized by the Boneheads Moderators including myself. The Boneheads team had locked the Discord channel, meaning no new individuals could enter the Discord. The Boneheads team joked about not doing the giveaway as another option was to "hold your bones".
- 34. Looking back, I believe the ETH giveaway combined with the details regarding the future deliverables was intended as a way to combat allegations of rug pull and fraud. To me this maneuver was the Boneheads teams attempt to deflect potential accusations by giving holders

something of actual value for the first time. Coincidentally, this led to a wave of secondary marketplace sales for Boneheads NFTs in January 2022 corresponding to the second highest peak in Exhibit "M".

Anticipated Q1 2022 Reveal

- 35. In February, the Boneheads team posted a few messages in the Boneheads Forever Discord. On February 10, 2022, the Boneheads team stated that "a reveal sneak peak" would be dropped "within the month only to this channel". In addition, on February 17, 2022, the Boneheads provided more detail about the incoming reveal. These messages from the Boneheads Forever Discord are attached hereto as Exhibit "V".
- 36. The Boneheads team did not provide a sneak peak in February of 2022 and nor was there any reveal by the end of Q1 2022 as the Boneheads team had promised. I have posted, as Exhibit "W" attached hereto, screenshots of the consumer sentiment during this time from the Boneheads Forever channel, including those stating the project was a rug pull.
- 37. The Boneheads team did not post anything on the Boneheads Forever channel in the second half of February 2022 or all of March 2022. On April 3, 2022, the Boneheads team posted a message to the Boneheads Forever channel stating the project was getting "closer to launch" and that "we're dropping everything at once site, refresh, marketplace, and the first collection (clothes + physicals)". I have attached this post from the Boneheads Forever channel as Exhibit "X" hereto.
- 38. There was effectively radio silence from the Boneheads team during the rest of April and May. I have attached several screenshots from Boneheads Forever community members as Exhibit "Y" attached hereto during this time. Exhibit "Y" shows that Boneheads Forever users were anticipating the "Avatar App Access" because of the website roadmap. Exhibit "Y" further shows

a community member, "SpaceMexManny" leaving the Boneheads Forever channel because he had been "completely let down" and that "It has come to a point where I feel like staying in these servers would be a way to silently agree with how things are done." Manny's positive presence in the server was pivotal for many of us. Concerns grew about the group's well-being without him. Many stayed in the server due to the fear of missing out or being unable to return to the Discord channel in the future.

Lawsuit and ZACHXBT Tweets

- 39. On June 11, 2022, a Boneheads Forever user by the name of "j0seph" shared a direct message he had received from @0xTay ("TAY") on Twitter. Screenshots of this from the Boneheads Forever Discord are attached hereto as Exhibit "Z". The message stated that TAY was looking to file a report with the department of justice regarding the Boneheads.
- Despite nearly 2 months of inactivity, the Boneheads team immediately responded in Discord on June 13, 2022 with a sneak peek of a collection. The Boneheads team further stated "p.s. 69 days until reveal" and that the reveal would take place on August 20, 2022. One user asked whether the "current bones" would be undergoing a refresh and the Boneheads team responded that "all are currently refreshing" and provided more detail about the soon to be delivered utility. Screenshots of these Boneheads Forever Discord messages are attached are hereto as Exhibit "AA".
- 41. The Boneheads team subsequently disappeared for another month and reappeared on July 10, 2022 with more "sneak peaks" and stated "big big day on the 1yr anniversary". Screenshots of these sneak peaks and these messages are attached hereto as Exhibit "AB".
- 42. On July 14, 2022, the blockchain sleuth name as ZachXBT on Twitter released a series of Tweets alleging that the Boneheads was a rug pull. Reactions within the Discord were mixed. I

have attached screenshots of the Boneheads Forever Discord channel during this time as Exhibit "AC" hereto. Among other things, Exhibit "AC" shows:

- The Boneheads team referred to ZachXBT's Tweet as "pure BS" and that "the doxed individuals are not the founders, they helped with marketing this project in the early stages of the launch";
- ii. The Boneheads team further stated that "Bonniversary is the week when the machine is set in motion";
- iii. The Boneheads team stated "we've worked with over 40 contractors at this point just on the digital side of things"; and
- iv. The Boneheads team stated "we're really looking forward to Bonniversary week, lots to come on that, and that's all we're focused on everything else is noise and completely irrelevant the product is the only thing that matters, and it's undeniable, BONEHEADS will be a massive brand one day, we have too much content at this point, and the DNA of the brand is raw, nobody can fuck with us".
- 43. "Bonniversary week" was understood as corresponding to the 1-year anniversary of the Boneheads NFT mint/launch, which would be August 20, 2022.
- 44. The messages shown in Exhibit "AC" by the Boneheads team resulted in members of the Boneheads community purchasing more Boneheads NFTs in anticipation of the anniversary release.
- 45. The Boneheads team then outlined an extensive plan for their anniversary week. I have attached screenshots from the Boneheads Forever Discord channel of this plan as Exhibit "AD" hereto. As Exhibit "AD" shows, the Boneheads team stated:
 - i. Anniversary week would reveal a roadmap and be the start of a marketing push;

- ii. Refresh would take place around 90 or so days after July 18, 2022, depending on how marketing went;
- iii. The few months following the reveal would focus on "Voxel, 3D, and 2D BH's";
- iv. There would be a "\$BONE" cryptocurrency token, an "app", "web 2 shopify" marketplace/store;
- v. In August, every Bonehead NFT "will get turned into an unrevealed state", and a character showcase would be available on the Boneheads website where Boneheads NFT holders would be able to "preview some traits, create some, and suggest traits"; and
- vi. Boneheads Forever Discord members would be given a "link to the mobile app in approximately two weeks" (on July 22, 2022).
- 46. Attached as Exhibit "AE" are a series of exchanges which took place on the Boneheads Forever Discord in August 2022 including some which are summarized as follows:
 - i. On August 15, 2022, the Boneheads team stated "no delays...whitepaper on anny week, site update sept 1, daily previews starting oct 1, drop november 1, reveal jan 1, app drops anny week for forevers and public push will start oct 1 in tandem with the previews";
 - ii. On August 20, 2022, on the anniversary date of the Boneheads NFT mint, no drop took place. The Boneheads team simply wished everyone a happy anniversary and stated a whitepaper would be released within a week; and
 - iii. On August 23, 2022, one of the biggest Boneheads NFT holders "Smokeypot" left the Discord.

- 47. Attached as Exhibit "AF" are messages posted by the Boneheads team on the Boneheads Forever Discord channel on September 1, 2022. These messages state, "don't expect anything with the WP....real spicy begins with the drop...Next is Oct 1, site and app dropping Oct 1, drop dropping Nov 1". The Boneheads concluded their message with "we'll be back October 1st".
- 48. The long-awaited whitepaper ("WP"), which took "1 year" to develop, is attached hereto as Exhibit "AG". The only thing of substance included in the whitepaper was that drops would open on the 1st of every month with the first drop scheduled for November 1, 2022. The whitepaper looks like it was put together in all of about a few hours.
- 49. Attached as Exhibit "AH" hereto are two communications from the Boneheads team in September 2022 in the Boneheads Forever Discord as follows:
 - On September 3, 2022, the Boneheads team stated that the refresh would be "Jan 1st refresh 100%". This refresh was originally intended to take place October 31, 2021 but was now pushed to January 1, 2023; and
 - ii. On September 23, 2022, the Boneheads team stated that website would be completed by October 1, 2022. The Boneheads team specifically used the phrase "signed sealed delivered" indicating the website was complete.
- 50. Attached as Exhibit "AI" hereto are communications from the Boneheads team in October 2022 in the Boneheads Forever Discord including the following:
 - i. On October 1, 2022, the date that the website was promised, the Boneheads team stated in Discord that "sorry no site previews today" but that limited edition pieces would be dropping on November 1, 2022; and

- ii. On October 27, 2022, the Boneheads team stated that "we'll know in the next 48 hours if Nov 1 deadline will be met....product is ready, packaging is delayed, the first drop is the forevers t-shirts".
- On November 1, 2022, the Boneheads team stated in Discord, "no easy way to say this, we're not going to make the nov 1 deadline, sorry to disappoint...". On November 2, 2022, the Boneheads team stated, "we set an internal deadline that everything has to be out by xmas or we're folding, and we're not going to fold...regardless of whether or we think its "good enough"...and that won't be pushed, 0% chance, I probably won't be happy with it, but it's what we all agreed on". This was met with extreme skepticism in the Discord. These Boneheads Forever Discord communications are attached hereto as Exhibit "AJ".
- 52. On November 4, 2022, the Boneheads team teased an image showing a product that says "NETFLIX AND BONE". The team subsequently stated that a trademark registration had been filed and that "we don't need permission from Netflix, if they have a problem they can suit us". These Boneheads Forever Discord communications are attached hereto as Exhibit "AK".
- On November 13, 2022, the Boneheads team stated that they "can't wait for Jan 1 and the first every month onwards forward" and that "full launch Jan 1". On December 25, 2022, the Boneheads team stated confirmed that a drop would be happening on January 1, 2023.

 These Boneheads Forever Discord communications are attached hereto as Exhibit "AL".
- On December 31, 2022, the Boneheads time released a message in the Boneheads Forever Discord regarding the long-awaited January 1, 2023 drop. The message stated that individuals would be able to fill out a google doc "tomorrow" with their information. The message further stated that "As far as the reveal goes we've decided that there's upside in

keep it unrevealed..". No Google document came and there was radio silence from the Boneheads team for several days following this announcement. For many consumers, including myself, this was the final straw. I have included, as Exhibit "AM" attached hereto, Boneheads Forever Discord communications evidencing the above including the frustration that Boneheads Forever members expressed at this.

- On January 7, 2023, the Boneheads team that the "drop" would be "shipping this month" and that Boneheads NFT holders would be "pleasantly surprised". As evidenced by the February 8, 2023 message by the Discord user "LUXBONE", no shipment or delivery took place in January 2023. These communications from the Boneheads Forever Discord are attached hereto as Exhibit "AN".
- 56. Since then, there were little or no communications from the Boneheads team and any attempt at communicating with the Boneheads team were responded to weeks or months later with some sort of "troll" response or skull emoji from the Boneheads team.
- 57. The Boneheads "General" chat channel and "Boneheads Forever" chat channels were made completed inaccessible in or around August 2023, after the news of this class action lawsuit broke. I am not sure if these channels have been deleted by the Boneheads team but I can no longer access them.
- I believe the Boneheads team never intended to deliver any utility and stringed consumers like myself along for years, eventually hoping that we would give up. The Boneheads team pulled the ultimate rug.
- 59. At this point, I have no expectation that I will ever get my money back. But, I am writing this Affidavit in order to hold these individuals accountable.
- 60. I swear this affidavit in support of this motion for and for no other improper purpose.

SWORN BEFORE ME remotely at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

Commissioner of Oaths in and for the Province of Ontario

Sohaib Mohammad (LSO: 80696K)

Dominic Simpson

Dominic Simpson

This is **Exhibit "A"** to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Pemotely

Boneheads NFT#	Price	Purchase Price	Gas Price	Date of Purchase	Transaction ID
3570	0.1	\$328.65	\$40.95	Aug-20-2021	https://etherscan.io/tx/0x7d6b88df75d9226f4e90a3a1113bbb1110295f4670ebba485b3d331d849178c9
1227	0.033	\$106.81	\$23.65	Aug-21-2021	https://etherscan.io/tx/0x43b6b162ba4d017230d618783a68a479c45f5458d04d1d28591b57f77e7833a5
9490	0.022	\$75.59	\$41.87	Sep-18-2021	https://etherscan.io/bx/0x9df2b3156eeefa98d109141a14c43807ccfb822974f671c534fd15d4cad4f667
3866	0.06	\$175.52	\$35.76	Sep-25-2021	https://etherscan.io/tx/0x89ce57c4521160a1483e335029d2b1cc348c33e0ddc45d78dc9970db145d1de5
8716	0.032	\$130.01	\$56.86	Oct-21-2021	https://etherscan.io/tx/0x7f2600ed29d8378e8b727b38b0698f7aa8d32ecc32298e19584e6438b2fef645
7229	0.029	\$122.39	\$52.72	Oct-25-2021	https://etherscan.io/tx/0x36cc40620a1eff6d4866d02f3a5285514451567a21f64994e630459521e19ef3
732	0.05	\$230.86	\$68.18	Nov-07-2021	https://etherscan.io/tx/0x37b7addf55e9410e5023f5cf1e4cda6e1e1e7acfe0a3ece8dd83034a4d7ab41a
638	0	\$0.00	\$76.50	Nov-26-2021	https://etherscan.io/tx/0x85ab3504249877241daaecf17f51595ca1118054d65b091255c3cffcddc3531c
7276	0.005	\$22.57	\$89.31	Dec-02-2021	https://ethenican.io/tx/0x530a7c424e6da3c241cf114c97b370d4acc74ddf49a938f62c840d9950b20732
4167	0.00005	\$1.84	\$70.51	Dec-31-2021	https://etherscan.io/tw/0xde7844eff5caaef2b37ec519d9d537afd9f483225a5efda5bb11d934c36ce86a
4169	0.00005	\$1.84	\$73.64	Dec-31-2021	https://etherscan.io/tx/0xef93e842d540ed3e0f480e4387742fafc01ba550c0b4f25eb76864ecb9287064
9837	0.07	\$257.31	\$68.66	Dec-31-2021	https://etherscan.io/tx/0xdc0a4425a9f80cfde7a796cfb1a5a31d5d7e665e4d0e0b074e9abd87ee6040b9
7960	0.017	\$64.03	\$63.76	Jan-01-2022	https://etherscan.io/tx/0x12c5249cb1bb8337eb9f269a482a4fb73b972ee49d498f431f2afd58e8c5b6f4
9146	0.04	\$133.98	\$69.50	Jan-15-2022	https://etherscan.io/tx/0x9df2b3156eeefa98d109141a14c43807ccfb822974f671c534fd15d4cad4f667
9216	0.037	\$123.93	\$69.50	Jan-15-2022	https://etherscan.io/tx/0x9df2b3156eeefa98d109141a14c43807ccfb822974f671c534fd15d4cad4f667
1596	0.04	\$133.98	\$69.50	Jan-15-2022	https://etherscan.io/tx/0x9df2b3156eeefa98d109141a14c43807ccfb822974f671c534fd15d4cad4f667
8148	0.04	\$133.98	\$69.50	Jan-15-2022	https://etherscan.io/tx/0x9df2b3156eeefa98d109141a14c43807ccfb822974f671c534fd15d4cad4f667
2741	1.1	\$3,160	\$2	Feb-12-2022	https://etherscan.io/tx/0x71279149a8ab9913aec2b1fb36599af350003663ba45fb47b2cc380e24f17fa3
8571	0.028	\$89	\$39	Feb-15-2022	https://etherscan.io/tx/0x85729d852f5213fcb4bd895af731889c730377649e72c9e0de6add5ffae6d6e9
1378	0.033	\$86.12	\$29.10	Feb-23-2022	https://etherscan.io/tx/0xff22685d8ba082cfaacffe0153e77c3d4b7993403c7dc65cccf3ff945322017a
1380	0.033	\$86.12	\$25.23	Feb-23-2022	https://etherscan.io/tx/0xfc6c33e53eef854c93e4b73a2ce55c8b785820548e30076396cdc18a3fc5d544
3793	0.0249	\$64.27	\$38.60	Feb-23-2022	https://etherscan.io/tx/0x96d8861f810f2c7175f7cadec37b765a85e526bb95d699391dccead38c95bccc
4020	0.011	\$17.86	\$4.50	Jun-17-2022	https://etherscan.io/tx/0x981105854850ef2ca51c1fbdae093f5362ecd238ba68272b7feee7f07d11d8e6
2348	0.013		\$4.50	Jun-17-2022	https://etherscan.io/tx/0x981105854850ef2ca51c1fbdae093f5362ecd238ba68272b7feee7f07d11d8e6
5882	0.014		\$4.50	Jun-17-2022	https://etherscan.io/tx/0x981105854850ef2ca51c1fbdae093f5362ecd238ba68272b7feee7f07d11d8e6
9517	0.014		\$4.50	Jun-17-2022	https://etherscan.io/tx/0x981105854850ef2ca51c1fbdae093f5362ecd238ba68272b7feee7f07d11d8e6
4924	0.0149	\$18	\$2	Nov-25-2022	https://etherscan.io/tx/0xeba6b8eb0f4729a7acc95072f86c7351e3f98ae12b65dbcb89d71285ce55318f
SUM		\$5,564.40	\$1,194.42		

This is **Exhibit "B"** to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration

Kemotely

October 12, 2021



BONESTAR 10/12/2021 9:31 PM

Hey Prismo!! Do you wanna MOD? I didn't remember whether you mentioned you wanted to or not 😃





Prismo 10/12/2021 9:32 PM

oh that would be sick Ivy, I'd really appreciate it!



BONESTAR 10/12/2021 9:33 PM

awesome, added you to it, thanks again for the support!

This is **Exhibit "C"** to the Affidavit of Dominic Simpson

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Kemotely



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 "D"** to the Affidavit of Dominic Simpson

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Remotely



BONESTAR 10/07/2021 11:08 AM
this channel will be our OG behind the scenes, if anyone has any questions let me know we'll drop a lot more information in here and provide lots of sneak peeks, that way you guys can know whatsup! there's gonna be a lot of game theory that we're going to deploy moving forward while we test every aspect of marketing available to us!



but at least this way we'll have you guys will have more understand of what's going on 🖖 and we can have a dope demeanour and play around in general a bit more

I basically want all our most active/top holders to be in this chat that way we can...make some...informed decisions regarding our activity 🤣



This is **Exhibit "E"** to the Affidavit of Dominic Simpson

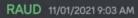
Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely



ya they did us right

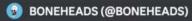
so current status is 2D's October 31st, then right away we're going to start teasing the 3D's two weeks after that in the meantime we're building up a massive promo campaign with hella celebs and artists





Have not. I'll have to check it out

Also, found where team said Oct 31: https://twitter.com/boneheads/status/1447924261130285075?s=21



@7Thirty__ @RaudskeggNFT @seedphrase full collection reveal October 31st, FUD thought we rugged, bought back 1500 BH's from papers, we're going to be the next supreme of blockchain, manufacturing + talent relations = our DNA

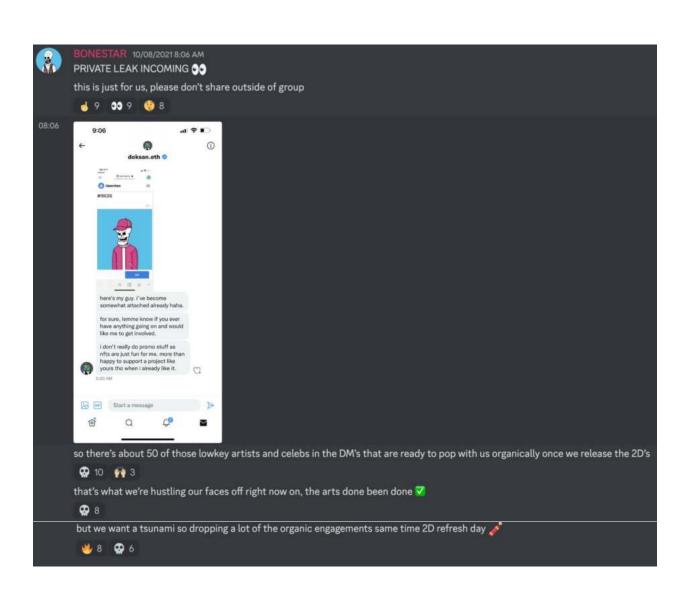


У Twitter • 10/12/2021 8:56 AM

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Remotely



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JP 10/10/2021 7:45 PM

ivy after 2d what's the next thing to be brought besides marketing. bone token/marketplace or 3d also can we see the new sexy 2ds jus sum sneak peeks 🐼 also saw ur text from earlier id love to mod 🔨



BOSS 10/10/2021 7:59 PM

@JP would do the hammer justice



BONESTAR 10/10/2021 8:00 PM

JP too young to mod

we'll be waiting for BAYC to do the due diligence on behalf of the whole space in regards to token 🤥



physicals, that's the core business, everything else is just fluff + marketing/relationships, easy money 😥





we're going to have a \$100K ETH giveaway contest, with a physical component, initiates shortly after 2D reveal

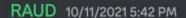
if anybody has seen please exit thru the giftshop, that's a good hint



This is **Exhibit "H"** to the Affidavit of Dominic Simpson

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Kemotely



https://twitter.com/raudskeggnft/status/1447693904027947011?s=21

raudbone (@RaudskeggNFT)

@BONEHEADS @ivybonee @nikkibonee @lexiibone My Bonehead is very sad they forgot their pants. But I know they'll be stoked with their fresh pair from the 2D metadata refresh coming in a few weeks! Then freezing metadata!!Then @opensea verification!!! #BONEHEADSFOREVER 🥋 📆 🐼





Twitter • 10/11/2021 5:41 PM



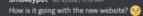
This is **Exhibit "I"** to the Affidavit of Dominic Simpson

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Remotely



Smokeypot 10/12/2021 11:13 AM





BONESTAR 10/12/2021 11:14 AM full force on marketing, once there's actually something of value to market site is pending because we were back and forth between 2D and 3D, but once we release the 2D site will be all about stats and marketplace style view, flips and rankings and top bone hoddlersss etc., more social (edited)

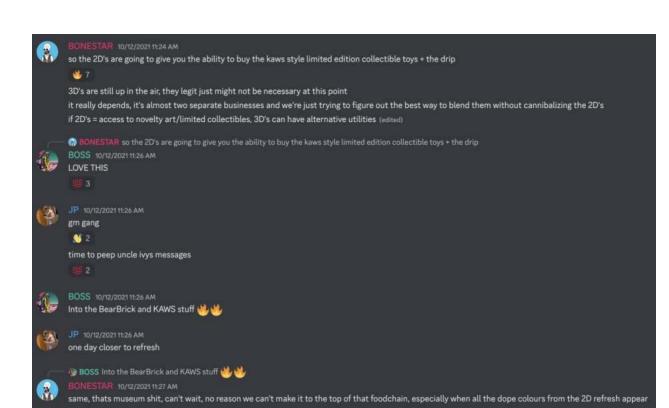
it'll be like a ranking site of sorts, activity based, and every bone will have their profile they can add socials too etc., bone follow bone vibes

00 7

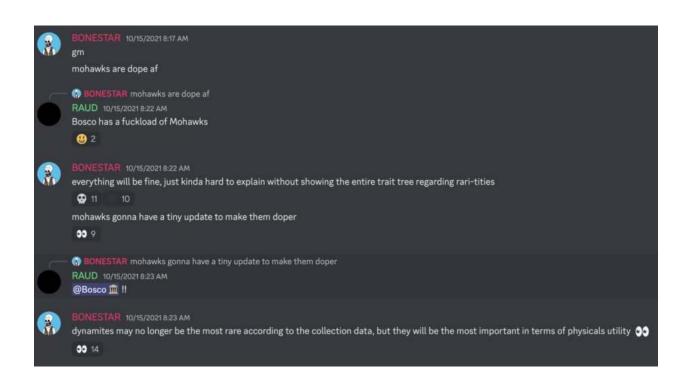
This is **Exhibit "J"** to the Affidavit of Dominic Simpson

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Remotely







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Remotely



if you guys only knew what is in the works, and how big this is going to be and by big i mean incredibly awesome, raw, and cool



the only leak = there was an article that released yesterday on TechCrunch regarding a similar direction + investors that we've been speaking to





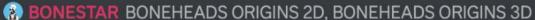




BONESTAR 10/21/2021 10:39 PM

= everything preserved the way we wanted to







groovybone 10/21/2021 11:05 PM

Yesssssirrr everything falling into place 👀 🔥





antisocialbone New #♥ · rules









groovybone 10/21/2021 11:13 PM

Can we still call you ivy ser 👀



BONESTAR 10/21/2021 11:13 PM

forever





groovybone 10/21/2021 11:13 PM



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Remotely



RAUD 10/09/2021 11:54 PM

Strapped for eth but imma keep tryna get a couple bones through the end of the month.



sbmitchellbone 10/18/2021 6:52 PM

Im going to my own sweep thur/fri just waiting hopefully get to 50 bones

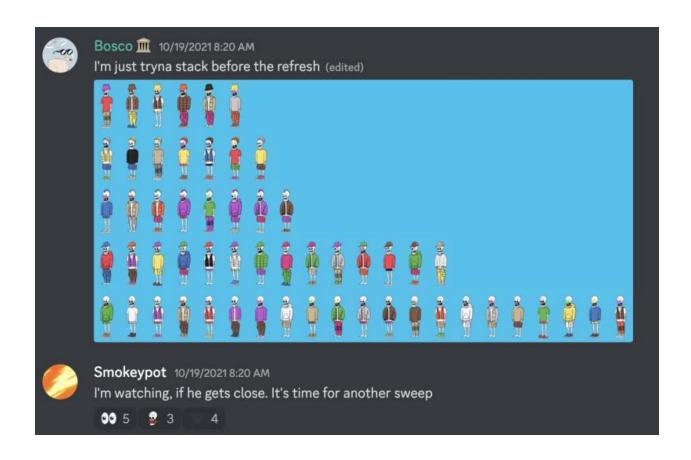




Bosco 10/18/2021 6:53 PM 17 more for me to be top 10



7





Dreuseff AKA BONE Brawler 10/21/20217-43 PM
Yo - with metadata refresh on 2Ds then we don't have to 'mint' anything - so no fees for current holders right?



sbmitchellbone 10/21/20217:48 PM wait someone, was selling a 19 bundle of bones

sbmitchellbone who was it

RAUD 10/21/20217:51 PM I messaged you. Itsdes



Bosco in 10/21/20217:54 PM
yeah im trying to buy that, but gas is outta control does anyone have experience with buying bundles?

so i had my metamask gas setting to medium when the Normal gas price was 77 gwei, but to buy the bundle of 16 NFTs the estimated gas fee was 0.19 ETH. that seems really high for a single transaction, since i thought buying a bundle counts as a single transaction.



sbmitchellbone 10/23/2021 4:01 PM

alright got my 40 bids in lol now I just need ppl to accept





sbmitchellbone 10/23/2021 4:28 PM got one weth accept lol (edited)





groovybone 10/23/2021 6:11 PM Аууу



sbmitchellbone 10/23/2021 6:21 PM Got me a (60 Gwei) buy, weee



groovybone 10/23/2021 6:24 PM

Jelly of everyone stackin. Hoping for some money to flow in soon 🙏







sbmitchellbone 10/27/2021 9:56 PM so Im buying a 10 bundle from des



but gas is a bit high lol



sbmitchellbone so Im buying a 10 bundle from des

RAUD 10/27/2021 9:58 PM

Swag. 10 Bones richer

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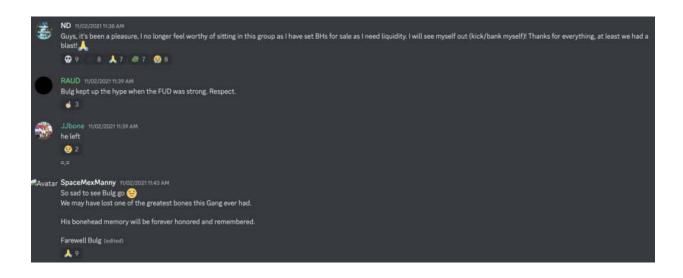
Remotely



This is **Exhibit "N"** to the Affidavit of Dominic Simpson

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Remotely





whyd he leave bc he is selling a couple lol is that not gang

he has like 50 bones ha



RAUD 11/02/2021 12:19 PM He's not happy with direction.

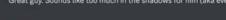
He's selling 50 of his 52

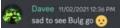


sbmitchellbone 11/02/2021 12:22 PM oh well I guess thats understandable



RAUD 11/02/2021 12:27 PM
Great guy. Sounds like too much in the shadows for him (aka everything 🥞)





I can see more and more people will be giving up hope. Kinda got the hopes of the gang up for something to happen in Oct, and now not showing up at all. I don't blame them Maybe its Ivy's new project, that Drippy Zombie thing? Lmao

This is **Exhibit "O"** to the Affidavit of Dominic Simpson

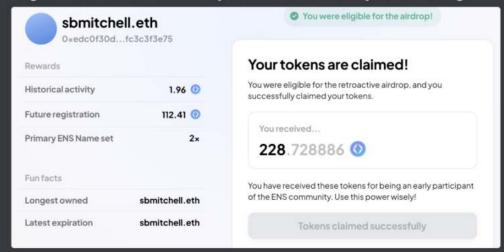
Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration

Remotely .



sbmitchellbone 11/09/2021 10:48 AM

lol glad I was like, let me randomly add this domain for my bones holdings



bones already making me monies



👩 sbmitchellbone lol glad I was like, let me randomly add this domain for my bones holdings groovybone 11/09/2021 10:48 AM me too LOL

i just thought it wascool to have a name and not a long ass string of text



BONEMEISTER 11/09/2021 11:24 AM u claim ur \$ens? @BONESTAR



BONESTAR 11/09/2021 11:33 AM 1K claimable tokens



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Remotely



respectfully this was supposed to be a close group to devs getting sneak peeks n info not selling but been dissapointed over n over





JP not selling but been dissapointed over n over



BONEMEISTER 11/25/2021 3:09 PM

Can't be disappointed if u don't have expectations 😩





Smokeypot 11/25/2021 3:10 PM I need a bone doll



BONEMEISTER Can't be disappointed if u don't have expectations 😩





JP 11/25/2021 3:10 PM

ik ifs jokes but it's pre tiring

been making jokes for awhile but shit is very frustrating



cant imagien thr ppl that have tons of bones



antisocialbone 11/25/2021 2:15 PM

People listing for free are crazy fr



ntisocialbone People listing for free are crazy fr



RAUD 11/25/2021 2:26 PM

Agreed. You have to be pretty pissed to put a bone up for free to get it out of your wallet..



Pissed. Smoking meth... who knows



RAUD 11/25/2021 2:28 PM

They could still get .01. So they're def making a point from it. That's their call, we'll transfer all day



RAUD They could still get .01. So they're def making a point from it. That's their call, we'll transfer all day

Swear. The next few months are gunna go crazy I can feel it



Dreuseff AKA BONE Brawler 11/25/2021 3:42 PM

Man

I've been been rugged a few times in this space and Ive been a part of great projects



BONEMEISTER 11/25/2021 3:43 PM ill buy ur bones @ .0069 per



Dreuseff AKA BONE Brawler 11/25/2021 3:43 PM

there is just a diff between between quiet and being dead quiet saw everything before mint was a mod leading up to mint



T-Bone 11/25/2021 3:46 PM

i guess devs are in forever stealthmode lol



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Remotely



jOseph 11/25/20217:41 PM

@nikkibone @lexibone @BONESTAR sup

@nikkibone @lexibone @BONESTAR say sum nice ^



BONESTAR 11/25/2021 8:28 PM

....hi?

what's the problem?





BONESTAR what's the problem?



JP 11/25/2021 8:30 PM

ser throw us a crumb

for thanksgiving



BONESTAR 11/25/2021 8:30 PM

happy thanksgiving



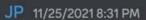


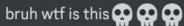
BONESTAR 11/25/2021 8:31 PM

...and?



🎃 j0seph Click to see attachment 🔄





explain someone

i am confusion

just want crumb

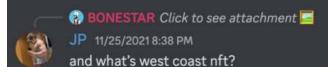
a bone if one may say



BONESTAR 11/25/2021 8:38 PM

we did have an in house team, but also:







BONESTAR 11/25/2021 8:38 PM

im confused by the hunting/messaging, all is well, everything is moving along accordingly richerds old company, they did doodles, etc.



JP 11/25/2021 8:39 PM are y'all waiting to drop anything until nfts as a whole are revived that was my guess since there's not a huge point to drop much in a dead market



BONESTAR 11/25/2021 8:39 PM

they're not dead, we're stealthing the next steps, maximum impact until we're ready





jOseph 11/25/2021 8:39 PM Bro just lookinh out for gang



JP 11/25/2021 8:39 PM even tho fashion nfts are going crazy rn getting tons of hype



jOseph 11/25/2021 8:40 PM These my internet homies



jOseph Bro just lookinh out for gang



BONESTAR 11/25/2021 8:40 PM

that's not BH forever, that's a lil...going behind our backs type of...stuff



jOseph 11/25/2021 8:40 PM Yeah you sound like a bitch



iOseph These my internet homies



BONESTAR 11/25/2021 8:40 PM

ya that's not something we think is cool tbh pardon?



JP 11/25/2021 8:40 PM

bro we would rlly just love updates or anything



jOseph 11/25/2021 8:40 PM You sound like a bitch for

Real



JP 11/25/2021 8:40 PM

just sucks being in here n devs not active ever that's it or just updates sayinf that we got things moving good not here to beef or anything just keeping it real with my personal thoughts

rip bro

dude called ivy a bitch im dead





BONESTAR 11/25/2021 8:42 PM

haha so confused, someone is lashing out



JP 11/25/2021 8:42 PM

i was so excited for what u said wallet suprised for mods too

 \boldsymbol{n} never happened so just been a bit hurt \boldsymbol{w} sum stuff passing dawg

that's all

i get no dates bc dates in projects never fucking work and just ruin things. but updates would be great

@BONESTAR ^^



BONESTAR 11/25/2021 8:45 PM

we're not dropping anything or any updates until our internal timelines

stealth = stealth

when it comes it comes, sorry

our creative vision and roll out is...our creative vision and our roll out, we're not willing to discuss it until we're ready



BONESTAR 11/25/2021 9:06 PM

i get the sentiment and i understand how everyone feels, but at the same time it's not worthwhile for me to just say "big things coming"

100 8

we're working on things that we personally think are very dope, and we're going to share those with the world when the time is right

E

21:07 we just got ahold of the bonestar.com domain, and the @BONESTAR IG handle, things take time, and we're messing around in the social sphere so, lots of things to line up

its two projects now, lots of setup work



RAUD 11/25/2021 9:07 PM





BONESTAR 11/25/2021 9:08 PM BONEHEADS + BONESTAR

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Remotely



carpet



groovybone 12/11/2021 10:49 PM Gang:

Boneguards have been considering a kick of JP for not being a forever bone with his recent messages and I gave him the boot for that last one. He can still be gang but these messages not forever material... (edited)

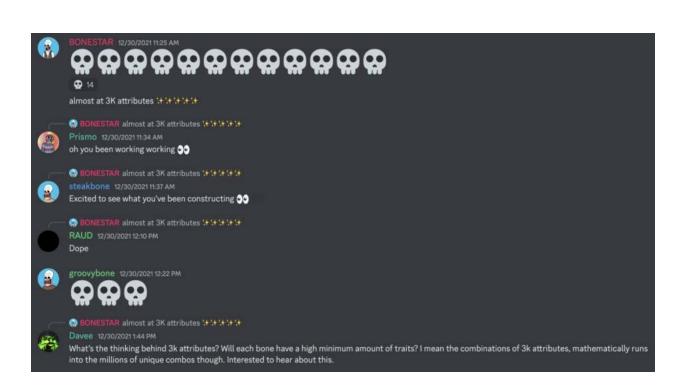
22:50 Shame

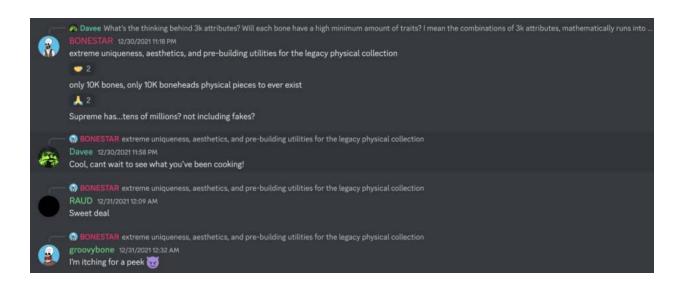


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Kemotery







BONEMEISTER 12/31/2021 6:08 AM

gotta get the 🧹 out when @BONESTAR in da house



steakbone 12/31/2021 6:10 AM





BONEMEISTER 12/31/2021 6:10 AM





BONEMEISTER gotta get the
out when @BONESTAR in da house



BONEMEISTER 12/31/2021 6:13 AM

floor back at .01 thx for playin



moulanbator 12/31/2021 9:42 AM

dummy j got scooped fkkkk hahahaha

im too fkn slow



BONEMEISTER 12/31/2021 9:42 AM

lmaoooo two more dummies got listed at .02 after boss scooped 4 for 1.2 total (edited)



moulanbator im too fkn slow



sry bb



moulanbator 12/31/2021 9:42 AM

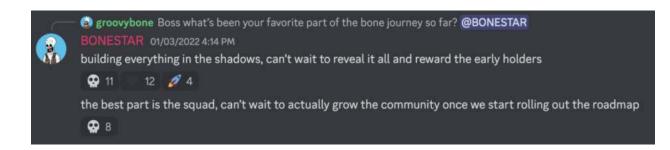
nice scoop homie 🤲



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Remotely





@groovybone papers definitely still lurking, i should've stayed quiet...wanted 2K bones before going into the reveal 😩 not just to hoard but for utily-tities sake





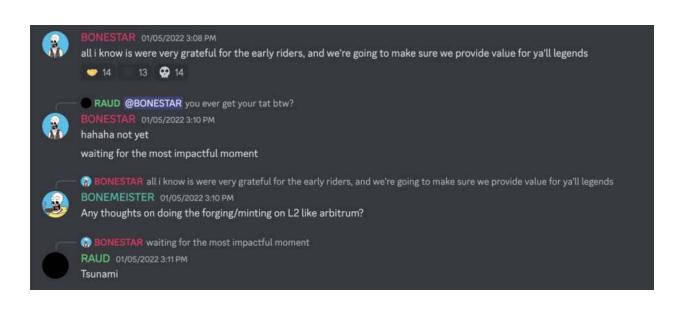
groovybone 01/05/2022 1:32 AM

Utily-tities @@ But Imaoo yeah I was waiting for some eth to come in to pick up a few more and then that shit ran 😝 (edited)





p.s. official collection renamed to "BONEHEADS - Origins" now on OS







BONESTAR 01/06/2022 9:27 PM

honestly boneyacht when we get boneheads acquired, till then no yacht, just gonna tend to our terrible trade record





Dreuseff AKA BONE Brawler 01/06/2022 11:24 PM

OooOo Lot of updates recently. What a roller coaster of emotions! Has been good for me to not obsess about looking for news here all the time when it became clear was going to take awhile / be in the dark. I'm used to being online like ALL THE TIME so hard to shake the 'every day must be more success' sometimes in this space. Getting excited again plans are coming closer to fruition!

里 5



BONESTAR 01/06/2022 11:33 PM





BONESTAR 01/09/2022 9:35 PM

p.s. just want to thank everyone in here for the VC vibes you all bring to the gang



it really means a lot to us, quite magical









this is our mission



#BONEHEADSFOREVER #BONEGANGFOREVER



Our vision is to play our part in changing the narrative around how streetwear and clothing companies operate on a fundamental level, and to * revolutionize streetwear through blockchain enabled mechanisms and functions that redistribute value directly to individuals that make up our community. redistribution of value, for the people, by the people.

Essentially our goal is to provide demand for a scarce and finite asset class (10K BONEHEADS) without needing the holders to ever sell their asset, while generating several benefits and upside through utilities (staking, renting, and collectible airdrops), allowing the masses to participate in the value creation for the original stakeholders by purchasing digital and physical goods...

= you own your bonehead forever, you rent it out to those that want to forge, and you sell the collectible airdrops (physicals)





BONESTAR 01/11/2022 8:38 PM

a pecentage of sales will be kicked back to the holders btw



10



BONESTAR 01/11/2022 8:38 PM

so when masses rent to forge, % of bone tokens spent to forge = kicked back to holders



RONESTAR so when masses rent to forge, % of bone tokens spent to forge = kicked back to holders

BONEMEISTER 01/11/2022 8:38 PM

can u give us any details at bone token at this time?



BONESTAR 01/11/2022 8:39 PM

there will be one

and you will be able to earn it through staking





steakbone 01/11/2022 8:39 PM

I'm pretty happy I never have to sell my bones. I'm attached to all of them





BONESTAR 01/11/2022 8:39 PM

you will also need to use bone tokens to unlock items, so they can be forged

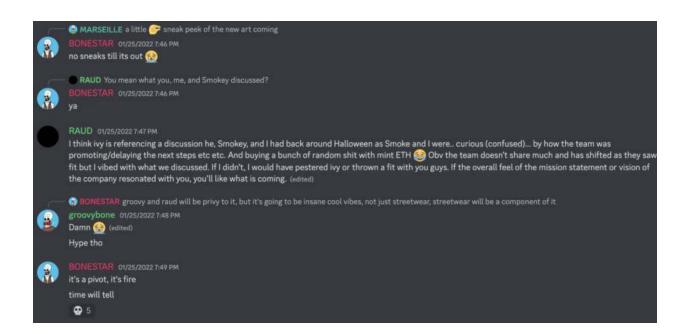


if the masses don't want to wait to forge, they buy tokens of those willing to sell = time clash of clans, gems



our vision is to build a community, with that, the art needs to be all encompassing, not just streetwear $\frac{1}{2}$

2 8





BONESTAR 01/25/2022 7:51 PM

the art is all encompassing, entertainment company with a clothing arm vs clothing company





Bosco m 01/25/2022 7:51 PM

Bonetainment



BONESTAR 01/25/2022 7:51 PM

positioning it in a very strategic way

hahaaha

hope everyone likes the art, gonna be a vibe!!!!!!!



the vision will be clear once you see the reveal





86 **#** 4 99 5 ≥ 4

its not just strictly clothing anymore, clothing will be a component of it

the initial vision was a cool quirky goofy world of bones on an island with animated scenes, bones juggling heads, bones playing volleyball with heads this way it'll be a brand, with a component of it being clothing, rather than a clothing company that's limited to exposure to a small audience when everyone see's the art, it's so awesome, like so fucking amazing, it'll be for a broad audience, and people will be able to relate to more of it, therefore to the project

now it's open to clothing and collectibles, an animated series, a game, etc., it'll be a franchise vs a company



that's why we made a major pivot in the art style, the bones are still the basis, but now they're just way cooler



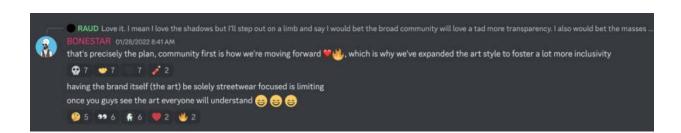
Moving away from rated R?

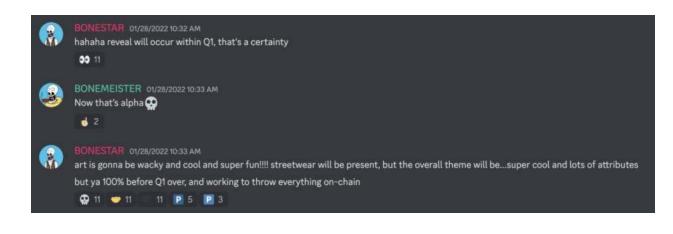


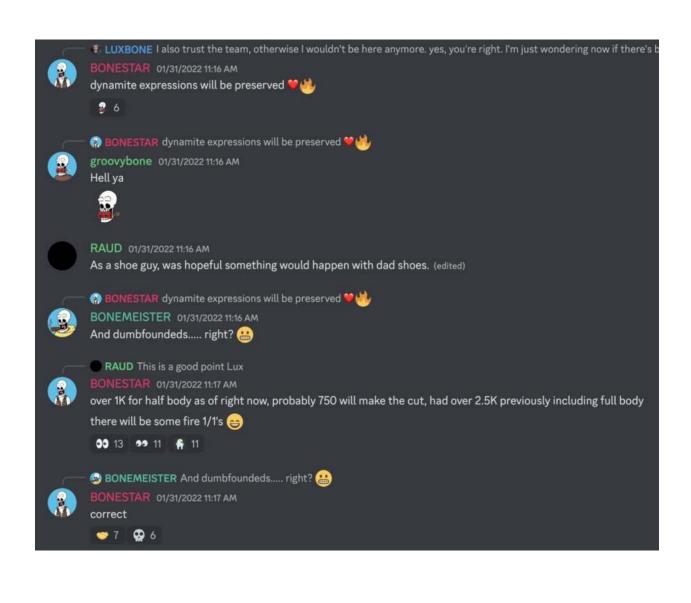
and the attributes are insane, and fire











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Remotely 1



hahahaa wait what's going on I need ketchup



staking boners in looks rare? 😲

on****

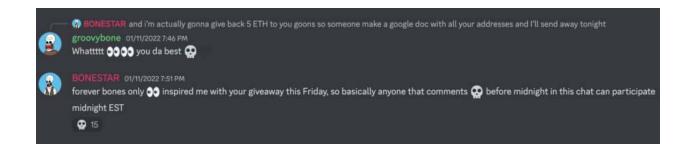
sold looks token airdrop for 10eths

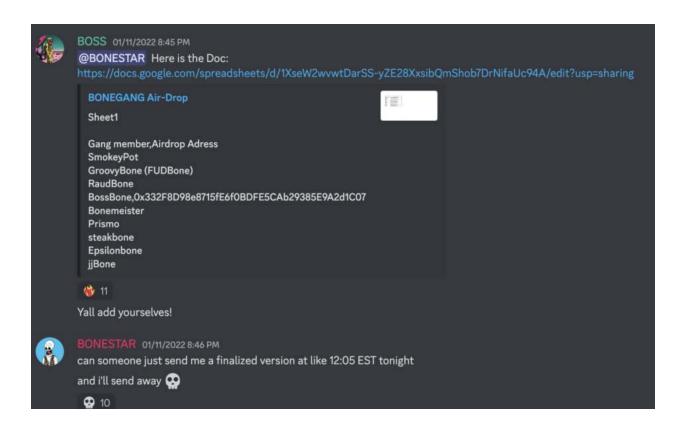
and i'm actually gonna give back 5 ETH to you goons so someone make a google doc with all your addresses and I'll send away tonight

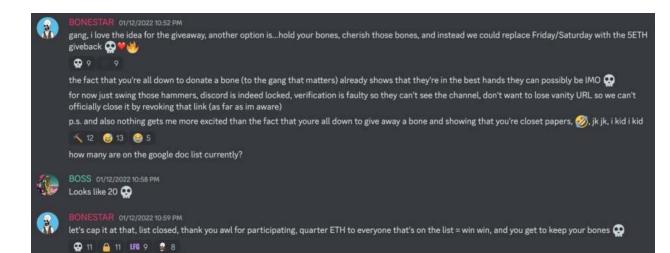


BONESTAR sold looks token airdrop for 10eths

BONESTAR 01/11/2022 7:41 PM 9eth***



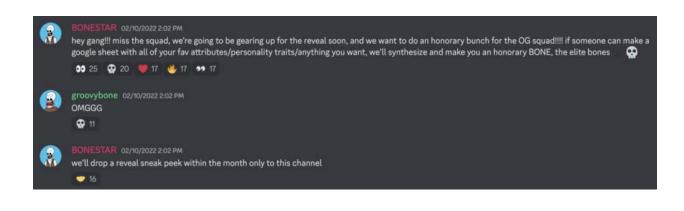


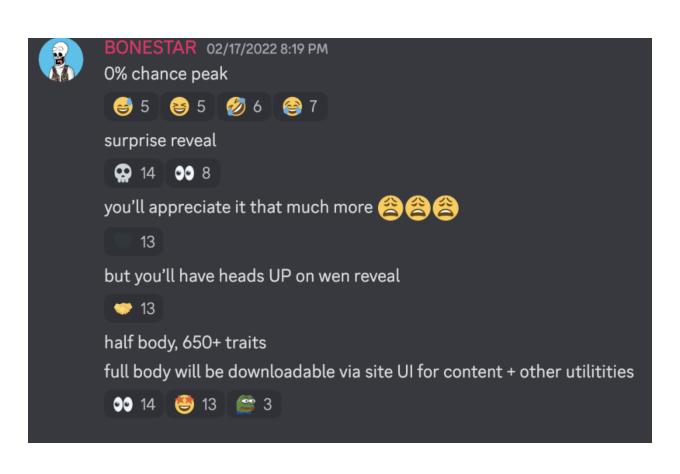


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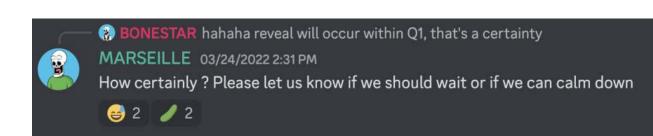
Remotely

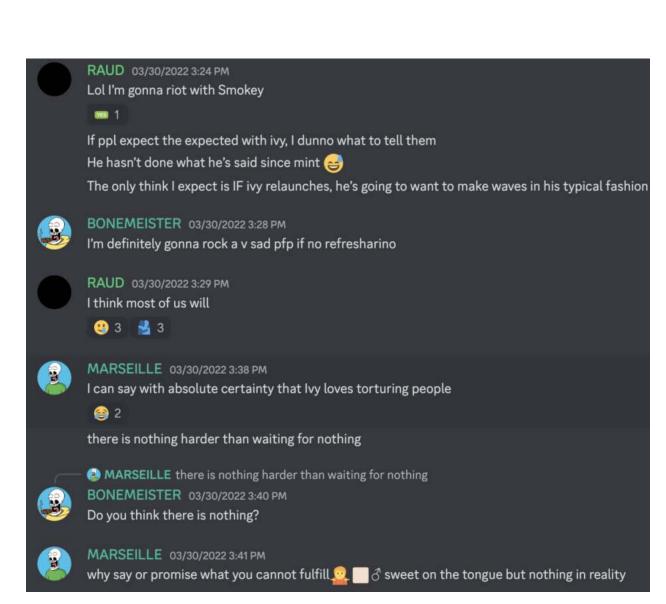


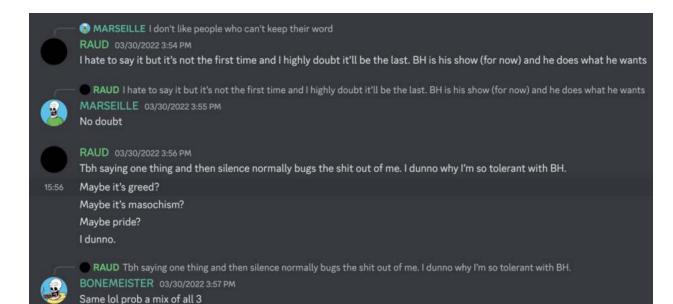


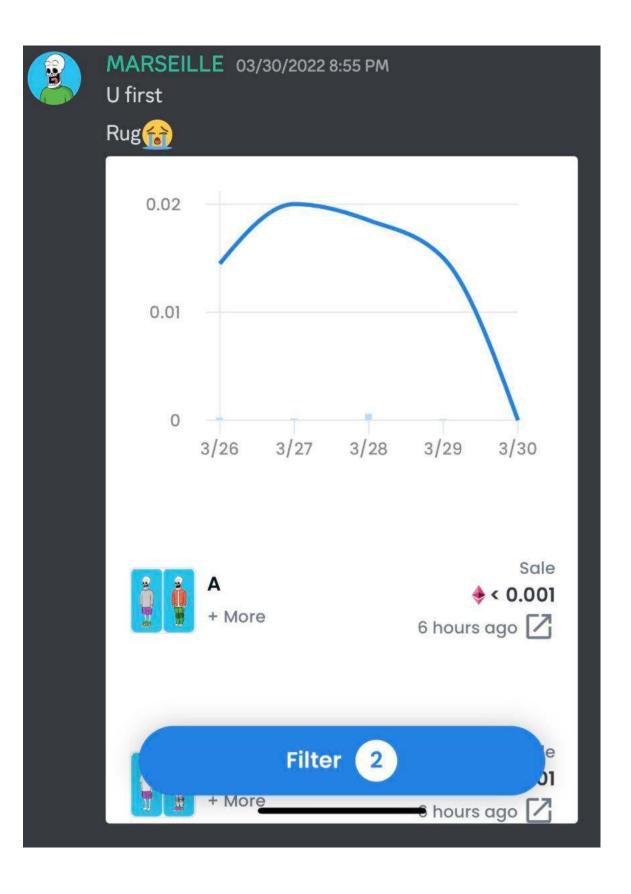
This is **Exhibit "W"** to the Affidavit of Dominic Simpson

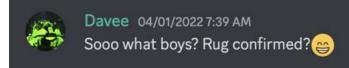
Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely











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Remotely.



Hey Gang! I've been talking with Raud over the past few weeks keeping close contact, he's seen some of the previews of the refresh - hound him - we've always consulted with him in an unofficial capacity - I was very close to sharing some previews in here with everyone, but because of the previous (leak) incident we're going to err on the side of caution - we're getting closer to the launch - and just so that everyone knows we're dropping everything at once - site, refresh, marketplace, and the first collection (clothes + physicals) - we're taking our time and watching what the biggest and best are doing and this gives us a lot of power because we don't have to take as much execution risk - from a tech perspective our plan is to emulate and build on top of the rails that the best (BAYC) communities/companies are doing, and then apply our BONEHEADS vision to the physical component of the brand, that's our differentiator - thanks for sticking around, hold tight, we're not going anywhere ...

45 15 6 7

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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.

Avatar SpaceMexManny 05/25/2022 6:31 PM

Hi Guys

Hope you are all well.

I am very sad to announce that I have decided to retire from the Boneheads discord servers.

I do not agree with how things have been handled from a human perspective by the team with regards to the kindness, trust and friendship we have extended towards @BONESTAR - Ivy and/or the team - founders.

It has come to a point where I feel like staying in these servers would be a way to silently agree with how things are done. I do not agree.

This is not a decision based on money or investment. My decision is based on being completely let down by the human side of things.

We have been nothing but patient and respectful to the team for a very long period of time without any kindness or communication in return.

I do not doubt or question the future of the project. It may very well be that it turns out to be just as amazing (or even more) than we ever imagined it to be. I have no information to doubt or confirm this.

That being said, I would like to reaffirm the love I have for so many of you.

I consider many of you as friends and I hope I will get a chance to keep a relationship all of you in the future (including @BONESTAR or anyone else that may be part of the team)

I leave with no heart feelings and I will forever keep a great positive memory of all the people I met through this project.

I hope you will all understand that my decision is not a negative one and is based on respect and kindness to all of you.

I wish you all the best and I will always be here and available to each and every one of you in the future.

Much love and many blessings to all of you!

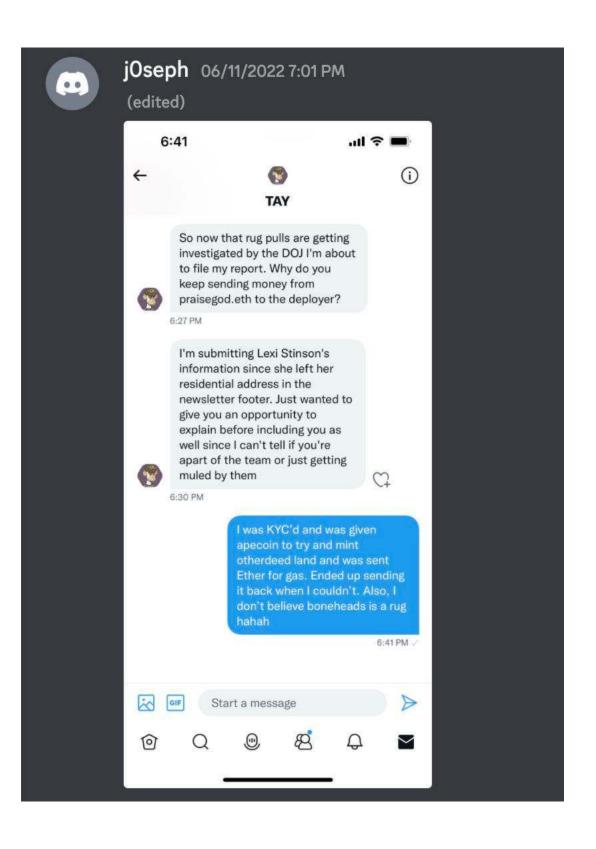


This is **Exhibit "Z"** to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

Notary Public in and for the Province of Ontario

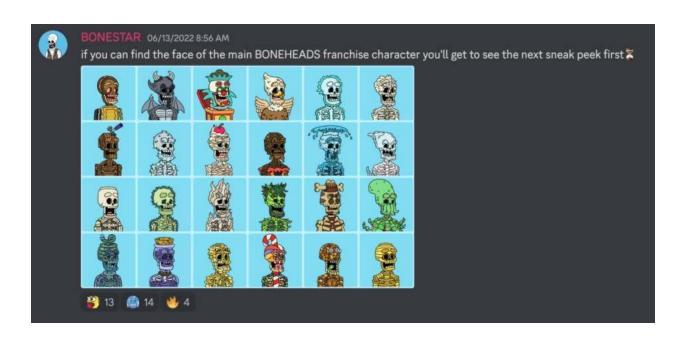
Sohaib Mohammad (LSO: 80696K)



This is Exhibit "AA" to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration

Remotely





BONESTAR 06/13/2022 9:22 AM

p.s. 69 days until reveal

00 14



RAUD The penny guy so relevant rn. My spirit Bone 😃





moulanbator 06/13/2022 9:22 AM also low key a dummie 👀



BONESTAR p.s. 69 days until reveal





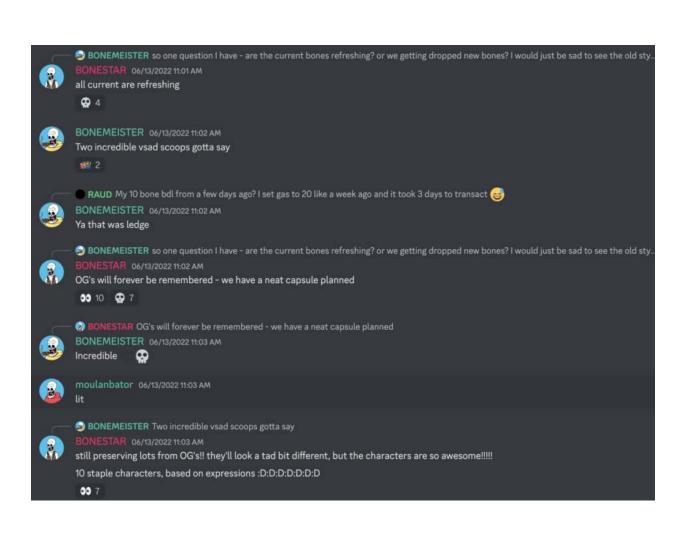


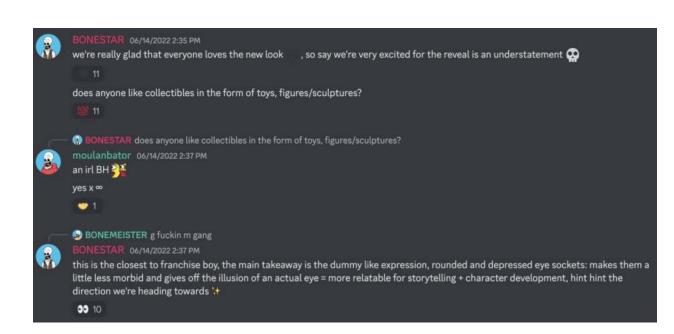




RONESTAR 04/13/2022 9:32 AA

those are some of the specials, some haven't been confirmed and won't make the cut, we didn't want to give away the finalized sneak's we've done one pivotal change to make them a little less morbid and more PG friendly, more in line with the vision the hint is:





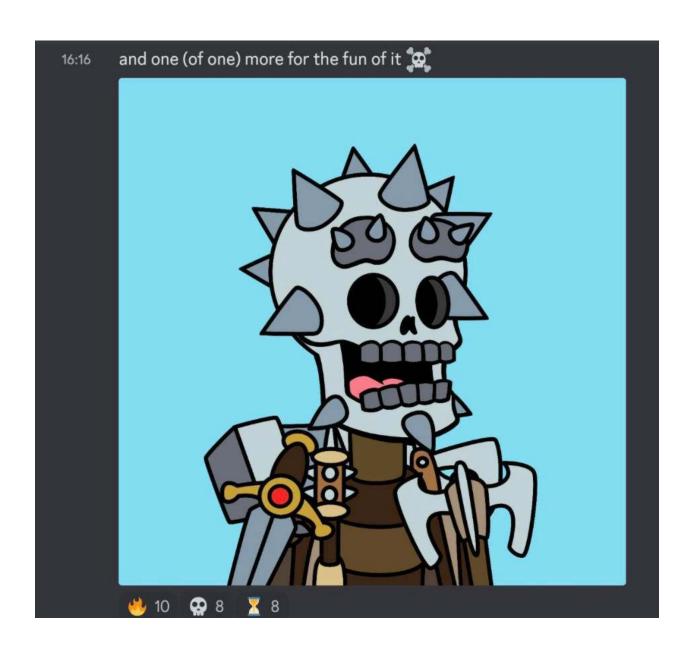
This is Exhibit "AB" to the Affidavit of Dominic Simpson

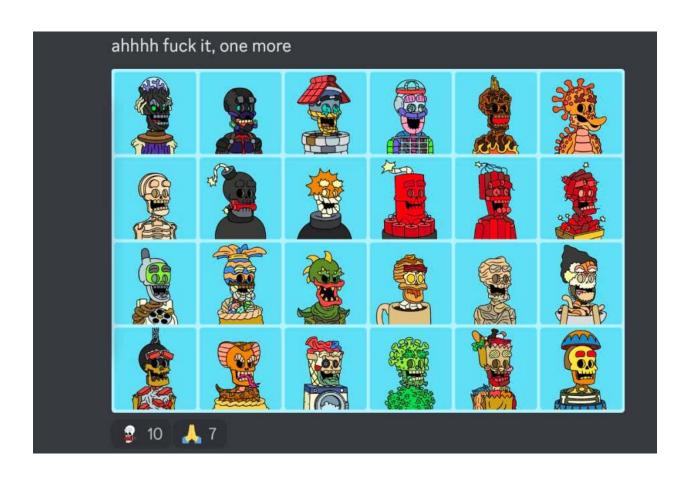
Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration

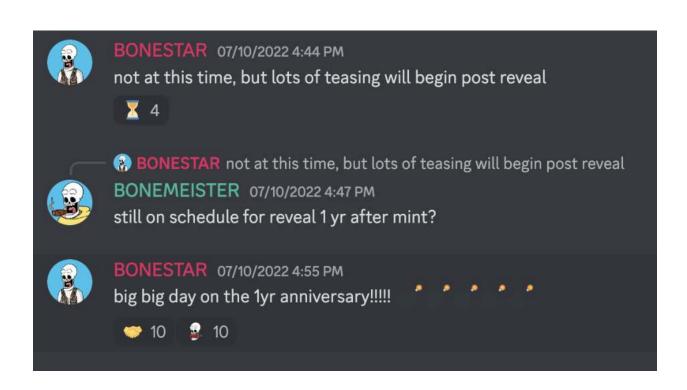
Remotely 1

Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)











BONESTAR 07/11/2022 10:18 AM

ngl our latest designs are trrrrash (edited)

10:19













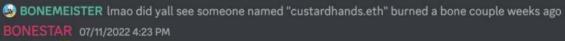
BONESTAR 07/11/2022 10:25 AM

rick and morty is cool, adult swim is cool things of such nature are cool components of brands/franchises vc and vc, very chill and very cool

99 4

vc, very culture bh is v vc in all the ways







i wonder if it was this one







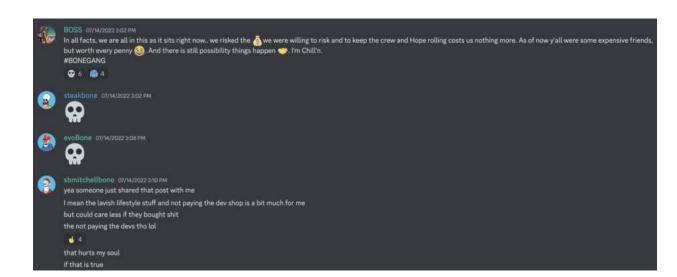
This is **Exhibit "AC"** to the Affidavit of Dominic Simpson

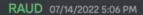
Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with Q. Reg 431/20, Administering Oath or Declaration

Remotely

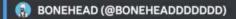
Notary Public in and for the Province of Ontario

Sohaib Mohammad (LSO: 80696K)





https://twitter.com/boneheaddddddd/status/1547702018428440577?s=21&t=GhlnBV_Rn1q1qrLgRJ7FgQ



wen biggest NFT rug account tweets and provides free publicity **00 00 00** cats outttttaaa the bag BH's, BONNIVERSARY week it all officially begins **10** Characters - 10 Seasons, if you were in our secret BONEHEAD FOREVERS over this past year you would have known this all along **20**



Twitter • 07/14/2022 4:58 PM

LEL

RAUD Speculation on 10 char/10 seasons?



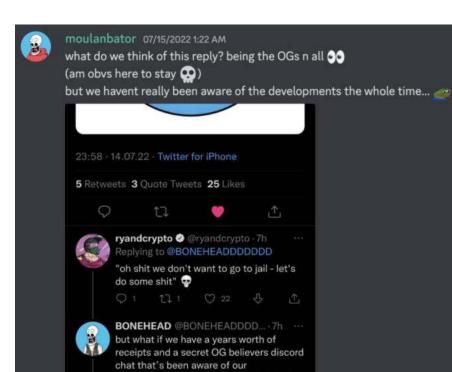
Dreuseff AKA BONE Brawler 07/14/2022 7:26 PM

I thought we were supposed to know about this the whole time??

I want to be careful about my reputation in this as well. A lot has changed in a year but still in the dark as to what's happening here.



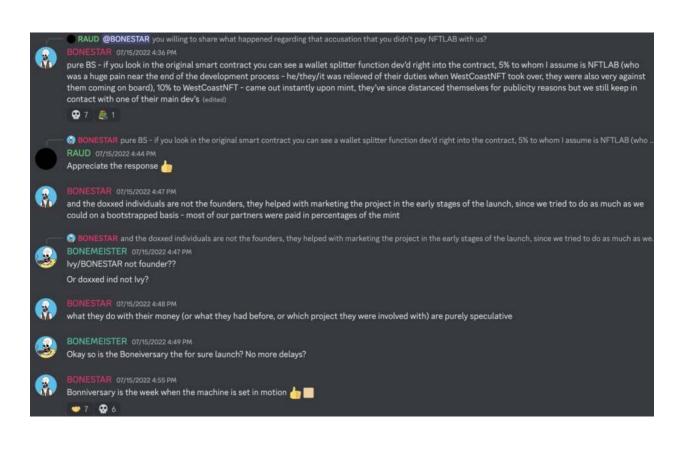
Are those traits new or were those made months ago when it was first announced 500K was being spent on designers? 10 seasons of what? Clothes? Collectibles? Animations?



developments and trolly tactics this entire

time 93939393939

and the fact this all comes out rn, from an outsider POV does look exactly like what this Ryan guy is saying although I suppose it's smart to capitalize on the fresh eyeballs





BONESTAR: 07/15/2022 4:56 PM
we'll drop some more alpha leading up to then, the brand is going to be extremely politically charged and there will be lots of content - people are either going to love us or despise us, no in between





BONEMEISTER The tsunami generator machine?



BONESTAR 07/15/2022 4:56 PM it'll take some time - web 2 + web 3

Wait so you're saying you're not affiliated with Ivy or Lexi at this point? Why do you have to assume NFT lab - like you're not sure because you weren't involved in that part / stage of the project?

There should be a good amount of funds from the mint plus the post sales of course. And then the cryptopunk / ape trading etc. like I had to assume funding wasn't an issue if there were potential dev funds being used for NFT trades

Have ppl from the original mint team bounced from internal boneheads team at this point?

Or you're same core group of ppl just working with diff designers and devs now?



pseudonymity isn't fool-proof so we're not disclosing who the founders are - maybe in the future - funding is not an issue, the money that we converted to USD when ETH was \$3,250-\$3,800 is worth more than the total USD amount at ETH's current price

we've worked with over 40 contractors at this point - just on the digital side of things

we're really looking forward to Bonniversary week, lots to come on that, and that's all we're focused on - everything else is noise and completely irrelevant the product is the only thing that matters, and it's undeniable, BONEHEADS will be a massive brand one day, we have too much content at this point, and the DNA of the brand is raw, nobody can fuck with us

you can't lose sight of the fact that most people on crypto twitter are morons that have never built a franchise and don't have an ounce of insight into what it takes and how long it takes, and let's not forget that if we didn't get inundated with the rug stigma immediately after mint / we wouldn't have taken this approach in the first place, people can't read, the ones that get it gave us the benefit of the doubt and that's fantastic, those are the only people we can level with, everyone else is writing us off due to the timeline - which is again, completely irrelevant, it will never hurt the brand - 5K peoples opinions...noise



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Remotely

Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)



BONESTAR 07/18/2022 8:47 AM

 $\ensuremath{^{\wedge \wedge}}$ the plan is 100% not to dilute this collection, this will be the one and only collection for BONES

probably going to move forward with the concept of using \$BONE tokens to unlock physical forging

00 5

web 2 store (clothes + collectibles) + web 3 store (exclusives only), gated with BH + \$BONE (\$BONE will be generated through staking)

00 5

our plan is to eventually (5-10 years from now, which means 20 by our standards 🥞) merge the web 2 to web 3 once critical mass adoption occurs



© BONESTAR web 2 store (clothes + collectibles) + web 3 store (exclusives only), gated with BH + \$BONE (\$BONE will be generated through staking)
BONEMEISTER 07/18/2022 8:51 AM



any physicals going to be available during Boneiversary week? 👀



BONESTAR 07/18/2022 8:51 AM

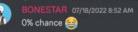
and then you'll only need \$BONE to unlock (not purchase) regular drops, for exclusives you'll still need BH + \$BONE



that'll be a way of generating value - through offloading \$BONE that gets generated while staked



■ BONEMEISTER any physicals going to be available during Boneiversary week? ○○





we have over 1,600 BH's, Boniversary week will reveal our roadmap, and will be the start of the marketing push – since it's still unrevealed, we can leverage our BH's to create a muuuuuuuch needed marketing push



ayyy sounds dope, exciting times ahead for BH 💀



BONESTAR: 07/18/2022 8:59 AM
the few months following the reveal will focus heavily on UGC - that's how people will fall in love with the brand, we can start to establish some goodwill

Voxel, 3D, and 2D BH's 😾 🔤 😾 🔤 😾 🔤

covers most of the digital bases for creatives and everyone to build/create art/buff up their identities





🧑 BONESTAR, the few months following the reveal will focus heavily on UGC - that's how people will fall in love with the brand, we can start to establish some goodwill



Imao i have so many questions but im sure lots will be answered Boneiversary week so ill refrain - thx for the updates mr BONESTAR



feel free to ask anytime

i assume it's airtight in here so, doesn't really matter, we can answer away at the core UGC is clearly the way to build a community



so are you saying for UGC we will have access to 3d, 2d and voxel models of our bones?



it's honestly the only way, and BH has an incredible story line based on 10 characters - we studied the fuck out of hundreds of media franchises, mapped the most common relatable traits, put them in a mixer, and spit out 10 characters





BONESTAR 07/18/2022 9:22 AM

purpose of the web 2 store and those collectibles is really just to build brand, and drive interest



one of the characters is BOOMBONE \nearrow

and he/she/it (it's he) says "boom" a lot

very cute coming soon video coming soon



RAUD Refresh of artwork/metadata is -90 days-ish out, January is soonest for physicals.. Is roadmap/white paper essentially what's potentially coming Aug 20?

BONESTAR 07/18/2022 9:24 AM

yes, and marketing will resume, quests, contests/giveaways

and store's and app's will be previewed – as well as the collections for the 1/1's

lots and lots of content

first mini game will be revealed

00 3



yup, UGC is the only way to build community

and to do that you need assets



honorary bone traits exist - maybe years down the line we'll do honorary bone collection but at this point we think it'll just confuse everyone and dilute the brand, but all those traits have been added into the collection and if upon reveal you don't get one with that trait and we have it within the 1600+ we own we'll happily slide it your way, and that goes for the people that bought perceived rares** too, will resolve that as well post reveal (edited)





RAUD 07/18/2022 9:40 AM

And that's fair/logical. I didn't know how you'd do honoraries logistically so makes sense to wait (if they're ever done). Keep it one collection: BONEHEADS -

I'm personally interested in the interface (I know you just said maybe screens; not full access yet). All/some pages tokengated? Discord replacement included? What teasers are going to be hidden around the site? All things to keep ppl satisfied/interested until next action comes (edited)



BONESTAR 07/18/2022 9:45 AM 1, no dilution

it'll be app based, you'll have a profile, you'll be able to see lots you just won't be able to purchase/act on it yet web 3 store interface is simple, modern, like mschf



web 2 shopify, but all custom and content centric, and everything is done in drops - so everything will have a campaign, cover art will be amazing, animations, all the bells and whistles

D 6 0 6 P 6 E 6

users will be able to show intent, which to us is data

09:48 brand + story + collectibles (with great content) + polarization, we'll see what happens





BONESTAR 07/19/2022 11:29 AM

UGC phase will start after reveal - August every BH will get turned into an unrevealed state - a cover for all the OS listings

a character showcase (where you'll get to know the 10 characters) will be available on the site - a "build a bone" screen on the site where you'll be able to preview some traits, create some, and suggest traits





BONEMEISTER 07/19/2022 11:30 AM

Oh damn so UGC not for another ~90 days from now?



BONESTAR 07/19/2022 11:31 AM

you'll be able to download a previewed BONE from 1 of the 10 characters an an identity stand in until the reveal

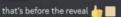


UGC will start in August on a small scale, but your true BH won't be revealed until reveal



our priority right now is the first collection for web 2, so we can start rolling the giveaways, QR code based ETH giveaways and BH giveaways, that's our bridge from web 2 to the web 3 BH collection







BONEMEISTER 07/19/2022 11:34 AM

I'm excited to see some of this politically charged content



we'll probably do 2-3 drops before the reveal to generate momentum



politically charged stuff will be able to be previewed in august for 3-5 of them 9 they're too awesome (edited)



#freespeech #nuclearenergy #psychidellics #climate #science

ai, the whole gamut

just think about how iconic and beautiful those covers/scenes will be of BH's in all those different states presenting the argument in one overwhelmingly destructive and hilarious collage



Lmao sounds hilarious I can't wait to hear what the Bones sound like



they just make sounds, they don't speak haha





🤛 BONESTAR for many reasons, do we go angry birds and kid friendly or do we go raw? believe it or not this took over a year to figure out, well you probably b.

Has this decision been finalized? Since the BH aren't talking, give me "Lego video game" vibes (which is great cuz they're for kids but still make adults laugh)



that google developer drama was overblown, he didn't even see the code, if you ask it to prove that it's real it'll start regurgitating that, if you ask it to prove it's fake it'll present just as many arguments



RAUD 07/19/2022 11:44 AM

I love either avenue but keeping it kid friendly with "suggestive undertones" would prob be my pref



RAUD Has this decision been finalized? Since the BH aren't talking, give me "Lego video game" vibes (which is great cuz they're for kids but still make adult...



it's 100% been finalized, it's way too difficult to tread that line between 9-16 and 16-30+, it's damn near fucking impossible - there isn't a single example on the planet (we analyzed over 100 franchises) that's done this succesfullly

however, with that being said...

kids want what they're not allowed to like/have



simpsons did that very well



BONESTAR 07/19/2022 11:44 AM

so we'll tread it there, but we think of everything else as distribution - so we're going to make a mobile game with tons of game modes - similar to how minions just took the running game and reskinned it

flappy bone, skulls and heads instead of angry birds, sticky game modes (edited)

that's more of a throw it all at the wall and see if it perpetuates, candy crush bone, different heads, etc.





BONESTAR 07/19/2022 8:14 PM

the web 2 physicals are coming much sooner than you all probably think!!!!

00 1

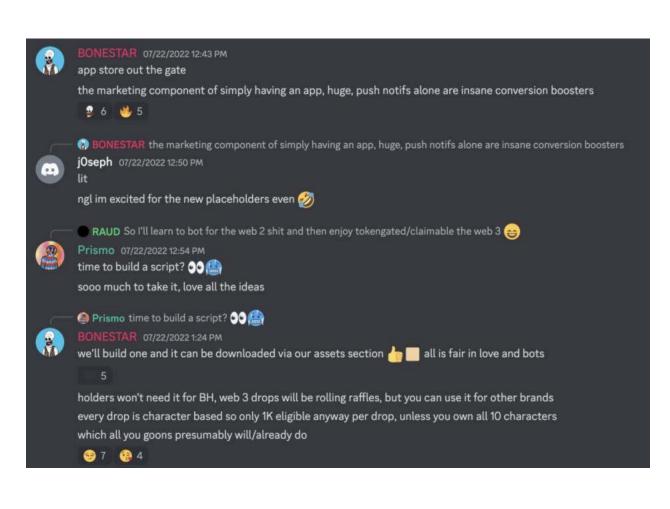
RAUD Btw, should have been more clear, refresh isn't first execution rather I meant is it's most important for brand as overall goals/objectives just my perc.

ii 100% agree with this, which is why we'll actually be previewing the art extensively and people will be able to play around with all the different traits - but that way we don't waste the opportunity to market it further for 3-4 months leading up to the reveal - since people will still want to gamble and see which BH they get - since it technically hasn't even dropped yet will build hype in the BG

so nowww, the drops coencide - it's one campaign for both drops

you'll be able to see the web 3 drop item on the web 2 store but it will link you to the web 3 store where users will get exposed to the web 3 side of things

and they're based on the 1/1's





BONESTAR 07/22/2022 1:42 PM

i'll send you guys a link to the mobile app in approximately two weeks!



for some initial feedback, the designs will be blurred out/placeholders

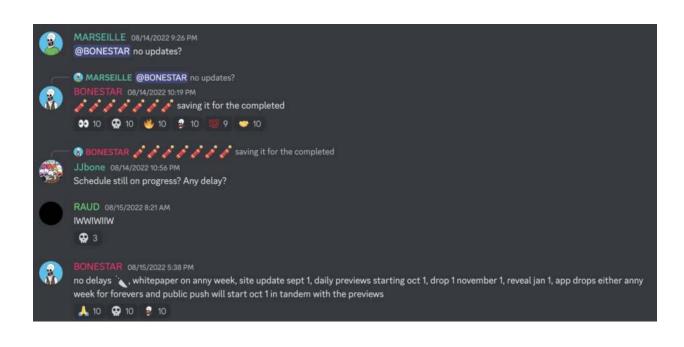


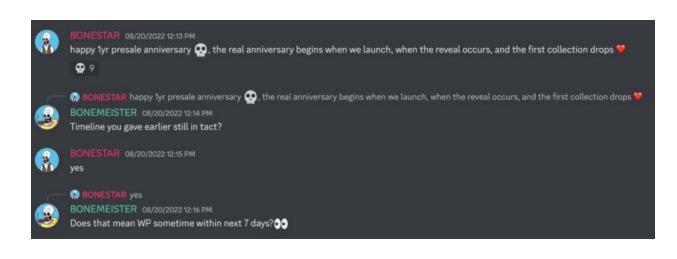


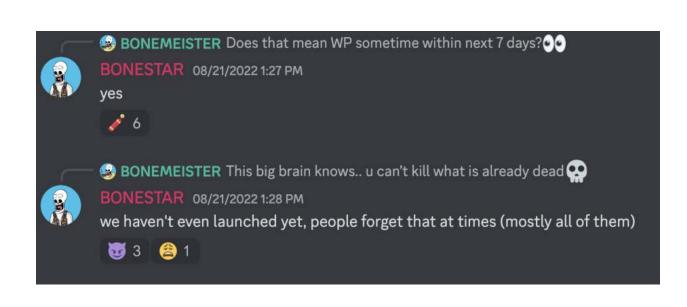
This is Exhibit "AE" to the Affidavit of Dominic Simpson

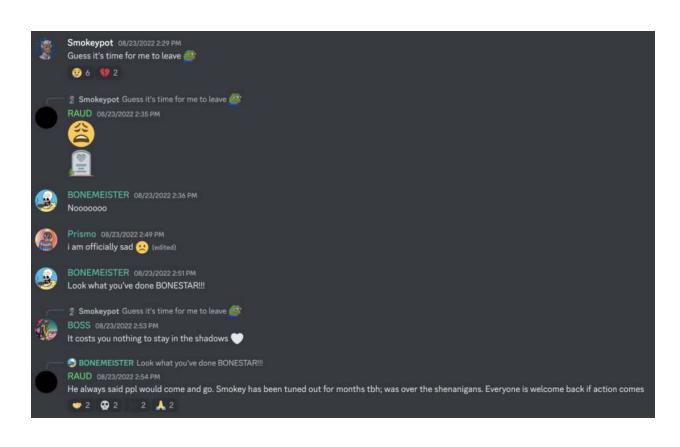
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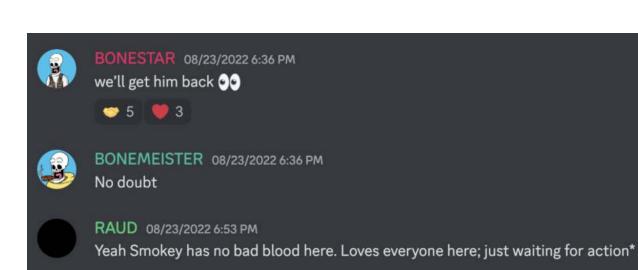
Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)











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Remotely

Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)



also by the way don't expect anything with the WP, get your hopes down, its our first formal announcement, that is all the real spicy begins with the drop so everyone's expectation managed? good.





JJbone 09/01/2022 9:17 PM So next date is 1 Oct? (edited)



MARSEILLE 09/01/2022 9:18 PM

So excited to see what you are cooked for us

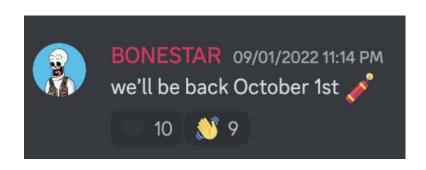


yes, next is Oct 1

site and app dropping Oct 1 drop dropping Nov 1







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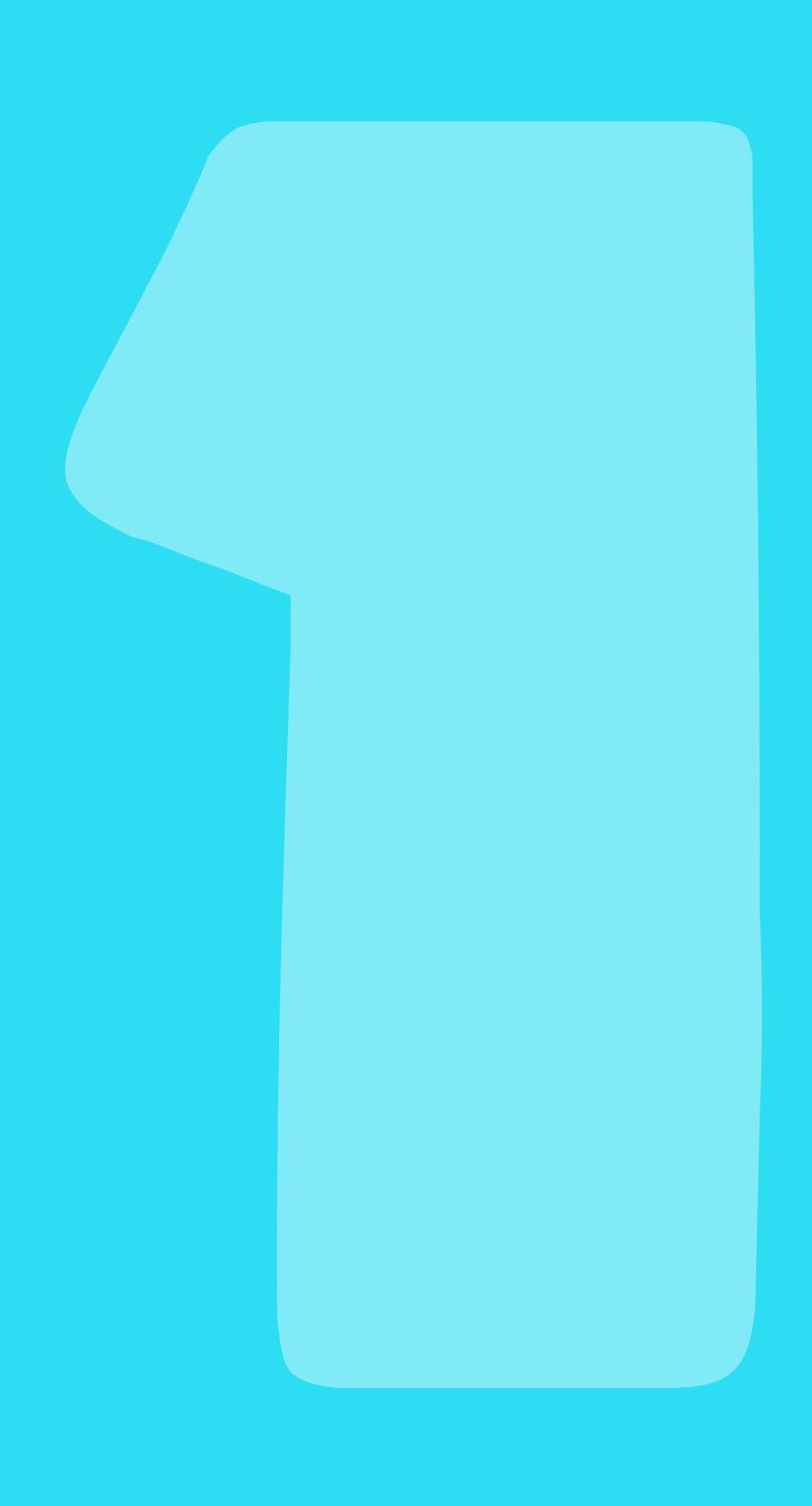
Notary Public in and for the Province of Ontario

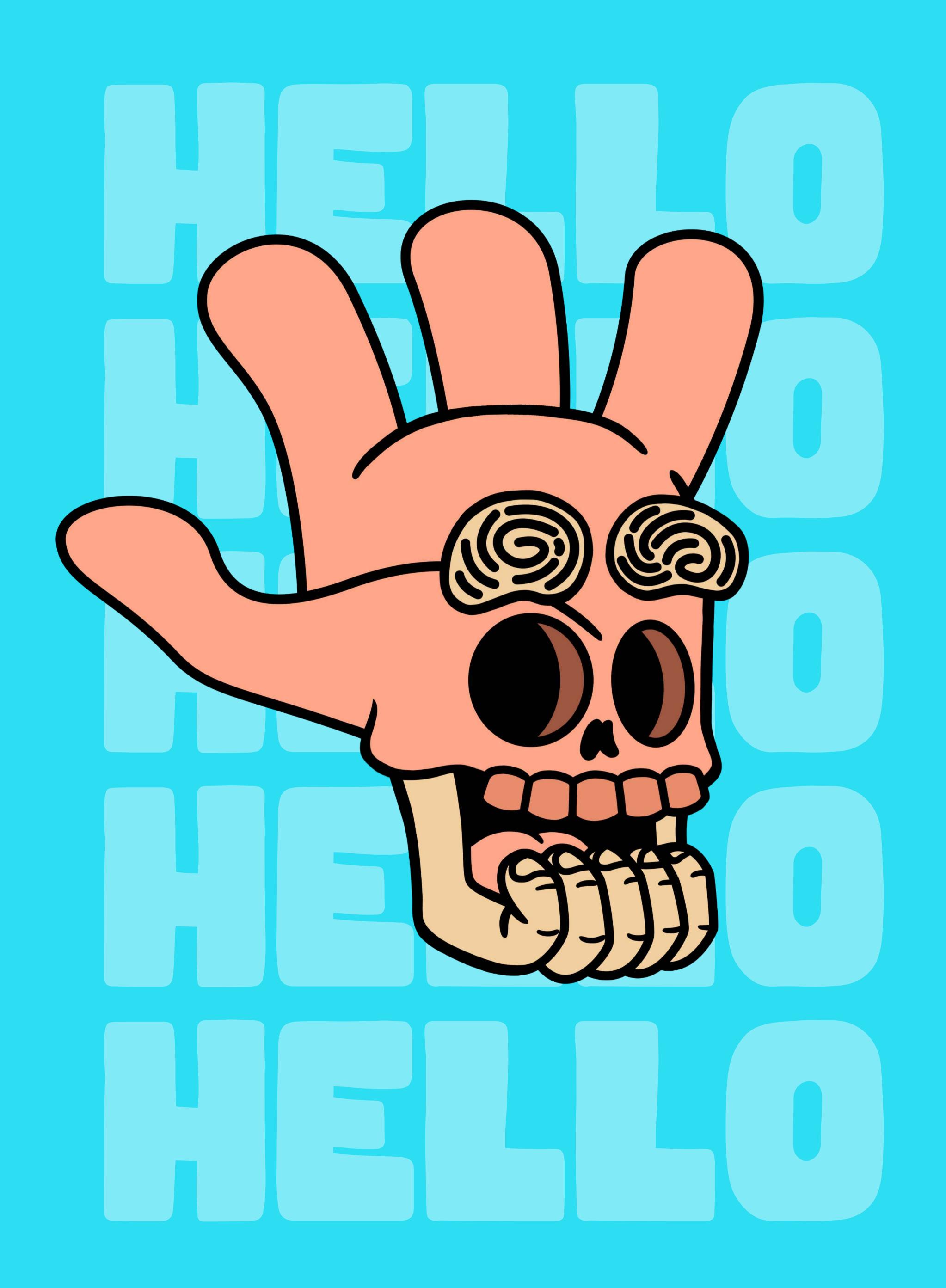
Sohaib Mohammad (LSO: 80696K)











BONEHEADS

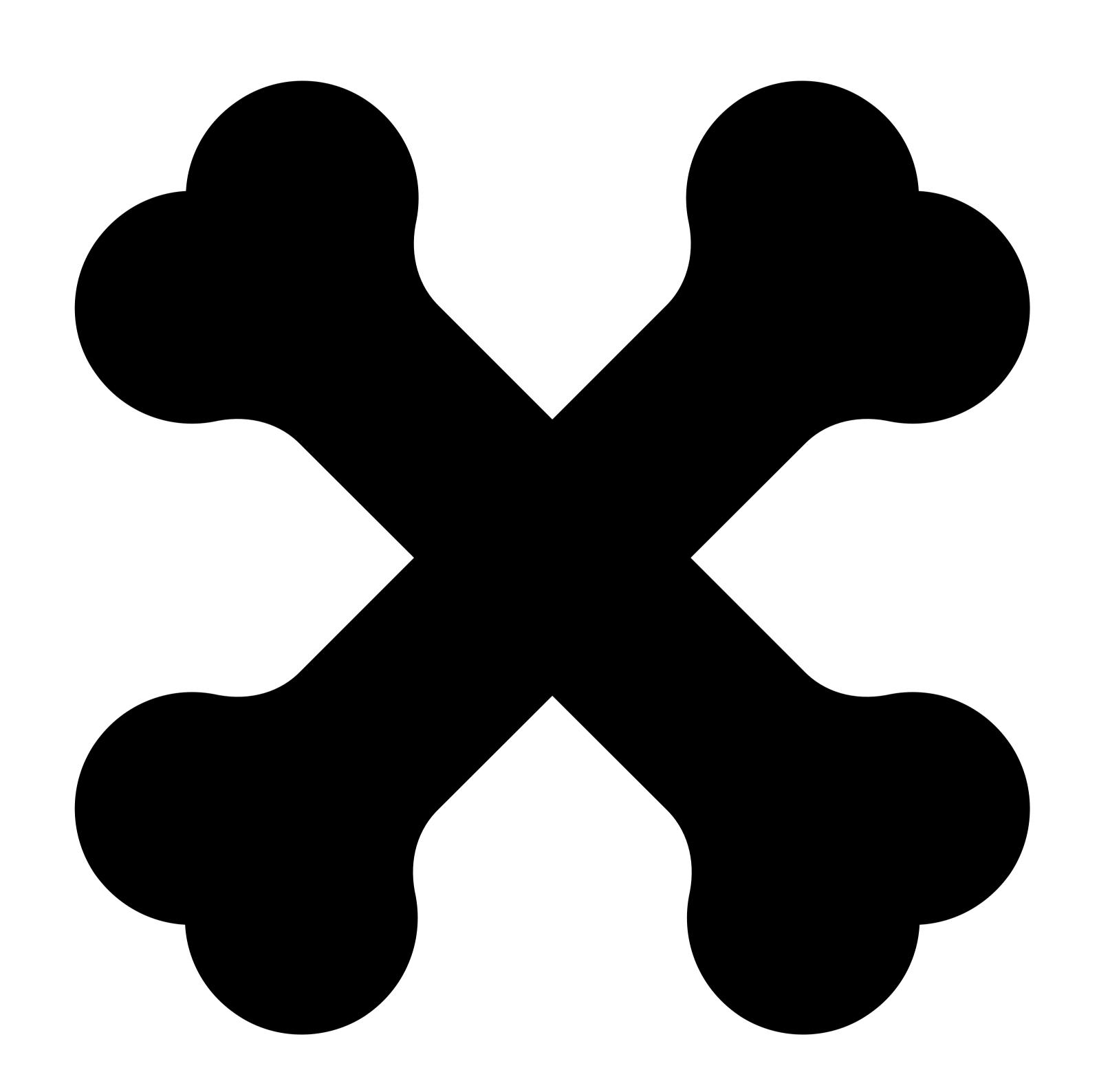
INTERACTIVE MEDIA EXPLORING WHAT IT MEANS TO BE HUMAN THROUGH DESTRUCTIVE EXPERIMENTS.

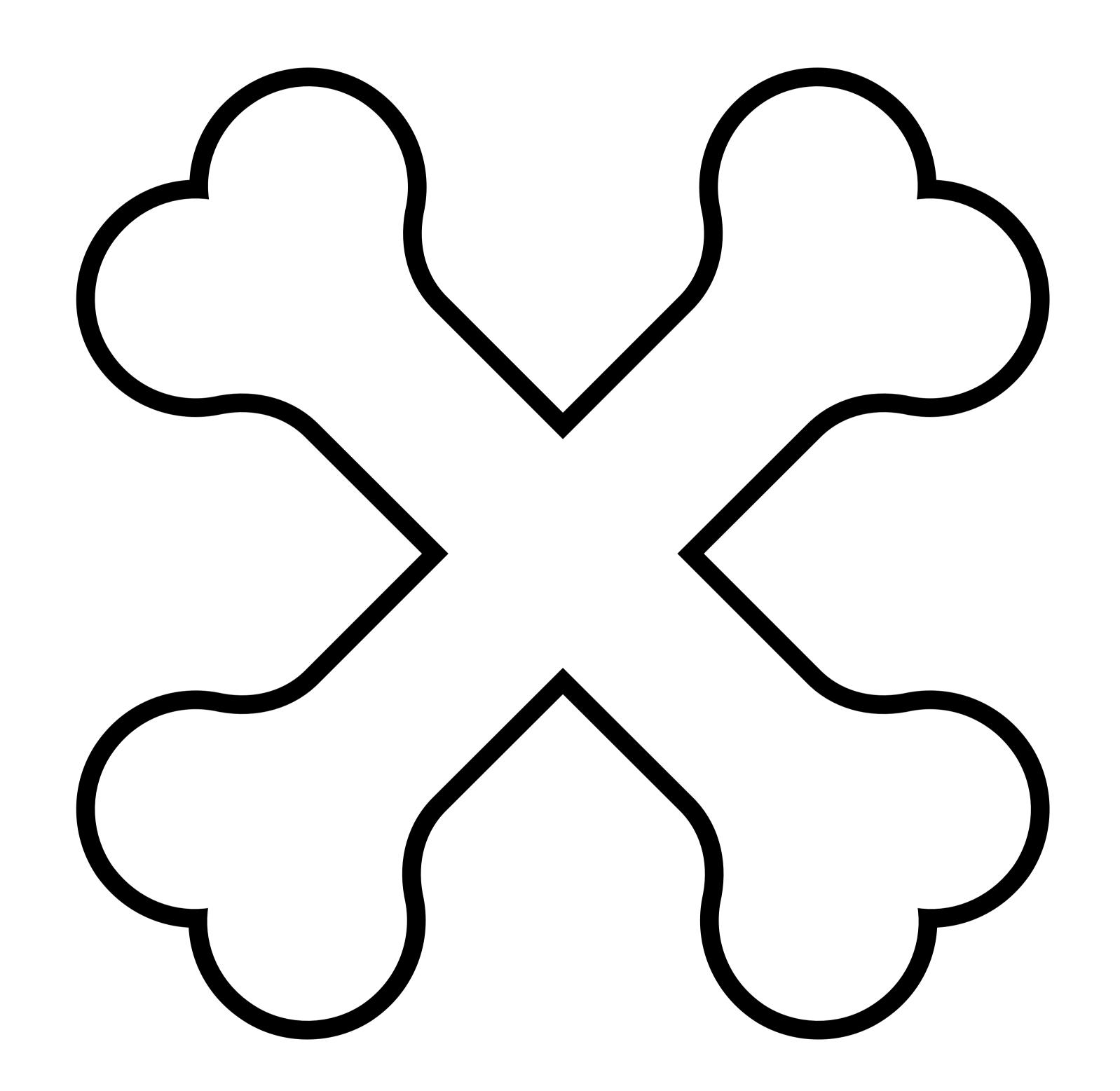


CONTROVERSY IS ATTENTION ATTENTION IS POWER

BY THE POWER INVESTED IN BONEHEADS", BONEHEADS" WILL DESTROY CULTURAL BOUNDARIES THROUGH CONTROVERSIAL EXPRESSION.









CBORESTAR

WHO THE F#CK IS @BONESTAR?

WHO THE F#CK ARE YOU...

EVERY DROP IS GATED.

EVERY DROP IS LIMITED.

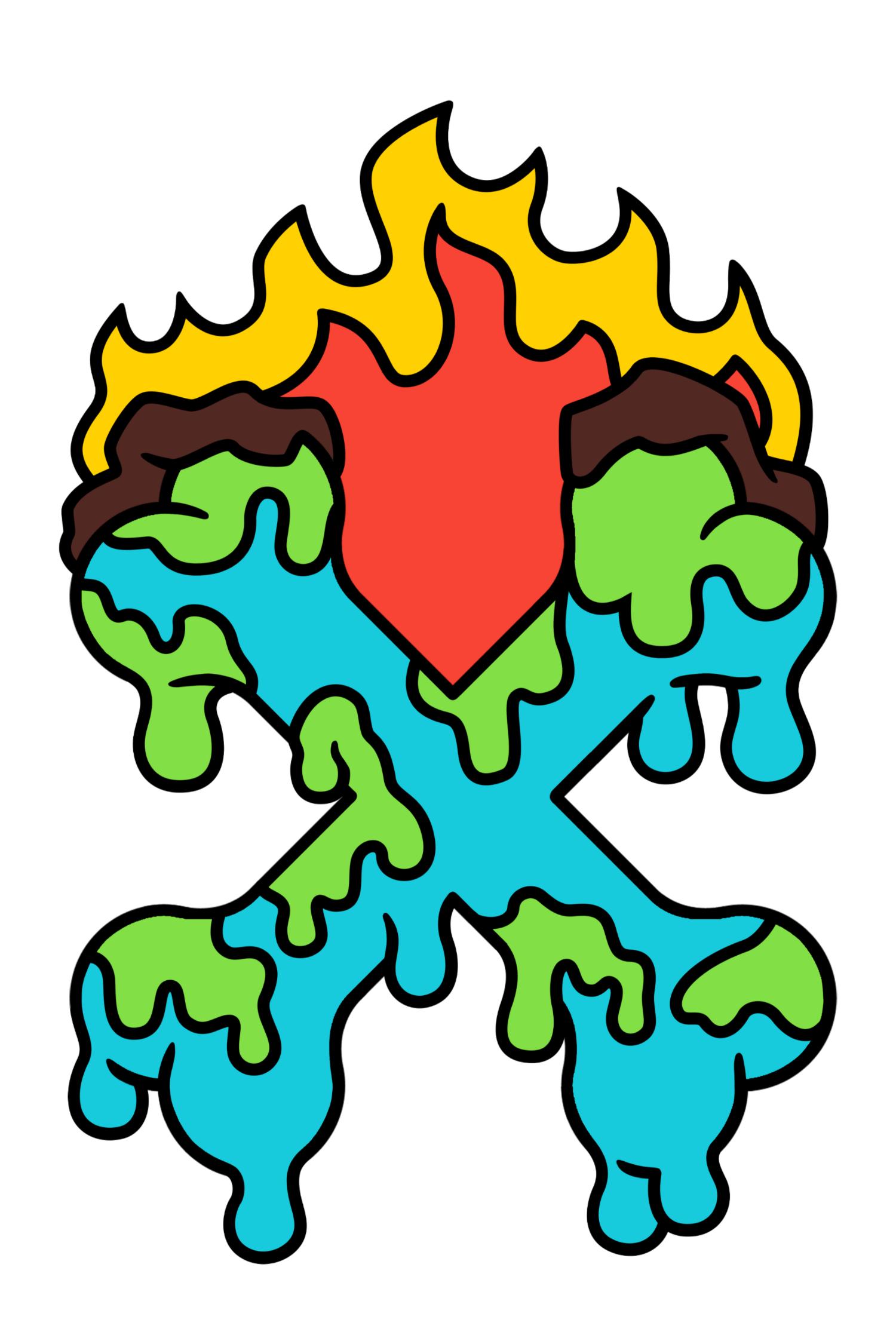
DROPS OPEN ON THE 1ST OF EVERY MONTH.

DROPS ARE ONLY OPEN FOR 24HRS.

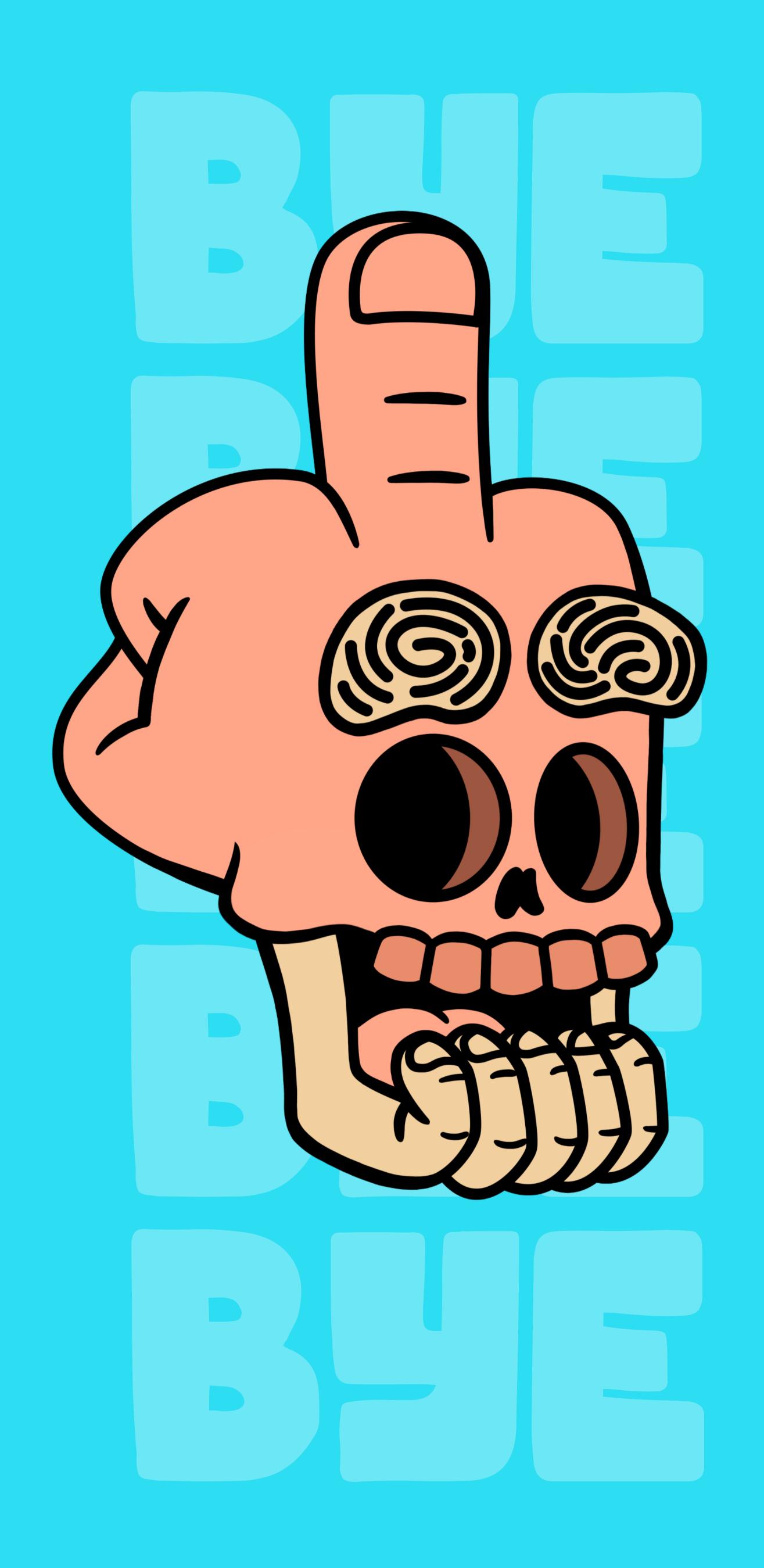
DROP 1 GOES LIVE NOVEMBER 1ST, 2022.

BURN BAB BURN





HEED IT. HEED IT.



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Notary Public in and for the Province of Ontario

Sohaib Mohammad (LSO: 80696K)

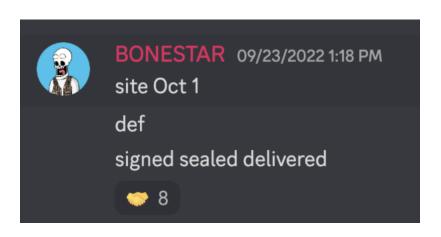


RONESTAR once we finalize NFT collection so many dope assets and emojis coming our way, we'll make our own SVG everything - putting hella emphasis on BONEMEISTER, page 1992 253 PM

So would that be after refresh in jan1?



BONESTAR 09/03/2022 2:54 PM Jan 1st refresh 100%



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Remotely



hey guys (and gals, and lamps), sorry no site previews today, I don't know if Raud relayed the message but we're dropping the first piece -> limited edition 1/1 head corresponding pieces Nov 1, it'll be a tshirt, very collectible centric packaging and branding, designer level quality 220gsm fine jersey 100% cotton, vintage white



all numbered to 1/100, and I'll personally guarantee that anyone in here that wants one will have guaranteed access at cost



we've pushed a lot of things up (timeline wise), just going to tsunami it all at once again, BH still #1 shadow contender, our time is coming, we won't forget this founding crew (edited)

and by cost I mean free of course, won't even charge shipping, unless you live in papa new guinea or something







BONESTAR 10/27/2022 8:23 PM

we'll know in the next 48hrs if Nov 1 deadline will be met, our fulfillment centres provide 2 day shipping within US and 7 days international, but we don't want anyone waiting to receive their order



we don't want to launch a pre-order

product is ready, packaging is delayed, the first drop is the forevers t-shirts, they're very limited and superior quality, and include 8x pieces of packaging





MARSEILLE @BONESTAR Can I get two or just one per hand

BONESTAR 10/27/2022 8:46 PM there isn't a limit



but only 50 will be made available to the public, were holding back 50 from every limited edition drop, and as we move along we'll scale that number back, after 12th month we'll scale down to 25 reserved

for the first drop everything numbered -#10 and up will be available to public, and you guys first and foremost - don't 100% quote me on this but i'll try to make it happen



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Remotely



hey guys (and all other pronouns), no easy way to say this, we're not going to make the nov 1 deadline, sorry to disappoint, as a consolation i'm personally covering the \$100 USD fee, you'll either be entitled to one of the t-shirts from the first limited edition drop or \$100 USD digital giftcard that can be used on anything else in the store, socks hats hoodies toys etc., to claim just like this message by the end of the day and i'll make note of everyone that's done it



🚷 BONESTAR hey guys (and all other pronouns), no easy way to say this, we're not going to make the nov 1 deadline, sorry to disappoint, as a consolation I'm



BONEMEISTER 11/01/2022 7:41 AM What's the plan forward?



the plan is the same as mentioned before, the dates have been pushed up slightly



NONESTAR the plan is the same as mentioned before, the dates have been pushed up slightly BONEMEISTER 11/01/2022 7:57 AM

Can you share anything regarding target dates or should we just assume surprise?

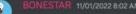


Whats the next target date?

@BONESTAR i am cold



S JJbone @BONESTAR i am cold





I am in pain and cold

i'm doing everything in my power to get everything, and I mean everything out by the 24th of December, the sites the apps the clothes and most importantly the NFT collection update, we had internal disagreement about putting things out sequentially as planned a few months back vs dropping it all at once and moving forward sequentially, and I think we'll do just that

08:05 we have two brands, boneheads and bonestar, both very different product offerings, that complicated logistics a little bit, it's still no excuse

A 4



BONESTAR 11/02/2022 11:07 AM
we set at internal deadline that everything has to be out by xmas or we're folding, and we're not going to fold, so..everything that we have will be out by xmas, regardless of whether we think its "good enough"

◎ 6 **00** 2 **♀** 5

 $^{11:08} \quad \text{ and that won't be pushed, 0\% chance, I probably won't be happy with it, but it's what we all agreed on} \\$



BONESTAR 11/02/2022 11:13 AM

think of it this way, this will either be the best Christmas, or the worst Christmas every for BH



BONESTAR haha everyone, first a foremost, nobody invested in a business because nobody invested in anything, users purchased a token that represented

Dreuseff AKA BONE Brawler 11/02/2022 3:16 PM

my main issue with this statement is that ppl bought the token because of how it was advertised - not for the art itself at the time. The focus was on the utility of what those tokens would 'do' besides being a jpg. That's why you had the website up before and during the sale which then got re-branded to 'pre-sale'

the scope of a project can change – ppl understand that but i didnt buy the jpg – bought into the roadmap which was presented during the sale and how the tokens we purchased would operate within the roadmap / ecosystem

I can understand keeping things close to chest for preserving some IP / but tbh it's hard to imagine what groundbreaking means at this point without knowing what team background is and their capabilites / who you are working with.

the deadline of 24th or the entire project goes bust? that sounds wild

forgive me but a launch a day before christmas is going to go largely unnoticed

there has to be more incentive than a t shirt release on that day and a marketing wave leading up to that date to make any impact (edited) without any communications on social platforms this month - I wouldnt see how december is going to 'save' the project if it isnt delivered. like you must not be relying on making sales immediately post launch in order to continue or fold

i can only speculate based on what is communicated in here – but if there is internal conflict about launch phases and directions – it means there are other invested parties BoneStar is reporting to which is concerning that things arent a majority decision or easy to blame another unknown party for continued delays. Its the lack of operational transparency that's been a continuous issue here – besides what the product itself actually is.

in the worst case - if this project was truly a rug - there's been plenty of time to have since created a legit project out of this and deliver in stages vs. biting off more than what the team has been capable of delivering as a 'wave' which never materializes



Dreuseff AKA BONE Brawler 11/02/2022 3:42 PM

There's no option but to HODL at this point for us supporters since there are no new reasons for other collectors / investors to want in - so I'll keep hoping to be pleasantly surprised vs disappointed by missed deadlines

This is Exhibit "AK" to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely





BONESTAR 11/04/2022 12:07 PM

TM means a trademark registration has been filed



we don't need permission from Netflix, if they have a problem they can suit us



This is Exhibit "AL" to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with Q. Reg 431/20, Administering Oath or Declaration

Remotely



BONESTAR 11/13/2022 7:30 PM

cant wait for Jan 1 and the first of every month onwards, forever





BONESTAR cant wait for Jan 1 and the first of every month onwards, forever

JJbone 11/13/2022 7:39 PM

So anything happen on 24/12?



3 JJbone So anything happen on 24/12?

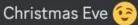


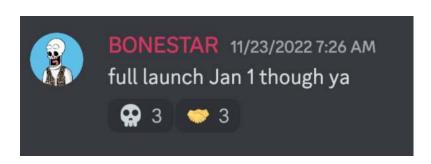


JJbone So anything happen on 24/12?



MARSEILLE 11/13/2022 10:59 PM







Bosco **12/07/2022 12:08** AM

Dec 31st or Jan 1st ... which is the date to look out for?



BONESTAR 12/07/2022 8:02 AM

Jan 1st





BONESTAR 12/25/2022 10:53 PM

JAN 1 , but it will be a quiet one from marketing perspective - we want as many boxes from the first drop as we can get, considering making it a forevers only drop (regardless forevers will get a box as promised, contributes to lore of exclusivity and shadow lurking)



This is Exhibit "AM" to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration

Remotely



Final reminder: DO NOT OPEN upon receipt!!!

The shipment is one box with 3 total packages - for the first drop and the first 100 we're doing a treasury-only batch (similar to the how nounsDAO functions - every 6th noun is automatically allocated to the team); since they'll be the most rare and a crucial component of a complete set, we believe holding them back will provide us with strategic leverage, and they need to be preserved and handled with utmost care and consideration for...the future - since that is basically the entire ethos of the brand (you will get to understand more about this when you view the contents of the box). We won't even hold any of the #'s/100 contents of the box). We won't even hold any of the #'s/100 contents of the box ourselves - we'll use samples when show the gang - we can do a virtual opening session once everyone confirms receipt for whomever is down.

For collecting your information: you'll be able to fill out a google doc tomorrow, we will delete your info from our possession immediately after sending out the boxes - these are considered gifts so they are void of any TOS or service level agreements - if you don't want to risk customs opening/unsealing the boxes (there are 3x security/authenticity seals per package) you'll be able to pick them up IRL in NY in December 2023.

In terms of the bucket auction we are actually unable (legally) to bid on our own "bucket", so we'll be forgoing attempting to directly acquire any

As far as the reveal goes we've decided that there's upside in keep it unrevealed, we believe that enhances and adds to our ability to reinvigorate the collection, and we have a risky/nuanced worldwide physical marketing stunt planned that incorporates the 1,700 BH's we currently own - in the meantime we are going to set live a rebrand, all the socials will be wiped, and the site will change, and all your current BH metadata will be erased, and new transient token art will be displayed.

HNY GANG, this will be the year that BH becomes whole.











Banstar, you promised so much to do on January 1st and you again did not fulfill your promises

You promised us something big and grandiose for January 1, including site updates, your marketing launch of the collection, but you didn't fulfill any of this promise, and again you give us some kind of google sheet in which we must fill in our names:(it doesn't even look serious

Why am I writing this to you... so I can tell myself that I did not remain silent

The question is where is all this promised what you have been telling us here for so long



everything happens all at once Jan 1



I don't know why I constantly run into scammers in my life





BONEMEISTER 01/03/2023 4:27 PM

@BONESTAR could you please address the above and perhaps give us an idea of how you plan to move forward? Just monthly drops? Any marketing? When should we expect rebrand/site refresh/metadata etc?





Bosco III 01/04/2023 3:44 PM

i'm confused by the radio silence @BONESTAR



BONEMEISTER 01/04/2023 3:44 PM





Dreuseff AKA BONE Brawler 01/05/2023 12:14 AM

I'm not putting in my mailing address honestly until we get more clarity on things moving otherwise. Like why no option for sizing etc?

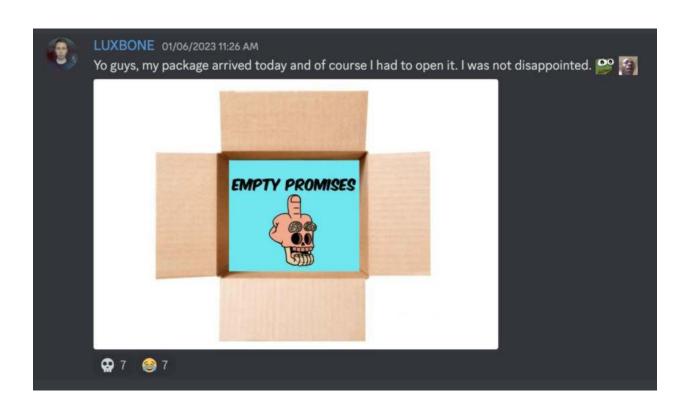


Davee 01/05/2023 12:21 AM

He might use the info to protect his ass in court. Best thing would be not to provide him with any info unless he actually delivers



adezeno.eth 01/05/2023 9:27 AM Oh shit



This is Exhibit "AN" to the Affidavit of Dominic Simpson

Sworn remotely before me at the City of Ottawa, Ontario and the affiant stated as being located at the City of Peoria, in the State of Illinois, in the Country of the United States of America on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely



JJbone 01/07/2023 11:53 AM so when will #1 drop box target to deliver

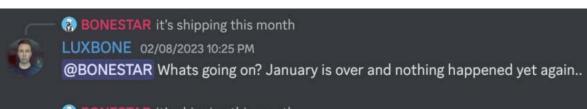


BONESTAR 01/07/2023 11:56 AM



you'll be pleasantly surprised it's shipping this month







aylan McRae-Yu	and	Profitly Incorporated et. al.,	Court File No.: CV-23-00092340-00CP
Plaintiff	ding	Defendants	

SUPERIOR COURT OF JUSTICE ONTARIO

Proceeding commenced at OTTAWA

Proceeding under the Class Proceedings Act, 1992

AFFIDAVIT OF DOMINIC SIMPSON (SWORN SEPTEMBER 21, 2023)

DELAWYER PROFESSIONAL CORPORATION

52 Bayswater Ave., Suite 1505 Ottawa, ON

K1Y 4K3

SOHAIB MOHAMMAD

TSO#: 80696K

Tel: (647)-535-8706 Email: sohaib@delawyer.io

Lawyer for the Plaintiff,

Taylan McRae-Yu



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

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

AFFIDAVIT OF GLEN WILDE (SWORN SEPTEMBER 21, 2023)

- I, Glen Wilde, of the City of London, in the United Kingdom, MAKE OATH AND SAY:
- 1. I am a prospective class member in this matter. Where I have made statements based on information and belief, I have stated the source of the information and believe it to be true.
- 2. I have reviewed the following documents in this matter: (1) The Statement of Claim; (2) The Statement of Defence and Counterclaim; (3) The Reply and Defence to Counterclaim; and (4) The Defendant's Motion Record dated September 1, 2023.

Background

- 3. I am 42 years old and presently reside in the United Kingdom with my wife and children.
- 4. I am an entrepreneur and have been working in the blockchain space since 2017.
- 5. I am the founder of a non-fungible token (NFT) project known as GNARS, a decentralized autonomous organization (DAO) and platform dedicated to empowering collective creation.

6. I also advise platforms that are bringing in photographers into the NFT space and have worked with notable platforms including ArtBlocks, Obscura DAO and Explorest.

Boneheads NFT

- On August 20, 2021, I minted 50 Boneheads NFTs at a total price of \$16,432.50 USD, and 7. a transaction fee of 0.485 ETH (\$1,596.09 USD), bringing my total purchase price to \$18,028.59 USD. Attached as Exhibit "A" hereto is the Ethereum transaction hash. 0x961e48987f7e4568c9a0222a67790869ca3f96e6560dcfb0d746c0ac1f8b1cde, evidencing this purchase.
- 8. I purchased the Boneheads NFTs because of the extensive promises of utility made in advance of the mint.
- 9. Based on my experience within the NFT space, I have no doubt that the Boneheads NFT sale was a rug pull. At all times, I was a patient holder of these NFTs. I have received none of the utility I was promised in advance of the mint.
- 10. I swear this affidavit in support of this motion for and for no other improper purpose.

SWORN BEFORE ME remotely at the City of Ottawa, Ontario and the affiant stated as being located at the City of Marfa, in the State of Texas, in the Country of the United States of America, on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

Notary Public in and for the Province of Ontario

Sohaib Mohammad (LSO: 80696K)

Glen Wilde

This is Exhibit "A" to the Affidavit of Glen Wilde

Sworn before me remotely at the City of Ottawa, Ontario and the affiant stated as being located at the City of Marfa, in the State of Texas, in the Country of the United States of America, on September 21, 2023, in accordance with O. Reg 431/20, Administering Oath or Declaration Remotely

Notary Public in and for the Province of Ontario Sohaib Mohammad (LSO: 80696K)

per

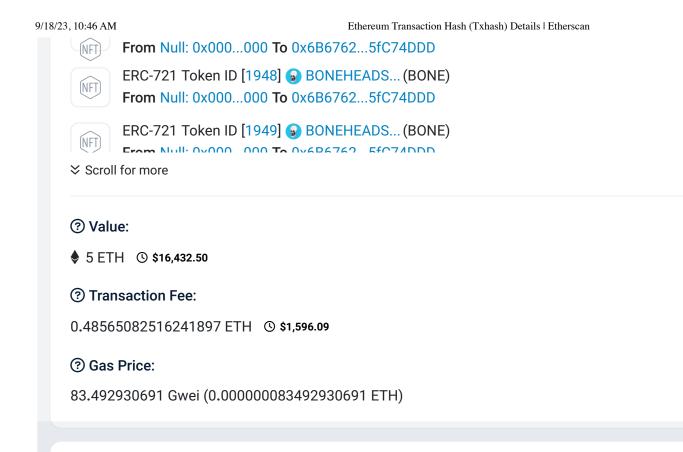
Transaction Details ()





Overview Logs (50) State Comments More ~ ? Transaction Hash: 0x961e48987f7e4568c9a0222a67790869ca3f96e6560dcfb0d746c0ac1f8b1cde ? Status: Success Block: **2** 13064146 5099259 Block Confirmations ? Timestamp: ① 758 days 18 hrs ago (Aug-20-2021 08:00:22 PM +UTC) **4** Transaction Action: ▶ Mint 50 of BONEHEADS... (BONE...) ③ Sponsored: ② From: 0x6B67623ff56c10d9dcFc2152425f90285fC74DDD [] ② Interacted With (To): 🖹 0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2 (BONEHEADS: BONE Token) 🗗 🔮 © ERC-721 Tokens Transferred: 50 ERC-721 Token ID [1944]
BONEHEADS... (BONE) (NFT) From Null: 0x000...000 To 0x6B6762...5fC74DDD ERC-721 Token ID [1945]
BONEHEADS... (BONE) (NFT) From Null: 0x000...000 To 0x6B6762...5fC74DDD ERC-721 Token ID [1946] BONEHEADS... (BONE) (NFT) From Null: 0x000...000 To 0x6B6762...5fC74DDD

ERC-721 Token ID [1947]
BONEHEADS... (BONE)



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.

Faylan McRae-Yu	puo	Profitly Incorporated et. al.,	Court File No.: CV-23-00092340-00CP
Plaintiff	allu	Defendants	

SUPERIOR COURT OF JUSTICE ONTARIO

Proceeding commenced at OTTAWA

Proceeding under the Class Proceedings Act, 1992

(SWORN SEPTEMBER 21, 2023) AFFIDAVIT OF GLEN WILDE

DELAWYER PROFESSIONAL CORPORATION

52 Bayswater Ave., Suite 1505 Ottawa, ON

K1Y 4K3

SOHAIB MOHAMMAD

TSO#: 80696K

Tel: (647)-535-8706 Email: sohaib@delawyer.io

Lawyer for the Plaintiff,

Taylan McRae-Yu



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

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;
- wii. "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;
- 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;
- 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)

- 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:
 - 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.

- 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.

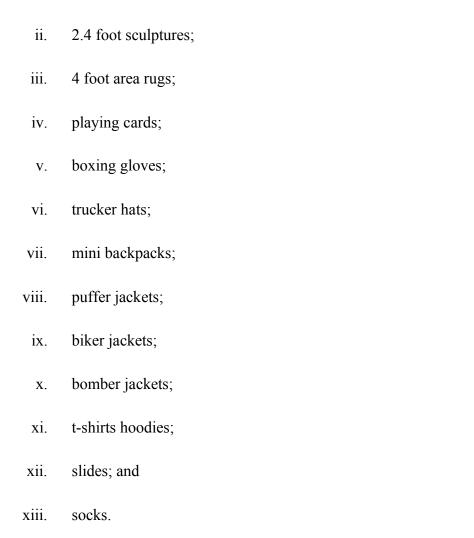
FACTUAL BACKGROUND

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:

- 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;



- 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".
- 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/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 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 led 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.
- 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.
- 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.
- 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.
- 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 recission 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 recission 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;
 - 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:
 - 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

SOHAIB MOHAMMAD

LSO#: 80696K

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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

Proceeding commenced at OTTAWA

SUPERIOR COURT OF JUSTICE

Proceeding under the Class Proceedings Act, 1992

STATEMENT OF CLAIM

DELAWYER PROFESSIONAL CORPORATION

Suites of Somerset

52 Bayswater Ave., Suite 1505 Ottawa, ON

K1Y 4K3

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Lawyer for the Plaintiff

OF JUSTICE AT OTTAWA

SUPÉRIEURE DE JUSTICE À OTTANA DÉPOSÉ À LA COUR

FILED SUPERIOR COURT 3인N 19 2023



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 DEFENCE AND COUNTERCLAIM

- 1. The Defendants, Profitly Incorporated, DMCB Holdings Inc., Ivan Avramenko, Alexandra Stinson and John Doe, admit none of the allegations contained in any of the paragraphs of the Statement of Claim.
- 2. The Defendants, Profitly Incorporated, DMCB Holdings Inc., Ivan Avramenko, Alexandra Stinson, (collectively the "**Defendants**"), have no knowledge of the allegations contained in paragraphs 6-23, 28, 30-31, 35-36 of the Statement of Claim.
- 3. The Defendants deny all other allegations contained in the Statement of Claim except as otherwise pleaded herein.
- 4. The Defendants request that paragraphs 6-21 of the Statement of Claim be struck as they are irrelevant to the matters at issue.

Parties

- 5. Profitly Incorporated ("**Profitly**") is a corporation incorporated pursuant to the laws of Ontario.
- 6. DMCB Holdings Inc. ("**DMCB**") is a corporation incorporated pursuant to the laws of Ontario.
- 7. Ivan Avramenko ("**Ivan**") is an individual residing in the Province of Ontario. Ivan is, *inter alia*, an entrepreneur with experience in technology start up companies.
- 8. Alexandra Stinson ("Alexandra") is an individual who resides in the city of Belleville, Ontario. Contrary to the allegations at paragraph 27 of the Statement of Claim, Alexandra is not a co-founder of the Boneheads NFT project ("Boneheads").

Non-Fungible Tokens

- 9. Non-fungible tokens ("NFTs") are cryptocurrency-based assets which are created through a process called "minting". Minting is when the individual information of an NFT gets recorded onto a publicly accessible database, called a blockchain. Once an NFT has been minted, it is given a unique identification number which allows it to be distinguishable from other NFTs. This identification number is what allows an NFT to be sold, exchanged, or traded between owners. The NFT's ownership details are also stored onto it, which includes the details of the individual or company that designed it.
- 10. The value of an NFT (after the initial sale) is given to a token on a case by case basis since every token is considered unique, therefore, a single value/price cannot be

applied to an entire collection of tokens, rather only to a specific token or set of tokens – this price is determined by the customer. It is a free market. A floor price does not indicate value for an entire collection of tokens, it simply indicates the lowest available price for a specific individual token.

The Boneheads NFT

- 11. In or around early 2021, DMCB launched Boneheads.
- 12. DMCB hired computer developers to assist with the engineering side of Boneheads. The developers built, *inter alia*, art designs, app designs, and website designs. Alexandra was never involved in the development or conceptualization of this project and is in no way involved with Boneheads.
- 13. Each Bonehead NFT represented a specific piece of art. The sale was a surprise blind mint, which is the standard practice, therefore, none of the purchasers knew which specific piece of art they were getting. The surprise aspect is part of the appeal for customers, since they have an opportunity to have a rare token. The Plaintiff was well aware of this before the sale took place. That is the reason he purchased over 30 tokens with the hope of obtaining a bonehead NFT that is rare compared to the rest. There is an implicit risk in purchasing tokens that is well known to purchasers. Tokens varied in price. Some individuals who purchased a bored ape yacht club NFT, for example, were lucky as that NFT ended up being worth upwards of \$500,000.00.
- 14. DMCB marketed Boneheads primarily through the social media website Discord ("Discord" or the "Boneheads Discord"). Discord allowed users to, *inter alia*,

communicate with the Boneheads community through via instant messaging, video calls, and voice calls.

15. Many people share ideas and information through the Boneheads Discord.

Boneheads' Benefits (the "Benefits")

16. Boneheads marketed six benefits that customers could receive with each Boneheads NFT purchase. At the time the Benefits were presented, they were not yet completed. Boneheads made it clear to the public that their Benefits were not yet ready to be launched, by posting a general description for each benefit as a way to inform potential Bonehead purchasers of potential Benefits once the Benefits were finalized. In no way was the marketing of these Benefits an official offer to potential purchasers.

Benefit 1 – Lifetime Membership ("Benefit 1")

- 17. Benefit 1 would give purchasers lifetime access to the Bonehead cabana (as long as they held the asset in their wallet), digital collectibles, and access to the Bonehead forging headquarters, which is where purchasers could forge their own physical and digital collectibles.
- 18. Boneheads is currently in the process of designing and finalizing apps for the release of Benefit 1. Further, Boneheads has not yet completed the domain purchase for Benefit 1. Without the domain, it is impossible to launch Benefit 1.
- 19. The Boneheads Discord community was made aware of the fact that Benefit 1 is not yet complete. As such, it would not be possible to rely on these Benefits when

deciding whether or not to purchase a Boneheads NFT as it was made clear that such Benefits were not yet finalized.

Benefit 2 – Exclusive Forging ("Benefit 2")

- 20. Benefit 2 would give Bonehead purchasers exclusive forging rights.
- 21. Boneheads made it clear that no timeline had been established with respect to when Benefit 2 would be available to the public. Further, as an abundance of caution, Boneheads marked a "to be determined" indicator as to when Benefits 2 would be completed.

Benefit 3 – Claimables ("Benefit 3")

- 22. Benefit 3 would allow Bonehead purchasers to claim specific physical Bonehead collectibles for free using their Bonehead NFT. This benefit was designed to give purchasers an unprecedented experience with the purchase of their Bonehead NFT.
- 23. It was made clear to the Bonheads Discord and Twitter community that there was no official timeline for completetion for Benefit 3.

Benefit 4 – App Access ("Benefit 4")

- 24. Benefit 4 would allow Bonehead purchasers priority access in testing the upcoming apps before they would be made public.
- 25. There was no publicly stated release date for Benefit 4.

Benefit 5 – Behind the Scenes ("Benefit 5")

- 26. Benefit 5 would allow Bonehead purchasers behind the scenes access to Bonehead products, including but not limited to, sculptures, accessories, playing cards and other Boneheads collectibles.
- 27. Bonehead Discord users have been given previews of Benefit 5 physical items, although Boneheads has yet to release anything official.

Benefit 6 – Voting Rights ("Benefit 6")

- 28. Benefit 6 would allow Bonehead purchasers voting rights with respect to the manufacturing of various Bonehead products.
- 29. Contrary to paragraph 37 of the Statement of Claim, at no time did Boneheads guarantee the release of any of their benefits, nor did they provide potential purchasers a specific release date. As such, the Plaintiff could not have relied on any alleged representations made by Boneheads, since no representations were made. The Defendants put the Plaintiff to the strict proof thereof.
- 30. Contrary to paragraph 43 (i) and (ii) of the Statement of Claim, Boneheads did not promise the chance to win \$1,000,000.00. Boneheads had not listed any giveaways on their company webpage. Further, these alleged giveaways were never included in the Boneheads Smart Contract (the "Smart Contract"), which is a digital contract that all Boneheads purchasers must agree to before purchasing their Boneheads NFT. The Plaintiff signed the Smart Contract, and as such, was eligible to be a Boneheads NFT

purchaser. Boneheads intends on offering \$250,000.00 worth of digital value for assets that will be available within the App, upon the App's release.

- 31. Contrary to paragraphs 45-47 of the Statement of Claim, the Boneheads Roadmap (the "Roadmap") was by no means a finished product. It was simply a *roadmap* into what Boneheads may create in the future. In no way was the Roadmap to be relied upon by potential Bonehead purchasers. This was made clear via Boneheads' Discord and Twitter pages. In general, NFT purchasers are aware of the risks associated with NFT projects and that roadmaps are not guaranteed. Roadmaps do not constitute promises capable of being accepted.
- 32. Contrary to paragraphs 51-54 of the Statement of Claim, as previously mentioned, the Benefits were not yet completed. Boneheads informed potential purchasers as to what they could expect to be given.
- 33. Contrary to paragraph 55 of the Statement of Claim, Boneheads did not guarantee the opening date for the Cabana Store. In fact, the Cabana Store opening was never a part of the sale, Benefits and/or Roadmap. This had no impact on the Plaintiff's tokens. No loss or damage resulted from the allegations in the Statement of Claim, and particularly the allegations at paragraph 55 of the Statement of Claim.
- 34. The Defendants deny the allegations made in paragraph 56 and 57 of the Statement of Claim. The Plaintiff's allegation that consumers relied on alleged promises and representations made by Boneheads is meritless. The Plaintiff is speaking on behalf of consumers he has no affiliation with, and as such, the Plaintiff's allegations hold no weight. The Plaintiff is not a proper representative plaintiff and will be put to the strict proof

thereof. In the alternative, if the Defendants did make promises and representations about their skillset that consumers relied on, which is denied, the Defendants plead that the Plaintiff does not have enough knowledge and/or expertise in NFTs and as a result, the Plaintiff relied on alleged representations that were outside the scope of his knowledge.

- 35. Contrary to paragraphs 62 and 64 of the Statement of Claim, the Defendants banned the Plaintiff from the Boneheads Discord server as a result of the Plaintiff engaging in inappropriate and disruptive conduct towards other server users. The Plaintiff would routinely post defamatory and abusive statements towards other users and the Defendants. Further particulars of the Plaintiff's behaviour shall be provided for before trial. As a result of the Plaintiff's disruptive behaviour, the Plaintiff's Discord server was likely "slower" than other users as this is a safety mechanism Discord had put in place to protect other users from disruptive users.
- 36. Contrary to paragraph 65 of the Statement of Claim, the Plaintiff has mischaracterized potential Bonehead NFT purchasers as "unsuspecting consumers". There was no rug pull by the Defendants. The Defendants put the Plaintiff to the strict proof thereof.
- 37. Contrary to paragraph 66 of the Statement of Claim, the Defendants have not dissipated any funds from Bonehead sales. The Smart Contract was programmed to automatically disburse funds from the sale contact directly as follows:
 - (a) 15% as payment to developers; and

- (b) 85% to a wallet controlled by the Defendant. This wallet is also used to pay for other developments.
- 38. Contrary to the allegations in the Statement of Claim, the funds were not moved from the Smart Contract. The funds were disbursed in accordance with industry standards and/or contractual terms. The project developers, who are world class developers and who have handled several projects, created the Smart Contract to automatically disburse the funds to the two wallets. This was the most efficient way to conduct the development. If the funds were not moved to a wallet controlled by DCMB, the funds would be inaccessible, which would impede on project development. In addition, as illustrated above, funds were moved in order to pay project developers. The Plaintiff has insufficient knowledge with respect to how NFT deposits work, and as such, the Plaintiff's claims are unfounded.
- 39. Contrary to paragraph 69 of the Statement of Claim, the alleged opening of the Boneheads Flagship Store in early 2022 was never a set deadline. Boneheads made it clear to potential purchasers that any opening dates were subject to change. In addition, the opening of the Flagship Store is in no way related to any of the Bonehead sale offerings and was never part of the Boneheads Benefits or the Roadmap. This was a new ambition that was never communicated before the sale of the NFTs.
- 40. With respect to paragraph 74 and 76 of the Statement of Claim, the collections and drops cited by the Plaintiff have not yet been released because they are still in development. The Defendants have not defrauded the Plaintiffs. At all material times the

Defendants have provided updates to the public regarding ongoing developments. This does not constitute a "rug pull" as alleged by the Plaintiff.

- 41. Contrary to paragraph 78-82 of the Statement of Claim, the Defendants have not breached any contract with the Plaintiff. Boneheads has simply not completed the Roadmap due to the complexity of building an NFT. The Roadmap is not an NFT. The Roadmaps are physical collectibles (physical products that need to be manufactured) and an App. Apps and physical collectibles can take years to develop. In addition to the physical collectibles and Apps, the DCMB have also been developing an app in stealth, which is a collection of 10,000 uniquely drawn characters. This development can easily take years to complete, especially when a single character can take upwards of one to three hours to create. For example, NFT projects that include 3-dimentional assets can take years to develop, and single assets/characters can take four to ten hours to develop, depending on the level of detail. BAYC is an example that development within this space can be lengthy, as BAYC has been working on developing a game for over two and a half years and have received over \$450 million in funding, yet the game has not yet been delivered.
- 42. Contrary to the allegations contained in paragraphs 83-84 of the Statement of Claim, the Defendants did not make any fraudulent misrepresentations. There was no false or misleading representation made by the Defendants. In the alternative, if the Defendants did make false or misleading representations, which is denied, the Defendants were not aware that those representations were false, nor were the Defendants reckless in making them. Further, the Plaintiff was not induced to act on the alleged false representations made by the Defendants. Further, and in the alternative, if

false representations were made by the Defendants, which is denied, the Defendants plead that:

- (a) The Plaintiff failed to take any reasonable steps to mitigate damages; and
- (b) The Plaintiff did not suffer any damages as a result of the alleged false representations, and, in the alternative, if the Plaintiff did suffer damages, which is denied, the Plaintiff's alleged damages are exaggerated, too remote, and not recoverable in law.
- 43. Contrary to paragraph 85 of the Statement of Claim, the Defendants did not make any negligent representations. No duty of care exists between the Defendants and the Plaintiff, nor was any untrue, inaccurate or misleading representation made by the Defendants. Further, if an untrue, inaccurate or misleading representation was made by the Defendants, which is denied, then that alleged representation was not reasonably relied on by the Plaintiff. Further, and in the alternative, if the Defendants did make an untrue, inaccurate or misleading representation, which is denied, then the Defendants plead that the Plaintiff did not suffer damages as a result. The Defendants put the Plaintiff to the strict proof thereof.
- 44. Contrary to paragraphs 86-89 of the Statement of Claim, the Defendants plead that the *Consumer Protection Act* (the "CPA") is not applicable to the facts of this action, and as such, no relief can be sought under that Act. Further, the Defendants put the Plaintiff to the strict proof thereof.

- 45. Contrary to paragraphs 90-96 of the Statement of Claim, the Defendants plead that the CPA is not applicable to the facts of this action, and as such, no relief can be sought under that Act. Further, the Defendants have not engaged in deceptive marketing tactics, as any alleged representations made by the Defendants were not false and/or misleading. Further, and in the alternative, if any false and/or misleading representations were made by the Defendants, which is denied, the Plaintiff did not suffer damages as a result.
- 46. Contrary to paragraphs 97-100 of the Statement of Claim, the Defendants have not been unjustly enriched through their alleged actions, nor have they have not received a benefit. Further, the Plaintiff has not suffered a corresponding deprivation due to the Defendant's alleged actions. If it is found that the Defendants have been enriched and the Plaintiff has suffered a deprivation due to the Defendants' alleged actions, which is denied, the Defendants plead that there was a juristic reason for such enrichment.
- 47. The Plaintiff's allegations contained in paragraphs 101-106 of the Statement of Claim are meritless and ought to be dismissed. Ivan, acting on behalf of DCMB, removed the funds in accordance with the Smart Contract in order to ensure that the funds were not "stuck", as well as to fund development, pay contractors and to fund other company deliverables and initiatives.
- 48. The Defendants, Profitly Incorporated, DMCB Holdings Inc., Ivan Avramenko, Alexandra Stinson and John Doe, ask that this action be dismissed with costs.

COUNTERCLAIM

- 49. The Plaintiffs by Counterclaim, Profitly Incorporated, DMCB Holdings Inc., Ivan Avramenko, and Alexandra Stinson (the "Plaintiffs by Counterclaim") claim:
 - (a) the sum of \$500,000.00;
 - (b) prejudgment interest in accordance with section 128 of the *Courts of Justice***Act, R.S.O. 1990, c. C.43, as amended;
 - (c) postjudgment interest in accordance with section 129 of the Courts of Justice Act;
 - (d) the costs of this proceeding, plus all applicable taxes; and,
 - (e) such further and other Relief as to this Honourable Court may seem just.
- 50. The Plaintiffs by Counterclaim, repeat and rely upon the allegations in the Statement of Defence in support of the Counterclaim.
- 51. In or around July 2023, Taylan McRae-Yu (the "**Defendant to the Counterclaim**") and/or his agents, using the Twitter username "ZachXBT" posted various defamatory statements and images in association with the Plaintiffs by Counterclaim.
- 52. The Defendant to the Counterclaim wrongfully obtained personal and private photographs of Alexandra Stinson ("Ms. Stinson") and posted them on Twitter, without her knowledge and/or consent. This was in direct breach of Ms. Stinson's right to privacy.

- 53. In addition to the foregoing, the Plaintiff used Ms. Stinson's likeness without her permission and defamed her character. The photographs depicted Ms. Stinson in a negative light and tarnished her reputation.
- 54. Further, the Defendant to the Counterclaim and/or his agenets posted defamatory, false and misleading posts on Twitter about the Plaintiffs by Counterclaim that have caused significant damage. On July 7, 2023, the Defendant to the Counterclaim and/or his agents posted the following defamatory statements:

"A class action lawsuit was filed in Canada against the Boneheads team for the \$3.1M NFT rug pull. The team quickly disappeared and spent the mint funds on BAYCs, luxury goods, and other items never fulfilling the road map. Yet another case where my research has been cited. If you minted a Boneheads NFT please contact @0xTAY or leave a comment below as they are currently looking for additional victims."

55. Again, on July 14, 2022, the Defendant to the Counterclaim and/or his agents posted the following:

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

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...

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...

4/ A decent chunk of proceeds from the mint were sent to @krakenfx @coinbase exchange accounts...

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...

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...

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 after Boneheads minted out...

8/ The corporation 'Profitly' 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...

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

10/ Earlier this week @0xTay_ reached out to me to share they were looking to potentially start a class action lawsuit against the Bonehead team.

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

Disclaimer: advising Chainabuse and invested in Breadcrumbs

- The Defendant to the Counterclaim's published statements made on July 7 and 14, 2023 contain false allegations against the Plaintiffs by Counterclaim. The statements portray the Plaintiffs by Counterclaim as having engaged in illegal activity. In addition, the posts plainly and/or by innuendo suggest that the Plaintiffs by Counterclaim improperly used the Defendant to the Counterclaim and other people's funds. The aforementioned posts have been reviewed by thousands of Twitter users.
- 57. The Plaintiffs by Counterclaim rely on the natural and ordinary meaning of the words which are *prima facie* defamatory and false.
- 58. In addition, the statements and images published about the Plaintiffs by Counterclaim contain innuendoes that tend to lead the reader to believe that the Plaintiffs by Counterclaim have engaged in illegal conduct and have dissipated and/or squandered funds.
- 59. The statements published by the Defendant to the Counterclaim about the Plaintiffs by Counterclaim are false and the innuendoes arising from those statements/images were maliciously published by the Defendants to the Counterclaim knowing that they are false or with reckless disregard as to whether they are true or not.

- 60. The Plaintiffs by Counterclaim state that the statements made by the Defendant to the Counterclaim are defamatory and libellous, and go far beyond fair comment and as such, the statements are malicious and designed specifically to impugn the Plaintiffs by Counterclaim's character.
- 61. The Plaintiffs by Counterclaim state that the defamatory statements have brought the Plaintiff by Counterclaim into ridicule, and they have suffered damage as a result.
- 62. As a result of the Defendant to the Counterclaim's statements, many people are reluctant to interact with the Plaintiffs by Counterclaim. In fact, people have contacted the Plaintiffs by Counterclaim regarding the aforementioned defamatory statements.
- 63. The Defendant to the Counterclaim's statements have negatively affected the Plaintiffs by Counterclaim's business. The words/images expressed by the Defendant to the Counterclaim have lowered the reputation of the Plaintiffs to the Counterclaim and caused and continue to cause damage to the Plaintiffs by Counterclaim and their business.
- 64. The Defendant to the Counterclaim acted with malice when publishing the defamatory statements and/or images, which entitles the Plaintiff to punitive and aggravated damages. Particulars of the damages shall be provided before trial.
- 65. The Plaintiffs by Counterclaim request that this counterclaim be heard at the same time as the main action.

August 9, 2023

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

ONTARIO SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT OTTAWA

STATEMENT OF DEFENCE AND COUNTERCLAIM

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

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

REPLY AND DEFENCE TO COUNTERCLAIM

- 1. Except as expressly admitted herein, Taylan-McRae-Yu ("Taylan", "Plaintiff" and "Defendant by Counterclaim"), denies each and every allegation contained the Statement of Defence and Counterclaim ("Defence and Counterclaim").
- 2. The Plaintiff specifically denies that Profitly Incorporated, DMCB Holdings Inc., Ivan Avramenko, Alexandra Stinson, and John Doe (collectively, the "Boneheads team", "Defendants" and "Plaintiffs by Counterclaim"), are entitled to the relief sought in paragraphs 49 and 64 of the Defence and Counterclaim.
- 3. The Plaintiff denies the allegation contained in paragraph 4 of the Defence and Counterclaim as paragraph 6-21 of the Statement of Claim are directly material to the issues in this matter. The Bored Ape Yacht Club ("BAYC") is directly pleaded in paragraphs 13 and 42 of the Defence and Counterclaim. The term "roadmap" is directly pleaded in paragraphs 31, 33, and 49 of the Defence and Counterclaim.

REPLY

The Parties

- 4. With respect to paragraph 5 of the Defence and Counterclaim, the Plaintiff admits that Profitly Incorporated is a corporation but denies that it is incorporated pursuant to the laws of Ontario. Profitly Incorporated is incorporated pursuant to the laws of Canada. Profitly Incorporated is presently pending dissolution for non-compliance.
- 5. With respect to paragraph 6 of the Defence and Counterclaim, the Plaintiff admits that DMCB Holdings Inc. is a corporation but denies that it is incorporated pursuant to the laws of Ontario. DMCB Holdings Inc. is incorporated pursuant to the laws of Canada.
- 6. With respect to paragraph 7 of the Defence and Counterclaim, the Plaintiff admits that Ivan Avramenko ("Ivan") is an individual residing in the Province of Ontario.
- 7. The Plaintiff has no knowledge of whether Ivan has experience in technology start up companies but admits that Ivan represented himself as having experience and expertise in technology start up companies. In addition to being a Director for Profitly Incorporated and DMCB Holdings Inc., Ivan Avramenko was a Director for the following companies:
 - i. "Midnight In Miami Inc." a Canadian corporation which was incorporated on June 24, 2015 and dissolved on May 19, 2016 under s. 210 of the *Canada Business Corporations Act*, R.S.C., 1985, c. C-44. Ivan was one of two Directors of this corporation;
 - ii. "Dreams Money Can Buy Inc." a Canadian corporation which was incorporated October 2, 2015 and dissolved July 29, 2018 for non-compliance. Ivan was the sole Director of this corporation;
 - iii. "Stradella Inc." a Canadian corporation which was incorporated March 15, 2016 and dissolved January 18, 2019 for non-compliance. Ivan was one of two Directors for this corporation;

- iv. "Tech-Sessories Online Inc." a Canadian corporation incorporated April 21, 2016 and dissolved July 11, 2016 under s. 210 of the *Canada Business Corporations Act*, R.S.C., 1985, c. C-44. Ivan was one of two Directors for this corporation; and
- v. "Fixx International Inc." a Canadian corporation incorporated February 15, 2018 and dissolved February 28, 2021 under s. 210 of the *Canada Business Corporations Act*, R.S.C., 1985, c. C-44. Ivan was one of three Directors for this corporation.
- 8. With respect to paragraphs 8 of the Defence and Counterclaim, the Plaintiff admits that Alexandra Stinson ("Alexandra") is an individual who resides in the city of Belleville, Ontario but denies that Alexandra is not a co-founder of the Boneheads NFT.

Non-Fungible Tokens

- 9. With respect to paragraph 9 of the Defence and Counterclaim, the Plaintiff admits that NFTs are created in a process called minting and each NFT contains a unique identification number making NFTs distinguishable from one another. The Plaintiff denies that ownership details are stored on an NFT because ownership details are stored on a blockchain, not the NFT itself. The Plaintiff further denies that NFTs contain the details of the individual or company that designed it because smart contracts can be launched anonymously.
- 10. With respect to paragraph 10 of the Defence and Counterclaim, the Plaintiff admits that a floor price is not necessarily indicative of the value of any individual NFT but denies that the floor price is not indicative of the value for an entire NFT collection.

The Boneheads NFT

- 11. The Plaintiff admits (in part) and denies (in part) the allegations contained in paragraph 13 of the Defence and Counterclaim as follows:
 - i. Each Boneheads NFT did represent a specific piece of art but it further also represented a membership comprising extensive utility, the subject of which is outlined in the Statement of Claim;

- ii. The Plaintiff admits that the surprise aspect of NFT minting is one part of the appeal for customers but denies that this was the reason he purchased 36 Boneheads NFTs for the reasons outlined in the Statement of Claim; and
- iii. The Plaintiff denies that "some" individuals who purchased a BAYC NFT were lucky that the NFT ended up being worth upwards of \$500,000 as the BAYC collection exceeded a floor price of \$500,000 in or around March 2022.
- 12. With respect to paragraph 14 of the Defence and Counterclaim, the Plaintiff admits that the Boneheads NFT was marketed through Discord and that Discord allowed the Boneheads community to communicate via instant messaging, video calls, and voice calls. The Plaintiff denies that this was the primary or sole mode of marketing for the reasons outlined in the Statement of Claim.

Boneheads' Benefits

- 13. With respect to paragraphs 16-29 of the Defence and Counterclaim, the Plaintiff admits that the Boneheads marketed benefits. The Plaintiff denies, for the reasons outlined in the Statement of Claim, that:
 - i. The number of benefits were limited to six benefits;
 - ii. That the description of each benefit encompasses the totality of benefit/utility which would flow to the consumer from each benefit;
 - iii. Consumers did not rely on the description of benefits in deciding whether or not to purchase the Boneheads NFT(s); and
 - iv. That the marketing of these benefits did not constitute an official offer to consumers.
- 14. With respect to paragraph 16 of the Defence and Counterclaim, the Plaintiff specifically denies that descriptions were general in nature. Rather, the descriptions were incredibly detailed and often included specific dates for their delivery, as outlined in the Statement of Claim.

15. With respect to paragraph 25 of the Defence and Counterclaim, the Plaintiff specifically denies that there was no publicly stated release date for the application ("App") in question as the Boneheads website specifically stated, in advance of the mint, that the Beta version of the App would be released in the "next 8-12 months", corresponding to the period between April – August 2022, as follows:

WHEN WILL I GET ACCESS TO THE

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.

- 16. With respect to paragraph 30 of the Defence and Counterclaim, the Plaintiff denies that giveaways must be included in the smart contract to constitute a binding offer to consumers.
- 17. The Plaintiff denies the allegations contained in paragraph 34 of the Defence and Counterclaim. Specifically, the Plaintiff denies that he relied on representations outside the scope of his knowledge. Taylan has been involved in the blockchain and cryptocurrency ecosystem for nearly a decade and had purchased dozens of NFTs in advance of the Boneheads mint, including a BAYC NFT. Taylan currently works in the blockchain space. Taylan is a proper representative Plaintiff and had spoken to a number of other consumers who purchased the Boneheads NFT in advance of launching this class action.
- 18. The Plaintiff specifically denies the allegation contained in paragraph 37 of the Defence and Counterclaim. There is a distinction between "dissipation of funds" and "smart contract programming". Smart contracts can be pre-programmed to "move" funds to

cryptocurrency addresses at a pre-determined interval, such as following mint. Smart contract funds that are moved to these addresses can subsequently be dissipated, which is what the Boneheads team did, as outlined in the Statement of Claim.

19. The Plaintiff denies the allegations in Paragraph 38 of the Defence and Counterclaim. There is no distinction between "moved" and "disbursed" and puts the Defendants to the strictest proof thereof.

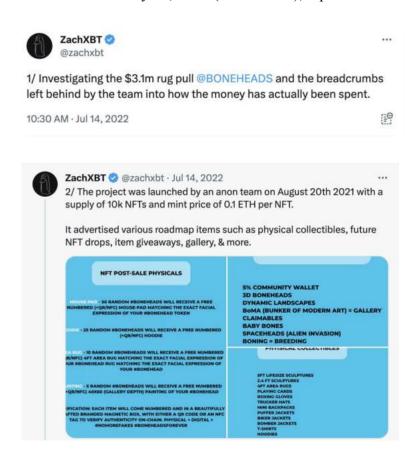
Causes of Action

20. The Plaintiff specifically denies the allegations contained paragraphs 41-48 of the Defence and Counterclaim and puts the Defendants to the strictest proof thereof.

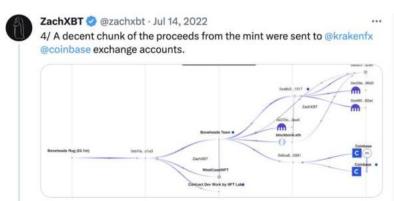
DEFENCE TO COUNTERCLAIM

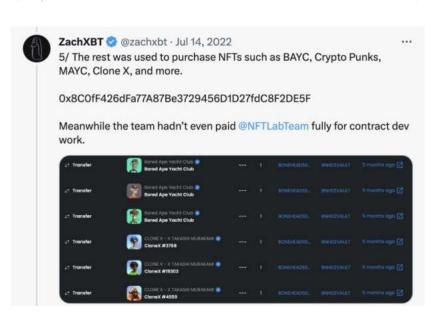
The Alleged Defamatory Statements

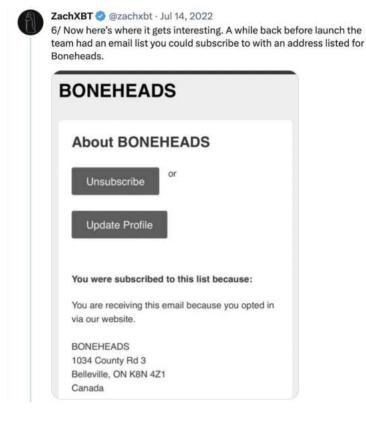
- 21. Twitter ("X") user @zachxbt ("ZachXBT") is a respected blockchain investigator dedicated to uncovering and reporting on fraud within the blockchain space.
- 22. In July 2022, Taylan reached out to ZachXBT to provide information related to the Boneheads NFT sale.
- 23. Unbeknownst to Taylan, ZachXBT had already been investigating the Boneheads NFT sale, including reaching out to the Boneheads NFT launch partners and consumers who had purchased the Boneheads NFT.
- 24. After exchanging messages and information regarding the Boneheads NFT, ZachXBT released a set of Tweets on July 14, 2022 ("First Post"), reproduced below:



















ZachXBT @ @zachxbt · Jul 14, 2022

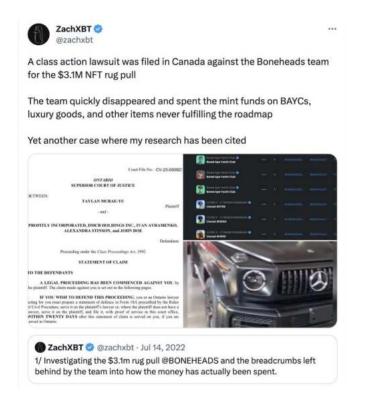
10/ Earlier this week @OxTAY_ reached out to me to share they were looking to potentially start a class action lawsuit against the Boneheads team.

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?



25. On July 7, 2023, following the filing of this action, ZachXBT released another Tweet ("Second Post") as follows:



Standing

- 26. The Defendant by Counterclaim specifically denies the allegation contained in paragraph 51 of the Defence and Counterclaim and puts the Plaintiffs by Counterclaim to the strictest proof thereof.
- 27. The Plaintiffs by Counterclaim have no standing to sue Taylan based on postings on the @zachxbt Twitter account.
- 28. ZachXBT is an independent blockchain investigator who controls the @zachxbt Twitter account.
- 29. ZachXBT had already been investigating the Boneheads NFT sale in advance of being contacted by Taylan.
- 30. Taylan is not ZachXBT and has no control, directly or indirectly, over the @zachxbt Twitter account or what is posted there. There is no agency relationship between ZachXBT and Taylan.
- 31. Taylan did not author any of content that was posted on the ZachXBT Twitter account nor did he review it in advance of its publication. Taylan is not a publisher of any of the content posted by the @zachxbt Twitter account.
- 32. Taylan collaborated with ZachXBT to the extent that he provided information regarding his own investigation into the Boneheads NFT sale to ZachXBT.
- 33. The Defendant by Counterclaim requests that the counterclaim be dismissed for lack of standing.

Alexandra Stinson

34. The Defendant by Counterclaim denies the allegation contained in paragraphs 52 and 53 of the Defence and Counterclaim and puts the Plaintiffs by Counterclaim to the strictest proof thereof.

- 35. ZachXBT's posts, shown in paragraphs 24-25 of the Reply and Defence to Counterclaim, do not contain any images of Alexandra.
- 36. The Defendant by Counterclaim did not post any images of Alexandra on Twitter.

Content

- 37. With respect to paragraph 54 of the Defence and Counterclaim, the Defendant by Counterclaim admits the contents of the Second Post as reproduced but denies that the content was posted by the Defendant by Counterclaim or his agents. The Defendant by Counterclaim further denies the postings were defamatory, false, misleading, or that they caused significant damage to the Plaintiffs by Counterclaim and puts the Plaintiffs by Counterclaim to the strictest proof thereof.
- 38. With respect to paragraph 55 of the Defence and Counterclaim, the Defendant by Counterclaim admits the contents of the First Post as reproduced but denies that the content was posted by the Defendant by Counterclaim or his agents.
- 39. The Defendant by Counterclaim specifically denies the allegations contained in paragraphs 56, 57, 58, 59, and 60 of the Defence and Counterclaim, and puts the Plaintiffs by Counterclaim to the strictest proof thereof.

Damages

- 40. The Defendant by Counterclaim specifically denies the allegations contained in paragraphs 61, 62, and 63 of the Defence and Counterclaim pertaining to damages suffered by the Plaintiffs by Counterclaim.
- 41. ZachXBT's Twitter thread is not the first instance where the Boneheads team was publicly accused of being a rug pull.
- 42. On October 2, 2021, in response to numerous allegations of being a rug pull, the Boneheads team posted the following on Twitter:



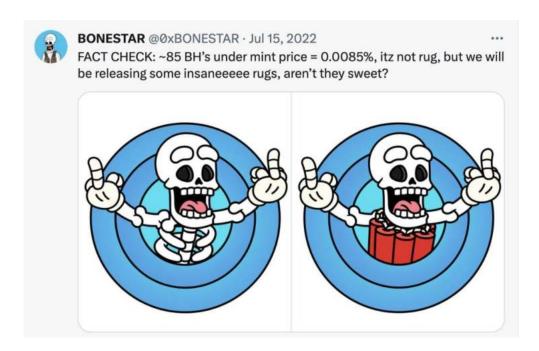
- 43. The Plaintiffs by Counterclaim wore the allegations of rug pull as a badge of honour and used them to market Boneheads and further induce consumers into purchasing the Boneheads NFT.
- 44. Any lowering of the reputation of the Boneheads team, which is specifically denied, if it did occur, was self-inflicted and not the product of ZachXBT's Twitter posts.
- 45. The Plaintiffs by Counterclaim responded on July 14, 2022 to the First Post as follows:



46. The Plaintiffs by Counterclaim also posted the following Tweet on their account on July 15, 2022 admitting the "free publicity" they had received from ZachXBT's Twitter thread:



47. On July 15, 2022, the Plaintiffs by Counterclaim joked about rug pull allegations and stated they would be releasing some "insaneeeee rugs" as follows:



- 48. The Defendant by Counterclaim specifically denies any business damages flowing from ZachXBT's Twitter post.
- 49. The Boneheads NFT has garnered approximately 416 ETH in secondary volume since its launch. Approximately 367.0749 ETH of this secondary volume took place prior to October 31, 2021 which is when delivery of the "3D Convergence Event", and other deliverables in the fall of 2021 were promised by the Boneheads teams to consumers.
- 50. The main cause of the considerable reduction in sales volume in the months proceeding October 31, 2021 is due to the Plaintiffs by Counterclaims' own actions, including due to non-delivery of deliverables to consumers as detailed in the Statement of Claim.

Defences

51. If ZachXBT's Twitter posts are found to be defamatory, which is specifically denied, and Taylan is found to be a publisher of the defamatory content, which is also denied, then the Defendant by Counterclaim relies on the following defences, precluding the Plaintiff by Counterclaim to the relief sought in paragraphs 49 and 64 of the Defence and Counterclaim.

ZachXBT's Twitter Posts Were Justified

- 52. The Defendant by Counterclaim relies on the defence of justification.
- 53. The statements made on ZachXBT's Twitter account on July 12, 2022 and July 7, 2023 were true or substantially true in substance and in fact.
- 54. The sale of the Boneheads NFT was a "rug pull" for the reasons outlined in the Statement of Claim.
- 55. Alexandra posted publicly available images on social media, including TikTok, showing the Boneheads NFT mint. Following the Boneheads mint, Alexandra posted more images showing extravagant luxury purchases, including a Mercedes-Benz G-Wagon SUV and designer clothing. This supports the inference that the funds from the Boneheads NFT sale were used to fund these luxury purchases.

56. In addition to immutable on-chain transactions showing that a minimum of \$1,786,169.95 was used to fund extravagant NFT purchases such as BAYC and Cryptopunk NFTs, a total of approximately \$963,474.80 has been moved by the Boneheads team into centralized exchanges. This supports the inference that the Boneheads team used funds obtained from the NFT mint to fund luxury purchases.

ZachXBT's Twitter Posts Constitute Fair Comment

- 57. The Defendant by Counterclaim relies on the defence of fair comment.
- 58. ZachXBT's Twitter posts relating to the Boneheads NFT sale are comments on a matter of public interest, aiming to inform and protect consumers from being further defrauded by the Boneheads team.
- 59. The Twitter posts in question are comments based on fact or inferences of fact, and are recognizable as such.
- 60. Objectively, any person would honestly express the same opinions as those on these proved facts. In fact, there were numerous allegations of rug pull levied against the Boneheads team, well in advance of ZachXBT's posts, by consumers who had purchased the Boneheads NFT.

ZachXBT's Posts Constitute Responsible Communication on Matters of Public Interest

- 61. In addition to the above or in the alternative, ZachXBT's posts should be viewed as journalistic in nature.
- 62. The communications by ZachXBT were responsible publications on matters of public interest, namely consumer protection.
- 63. ZachXBT conducted due diligence, including gathering information from sources other than the Defendant by Counterclaim.

64. Having regard to the seriousness of the allegations, ZachXBT conducted their own investigation on the "Breadcrumbs" application, tracing how funds obtained from the Boneheads NFT sale were used.

No Malice

- 65. The Defendant by Counterclaim denies the allegation contained in paragraph 64 of the Defence and Counterclaim. The Defendant by Counterclaim did not act maliciously and puts the Plaintiffs by Counterclaim to the strictest proof thereof.
- 66. On the contrary, the conduct of the Boneheads team is reprehensible.
- 67. In addition to defrauding consumers around the world, including in Canada, Europe, the United Kingdom, the United States, and the Middle East, for which particulars will be provided, the Plaintiff by Counterclaim has sued Taylan, the class representative, who has acted for the purposes of achieving justice for thousands of consumers like himself around the world.
- 68. The defamation claims levied against Taylan are baseless, completely lack standing, and are intended to silence legitimate criticism against an individual acting for the public interest.
- 69. The Defendant by Counterclaim specifically denies the allegation in paragraph 65 of the Defence and Counterclaim. The defamation claim against Taylan is frivolous, vexatious, abusive, made in bad faith and intended prolong the proceeds unreasonably while the Plaintiffs by Counterclaim make themselves judgment proof or so that they can half-heartedly deliver utility in the time it takes for the matter to be resolved in an attempt to evade liability for fraud.
- 70. The Defendant by Counterclaim requests that the Counterclaim be dismissed with full costs and any other relief this Honourable Court deems just.

Dated this 8th of September, 2023.

DeLawyer Professional Corporation

52 Bayswater Ave., Suite 1505 Ottawa, ON, K1Y 4K3

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Lawyers for the Defendants, Profitly Incorporated, DMCB Holdings Inc., Ivan Avramenko, Alexandra Stinson, and John Doe

Court File No.: CV-23-00092340-00CP	
Profitly Incorporated, et. al.,	Defendants
Ş	alla
Taylan McRae-Yu	Plaintiff

ONTARIO SUPERIOR COURT OF JUSTICE

Proceeding commenced at OTTAWA

Proceeding under the Class Proceedings Act, 1992

REPLY AND DEFENCE TO COUNTERCLAIM

DELAWYER PROFESSIONAL CORPORATION

Suites of Somerset

52 Bayswater Ave., Suite 1505

Ottawa, ON

K1Y 4K3

SOHAIB MOHAMMAD

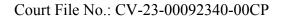
LSO#: 80696K

Tel: (647)-535-8706

Email: sohaib@delawyer.io

Lawyer for the Plaintiff







ONTARIO SUPERIOR COURT OF JUSTICE

THE HONOURABLE)	FRIDAY, THE 23rd
JUSTICE)	DAY OF JUNE, 2023
HOOPER		
BETWEEN:		
(Court Seal)		

TAYLAN MCRAE-YU

- and -

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

Proceeding under the Class Proceedings Act, 1992

ORDER (MAREVA INJUNCTION)

NOTICE

If you, the Defendant, disobey this order you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized. You are entitled to apply on at least twenty-four (24) hours notice to the Plaintiff, for an order granting you sufficient funds for ordinary living expenses and legal advice and representation.

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the terms of this Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

A MOTION, made by the Plaintiff, Taylan McRae-Yu, on their own behalf and on behalf of the proposed class as defined in Statement of Claim, for an interim Order in the form of a *Mareva* injunction restraining the corporate Defendants, Profitly Incorporated and DMCB Holdings, and the individual Defendants, Ivan Avramenko, Alexandra Stinson, and John Doe (collectively, the "Boneheads team" and "Mareva Respondents"), from dissipating assets and for other relief, was heard this day at the Ottawa Courthouse.

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;

WHEREAS THIS COURT made an interim *Mareva* Order for a period of ten (10) days dated June 15, 2023, which order is appended hereto as Schedule "C";

ON READING a subsequent agreement between the parties, the Order dated June 15, 2023 is amended as follows;

Mareva Injunction

- 1. **THIS COURT ORDERS** that the Defendants, 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. As outlined in Schedule "A", this paragraph does not extend to corporate bank accounts, credit cards and/or other credit facilities, and does not affect the individual defendants' personal bank accounts, credit cards and other credit facilities.
- 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 make an undertaking as to damages potentially arising from the granting and enforcing of this Order is hereby dispensed with at this time subject to submissions from the Defendants.

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 should the Court dismiss the Defendants motion to set aside and/or vary the Mareva Order, within 7 days from the Decision of the Court to dismiss the Defendants motion, each Mareva Respondent shall prepare and provide to the Plaintiff, a sworn statement describing the nature, value, and location of his assets worldwide as defined in paragraph 1 and Schedule A of this order [whether in his/their 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, should the Defendants motion to set aside and/or vary the Mareva Order be dismissed.
- 8. **THIS COURT ORDERS** that if the provision of any of this information in paragraph 6 is likely to incriminate the Mareva Respondent, he or she may be entitled to refuse to provide it, but is recommended to obtain legal advice before refusing to provide the information.

Intermediaries

- 9. **THIS COURT ORDERS** that the entities listed in Schedule "B" as well as any 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 should the Court dismiss the Defendants' motion to set aside and/or vary the Mareva Order, the Intermediaries shall 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 Order will continue on an interlocutory basis unless the Mareva Respondents successfully move to have this Order set aside and/or varied or until further order of the court;
- 14. **THIS COURT ORDERS** that this Order is and shall be immediately in effect upon issuance regardless of whether it has been formally entered.
- 15. **THIS COURT ORDERS** that the Defendants' motion to set aside and/or vary this Order shall be heard before the Honourable Justice Hooper on July 27, 2023, or at a later date, on the consent of the parties and/or further Order of the Court.

Justice J. Hooper

Issued on June 26 2023

SCHEDULE "A"

Boneheads team:

- 1. Assets of the Boneheads team, including funds 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 owned or controlled by or held for the benefit of the Boneheads team or in cryptocurrency exchanges or NFT marketplaces under the name of the Boneheads team or held for the benefit of the Boneheads team. For clarity, this Order does not affect the Boneheads team's use of corporate bank accounts, credit cards and/or other credit facilities. The Order also does not affect the individual defendants' personal bank accounts, credit cards and other credit facilities. The Order does affect tangible assets and real property, such as vehicle, houses, apartments and land that has been generated or raised in connection with transactions of the Boneheads NFT
- 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	1	0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F
(ETH)	2	0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317
	3	0xa1e43fcb51656354931d47458eceadbc6545df57
	4	0x3acef2d359f430cee5e205262a884d6087dda4fa
	5	0xbaf331f090320502380ea975562c0c72e2da3c85
	6	0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518
	7	0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147
	8	0x82ef36b1c710e4384eb20d70074bc972972d58b8
	9	0xd697255b298cf5d90f3f0c9a0e525ba8e829c952
	10	0x0bc42633195913892c48a224a846ddae067898ed
	11	0xea415b3b5e02b2259019763e2e81c48668b80f0e
	12	0x7D7e14Fd2b185d9A0ADA62Ae4b59A5Ea8Ab7Ec05
	13	0xca5a943044d32fc18c4487195A2Bf9D60918cD55
	14	0x270c21bfb99a14e41408568570c3a4f481253ee6
	15	0xc59ef925b947473b85b85f7583d29487ee2e8620
	16	0xe66f9e497e1b83959f319b133ecf88feaa8b82ac
	17	0x6ce6afb735ddc2d6c3ac0187a1919fc20b720991
	18	0xf38269dae289dcf9b2d3372c26181ce473c940fc
	19	0x05B0e921728378b1a7CB2bfaBf68558E6AE4bc8c
	20	0x4ad64983349c49defe8d7a4686202d24b25d0ce8

Profitly Incorporated

3. Any and all funds, digital assets, cryptocurrency or NFTs, held in cryptocurrency wallets, cryptocurrency exchanges, or NFT marketplaces, generated or raised in connection with transactions of the Boneheads NFT.

DMCB Holdings Inc.

4. Any and all funds, digital assets, cryptocurrency or NFTs, held in cryptocurrency wallets, cryptocurrency exchanges, or NFT marketplaces, generated or raised in connection with transactions of the Boneheads NFT

Ivan Avramenko

5. Any and all funds, digital assets, cryptocurrency or NFTs, held in cryptocurrency wallets, cryptocurrency exchanges, or NFT marketplaces, generated or raised in connection with transactions of the Boneheads NFT.

Alexandra Stinson

6. Any and all funds, digital assets, cryptocurrency or NFTs, held in cryptocurrency wallets, cryptocurrency exchanges, or NFT marketplaces, generated or raised in connection with transactions of the Boneheads NFT.

John Doe

7. Any and all funds, digital assets, cryptocurrency or NFTs, held in cryptocurrency wallets, cryptocurrency exchanges, or NFT marketplaces, generated or raised in connection with transactions of the Boneheads NFT.

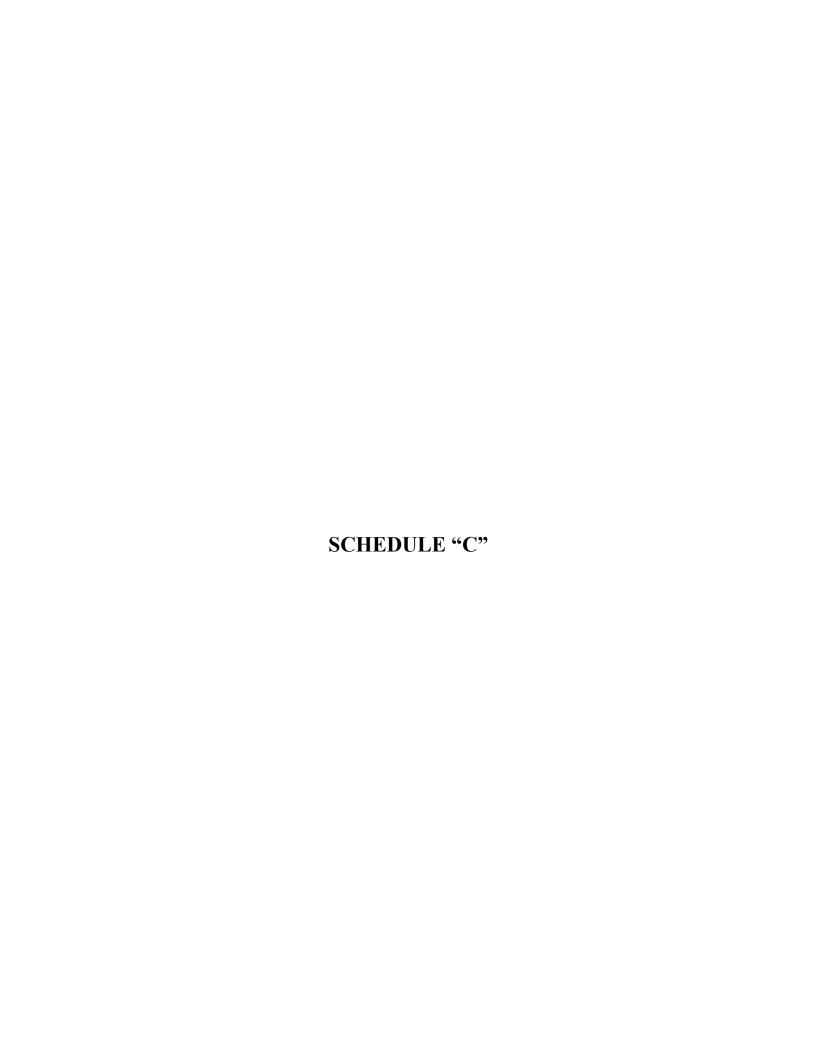
SCHEDULE "B"

Digital Asset (Cryptocurrency) Platforms/Exchanges

Coinbase		
Kraken		
Kucoin		
Robinhood		
NET Mania de la com		

NFT Marketplaces:

Opensea





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

ONTARIO SUPERIOR COURT OF JUSTICE

THE HONOURABLE)	THURSDAY, THE 15th
JUSTICE HOOPER)	DAY OF JUNE, 2023
BETWEEN:		
(Court Seal)		

TAYLAN MCRAE-YU

- and -

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

Proceeding under the Class Proceedings Act, 1992

ORDER (MAREVA INJUNCTION

NOTICE

If you, the Defendant, disobey this order you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized. You are entitled to apply on at least twenty-four (24) hours notice to the Plaintiff, for an order granting you sufficient funds for ordinary living expenses and legal advice and representation.

Any other person who knows of this order and does anything which helps or permits the Defendant to breach the terms of this Order may also be held to be in contempt of court and may be imprisoned, fined or have their assets seized.

THIS MOTION, made without notice by the Plaintiff, Taylan McRae-Yu, on their own behalf and on behalf of the proposed class as defined in Statement of Claim to be filed, for an interim Order in the form of a *Mareva* injunction restraining the corporate Defendants, Profitly Incorporated and DMCB Holdings, and the individual Defendants, Ivan Avramenko, Alexandra Stinson, and John Doe (collectively, the "**Boneheads team**" and "**Mareva Respondents**"), from dissipating its assets and other relief, was heard this day at in person at the Ottawa Courthouse.

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 Defendants, 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 whethere 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 at this time subject to submissions from the Defendants.

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.

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.

Statement of Claim

14. **THIS COURT ORDERS** that the Plaintiff will issue the Statement of Claim forthwith but for the purposes of this Order, they may serve the draft Statement of Claim, as outlined in paragraphs 15 and 16.

Service of this Order

- 15. **THIS COURT ORDERS** that service of this Order, Motion Materials and draft Statement of Claims 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.
 - (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
 - and that such service shall be deemed valid and effective upon the earlier of (a) confirmation of receipt of the Order, Motion Materials and draft Statement of Claim or (b) 24 hours from the time the Order and Motion Materials and draft Statement of Claim are sent in accordance with paragraphs 15(a) to (e) above.
- 16. **THIS COURT ORDERS** that service of this Order and the draft Statement of Claim shall be made to the following Mareva Respondents through the following means, as applicable:
 - (a) On the Mareva Respondent, John Doe, by airdropping an NFT to John Doe's Ethereum cryptocurrency wallet with address:
 - 0xca5a943044d32fc18c4487195A2Bf9D60918cD55;
 - (b) On the Mareva Respondents, by airdropping an NFT into the following Ethereum cryptocurrency wallet addresses:

- 0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F;
- 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317;
- 0xa1e43fcb51656354931d47458eceadbc6545df57;
- 0x3acef2d359f430cee5e205262a884d6087dda4fa;
- 0xbaf331f090320502380ea975562c0c72e2da3c85;
- 0x17cA15f1FD9593aE035b9fe5B5aCAB95402B1518;
- 0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147;
- 0x82ef36b1c710e4384eb20d70074bc972972d58b8;
- 0xd697255b298cf5d90f3f0c9a0e525ba8e829c952;
- 0x0bc42633195913892c48a224a846ddae067898ed;
- 0xea415b3b5e02b2259019763e2e81c48668b80f0e; and
- 0x7D7e14Fd2b185d9A0ADA62Ae4b59A5Ea8Ab7Ec05.

and that such service shall be deemed valid and effective upon the earlier of (a) confirmation of receipt of the Order and draft Statement of Claim or (b) 24 hours from the time the Order and draft Statement of Claim are sent in accordance with paragraphs 16(a) to (b) above.

- 17. **THIS COURT ORDERS** that this Order is and shall be immediately in effect upon issuance regardless of whether it has been formally entered.
- 18. **THIS COURT ORDERS** that the return of this motion will be heard on June 23, 2023 at 10 a.m., unless agreed upon between the parties.

JUSTICE J. HOOPER

Issuance Date: June 16, 2023

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	1	0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F
(ETH)	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, 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.

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.

Ivan Avramenko

5. 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

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.

John Doe

7. 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

Profitly Incorporated et. al.	Defendant
	- and -
Taylan McRae-Yu	Plaintiff

SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST) ONTARIO

PROCEEDING COMMENCED AT OTTAWA

Proceeding under the Class Proceedings Act, 1992

ORDER

DELAWYER PROFESSIONAL CORPORATION

52 Bayswater Ave., Suite 1505 Suites of Somerset

Ottawa, ON K1Y 4K3

Sohaib Mohammad LSO#: 80696K

Tel: (647)-535-8706 Email: sohaib@delawyer.io

Lawyer for the Plaintiff

Profitly Incorporated et. al.

Plaintiff - and - Defendant

ONTARIO SUPERIOR COURT OF JUSTICE (COMMERCIAL LIST)

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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

Taylan McRae-Yu	, Cu	Profitly Incorporated et. al.,	Court File No.: CV-23-00092340-00CP
Plaintiff	alid	Defendants	

SUPERIOR COURT OF JUSTICE ONTARIO

Proceeding commenced at OTTAWA

Proceeding under the Class Proceedings Act, 1992

RESPONDING MOTION RECORD OF THE PLAINTIFF, TAYLAN MCRAE-YU

DELAWYER PROFESSIONAL CORPORATION

52 Bayswater Ave., Suite 1505 Ottawa, ON

K1Y 4K3

SOHAIB MOHAMMAD

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Lawyer for the Plaintiff,

Taylan McRae-Yu