# ONTARIO <br> SUPERIOR COURT OF JUSTICE 

B ETWEEN:

# 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

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## TAB 1

## 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 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 " $\mathbf{F}$ " 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.
15. In May 2021, I came across an NFT collection known as Bored Ape Yacht Club (BAYC).
16. The BAYC website (boredapeyachtclub.com), the landing page for which is attached as Exhibit "H", contained a number of items that I viewed as being both relatively novel and exciting. Firstly, the BAYC website explicitly stated "Your Bored Ape doubles as your Yacht Club membership card, and grants access to members-only benefits". In addition, the BAYC website
used a term which I had not previously seen called a "roadmap". The roadmap in question included a number of "goalposts" that the BAYC team would work towards after a certain percentage of NFT sales occurred. This included: exclusive BAYC merch store featuring limited edition tees, hoodies, and other goods; a "mutant ape (NFT Breeding)"; and a Bored Ape liquidity pool.
17. 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.
18. 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).
19. 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.
20. 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.
21. 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 " $\mathbf{O}$ " is the Opensea page for BAYC, showing the "creator earnings" (royalties) of $2.5 \%$.
22. 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.
23. In other cases, projects turned out to be what was termed a "slow rug" in the NFT community. For example, projects delivered only a portion of the utility they had promised holders or simply stated that they were "building" and developing the utility they had promised to purchasers, but never delivered anything.

## Boneheads (Pre-Mint)

25. In or around July 2021, I came across an NFT project on Twitter known as "Boneheads". I began to follow the Twitter page for the Boneheads NFT project and joined the community Discord. Attached as Exhibit "P" is a screenshot of the Twitter page for the Boneheads NFT project.
26. There are a number of things that attracted me to the Boneheads NFT project. Firstly, I found the NFT art to be distinctive and visually appealing. A screenshot of the Opensea page for the Boneheads NFT which shows the Boneheads NFT art is attached as Exhibit "Q". Secondly, it was clear that the team had put significant effort into marketing and promotion of the Boneheads NFT project, as evidenced by the tens of thousands of active Discord members at the time and the fact that each "tweet" the team put out on Twitter received dozens, if not hundreds of likes and/or re-tweets. Additionally, the development team was extremely active in the Discord and was essentially available around the clock to engage with the community and answer questions, including responding to criticism and concerns of prospective purchasers.
27. The Boneheads team represented themselves as a team with significant experience in technology and start-ups, with the expertise/background to deliver on their ambitious roadmap.

For example, the Boneheads website (boneheads.io) contains an "About" page, a copy of which is attached as Exhibit "R" states the following:
i. "Seven brilliant collaborators spent over 1,500+ hours developing over 500+ attributes across 8 categories, in 8 K high-resolution...";
ii. "This is a real business, with experienced investors, and a clearly defined objective...";
iii. "Our core team has spent the better part of our adult lives building startups and helping others achieve their goals in a collaborative way";
iv. "Together, we've cultivated over 40 years of experience in design, product management, manufacturing, and marketing, to bring you our brainchild Boneheads."; and
v. "From inception, \#Boneheads has been a collaborative effort spanning more than 6 countries and 14 talented individuals".
28. The "About" page and of the Boneheads website also makes it clear that what the proceeds from the mint would be used towards:
i. "\#Boneheads are priced in accordance to the level of effort, quality, funding spent to date, and to the funding that is required for us to deliver on our vision and roadmap"; and
ii. "By pricing our \#Boneheads a little bit higher than what the community is used to, we believe this will give more individuals an opportunity to participate and join our burgeoning community, and it will give us the necessary runway for attracting talent and building our platform.".
29. The Boneheads NFT team promised holders that purchase of their NFT would be accompanied by relatively novel utility and an ambitious roadmap and that funds from the sale of

Boneheads would be used to deliver on this roadmap. In addition to the "About" page, the Boneheads website contained a "Roadmap" page, a "Benefits" page, and an "FAQ" page which are respectively attached as Exhibit "S", Exhibit "T", and Exhibit "U", which outlined, in detail, the utility that would flow with ownership of the Boneheads NFT. This included:
i. "There will be a $10 \%$ royalty on secondary sales, this will go towards establishing a community-powered creator fund" (Exhibit "R");
ii. "Our goal is to create a multimedia franchise spanning the rapidly evolving physical and digital design + fashion + gaming + art spectrum and iterate until we've developed something that is truly unique and imaginative" (Exhibit "R");
iii. "We will be putting relentless focus into developing the backbone of our business, which will be a physical + digital identity fashion gaming wearables NFT platform from which you will be able to mint and forge digital + physical collectibles" (Exhibit "R");
iv. "We plan on making and developing physical + digital products and representations of anything that we think is cool in the world, life life-size 5FT Boneheads sculptures, toys, fuzzy zebra print mini backpacks, studded boxing gloves, and more" (Exhibit "R");
v. "Our business model is mint + forge. You will be able to forge physical collectibles (grails, clothing, accessories, and more) of the digital representations that we release through NFTs through the Cabana." (Exhibit "R");
vi. "Only token holders will be able to participate in the exclusive drops that we release" (Exhibit "R");
vii. "...every single item will come with a numbered verifiable scannable QR code/NFC tag that will be verifiable on-chain" (Exhibit "R");
viii. "Code-based digitals" including 5\% community wallet; 3D boneheads, boning $=$ breeding, the spa = liquidity pool; and consumer facing avatar app (Exhibit "S");
ix. "NFT post-sale physicals" including mouse-pads; area rugs; and paintings (Exhibit "S");
x. "Physical collectibles" including 5FT lifesize sculptures; 2.4 FT sculptures; 4FT area rugs; boxing gloves; trucker hats; mini backpacks; puffer jackets; biker jackets; t-shirts; hoodies; slides; and socks (Exhibit "S");
xi. "Owning a \#BONEHEAD grants you a lifetime membership (as long as you hold it in your wallet) to the Cabana, the forging HQ, where you will be able to forge physical and digital collectibles" (Exhibit "T");
xii. "The more \#BONEHEAD that you own, the more items you will be able to forge" (Exhibit "T");
xiii. "Token holders will have access to several claimables that we currently have on the roadmap" (Exhibit "T");
xiv. "Token holders will be the first to have an opportunity to access and test our 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 $\$ 1 \mathrm{M} "$. 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.... $\$ 250 \mathrm{~K}$ ???????....". 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 $950.5 \mathrm{ETH}(\$ 3,123,818.25$ USD (approximately $\$ 4,005,047.38 \mathrm{CAD})$ ), the "BONEHEADS: Deployer" address received and continues to receive a royalty from every secondary market sale of the Boneheads NFT. The Boneheads team has received at least 27.0958 ETH ((\$87,811.97 USD (\$112,072.43 CAD)) in royalty payments to date. Exhibit "AC" shows Etherscan transactions to the "Boneheads: Deployer" from the "Opensea: Royalties Distributor" wallet.
38. Immediately after the mint sold out, the Boneheads Discord chat was put to "slow" mode, meaning community members were limited to sending a message once every few minutes. Within the NFT community, this behavior is seen as problematic because it is an initial red flag that the project is about to be rug pulled. In the past, I have been part of rug pulls where shortly after the completion of the mint, the Discord channel for the NFT project has been muted and then deleted, leaving almost no way for community members who have been defrauded by a project to communicate with one other. Members of the community, including myself, who expressed concern on the Discord channel were immediately, and without any warning, banned/booted from the channel, which was a complete " 180 " with how the team had been interacting with the community members just moments earlier.
39. At approximately 5:02 pm EST on August 20, 2021, just an hour after the mint for the Boneheads NFT had sold out, and during a period where significant secondary volume had taken place, the Boneheads team abruptly announced on the Discord channel that they would be back on Monday (August 23, 2021). This announcement is attached as Exhibit "AD". The Discord moderators for Boneheads also expressed concern about this behavior.

## Boneheads (Months Following The Mint)

40. In the weeks and months following the Boneheads mint, the Boneheads team became less and less active on Discord and social media. Whenever they were questioned about when utility would be delivered to NFT holders, the Boneheads team would either ban members from Discord or block them on Twitter. The Boneheads team also periodically made promises of utility to keep the ruse going. Not only did this lead to consumers who purchased the Boneheads NFT holding out hope, it led to new waves of consumers purchasing the NFT on the secondary market.
41. As of June 2023, 22 months after the sale of the Boneheads NFT, not a single roadmap or utility item has been delivered to consumers. Even the simplest roadmap items, like t-shirts and pants, have not been delivered. None of the promised giveaways have actually taken place.
42. Following the sale of the mint, the Boneheads team stated on their website that a flagship store for the Boneheads brand would be opening in Los Angeles in Early 2022. A screenshot of this is attached as Exhibit "AE". This was reinforced from the Boneheads teams Twitter account on December 31, 2022 , a screenshot of which is attached as Exhibit "AF". No such flagship store has ever been opened.
43. The Boneheads team provided almost no updates from January to June 2022. It was around this time that I connected with @zachxbt ("Zach XBT") on Twitter, an independent blockchain investigator dedicated to investigating blockchain fraud. Zach XBT has nearly 400,000 followers on Twitter and is highly respected in the cryptocurrency/blockchain space, having helped authorities in various jurisdictions with his investigations. Attached as Exhibit "AG" is a screenshot of Zach XBT's Twitter profile page.
44. On July 14, 2022, Zach XBT released the results of his independent investigation on the Boneheads NFT project on his Twitter, stating that the project was a $\$ 3.1$ million rug pull.

Screenshots of ZachXBT's Twitter thread corresponding to this investigation are attached as Exhibit "AH".
45. Despite months of inactivity, the Boneheads team responded in under an hour to Zach XBT's tweets. The Boneheads team stated that they were not a "rug" but a "deliberately slow creative process" and then teased an image of a new collection, hinting that its release would happen in August 2022, marking the anniversary of the Boneheads mint. No such collection was released. Screenshots from this Twitter post is attached hereto as Exhibit "AI".
46. On August 27, 2022, Zach XBT released another tweet on his Twitter account. The tweet showed direct messages that were sent to him by the Boneheads team at the time he released his July 14, 2022 investigation results. The messages state "our brand activations are officially launching the week of the $24^{\text {th }}$ 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 firsthand 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".
53. On August 20, 2021, subscribers to the Boneheads "newsletter" received an email reminder about the Boneheads mint. Included in the footer of the email was an address "1034 County Road 3, Belleville, ON, K8N 4Z1". A screenshot of this newsletter including the address is attached as Exhibit "AN".
54. After conducting searches into the address, I was able to find two connected corporations and two named individuals who I believe are part of the Boneheads team. The corporate documents for these corporations show the following:
i. DMCB Holdings Inc. is a federal corporation registered at 12 Amber Place, Belleville, ON, K8P 0B5 with Ivan Avramenko serving as director, with a listed personal addresses at 12 Amber Place, Belleville, ON, K8P 0B5 and 1034 County Road 3, Belleville, ON, K8N 4Z1 and a Phone Number of 416-995-7010. The corporate documents for this corporation are attached as Exhibit "AO"; and
ii. Profitly Incorporated is a federal corporation registered at 12 Amber Place, Belleville, ON, K8P 0B5. Ivan Avramenko (12 Amber Place, Belleville, ON, K8P 0B5) and Alexandra Stinson (1034 County Road 3, Belleville, ON, K8N 4Z1) at the current directors of this corporation. The corporate documents for this corporation are attached as Exhibit "AP". Attached as Exhibit "AQ" is the result of a corporate search conducted on June 5, 2023 which show that Profitly Incorporated is currently undergoing dissolution.
55. On July 28 2021, in advanced of the project mint, the Discord user "BONESTAR", who is listed as a co-founder of the Boneheads project, shared the phone number $+1-416-995-7010$ with a freelance developer ("LazyFrank") contracted to configure the Boneheads Discord server. I have attached a screenshot of this conversation as Exhibit "AR". This corresponds to Ivan Avramenko's phone number as shown in Exhibit "AO" and leads to a voicemail under the same name.
56. Alexandra Stinson operated the Twitter handle @lexibone and the "TikTok" social media accounts under "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".
57. The Twitter handle @Ivybonee is the former Twitter handle of Ivan Avramenko and 0xA1e43fcB51656354931D47458EceaDBC6545df57 is one of his cryptocurrency wallet addresses (it is represented as "ivybone.eth" in ENS form). Alexandra shared images of Ivan on her TikTok account, a screenshot of which is attached hereto as "Exhibit AU" where he is also seen wearing a set of Boneheads pants, a screenshot of which is attached hereto as Exhibit "AV". 58. The third individual, @nikkibonee is the active Twitter handle of the third unknown Boneheads creators who controls, at minimum, the Ethereum Address 0xca5a943044d32fc18c4487195A2Bf9D60918cD55 (given the short-hand name "nikkibone.eth"). I have attached a screenshot of the still active Twitter profile page of this individual as Exhibit "AW", and a screenshot of the Opensea profile page corresponding to their cryptocurrency wallet as Exhibit "AX". I have been unable to tie an identity to this individual.
58. Given that thousands of individuals including myself had been victims of the rug pull perpetuated by the Boneheads team, I began to seek legal advice in the summer of 2022 to see if any lawyers in Ontario would be willing to take on this case. After a series of unsuccessful consultations, I was eventually advised that I should just pursue the matter in Small Claims Court. This was generally because the counsel I consulted did not have a deep understanding of NFTs. 60. As such, on July 11, 2022, I filed a "Plaintiff's Claim" with the Small Claims Court in Belleville against Profitly Incorporated, a copy of which is attached hereto as Exhibit "AY". The process server who served the Plaintiff's Claim was met with extreme hostility during his service, and stated that it was the most difficult personal service attempt in his 20 years of being a process server. The process server refused to provide me with an Affidavit of Service evidencing the service.
59. 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".
60. 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.
61. I understand the seriousness of an allegation of fraud and do not make it lightly. However, I believe the Boneheads team defrauded thousands of consumers, including myself, into purchasing their NFT through extensive promises of utility as I have outlined.

## Assets At A Risk of Dissipation

64. The "Breadcrumbs" application (breadcrumbs.app), is an investigation tool that is helpful to visualize blockchain data such as the movement of cryptocurrency funds. Attached hereto as Exhibit "BA" is the landing page for the Breadcrumbs website.
65. The "BONEHEADS: Deployer" address, which received 807.925 ETH (\$2,655,245.51 USD (approximately $\$ 3,404,290.27 \mathrm{CAD}$ )) 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 $\mathbf{\$ 9 4 3 , 6 7 8 . 2 0} \mathbf{C A D}$ have been moved from these accounts into a number of centralized exchanges as shown in Table 1 and summarized as follows:
i. 31 ETH ( $\mathbf{\$ 9 9}, 984.30$ USD ( $\mathbf{\$ 1 2 6 , 1 2 0 . 1 9} \mathbf{C A D}$ )) in funds were moved from the "BONEHEADS: Deployer" into "Coinbase Exchange 1" on August 29, 2021;
ii. 28 ETH ( $\mathbf{\$ 1 1 0 , 3 1 4 . 1 2}$ USD ( $\mathbf{\$ 1 3 8 , 1 7 9 . 4 7} \mathbf{C A D}$ )) in funds were moved from the "BONEHEADS: Deployer" into "Kraken Exchange 1" on September 3, 2021;
iii. 25.358 ETH ( $\mathbf{\$ 9 8}, 567.28$ USD ( $\mathbf{\$ 1 2 3 , 4 7 5 . 2 3} \mathbf{C A D}$ )) in funds were moved from "BNHDZVAULT" into "Kraken Exchange 2" on September 4, 2021;
iv. $\mathbf{9 4 . 4 5}$ ETH ( $\mathbf{\$ 1 6 0 , 0 0 8 . 3 5}$ USD $\mathbf{( \$ 2 1 2 , 7 3 4 . 0 8} \mathbf{C A D})$ ) 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 ( $\mathbf{2 3}, \mathbf{8 8 0 . 1 3}$ USD ( $\mathbf{\$ 3 1 , 5 1 0 . 4 1} \mathbf{C A D} \mathbf{~ )}$ ) 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 " 3 C 85 " to "Robinhood Exchange" between March 20, 2022 to April 1, 2022;
vii. 3 ETH ( $\$ 12,870.30$ USD ( $\mathbf{\$ 1 5 , 9 3 7 . 2 9} \mathbf{C A D}$ )) were moved from "ticasso.eth" into "Kucoin 4" on October 31, 2021; and
viii. 4.78 ETH (\$14,608.64 USD (\$18,412.73 CAD)) were moved from "BNHDZVAULT" to "Robinhood Exchange" on April 18, 2022.
72. Blockchain data on Etherscan shows one final account with the cryptocurrency wallet address 0x7D7e14Fd2b185d9A0ADA62Ae4b59A5Ea8Ab7Ec05 ("EC05") which may be under the control of the Boneheads team. The address received 0.5 ETH directly to the BONEHEADS: Deployer address on January 27, 2022 and sent 30 ETH directly to the BONEHEADS: Deployer address on March 23, 2022. Exhibit "BT" attached is the Etherscan page outlining all the transactions for this cryptocurrency wallet.
73. Attached as Exhibit "BU" is Table 2 which shows how the funds received by the Boneheads team were used on extravagant NFT purchases. Each of the rows in Table 2 are supported by attached Exhibits "BV" - "CH" which show Opensea or Etherscan transactions for these purchases. Table 2 only looks at some of the larger purchases made by the Boneheads team:
i. "BONEHEADS: Deployer" - Currently holds over 1,800 NFTs. Table 2 looks at11 NFT collections purchased by this wallet totaling 188 individual NFTs. The total cost for just these 188 NFTs was approximately $\mathbf{\$ 1 , 2 3 5 , 9 2 8 . 1 4} \mathbf{C A D}$;
ii. "BNHDZVAULT" - This account purchased 2 NFTs on January 28, 2022 at a total cost of approximately $\mathbf{\$ 1 0 3 , 7 5 8 . 2 1} \mathbf{C A D}$; and
iii. "ivybone.eth" - This account made a total of 14 NFT purchases on May 1, 2022 for a total of approximately $\mathbf{\$ 4 4 6 , 4 8 3 . 6 0} \mathbf{C A D}$.
74. In total, across these the "BONEHEADS: Deployer", "BNHDZVAULT" and "ivybone.eth" accounts, 204 NFTs purchases totaling $\mathbf{\$ 1 , 7 8 6 , 1 6 9 . 9 5} \mathbf{C A D}$ are shown in Table 2.
75. Zapper (zapper.xyz) is a tool which estimates the value of cryptocurrency wallets, based on current market price of their NFT and cryptocurrency holdings.
76. Attached as Exhibits "CI" - "CK" are Zapper results showing the current value, as of June 5 2023, of the Boneheads teams main wallet holdings are as follows:
i. "BONEHEADS: Deployer" - \$149,009.08 USD (\$200,101.31 CAD) (Exhibit "CI");
ii. "BNHDZVAULT" - \$37,225.36 USD (\$49,989.19 CAD) (Exhibit "CJ"); and
iii. "ivybone.eth" - \$13,648.12 USD (\$18,327.78 CAD) (Exhibit "CK").
77. Based on Exhibit "BT" attached, as of June 5, 2023, the "EC05" wallet currently has a balance of 71.69 ETH ( $\$ 130,034.47$ USD ( $\$ 174,620.68 \mathrm{CAD})$ ) 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 $\$ 3,500,000 \mathrm{CAD}$.
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 $\$ 500,000 \mathrm{CAD}$.
80. Without a Mareva injunction, consumers like myself face the real possibility of nonrecovery 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, $\mathrm{ON}, \mathrm{K} 8 \mathrm{~N} 4 \mathrm{Z} 1$ 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.
102. I swear this affidavit in support of this motion for and for no other improper purpose.

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


Commissioner of Oaths in and for the Province of Ontario


Taylan McRae-Yu Abbas Ali Kassam (LSO: 66326T)

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

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


Commissioner of Oaths in and for Ontario

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

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

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

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## History

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

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

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

## Bitcoin As A State Transition System



From a technical standpoint, the Bitcoin ledger can be thought of as a state transition system, where there is a "state" consisting of the ownership status of all existing bitcoins and a "state transition function" that takes a state and a transaction and outputs a new state which is the result. In a standard banking system, for example, the state is a balance sheet, a transaction is a request to move $\$ X$ from $A$ to $B$, and the state transition function reduces the value in A's account by $\$ X$ and increases the value in B's account by \$X. If A's account has less than $\$ \mathbf{X}$ 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 $\operatorname{APPLY}(S, T X) \quad->S^{\prime}$ 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 $\mathrm{S}[0]$ 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 $0 \ldots \mathrm{n}-1$, setS[ $\mathrm{i}+1]=$ 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:

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

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

## Merkle Trees

Left: it suffices to present only a small number of nodes in a Merkle tree to give a proof of the validity of a branch.
Right: any attempt to change any part of the Merkle tree will eventually lead to an inconsistency somewhere up the chain.


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

A Merkle tree is a type of binary tree, composed of a set of nodes with a large number of leaf nodes at the bottom of the tree containing the underlying data, a set of intermediate nodes where each node is the hash of its two children, and finally a single root node, also formed from the hash of its two children, representing the "top" of the tree. The purpose of the Merkle tree is to allow the data in a block to be delivered piecemeal: a node can download only the header of a block from one source, the small part of the tree relevant to them from
another source, and still be assured that all of the data is correct. The reason why this works is that hashes propagate upward: if a malicious user attempts to swap in a fake transaction into the bottom of a Merkle tree, this change will cause a change in the node above, and then a change in the node above that, finally changing the root of the tree and therefore the hash of the block, causing the protocol to register it as a completely different block (almost certainly with an invalid proof of work).

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

## Alternative Blockchain Applications

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

- Namecoin - created in 2010, Namecoin is best described as a decentralized name registration database. In decentralized protocols like Tor, Bitcoin and BitMessage, there needs to be some way of identifying accounts so that other people can interact with them, but in all existing solutions the only kind of identifier available is a pseudorandom hash 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 $\operatorname{APPLY}^{\prime}(\mathrm{S}, \mathrm{TX})$ 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, $\operatorname{APPLY}(\mathrm{S}, \mathrm{TX})$-> 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.
2. Calculate the transaction fee as STARTGAS * GASPRICE, and determine the sending address from the signature. Subtract the fee from the sender's account balance and increment the sender's nonce. If there is not enough balance to spend, return an error.
3. Initialize GAS = STARTGAS, and take off a certain quantity of gas per byte to pay for the bytes in the transaction.
4. Transfer the transaction value from the sender's account to the receiving account. If the receiving account does not yet exist, create it. If the receiving account is a contract, run the contract's code either to completion or until the execution runs out of gas.
5. If the value transfer failed because the sender did not have enough money, or the code execution ran out of gas, revert all state changes except the payment of the fees, and add the fees to the miner's account.
6. Otherwise, refund the fees for all remaining gas to the sender, and send the fees paid for gas consumed to the miner.

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

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

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

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

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

## Code Execution

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

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

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

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

## Blockchain and Mining



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

1. Check if the previous block referenced exists and is valid.
2. Check that the timestamp of the block is greater than that of the referenced previous block and less than 15 minutes into the future
3. Check that the block number, difficulty, transaction root, uncle root and gas limit (various low-level Ethereum-specific concepts) are valid.
4. Check that the proof of work on the block is valid.
5. Let $\mathrm{S}[0]$ be the STATE_ROOT of the previous block.
6. Let TX be the block's transaction list, with $n$ transactions. For all in in $0 \ldots n-1$, setS[i+1] $=$ $\operatorname{APPLY}(S[i], T X[i])$. 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 systen, 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 $\$ \mathrm{x}$ 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:

- $\quad[0, i, \mathrm{~K}, \mathrm{~V}]$ 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 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 75 th 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 15 s 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 $k R$ 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. $1 / \mathrm{N}$ 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 $\mathrm{kR} / \mathrm{N}$ since the miner has a $1 / \mathrm{N}$ chance of processing the next block, and the processing cost for the miner is simply $k C$. Hence, miners will include transactions where $k R / N>k C$, or $R>N C$. Note that $R$ is the per-operation fee provided by the sender, and is thus a lower bound on the benefit that the sender derives from the transaction, and NC is the cost to the entire network together of processing an operation. Hence, miners have the incentive to include only those transactions for which the total utilitarian benefit exceeds the cost.

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

1. The miner does pay a higher cost to process the transaction than the other verifying nodes, since the extra verification time delays block propagation and thus increases the chance the block will become a stale.
2. There do exist non-mining full nodes.
3. The mining power distribution may end up radically inegalitarian in practice.
4. Speculators, political enemies and crazies whose utility function includes causing harm to the network do exist, and they can cleverly set up contracts whose cost is much lower than the cost paid by other verifying nodes.

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

```
blk.oplimit = floor((blk.parent.oplimit * (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 $\mathrm{x}<27$ : $\mathrm{x}=\mathrm{x}$ *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 $[\mathrm{A}]=0$, and sends a transaction with just enough gas to run the first step but not the second (ie. making a withdrawal but not letting the balance go down). The contract author does not need to worry about protecting against such attacks, because if execution stops halfway through the changes get reverted.
- A financial contract works by taking the median of nine proprietary data feeds in order to minimize risk. An attacker takes over one of the data feeds, which is designed to be modifiable via the variable-address-call mechanism described in the section on DAOs, and converts it to run an infinite loop, thereby attempting to force any attempts to claim funds from the financial contract to run out of gas. However, the financial contract can set a gas limit on the message to prevent this problem.

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

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

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

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

## Currency And Issuance

The Ethereum network includes its own built-in currency, ether, which serves the dual purpose of providing a primary liquidity layer to allow for efficient exchange between various types of digital assets and, more importantly, of providing a mechanism for paying transaction fees. For convenience and to avoid future argument (see the current $\mathrm{mBTC} / \mathrm{uBTC} /$ 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.
- $0.099 x$ 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 $0.099 x$ will be allocated to long-term research projects.
- $\quad 0.26 x$ 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 26 X then 0.26 X will be mined and 0.26 X lost every year, creating an equilibrium).

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

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


## Mining Centralization

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

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

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

## Scalability

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

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

In the near term, Ethereum will use two additional strategies to cope with this problem. First, because of the blockchain-based mining algorithms, at least every miner will be forced to be a full node, creating a lower bound on the number of full nodes. Second and more importantly, however, we will include an intermediate state tree root in the blockchain after processing each transaction. Even if block validation is centralized, as long as one honest verifying node exists, the centralization problem can be circumvented via a verification protocol. If a miner publishes an invalid block, that block must either be badly formatted, or the state $\mathrm{S}[\mathrm{n}]$ 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 $2^{\wedge} 256-1$.

## 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/\[English\]-RLP
20. Ethereum Merkle Patricia trees: https://github.com/ethereum/wiki/wiki/\[English\]-Patricia-Tree
21. Peter Todd on Merkle sum trees:http://sourceforge.net/p/bitcoin/mailman/message/31709140/

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

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


Commissioner of Oaths in and for Ontario

# The Ethereum Blockchain Explorer 

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

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

MARKET CAP
\$224,213,125,023.00

TRANSACTIONS
MED GAS PRICE
1,990.03 M (13.2 TPS)
41 Gwei (\$1.61)

TRANSACTION HISTORY IN 14 DAYS
1 300k


900k
May 21
May 28
Jun 4

## Latest Blocks

Block 1741442512 secs ago
Fee Recipient Fee Recipient: Oxe..
205 txns in 24 secs 0.02881 Eth

Block 1741442436 secs ago
Fee Recipient beaverbuild

Block 1741442348 secs ago
Fee Recipient builder0x69
128 txns in 12 secs 0.07102 Eth

Block 174144221 min ago
Fee Recipient Fee Recipient: 0xF...
150 txns in 12 secs 0.0754 Eth

Block 174144211 min ago
Fee Recipient MEV Builder: 0xb4...
123 txns in 12 secs 0.04139 Eth

Block 174144201 min ago
Fee Recipient rsync-builder
116 txns in 12 secs 0.02835 Eth

VIEW ALL BLOCKS $\rightarrow$

## 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 0Eth

TX\# 0x9295a016e25d... 12 secs ago
From 0x0292ae...AB6B299E
To 0x1c76B8...D8f76d9c 0Eth

TX\# 0xae5ffa60d25ad... 12 secs ago
From 0xeca5A1...5E5b277D
To 0xC02aaA...3C756Cc2 1.281 Eth

TX\# 0xe1c6140963e8... 12 secs ago
From 0xf396Cd...Fa465CDC
To 0xC2c862...05246Fd8 0.00262 Eth

TX\# 0x523e02a538b7... 12 secs ago
From 0xeE0e3e...54Afe1A9
To 0x111111...3A960582 0.054Eth

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
— A.K
Commissioner of Oaths in and for Ontario

## Decentralised naming for wallets, websites, \& more.



## Your web3 username $\curvearrowright$

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

## nick.eth

ENS is the most widely integrated blockchain naming standard.
2.73m

Names
570
Integrations
697k

## One Name For All of Your Addresses

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


## Decentralised Websites

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

mysite.com

vitalik.eth

domain.org

## Use Traditional Domains

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

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

.XyZ
.art

ENS Ecosysteme

Wallets



See More +

## Browsers



Extension

## Get Involvede



# Subscribe to our mailing list 

Subscribe

Join our Discord community
Join Discord


Discuss on our forum

Read our documentation
Read docs

## Get Supporte



## Email the support team

Email


\#create-a-ticket in Discord
Go to Discord

## ENS

y Twitter

M Medium

GitHub
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

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:0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045Expiration Date:2034.06.03 at 19:57

Registrant:
0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045 Lookup names QController:
0xd8dA6BF26964aF9D7eEd9e03E53415D37aA96045 Lookup names Q

+ Click to show more

Related Transactions

| Transactions | Age | From | Action |
| :--- | :--- | :--- | :--- |
| $0 \times 6 \mathrm{~d} 90347 \mathrm{f9} 2 \mathrm{~d} 30 \mathrm{aee} 0 \ldots$ | 13 hrs 5 mins ago | $0 \times 6 \mathrm{~A} 75 \mathrm{aC} \ldots 2 \mathrm{e} 5 \mathrm{f} 1 \mathrm{E} 6 \mathrm{D}$ | purchaseDomains |
| $0 x d 5 \mathrm{~d} 554 \mathrm{f} 2757 \mathrm{ce} 4 \mathrm{dc} 0 \ldots$ | 3 days 18 hrs ago | $0 \times 26 \mathrm{fA} 93 \ldots \mathrm{~A} 506 \mathrm{~d} 751$ | ownerMintSubdomains |


| Transactions | Age | From | Action |
| :---: | :---: | :---: | :---: |
| 0xc78814a2c4b07f9f0... | 23 days 4 hrs ago | 0xd8dA6B...7aA96045 | setSubnodeRecord |
| 0x6e09164805b5e873... | 29 days 7 hrs ago | 0x62F470...c1E004a5 [0 | proveAndClaimWithRes |
| 0x52763530978d3bfc9... | 40 days 16 hrs ago | 0x946BB9...9a94fA3F [] | setSubnodeOwner |
| 0x2447736349ecd710... | 50 days 2 hrs ago | 0x917698...39f44b42 [ | setSubnodeRecord |
| 0xacc9a009bc27e253... | 68 days 19 hrs ago | 0x39c4B3...12F4b6c4 [0](000000000000000000000000000000000000000000000000000000000000000f) | grabSubdomain |
| 0x3858d89285a1bc9e... | 71 days 15 hrs ago | 0xDAB330...93eeA9a4 [0](000000000000000000000000000000000000000000000000000000000000000f) | setSubnodeRecord |
| $0 x 0 e a 3 c 743 c e f 393 c 84 . .$. | 89 days 6 hrs ago | 0x05bB8D...d86746E4 | buySubnode |
| 0x733224f17e0672692... | 100 days 18 hrs ago | 0x8953cD...56cB38A7 | setSubnodeRecord |
| 0xcfb42c399286d6a26... | 113 days 21 hrs ago | 0xB38565...2f745b8A [ | setSubnodeRecord |
| 0xdc96677be8a4e6a4... | 116 days 6 hrs ago | 0x95586B...9fBf4652 [ | registerSubnode |
| 0xde4bfa5078c9c35f8... | 116 days 16 hrs ago | 0x70Fd9e...d716F86e [0 | register |
| 0xf744dc0d9fa52824f... | 145 days 22 hrs ago | 0x7bF925...55AD36be | \{Unknown Function\} |
| 0x7c99f393efaa72466... | 160 days 8 hrs ago | 0xa1bc85...b537DF73 | setSubnodeRecord |
| 0x1d50169e1bc1d4a5f... | 160 days 8 hrs ago | 0xa1bc85...b537DF73 [] | setSubnodeRecord |
| 0x5d7b96e8b298bff60... | 160 days 8 hrs ago | 0xa1bc85...b537DF73 [0 | setSubnodeRecord |
| 0x78fd2633eb39f67d6... | 163 days 14 hrs ago | 0x0490e3...a6324656 [0](000000000000000000000000000000000000000000000000000000000000000f) | registerSubdomain |
| 0x77ba345c6eb1b280... | 187 days 19 hrs ago | 0xB2551F...5ebEb40e [0](000000000000000000000000000000000000000000000000000000000000000f) | setSubnodeRecord |
| 0x53033d2d50b44016... | 197 days 2 hrs ago | 0x60203B...11D2A407 [ | setSubnodeRecord |
| 0x9f6d53fd60b4dd574... | 197 days 9 hrs ago | 0xDDd396...BF076364 [ | claimSubdomain |
| 0x7453ac87a2d7c54d... | 212 days 20 hrs ago | 0x5A1336...14792b65 [0](000000000000000000000000000000000000000000000000000000000000000f) | setDomain |
| 0x7e959dec923808f98... | 215 days 5 hrs ago | 0xD6dD42..200D03c0 [ | setSubnodeRecord |
| 0xdf19748655ab899ae... | 215 days 5 hrs ago | 0xD6dD42...200D03c0 [ | setSubnodeRecord |


| Transactions | Age | From | Action |
| :---: | :---: | :---: | :---: |
| 0xa1f3e0da9a36a4797... | 217 days 6 hrs ago | 0xb9f424...D8275374 | claimSubdomain |
| 0x8ed83ef866895981e... | 226 days 23 hrs ago | 0x384973...e897f234 | registerSubdomain |
| 0x478f6421afa3e5e17... | 227 days 6 hrs ago | 0xfAB225...0a6ac1a9 [ | setSubnodeOwner |
| 0xb189b23c4283be8d... | 227 days 6 hrs ago | 0xfAB225...0a6ac1a9 [] | setSubnodeRecord |
| 0xcc55204b78686088... | 251 days 17 hrs ago | 0x93a86f...957fc647 [ | setSubnodeRecord |
| 0x5352611b2ecd8b96... | 252 days 23 hrs ago | 0xEODef7...a9a9A496 [ | setSubnodeRecord |
| 0x988f35612df2b05c8... | 253 days 21 hrs ago | 0xC60Bc5...e92db490 [0](000000000000000000000000000000000000000000000000000000000000000f) | setSubnodeRecord |
| 0xa0c5a2df8fa4f8d69... | 256 days 16 hrs ago | 0xcB3577...33D46eC6 [ | register |
| 0x6050db79f0f574e93... | 259 days 17 hrs ago | 0x8574e3...13BCd156 [0](000000000000000000000000000000000000000000000000000000000000000f) | mint |
| 0x3eb1db026b10a072... | 264 days 7 hrs ago | 0x16CAc4...31dC865D | setSubnodeRecord |
| 0x2422b070aa5d79dc... | 273 days 11 hrs ago | 0x0c2364...30FB928e [ | renew |
| 0x1cb822811348639e... | 283 days 7 hrs ago | 0x438D45...edD399AB [ | renew |
| 0xf54e43b7ea6ae82ed... | 300 days 11 hrs ago | 0x754632...c2431320 [ | renew |
| 0x0e93f22406c0a62b1... | 317 days 8 hrs ago | 0xb96846...e9714473 [ | registerSubdomain |
| 0x033605d543a9eca0... | 345 days 11 hrs ago | 0x4b44F8...2C94107e [ | registerSubdomain |
| Oxca38961269750041... | 351 days 2 hrs ago | 0x06AD1D...3E1581C9 [ | setSubnodeRecord |
| 0x04d6f8636feb742be... | 356 days 5 hrs ago | 0x2a704f...0F9C67a2 | register |
| 0xe4add275ed6d9c2b... | 382 days 11 hrs ago | 0x005f77...4C49069F | setSubnodeRecord |
| 0x37dcf80ab8e26f367... | 406 days 15 hrs ago | OxedC549...133fE8d8 | setSubnodeRecord |
| 0xd486930cfc1b16206... | 443 days 1 hr ago | 0x7c49Af...e038363d [ | setSubnodeRecord |
| 0x127a7c7e34e0f0a4a... | 555 days 1 hr ago | 0xF27696...59342fA6 | execute |
| 0x7a0eeacf5aeab976d... | 561 days 52 mins ago | 0x016E8E...8De72b8b [o | inviteInstallToken_q |


| Transactions | Age | From | Action |
| :---: | :---: | :---: | :---: |
| 0xe00522bcc7c2bc53f... | 626 days 22 hrs ago | 0xC8Fa92...93F3a096 | register |
| 0xc0ff895e97eafd30e7... | 647 days 14 hrs ago | 0x618629...fC539cfE [ | claimGlyph |
| 0x793e079fbc427cba0... | 728 days 4 hrs ago | 0x3243Ed...cF0F68f2 [] | executeMetaTx |
| 0xe8085d999e1084f97... | 750 days 17 hrs ago | 0xDE0f33...ccFBB46d | setSubnodeRecord |
| 0x9362caa3b26f40a8f... | 759 days 12 hrs ago | 0x0f1C01...3d8b412e | setSubnodeRecord |
| 0xbb13efab7f1f798f63... | 839 days 19 hrs ago | 0xd8dA6B...7aA96045 | setResolver |
| 0x2b36da5e623b152b... | 926 days 23 hrs ago | 0x5247cb...6cf57cBa | register |
| 0x818d94225b89d66a... | 971 days 5 hrs ago | 0x412410...8b0A1257 | executeMetaTx |
| 0xab2cc289b49a5ccc... | 1038 days 4 hrs ago | 0xd8dA6B...7aA96045 | renew |
| 0xc3625d14c03f7512d... | 1075 days 2 hrs ago | 0x310e21...faddDAF6 | create |
| 0xa46b9c76d9ba86abf... | 1087 days 10 hrs ago | 0x0103a4...fdEF5A4F [0](000000000000000000000000000000000000000000000000000000000000000f) | setSubnodeRecord |
| 0xe35c14eb31991dc3... | 1099 days 3 hrs ago | 0x29709b...0F1C5D68 | createProxyWithNonce |
| 0x356677feb564659fc... | 1208 days 19 hrs ago | 0xA80000...d1952d1c [ | createProxy |
| 0x9734339fcb68fb566... | 1210 days 13 hrs ago | 0x0904Da...a3b99859 [] | migrateSubdomain |
| 0xc3f86218c67bee825... | 1214 days 18 hrs ago | 0x0904Da...a3b99859 [ | migrateAll |
| 0x230ed470cd563dce... | 1215 days 20 hrs ago | 0xe74Ab7...30be29b6 [ | migrateNames |

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

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


Commissioner of Oaths in and for Ontario

## August 2021

| Date | US Dollar to Cana | onthly Exchange Rates |
| :---: | :---: | :---: |
| Sunday 1 August 2021 | \$1 USD = \$1.2471 | US Doilar 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 Doilar 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 Doilar rate for 22/08/2021 |
| Monday 23 August 2021 | \$1 USD $=\$ 1.2651$ | US Dollar Canadian Doilar 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 |

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

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


Commissioner of Oaths in and for Ontario

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

## Cryplopisinks()

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）
212．4K三（\＄300．39M）
Value of Sales（24 Hours）
56．96三（\＄106．47K）
Value of Sales（Week）
841．50ミ（\＄1．59M）
Value of Sales（4 Weeks）
$4.83 \mathrm{~K} \equiv$（\＄8．84M）
；Top Punk Owners（／cryptopunks／leaderboard）

All Punk Types and Attributes（／cryptopunks／attributes）

## Largest Sales

See all top sales（／cryptopunks／topsales）


\#4464 (/cryptopunks/details/4464)
$2.5 \mathrm{~K} \equiv(\$ 2.62 \mathrm{M})$
Jul 12, 2022

(/cryptopunks/details/4464)
\#5217 (/cryptopunks/details/5217)
2.25K (\$5.45M)

Jul 30, 2021
(/cryptopunks/details/5217)

)

(/cryptopunks/details/2140)
\#2140 (/cryptopunks/details/2140)
1.6K

Jul 30, 2021

(/cryptopunks/details/5577)
\#5577 (/cryptopunks/details/5577)
2.5K三 (\$7.7M)

Feb 09, 2022

(/cryptopunks/details/4156)
\#4156 (/cryptopunks/details/4156)
2.5K (\$10.26M)

Dec 09, 2021

(/cryptopunks/details/8857)
\#8857 (/cryptopunks/details/8857)
2K
Sep 11, 2021

(/cryptopunks/details/7252)
\#7252 (/cryptopunks/details/7252)
1.6K三 (\$5.33M)

Aug 24, 2021

## Recent Transactions


(/cryptopunks/details/1663)
\#1663 (/cryptopunks/details/1663)
Transferred to Oxc385e9

(/cryptopunks/details/1663)
\#1663 (/cryptopunks/details/1663)
Transferred to
Ox00eb96

(/cryptopunks/details/1864)
\#1864 (/cryptopunks/details/1864)
Transferred to Oxd2f9cf

(/cryptopunks/details/1663)
\#1663 (/cryptopunks/details/1663)
Transferred to 0xb7f7f6

(/cryptopunks/details/1663)
\#1663 (/cryptopunks/details/1663)
Transferred to Oxed01f8

(/cryptopunks/details/9718)
\#9718 (/cryptopunks/details/9718)
Transferred to Oxd2f9cf

(/cryptopunks/details/4478)
\#4478 (/cryptopunks/details/4478)
Transferred to
0x2be665
（／cryptopunks／details／4478）
\＃4478（／cryptopunks／details／4478）
Transferred to
Ox7ed875

\＃4478（／cryptopunks／details／4478）
Bought for
56．96三
（\＄106，486）
（／cryptopunks／details／4478）

## （／apropunks／details／447）

（／cryptopunks／details／4478）
\＃4478（／cryptopunks／details／4478）
Transferred to
0x4db132

（／cryptopunks／details／2276）
\＃2276（／cryptopunks／details／2276）
Offered for
94．95三
（\＄177，507）

## For Sale

The lowest price Punk currently for sale is $\mathbf{5 2 . 9 9} \mathbf{E T H}$（\＄99，064．27 USD）．
Showing most recent offers，click here to see all 1，052（／cryptopunks／forsale）．
 （／cryptopunks／details／8611）（／cryptopunks／details／5433）（／cryptopunks／details／3485） （／cryptopunks／details／2309）（／cryptopunks／details／1322）园 （／cryptopunks／details／6561）（／cryptopunks／details／2834） （／cryptopunks／details／4065）䯘 （／cryptopunks／details／9127） （／cryptopunks／details／5728） （／cryptopunks／details／6828） （／cryptopunks／details／1096）

（／cryptopunks／details／5817）（／cryptopunks／details／5100）
（／cryptopunks／details／6948）

（／cryptopunks／details／2450）
（／cryptopunks／details／4420）
（／cryptopunks／details／8924）

（／cryptopunks／details／5460）類 （／cryptopunks／details／9390） （／cryptopunks／details／4480）

（／cryptopunks／details／3492） （／cryptopunks／details／9255）

（／cryptopunks／details／8320） （／cryptopunks／details／2608）

（／cryptopunks／details／692） （／cryptopunks／details／7763）

（／cryptopunks／details／9106）
（／cryptopunks／details／1370） （／cryptopunks／details／6425）
（／cryptopunks／details／8705） （／cryptopunks／details／2689） （／cryptopunks／details／1753） $\begin{aligned} & \text { P1 } \\ & =1\end{aligned}$ （／cryptopunks／details／1360）
 （／cryptopunks／details／5580） （／cryptopunks／details／9293） （／cryptopunks／details／5151） （／cryptopunks／details／2154） （／cryptopunks／details／4191）
 （／cryptopunks／details／9197） （／cryptopunks／details／3138）勛 （／cryptopunks／details／3351）
（／cryptopunks／details／5643）

（／cryptopunks／details／5084）

（／cryptopunks／details／5270）

## Bids

The average bid over the last year was 91.37 ETH（ $\$ 170,813.94$ USD）．
The average currently open bid is $\mathbf{1 . 0 5} \mathbf{E T H}$（ $\mathbf{\$ 1 , 9 5 7 . 6 6 ~ U S D )}$
Total value of all current bids is $\mathbf{6 1 0 . 5} \mathbf{E T H}$（ $\$ 1,141,314.38$ USD）．
Showing most recent bids，click here to see all 583 （／cryptopunks／bids）．
 （／cryptopunks／details／776）（／cryptopunks／details／1981）（／cryptopunks／details／3794） （／cryptopunks／details／4949）解（／cryptopunks／details／88） （／cryptopunks／details／3348）（／cryptopunks／details／4156）（／cryptopunks／details／5578） （／cryptopunks／details／5）（／cryptopunks／details／1290） （／cryptopunks／details／4932）
（／cryptopunks／details／2216） （／cryptopunks／details／165）
（／cryptopunks／details／3092） $\qquad$ （／cryptopunks／details／5186）
$\qquad$


（／cryptopunks／details／8910）

 （／cryptopunks／details／8390）媵 （／cryptopunks／details／1228）
 （／cryptopunks／details／1694）
 （／cryptopunks／details／6378）
 （／cryptopunks／details／6908） （／cryptopunks／details／7296） （／cryptopunks／details／318）
 （／cryptopunks／details／1718）
 （／cryptopunks／details／2300）
 （／cryptopunks／details／2491）
 （／cryptopunks／details／2711） （／cryptopunks／details／3857）数总（／cryptopunks／details／3883） （／cryptopunks／details／4310） $\qquad$ （／cryptopunks／details／4459） （／cryptopunks／details／4834） $\qquad$ （／cryptopunks／details／5396） （／cryptopunks／details／5408） （／cryptopunks／details／5646） （／cryptopunks／details／5905） （／cryptopunks／details／6120） （／cryptopunks／details／6276）
（／cryptopunks／details／6653）

（／cryptopunks／details／7227） （／cryptopunks／details／7667）

## Sales

The average sale price of a Punk over the last year is $\mathbf{3 9 8 . 8 5}$ ETH（\＄745，638．06 USD）．
The total value of Punks sold over the last year is $\mathbf{2 1 2 , 3 9 5 . 9 2}$ ETH（ $\mathbf{\$ 3 9 7 , 0 7 2 , 0 5 1 . 5 9 ~ U S D ) .}$
Showing most recent sales，click here to see all 23，909（／cryptopunks／sales）．
 （／cryptopunks／details／3841）（／cryptopunks／details／1663）（／cryptopunks／details／1741） （／cryptopunks／details／7513）
（／cryptopunks／details／8535）辩
）（／cryptopunks／details／4624 （／cryptopunks／details／4108） （／cryptopunks／details／8539）
（／cryptopunks／details／1462） （／cryptopunks／details／2769）
（／cryptopunks／details／7209） （／cryptopunks／details／6658）
 （／cryptopunks／details／7354）og （／cryptopunks／details／6447） （／cryptopunks／details／5271）（／cryptopunks／details／3913）



## 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).




## What is a CryptoPunk?

CryptoPunks are $24 \times 24$ 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.

1. Download and install a Web3 browser plugin for Chrome, such as MetaMask (https://metamask.io/). This will allow websites (that you authorize) to connect to your Ethereum wallet.
2. If you made a new account, buy some $\$ E T H$. 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 ${ }^{\text {TM }}$ 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-chaincryptopunks).

## 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

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

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


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c
OpenSea Drops stats Q Search items, collections, and accounts
1 Connect wallet
(2) 1


By C352B5
Items 9,996 . Created Jun 2017 . Creator earnings 0\% . Chain Ethereum - Category PFPs
CryptoPunks launched as a fixed set of 10,000 items in mid-2017 and became one of the inspirations for the ERC-721...
See more r

| 1,146,256 ETH <br> total volume |  | floor price | $0 \%$ <br> listed | $3,686$ <br> owners | $37 \%$ <br> unique awners |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Items | Analytics | Activity |  |  |  |
| Items | Analytics | Activity |  |  |  |

FFilter Live 9,997 resuits $Q$ Search by name or trait
Status
Price
Quantity
Currency
Traits
accessory

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


Commissioner of Oaths in and for Ontario


## WELCOME TO THE BORED APE YACHT CLUB

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



## FAIR DISTRIBUTION

(BONDING CURVES ARE A PONZI)
There are no bonding curves here. Buying a Bored Ape costs 0.08 ETH. There are no price tiers; BAYC membership costs the same for everyone.

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

## BUY AN APE

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

> BUY AN APE ON OPENSEA

## THE SPECS

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

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

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


## WELCOME TO THE CLUB

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


10,000 Provably-rare Bored Ape tokens


Fair Launch, fair distribution: All apes cost 0.08 ETH


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


The Bathroom: A member's-only graffiti board


Gain additional
benefits through roadmap activations

## THE BATHROOM

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

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

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


## ROADMAP ACTIVATIONS

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

| 10\% | We payback our moms. |
| :---: | :---: |
| 20\% | We-release the-Caged Apes. 5 - Caged Apes (tokens-held-back from the-sale) are-airelropped to random Apeholders. |
| 40\% | BAYC gets its own Youfube channel, BAYC Lofi Radio-Beats to Ape into Shiteoins fo. |
| 60\% | Aember-Exelusive BAYC Mereh Store-gets unlocked, featuring Limited Eelition tees, hooclies, and other goodies. |
| 80\% | Fhe clubhouse inage beeomes interactive and the Mysterious Note becomes legible, beginning a treasure hunt. The first to solve the mystery will be rewarded 5 [TI I and a Bored Ape: |
| 90\% | Fhe Bored Ape liquidity poot is initiated. |
| 100\% | Fhe Mutant Ape (NFT Breeding) Areade 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

## 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 ${ }^{\text {ORED APs }}$ 'A7647A8aB7C2061c2E118A18a936f13D

$$
\begin{aligned}
& \text { OD } \\
& r_{\text {ACHT }} \mathrm{CLL}^{\prime}{ }^{\mathrm{B}}
\end{aligned}
$$

GET ON THE LIST

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


Commissioner of Oaths in and for Ontario
(7) Transaction Hash:

0x2806de6646e8a196adfdd28b95e7f9d487a5333d7de3a80a414a1dca3364f8ae
(?) Status:

```
Success
```

(?) Block:

- 12359213 5055747 Block Confirmations
(?) Timestamp:
© 763 days 9 hrs ago (May-03-2021 05:06:41 AM +UTC)


## \& Transaction Action:

- Sale: 1 NFT On () OpenSea


## Sponsored:

(3) From:
() 0

Oxtay.ethInteracted With (To):
0x7Be8076f4EA4A4AD08075C2508e481d6C946D12b (OpenSea: Wyvern Exchange v1)
$\llcorner$ Transfer 0.0245 ETH From OpenSea: Wyvern Exchang... To OpenSea: Wallet
Transfer 0.4655 ETH From OpenSea: Wyvern Exchang... To 0xdF36E5...5986fbBF

ERC-721 Tokens Transferred:
ERC-721 Token ID [5256] BoredApeYach... (BAYC)
From 0xdF36E5...5986fbBF To 0xe241be...690ae924
(3) Value:
0.49 ETH © \$ $\$ 1,681.78$
(?) Transaction Fee:
0.009188205 ETH \$17.16

## Gas Price:

39 Gwei (0.000000039 ETH)

## Ether Price:

## \$3,432.21 / ETH

## © Gas Limit \& Usage by Txn:

273,242 | 235,595 ( $86.22 \%$ )

## Other Attributes:

Nonce: 25 Position In Block: 97

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

MethodID: 0xab834bab
[0](000000000000000000000000000000000000000000000000000000000000000f): 0000000000000000000000007be8076f4ea4a4ad08075c2508e481d6c946d12b

View Input As $\checkmark$
Decode Input Data

## More Details:

- Click to show less


## © Private Note:

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

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

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

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Commissioner of Oaths in and for Ontario


## BORED APE KENNEL CLUB ADOPTION DRIVE

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

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


## LIMITED-TIME ONLY

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

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

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

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


## CHARITABLE CONTRIBUTIONS

The BAKC collection currently has a $2.5 \%$ royalty fee associated with secondary sales on OpenSea.
BAKC launched on 6/18/22; all royalties for the first 6 weeks were donated to animal charities, allowing us to donate over $\$ 7 \mathrm{M}$ to Organgutan Outreach, Friends of Bonobos, Wright Way Rescue, and Wolf Conservation Center.

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

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.

## FAQ

What was the inspiration behind the Bored Ape Kennel Club?

Will you be releasing more dogs after this?

Why didn't you make these profile pictures?


GET ON THE LIST

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

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Commissioner of Oaths in and for Ontario


## Bored Ape Chemistry Club e

| By Yugatabs 0 |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Unique items 3 －Total items 535 －Created Aug 2021 －Creator earnings 2．5\％－Chain Eth |  |  |  |  |  |  |
| Bored Ape Chemistry Club consists of 10，000 Mutant Serums，to be airdropped to all Bored |  |  |  |  |  |  |
| See more v |  |  |  |  |  |  |
| 58,1 <br> total $y$ |  | $17.25 \text { ETH }$ <br> floor price | 3．1337 WETH <br> bost offer | $67 \%$ <br> unted | $273$ <br> owners | 51\％ <br> unique owners |
| Items | Analytics | Activity |  |  |  |  |

Price low to high $\checkmark$ 覀 田 煰

| Status |  | $\checkmark$ | C 3 items |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Owner |  | $\checkmark$ |  |  |  |
| Price |  | $\checkmark$ |  |  |  |
| Quantity |  | $\checkmark$ |  |  |  |
| Currency |  | $\checkmark$ |  |  |  |
|  |  |  | M1 Mutant Serum | M2 Mutant Sorum | Mega Mutant Serum |
| Attributes |  |  | 17.25 ETH | 27.8969 ETH |  |
|  |  |  | （ast sale：17．770 ETH | Lost tale： 30 WETH | tast saie： sel |
| Serum Type | 3 | $\checkmark$ |  |  |  |

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


Commissioner of Oaths in and for Ontario


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


Commissioner of Oaths in and for Ontario

## APECOIN IS FOR THE WEB3 ECONOMY.

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

## THE APE FOUNDATION

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

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

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

## THE DAO

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

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

## THE BOARD

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

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## 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\%* <br> 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:

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


## 8\%

## BAYC FOUNDERS

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

80,000,000 tokens to founders of Yuga Labs
Initial lock-up for 12 months, then 2,222,222.22 unlocked per month for 36 months

## APECOIN CLAIMING FOR BAYC AND MAYC HOLDERS

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

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

```
Mutant Ape only
2,042 tokens
```

Bored Ape + Kennel Club 10,950 tokens (token IDs do not need to match)
Mutant Ape + Kennel Club 2,898 tokens
(token IDs do not need to match)

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


## HOW IT WORKS

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

- initiating the BAYC/MAYC/BAKC claim period
- ending the claim period 90 days after launch
- taking ownership of all unclaimed APE tokens at the end of the claim period
- transferring these unclaimed tokens to the Coinbase Custody wallets that constitute the Ecosystem Fund

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

## USE THE NFT CHECKER

## APE FOUNDATION IP

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

## FAQ

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

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


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

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

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

## HOW WAS THE FOUNDATION BOARD SELECTED?

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

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

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

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

## WHAT ROLE DOES YUGA LABS PLAY IN ALL OF THIS?

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

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

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

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


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

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

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

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

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

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Commissioner of Oaths in and for Ontario

## THEOTHERSDELITEPAPER



WHITISTHISLITEPRPIRT


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

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

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

## WHIT IS OTHERSDIE?



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 $\mathrm{M}^{2}$. 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.

## WHITIS PHIASEI?

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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).

## PIII|ITIES

## Nin裣?



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.


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.

## 



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.



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.

## 

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-huildinchavengesrbeen done before in the digital space. To ensure the besi, playtest at huge scale with Voyagers, trying out new systems, content and mechanics, and pushing Otherside's technology to its limits together.

## DFINE GODITENT NODERATION

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.

## 

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 Staneofthis_experience in accordance with the rules will be eligible to recel entives 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.

## FIRPT TAIP

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 COITX

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

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

## TIIE OITM



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 Vovaqerctopether, so to make sure everything works properly with needs to be rules we can all follow - 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 $\mathrm{M}^{2}$ 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 $\mathrm{M}^{2}$ metaverse network project, and any outside project that adopts this standard.

## 



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 blıpmrints 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 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.

## 



CROWD networking \& Renoering


CROWD \& SPATIAL AUOYO


ACCESS FROM ROH DEUICE

Otherside will utilize Improbable's $\mathrm{M}^{2}$ 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 \& Renderina ${ }^{\text {Hampatat thousands of people come }}$ 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.


##  RETDINIIG

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

We've partnered with Improbabléc M ${ }^{2}$ Platfarm, which, since 2020, has publicly demonstrated their sology enabling thousands of players to participate in events such as Scavengers ScavLab and the AleXa Concert. By cleverly optimizing network traffic and developing a new kind of rendering system, Morpheus has already blown away records for in-room concurrency while maintaining more than 30 frames per second and high-fidelity graphics.

Specifically, leveraging Morpheus offers...

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

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

## GHIIIINE: BROWN AODID

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.

Built to handle thousands of inputauriostrazms, and thousands of rendered spatial output strean $\mid, 1$ sation supports distance attenuation, air absorption, occlusion, voice projection, head muffling. Specifically:

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


## 

There are a limited number of potential players that have highperformance 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: STREANIME TEBHNOLOOH FOR ALL PLITFOMMS

The $\mathrm{M}^{2}$ 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.

## सuঞar



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.

## IPEPOIII

## सи丬!



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.

## 

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!

## WHIISTVIURI

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

Meebits, shaping web3 through storytellipo exneriences, and community. For more information, visit yuga.con wi ewo alabs.io.

## WHO IS IWPROBAIETE

## IUPDOBBEIE

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.

## 

To bring interconnected virtual worlds like Otherside to life, Improbable established $\mathrm{M}^{2}$ (MSquared) and opened the $\mathrm{M}^{2}$ Network to help companies create better Metaverse experiences. $\mathrm{M}^{2}$ 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 M ${ }^{2}$ Network.

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$$



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

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


Commissioner of Oaths in and for Ontario


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

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## BONEHEADS

@BONEHEADS
PENDING... •• \#BONEHEADSFOREVER
( ) opensea.io/collection/bon... Joined May 2021
0 Following $\mathbf{8 , 3 5 4}$ Followers

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

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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

EXPERIENGED INVESTORS, AND A CLEARIY DEFINED
 TO THE LEVEL OF EFFORT, QUALITY, FUNDING SPENT TO DATE, AND TO THE FUNDING THAT IS REQUIRED FOR US TO DELIVER ON OUR VISION AND ROADMAP - WE DO NOT SEE THIS AS A "QUICK" WAY TO MAKE MONEY OUR GOAL IS NOT TO MERELY BUILD HYPE AND SELL OUT IN 6 HOURS (ALTHOUGH THAT WOULD BE NICE), WHICH IS WHY WE ELECTED TO DO A SURPRISE DROP. MOST ~10K TOKEN PROJECTS HAVE SOLD OUT WITHIN THE FIRST ~6HRS AND ENDED UP IN THE HANDS OF ~1.5K WALLETS. BY PRICING OUR \#BONEHEADS A LITTLE BIT HIGHER THAN WHAT THE COMMUNITY IS USED TO, WE BELIEVE THAT THIS WILL GIVE MORE INDIVIDUALS

AN OPPORTUNITY TO PARTICIPATE AND JOIN OUR BURGEONING COMMUNITY, AND IT WILL GIVE US THE NECESSARY RUNWAY FOR ATTRACTING TALENT AND BUILDING OUT OUR PLATFORM. WE'RE HERE FOR THE LONG HAUL. OUR GOAL IS TO CREATE A MULTIMEDIA

FRANCHISE SPANNING THE RAPIDLY EVOLVING PHYSICAL AND DIGITAL DESIGN + FASHION + GAMING + ART SPECTRUM AND ITERATE UNTIL WE'VE DEVELOPED SOMETHING THAT IS TRULY UNIQUE AND IMAGINATIVE.

WE WILL BE PUTTING RELENTLESS FOCUS INTO DEVELOPING THE BACKBONE OF OUR BUSINESS, WHICH WILL BE A PHYSICAL + DIGITAL IDENTITY FASHION AND GAMING WEARABLES NFT PLATFORM FROM WHICH YOU WILL BE ABLE TO MINT AND FORGE DIGITAL + PHYSICAL COLLECTIBLES. CONSIDER THE \#BONEHEADS AS THE CURRENT MANNEQUINS. INTEROPERABILITY

# ACROSS CHAINS IS SOMETHING THAT WE WILL WORK  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 -

BONEHEADS. FROM INCEPTION, \#BONEHEADS HAS

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.

## \% ? 0 mintabonehead

 WHY ARE WE DIFFERENT?OUR PRIORITY IS TO DEVELOP A PHYSICAL + DIGITAL IDENTITY PLATFORM. WHAT DOES THIS MEAN? THIS MEANS THAT YOU WILL BE ABLE TO HAVE TWO SELF(S).

A PHYSICAL SELF, AND A DIGITAL SELF. MOST DEVELOPERS ARE WORKING ON THE DIGITAL ASPECT. INCREDIBLE METAVERSE APPLICATIONS AND USE CASES ARE BEING DEVELOPED. PEOPLE WANT TO STUNT IN DIGITAL LIFE, AVATAR ADOPTION AND EXPRESSION IS HERE, FOR GOOD, BUT WE HAVE AN INSIGHT THAT MOST DEVELOPERS ARE SEEMINGLY OVERLOOKING: PEOPLE ALSO WANT TO STUNT IN PHYSICAL LIFE. THAT WILL NEVER CHANGE. ONLY A

HANDFUL OF DEVELOPERS ARE FOCUSING ON CREATING A PRODUCT/BRAND THAT FACILITATES A SYMBIOTIC RELATIONSHIP BETWEEN YOUR DIGITAL AND PHYSICAL IDENTITY. OUR BUSINESS MODEL IS MINT + FORGE. YOU WILL BE ABLE TO FORGE PHYSICAL COLLECTIBLES (GRAILS, CLOTHING, ACCESSORIES, AND MORE) OF THE DIGITAL REPRESENTATIONS THAT WE RELEASE THROUGH NFTS THROUGH THE CABANA. ONLY TOKEN HOLDERS WILL BE ABLE TO PARTICIPATE IN THE EXCLUSIVE DROPS THAT WE RELEASE. WE DON'T JUST PLAN ON GIVING YOU THE MOST ROBUST DIGITAL EXPERIENCE, BUT WE'RE ALSO GOING TO TURN YOU

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

SHIFTING CUITURE, ONE PIXEL AT A TIME. BONEHEADS
 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

## ANGULAR ENGINEER. POSITION 3: SENIOR PRODUCT  LEAD.

# \#BONEHEADSFOREVER 

## 3n MINT A BONEHEAD

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

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## 42 ? 2 CODE-BASED DIGITALS

5\% COMMUNITY WALLET<br>3D BONEHEADS<br>DYNAMIC LANDSCAPES<br>BoMA (BUNKER OF MODERN ART) = GALLERY<br>CLAIMABLES<br>BABY BONES<br>SPACEHEADS (ALIEN INVASION)<br>BONING = BREEDING<br>THE SPA = LIQUIDITY POOL<br>CONSUMER-FACING AVATAR APP<br>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

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

## 多 ? 0 元

 PHYISICAL COLLECTIBLES
## 5FT LIFESIZE SCULPTURES <br> 2.4 FT SCULPTURES <br> 4FT AREA RUGS <br> PLAYING CARDS <br> BOXING GLOVES <br> TRUCKER HATS <br> MINI BACKPACKS <br> PUFFER JACKETS <br> BIKER JACKETS <br> BOMBER JACKETS <br> T-SHIRTS <br> HOODIES <br> SLIDES <br> SOCKS



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

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- 4. 

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## \% ? 0 mintabonehead

1- LIFETIME MEMBERSHIP

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

## 2 - EXCLUSIVE FORGING

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

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3 \text { - CLAIMABLES }
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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)

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. \#BONEHEADSFOREVER

## 5 - BEHIND THE SCENES

TOKEN HOLDERS WILL GET EXCLUSIVE BEHIND-THESCENES 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

## 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

## 42 MINT A BONEHEAD

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

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RELEASE DATE?

WERE DOING A SURPRISE DROP AND THE

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

## HOW MANY WILL BE AVAILABLE IN THE PRESALE?

THERE WILL BE 9,500 \#BONEHEADS AVAILABLE DURING THE PRESALE. 200 ARE RESERVED FOR COMMUNITY GIVEAWAYS, BOUNTIES, GROWTH INCENTIVES, AND \#BONEGANG EMPOWERMENT. 200 ARE RESERVED FOR THE CURRENT DEVELOPMENT TEAM ( 12 EMPLOYEES),

THE FOUNDERS, AND OUR INVESTORS. 100 ARE RESERVED IN CONSIDERATION FOR FUTURE HIRES, INVESTORS, AND COLLABORATORS. THERE WILL BE A 5\% ROYALTY ON SECONDARY SALES, THIS WILL GO TOWARDS ESTABLISHING A COMMUNITY-POWERED CREATOR FUND, COMMUNITY BOUNTIES, AS WELL AS HIRING THE BEST DEVELOPERS.

## \% ? 0 mintabonehead WHERE CAN I PURCHASE A \#BONEHEAD NFT?

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

## HOW MUCH WILL IT COST TO BUY A \#BONEHEAD?

DUE TO THIS BEING A SURPRISE DROP, THE PRICE WILL NOT BE REVEALED UNTIL THE SMART CONTRACT HAS
been deployed and the minting has been ACTIVATED ON OUR WEBSITE. THERE WILL NOT BE A BONDING CURVE.

## \% ? 0 \% mirabonehead HOW MANY \#BONEHEADS CAN I BUY?

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

## HOW WAS THE PRICE DETERMINED?

THIS IS NOT YOUR RUN-OF-THE-MILL HALF-BODIED ANIMAL COLOURING-BOOK CATALOG PROJECT (NOOFFENCE, WE LOVE YOU). NOT ALL PROJECTS ARE CREATED EQUAL. THIS IS A REAL BUSINESS, WITH EXPERIENCED INVESTORS, AND A CLEARLY DEFINED OBJECTIVE. \#BONEHEADS ARE PRICED IN ACCORDANCE TO THE LEVEL OF EFFORT, QUALITY, FUNDING SPENT TO DATE, AND TO THE FUNDING THAT IS REQUIRED FOR US TO DELIVER ON OUR VISION AND ROADMAP - WE DO

NOT SEE THIS AS A "QUICK" WAY TO MAKE MONEY =

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 ~11.5K 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.

## 

BU'I ISN'T THAT STILL EXPENSIVE?

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

## \% ? 0 \% mitabonehead WHY DON'T YOU JUST MAKE THE MAX SUPPLY PER TX LOWER?

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

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

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

## \% ? 9 mintabonehead WHEN WILL THE \#BONEHEADS BE REVEALED?

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

## WILL YOU BE DROPPING PHYSICAL COLLECTIBLES?

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

## 

DOES OWVNING A \#BONEHEAD TOKEN GIVE ME ANY EXCLUSIVE ACCESS?

YES. PLEASE VISIT BENEFITS TO LEARN MORE INFORMATION REGARDING THIS TOPIC.

## IS \#BONEHEADS JUST AN ARTBASED 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

WIL ALIOW YOU TO MAKE AN AVATAR WITH ALL THE
 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.

HOW ARE YOU DIFFERENT?

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

## WHY DID YOU CREATE THIS?

We care. We care about technology, and we care about fashion. We care about engineering, and we care about design. We like nice things, and we like a clean and immersive user experience. We care about most people ( $j k$, all), and we want to create the best brand, app, platform, art, and digital experience possible for them to
enjoy and cultivate a community around $==$ and If in the
 themselves and find confidence in their distinctiveness to be able to share more of their authentic selves, then we can die happily ever after.

# \#BONEHEADSFOREVER 

## 47 MINT A BONEHEAD

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

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

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

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(?) Transaction Hash:
0xf291710af98989f289b36566a943a9175d2b5f68c95d1ff0f2b16857957f50e6
(?) Status: $\bigcirc$ Success
(3) Block:

- 130641334351244 Block Confirmations
(?) Timestamp:
(1) 653 days 20 hrs ago (Aug-20-2021 07:58:23 PM +UTC)


## \& Transaction Action:

- Mint 15 of \& BONEHEADS... (BONE...)


## (?) Sponsored:

(?) From:
() mandyxthejungle.ethInteracted With (To):
0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2 (BONEHEADS: BONE Token)
(?) ERC-721 Tokens Transferred: 15

ERC-721 Token ID [513] (3) BONEHEADS... (BONE)
From Null: 0x000...000 To 0x1531b8...dB5cc255
ERC-721 Token ID [514] ? BONEHEADS... (BONE)
From Null: 0x000...000 To 0x1531b8...dB5cc255
$\approx$ Scroll for more
(?) Value:

- 1.5 ETH (1) \$4,929.75
(?) Transaction Fee:
2.6503275 ETH \$4,733.99

Gas Price:
1,500 Gwei (0.0000015 ETH)

More Details:

+ Click to show more


## (?) Private Note:

To access the Private Note feature, you must be Logged In
:Q: A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

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

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


Commissioner of Oaths in and for Ontario

## (?) Transaction Hash:

0x9fb87bbd90bf1f7f308066e05ddd976bd3acf176b3aac4793d392c475bf8a817
(?) Status: © Success
(3) Block:

- 130643134351080 Block Confirmations
(?) Timestamp:
(1) 653 days 19 hrs ago (Aug-20-2021 08:34:52 PM +UTC)


## \& Transaction Action:

- Mint 10 of 8 BONEHEADS... (BONE...)

Sponsored:
(3) From:

0x5bB4fdbC9dd62fF5317fbd0C17a07cbdDf82Db14
(?) Interacted With (To):
0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2 (BONEHEADS: BONE Token)$\bullet$ ERC-721 Tokens Transferred: 10

From Null: 0x000...000 To 0x5bB4fd...Df82Db14
ERC-721 Token ID [9991] 3. BONEHEADS... (BONE)
From Null: 0x000...000 To 0x5bB4fd...Df82Db14
ERC-721 Token ID [9992] 3 BONEHEADS... (BONE)
From Null: 0x000...000 To 0x5bB4fd...Df82Db14
ERC-721 Token ID [9993] 3) BONEHEADS... (BONE)

From Null: 0x000...000 To 0x5bB4fd...Df82Db14
ERC-721 Token ID [9994] 3 BONEHEADS... (BONE)
From Null: 0x000...000 To 0x5bB4fd...Df82Db14
ERC-721 Token ID [9995] 3 BONEHEADS... (BONE)
$\approx$ Scroll for more
(3) Value:

- 1 ETH © \$ $\mathbf{3}, 286.50$
(?) Transaction Fee:
0.051294583325028945 ETH \$92.27
(?) Gas Price:
43.164723481 Gwei ( 0.000000043164723481 ETH)


## More Details:

+ Click to show more


## (?) Private Note:

To access the Private Note feature, you must be Logged In
:Ó: A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

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

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

- 4. K

Commissioner of Oaths in and for Ontario

## Transaction Details

| Overview Logs (1) State | Comments |
| :---: | :---: |
| (3) Transaction Hash: | 0x4a95f9536fafb75f29b0256bb3b4889669f3c92bde47a3ddfce95f1d0a4babf5 ㄴ |
| (3) Status: | - Success |
| (3) Block: | -13064254 3465319 Block Confirmations |
| (3) Timestamp: | (1) 529 days 1 hr ago (Aug-20-2021 08:23:38 PM +UTC) । (i) Confirmed within 30 secs |
| 洞 Transaction Action: | - Mint of 3 BONEHEADS (BONE). To 0xe241bedb5a6270c5a96219a52f59c7c3690ae924 - 1 of Token ID [8669] |
| (3) Sponsored: |  |
| (3) From: | () Oxtay.eth [ |
| (3) Interacted With (To): | Contract 0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2 (BONEHEADS: BONE Token) - - - |
| (3) ERC-721 Tokens Transferred: | - From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8669] B BONEHEADS (BONE). |
| (3) Value: | 0.1 Ether (\$328.65) |
| (3) Transaction Fee: | 0.012418157662848435 Ether (\$19.50) |
| (3) Gas Price: | 0.000000084492782095 Ether (84.492782095 Gwei) |
| (3) Ether Price: | \$3,286.50 / ETH |
| Click to see More_ $\downarrow$ |  |
| (3) Private Note: | To access the Private Note feature, you must be Logged In |

浱 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

(3) Transaction Hash:
(3) Status:
(?) Block:
(?) Timestamp:

## 源: Transaction Action:

0x4d736409ecb84f93a42ba8328cd9220590729196e57ac6bf402318db06e9fa8e 나
© Success

130642633465317 Block Confirmations
(1) 529 days 1 hr ago (Aug-20-2021 08:25:45 PM +UTC) | (i) Confirmed within 21 mins:33 secs

- 1 of Token ID [8914]
- 1 of Token ID [8915]
- 1 of Token ID [8916]
- 1 of Token ID [8917]
- 1 of Token ID [8918]
- 1 of Token ID [8919]
- 1 of Token ID [8920]
- 1 of Token ID [8921]
- 1 of Token ID [8922]
- 1 of Token ID [8923]

Scroll for more च
(?) Sponsored:
(3) From:
(3) Interacted With (To):

## () Oxtay.eth 니

Contract 0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2 (BONEHEADS: BONE Token)
(3) ERC-721 Tokens Transferred: ${ }^{(1)}$ From Null Address: 0x00... To 0xe241bedb5a627... (15 ERC-721 Transfers found)

For ERC-721 Token ID [8909] B BONEHEADS (BONE)
From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8910] 3 BONEHEADS (BONE)

- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8911] B BONEHEADS (BONE).
- From Null Address: 0x00... To 0xe241bedb5a627.. For ERC-721 Token ID [8912] B BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627. For ERC-721 Token ID [8913] B BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8914] 3 BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8915] B BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627.. For ERC-721 Token ID [8916] BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8917] B BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8918] B BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627..
- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8920] 3 BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [8921] 3 BONEHEADS (BONE).
-From Null Address: 0x00... To 0xe241bedb5a627...

| $\underline{\text { Overview }} \quad \underline{\text { Logs (15). State }}$ Comments |  |
| ---: | :--- |
|  | $\bullet$ From Null Address: 0x00... To 0xe241bedb5a627... |

\$3,286.50 / ETH
(?) Gas Limit \& Usage by Txn:
2,650,327 | 1,769,685 (66.77\%)
(3) Gas Fees:
(?) Burnt \& Txn Savings Fees:

## (?) Other Attributes:

(?) Input Data:
Function: mint(uint256 numberOfBoneheads)

## MethodID: 0xa0712d68

Click to see Less_ $\uparrow$

## (?) Private Note:

To access the Private Note feature, you must be Logged In
: A A transaction is a cryptographically signed instruction from an account that changes the state of the blockchain. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

## Transaction Details

(?) Transaction Hash:
(?) Status:
(3) Block:
(?) Timestamp:

㳚 Transaction Action:

0xe2d7dbebd439f9b13975242f8eb26134191b5256a40bfaefe5403245cbbb8014

- Success
- 130642693465325 Block Confirmations

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

- Mint of 3 BONEHEADS (BONE). To 0xe241bedb5a6270c5a96219a52f59c7c3690ae924
- 1 of Token ID [9086]
- 1 of Token ID [9087]
- 1 of Token ID [9088]
- 1 of Token ID [9089]
- 1 of Token ID [9090]
- 1 of Token ID [9091]
- 1 of Token ID [9092]
- 1 of Token ID [9093]
-1 of Token ID [9094]

Scroll for more च
(?) Sponsored:
(3) From:
(3) Interacted With (To):
(3) ERC-721 Tokens Transferred: (10 ERC-721 Transfers found)
() Oxtay.eth

Contract 0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2 (BONEHEADS: BONE Token)

## (3) Value:

$$
1 \text { Ether } \quad(\$ 3,286.50)
$$

(3) Transaction Fee: 0.081254751856286565 Ether (\$127.82)
(?) Gas Price:
0.0000000068215667997 Ether (68.215667997 Gwei)
(?) Ether Price:
(?) Gas Limit \& Usage by Txn:
(3) Gas Fees:
(?) Burnt \& Txn Savings Fees:
(?) Other Attributes:
Txn Type: 2 (EIP-1559) Nonce: 345 Position In Block: 62
(?) Input Data:
Function: mint(uint256 numberOfBoneheads)

MethodID: 0xa0712d68
[0](000000000000000000000000000000000000000000000000000000000000000f): 000000000000000000000000000000000000000000000000000000000000000a

Click to see Less_ $\uparrow$
(3) Private Note: To access the Private Note feature, you must be Logged In

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

## Transaction Details

(?) Transaction Hash:
(3) Status:
(3) Block:
(?) Timestamp:

㳚 Transaction Action:

0xc18eff4a50b59c953585cc540aa061d17470fec28275c799b3f9fe9d7d0fad6f L

- Success
- 130642693465329 Block Confirmations
(1) 529 days 1 hr ago (Aug-20-2021 08:27:17 PM +UTC) | (i) Confirmed within 5 mins:56 secs
- Mint of 3 BONEHEADS (BONE). To 0xe241bedb5a6270c5a96219a52f59c7c3690ae924
- 1 of Token ID [9096]
- 1 of Token ID [9097]
- 1 of Token ID [9098]
- 1 of Token ID [9099]
- 1 of Token ID [9100]
- 1 of Token ID [9101]
- 1 of Token ID [9102]
- 1 of Token ID [9103]
- 1 of Token ID [9104]

Scroll for more च
(?) Sponsored:
(3) From:
(3) Interacted With (To):
(3) ERC-721 Tokens Transferred: (10 ERC-721 Transfers found)

## () Oxtay.eth 니

Contract 0xf9c2874a88ed6c5a8115cb5693996c8fe22b3ce2 (BONEHEADS: BONE Token)

- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [9096] B BONEHEADS (BONE).

From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [9097] B BONEHEADS (BONE)

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

For ERC-721 Token ID [9098] B BONEHEADS (BONE)

- From Null Address: 0x00... To 0xe241bedb5a627.. For ERC-721 Token ID [9099] 3 BONEHEADS (BONE)
- From Null Address: $0 \times 00 \ldots$ To $0 x e 241$ bedb5a627... For ERC-721 Token ID [9100] B BONEHEADS (BONE)
- From Null Address: 0x00... To 0xe241bedb5a627... For ERC-721 Token ID [9101] B BONEHEADS (BONE).
- From Null Address: 0x00... To 0xe241bedb5a627.. For ERC-721 Token ID r91021 B BONFHFADS (BONF)

Overview Logs(10) State Comments
(NIT)
(NIT)

(NIFT)

For ERC-721 Token ID [9103] BONEHEADS (BONE)

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

| (?) Value: | 1 Ether $(\$ 3,286.50)$ |
| :--- | :--- |
| (?) Transaction Fee: | 0.112106717284648255 Ether $(\$ 176.51)$ |
| ? Gas Price: | 0.000000094116767719 Ether (94.116767719 Gwei) |
| ? Ether Price: | $\$ 3,286.50 / \mathrm{ETH}$ |

## Click to see More_ $\downarrow$

(3) Private Note:
To access the Private Note feature, you must be Logged In

[^0]This is Exhibit "AA" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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


Commissioner of Oaths in and for Ontario
(3) Transaction Hash:

0xd8bfa15362c29c79c80adb54a8a66286c6b6b98eebc7880f8be4c58e7c34677f
(3) Status:

```
Success
```

(?) Block:

- 130643774351058 Block Confirmations
(?) Timestamp:
(1) 653 days 19 hrs ago (Aug-20-2021 08:47:36 PM +UTC)
(?) Sponsored:
(3) From:
() boneheads.eth (BONEHEADS: Deployer)
(?) To:
0xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2 (BONEHEADS: BONE Token)
Transfer 950.5 ETH From BONEHEADS: BONE Token To 0xb1FA95...158aC1A3
(3) Value:
$\downarrow 0$ ETH (\$0.00)
(?) Transaction Fee:
0.001478511509368082 ETH $\$ 2.68$

Gas Price:
42.704393431 Gwei (0.000000042704393431 ETH)

## Gas Limit \& Usage by Txn:

52,782 | 34,622 (65.59\%)

## (?) Gas Fees:

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

## © Burnt \& Txn Savings Fees:

```
Burnt: 0.001150741198281066 ETH ($2.09) Txn Savings: 0 ETH ($0.00)
```


## Other Attributes:

Txn Type: 2 (EIP-1559) Nonce: 9 Position In Block: 140

## (?) Input Data:

Function: withdraw()

MethodID: 0x3ccfd60b

View Input As $\checkmark$

More Details:
— Click to show less

## (?) Private Note:

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

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

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

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


Commissioner of Oaths in and for Ontario

## Contract 0xb1FA950B59eE7e228e5f666Bf33d64E8158aC1A3

|  |  | 3 More $\checkmark$ |
| :---: | :---: | :---: |
| Overview | Additional Info |  |
| eth balance | PRIVATE NAME TAGS |  |
| 0 ETH | + Add |  |
| ETH VALUE IN USD | CREATOR |  |
| \$0.00 | BONEHEADS: Deployer at txn 0xc25aded97f965239... |  |
| TOKEN HOLDINGS |  |  |
| - |  |  |
| Other Info |  |  |
| MULTICHAIN ADDRESSES |  |  |
| 1 address found via Blockscan |  |  |


| Parent Txn Hash | Block | Age | From |  | To | Value |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 0x409036af3e00dc32... | 13064418 | 537 days 16 hrs ago | ®0xb1FA95...158aC1A3 [ | $\rightarrow$ | BONEHEADS: Deployer [0](000000000000000000000000000000000000000000000000000000000000000f) | 807.925 ETH |
| 0x1eaa32ba5f1c9dbe... | 13064408 | 537 days 16 hrs ago | G0xb1FA95...158aC1A3 | $\rightarrow$ | () westcoastnft.eth | 95.05 ETH |
| 0xc0976f70fcb07ef2f... | 13064397 | 537 days 16 hrs ago | © 0xb1FA95...158aC1A3 | $\rightarrow$ | () ${ }^{\text {no-op.eth }}$ | 47.525 ETH |
| 0xd8bfa15362c29c79... | 13064377 | 537 days 16 hrs ago | ® BONEHEADS: BONE T... | $\rightarrow$ | 0xb1FA95...158aC1A3 [] | 950.5 ETH |



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

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


Commissioner of Oaths in and for Ontario

## Transaction Details

$\square$ >
(?) Transaction Hash:
0x81f5d07bb7051cc6090f71577782b982ba04ec7026d5f65c5124da835ccb0de9
(2) Status:

```
Success
```

(?) Block:

- 130649173712403 Block ConfirmationsTimestamp:
(1) 563 days 16 hrs ago (Aug-20-2021 10:33:19 PM +UTC) | © Confirmed within 30 secs
(?) Sponsored:


## (?) From:

0x9B814233894Cd227f561B78Cc65891AA55C62Ad2 (OpenSea: Royalties Distributor)
(3) To:

0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)
(3) Value:

- 9.921329954401314724 ETH
(3) Transaction Fee:
0.000756 ETH $\$ 1.18$
(3) Gas Price:

36 Gwei (0.000000036 ETH)

More Details:

+ Click to show more
(?) Private Note:
To access the Private Note feature, you must be Logged In
© $\because=$ A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

Transaction Details $<$ >
(3) Transaction Hash:

0xd00912a7a757cf6c2a15f7f74de2c2dd2e7d885cf6dc864a0ed183ec29811b7b
(3) Status:

Success
(?) Block:
( 130698883707433 Block Confirmations
(?) Timestamp:
(1) 562 days 22 hrs ago (Aug-21-2021 05:04:59 PM +UTC) | © Confirmed within 30 secs
(3) Sponsored:
(?) From:
0x9B814233894Cd227f561B78Cc65891AA55C62Ad2 (OpenSea: Royalties Distributor)
(?) To:
0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)
(3) Value:

- 5.467952229079118272 ETH
(3) Transaction Fee:
0.001281 ETH $\$ 2.00$
(3) Gas Price:

61 Gwei (0.000000061 ETH)

More Details:

+ Click to show more
(3) Private Note:

To access the Private Note feature, you must be Logged In
:Q: A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.
(?) Transaction Hash:
0x1cc486a76705ec6bfff002d30274c6659b001a0c5b37a583e83c559cf72e4a15
(3) Status:

Success
(?) Block:
( 130726693704652 Block Confirmations
(?) Timestamp:
(1) 562 days 12 hrs ago (Aug-22-2021 03:24:03 AM +UTC) | $\begin{gathered}\text { © } \\ \text { Confirmed within } 30 \text { secs }\end{gathered}$
(3) Sponsored:
(?) From:
0x9B814233894Cd227f561B78Cc65891AA55C62Ad2 (OpenSea: Royalties Distributor)
(?) To:
0x8COfF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)
(3) Value:

- 1.696610278297943994 ETH
(3) Transaction Fee:
0.000672 ETH $\$ 1.05$
(3) Gas Price:

32 Gwei (0.000000032 ETH)

More Details:

+ Click to show more
(3) Private Note:

To access the Private Note feature, you must be Logged In
© $\because=$ A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

Transaction Details < $>$
(?) Transaction Hash:
0x963b1bd68394732923c51ddc79c673f178f3f7c804d4579ac09101976990f9b4
(3) Status:
Success
(?) Block:
( 130985083678821 Block ConfirmationsTimestamp:558 days 12 hrs ago (Aug-26-2021 03:18:33 AM +UTC) | ${ }^{\top}$ Confirmed within 30 secsSponsored:

## (?) From:

0x9B814233894Cd227f561B78Cc65891AA55C62Ad2 (OpenSea: Royalties Distributor)
(?) To:
0x8COfF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)
(3) Value:

- 7.737244200868120506ETH © \$ $23,936.09$
(3) Transaction Fee:
0.001806 ETH $\$ 2.81$
(3) Gas Price:

86 Gwei (0.000000086 ETH)

More Details:

+ Click to show more
(3) Private Note:

To access the Private Note feature, you must be Logged In
:Q: A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

Transaction Details < >
(?) Transaction Hash:
0x9b41519fb5ad82fd4e32fa05961eee8842b1ab6bf4fd0dccccdd14af2399b132
? Status:
Success
(?) Block:

- 133650423412296 Block Confirmations
(?) Timestamp:
() 517 days 4 hrs ago (Oct-06-2021 11:09:57 AM +UTC) | ©亍 Confirmed within 30 secs
? Sponsored:
(?) From:
0x18c2E87D183C5338A9142f97dB176F3832b1D6DE (OpenSea: Payments)
(?) To:
0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)
(?) Value:
* 2.273063944999999383 ETH
? Transaction Fee:
0.002251056607464 ETH $\$ 3.52$
(?) Gas Price:
107.193171784 Gwei (0.000000107193171784 ETH)

More Details:

+ Click to show more
(3) Private Note:

To access the Private Note feature, you must be Logged In
:Q A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

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

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

```
ivybone ceask583ni8
```

@everyone

BONEGANG,

WELL BE BACK ON MONDAY. DONT LET THE FUD GET TO YOU. NEW WAVES NEW PLAYS. REAL EYES REALIZE REAL EYES.

THANK YOU,
\#BONEHEADSFOREVER

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

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


Commissioner of Oaths in and for Ontario

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

Commissioner of Oaths in and for Ontario

```
BONESTAR @0xBONESTAR - Dec 31, 2021
```

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


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

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


Commissioner of Oaths in and for Ontario


## ZachXBT

@zachxbt

On-chain sleuth. Rug pull survivor turned 2D detective
© donations: zachxbt.eth Joined February 2015
1,374 Following $\quad \mathbf{3 9 9 . 6 K}$ Followers

This is Exhibit "AH" 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.t

Commissioner of Oaths in and for Ontario

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<br>288 Retweets 29 Quotes 1,325 Likes 56 Bookmarks

$\square$
ZachXBT @zachxbt•Jul 14, 2022 ...
2/ The project was launched by an anon team on August 20th 2021 with a supply of 10k NFTs and mint price of 0.1 ETH per NFT.

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


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 @zachxbt•Jul 14, 2022
5/ The rest was used to purchase NFTs such as BAYC, Crypto Punks, MAYC, Clone X, and more.

Ox8COfF426dFa77A87Be3729456D1D27fdC8F2DE5F

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

| こ Transtor | Borod Apo Yucht Club e Bored Ape Yacht Club | --- | 1 | MOMEHIARSS: | Inhtivatit | 5 monthe geg [4] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\stackrel{\text { 2 Transfor }}{ }$ | Bered Ape Yacht Club \& Bored Ape Yacht Club | --- | 1 | BONEHEADSS.- | 6thgiguaut |  |
| こ Tranafor | Bored Apt Yacht cinb e Bored Ape Yacht club | -- | 1 | Bonereadis: | gnhozyant | Pmontwoga |
| :- Transter | CIONE X-X TAKASFI MURAKAM Clonex \#3768 | -- | 1 | BONEHEADSS: | (0xHDEVAM | 5 montst ogo [8] |
| - Transter | CIONE X - X TAKASHI MURAKAMI Clonex \#19303 | --- | 1 | Bowentass:- | Bantrivaili | Smorimiage |
| Transter | CIONE X-X TAKASHII MURAKAME Clonex \#4959 | -- | 1 | gorlitabse | [renovain | 5 monthroge [if |

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

## BONEHEADS

## About BONEHEADS

## Unsubscribe

## Update Profile

You were subscribed to this list because:

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

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

3
โ】 3112
$1 / 1$ さ

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...

## Corporate History

## Corporate Name History

> 2021-08-26 to Present DMCB HOLD

## Certificates and Filings

## Certificate of Incorporation

2021-08-26

Q 2
〔】 5
116
$1 / 1$
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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．


13
さ】 16

187


ZachXBT＠zachxbt•Jul 14， 2022
10／Earlier this week＠0xTAY＿reached out to me to share they were looking to potentially start a class action lawsuit against the Boneheads team．

BONEHEADS＠BONEHEADS • Oct 2， 2021 so if this wasn＇t a rug then．．．what was it？best answer wins a BONEHEAD giveaway winner announced．．．like never？
5
〔】 15197
Ilı
さ

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**

# Join us in making the cryptoverse a safer place 

## Q |Search crypto address

www.chainabuse.com
chainabuse.com
ZachXBT's report on Chainabuse: Rug Pull Scam
Boneheads Rug Pull - NFT project launched August 2021 with a supply of 10,000 NFTs and a mint price of 0.1 ETH. The project mint...
Q 49
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O 295
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さ

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
— A.K
Commissioner of Oaths in and for Ontario

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


Commissioner of Oaths in and for Ontario

ZachXBT @zachxbt • Aug 27, 2022
Update: after my thread the team messaged me \& called it "FUD". They said everything would soon be delivered the week of 24th of Aug. Now here we are with the week over

How hard is it to deliver merch, have giveaways, \& airdrop a collection?

It's been over a year since launch


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


Commissioner of Oaths in and for Ontario


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


Commissioner of Oaths in and for Ontario


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
— 4.人
Commissioner of Oaths in and for Ontario


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.K
Commissioner of Oaths in and for Ontario

## BONEHEADS

## About BONEHEADS

Unsubscribe
or

## Update Profile

## You were subscribed to this list because:

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

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

Add us to your address book


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

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


Commissioner of Oaths in and for Ontario

Form 2
Initial Registered Office Address and First Board of Directors
Canada Business Corporations Act
(CBCA) (s. 19 and 106)

## Formulaire 2

Siège social initial et premier conseil d'administration
Loi canadienne sur les sociétés par actions (LCSA) (art. 19 et 106)

Corporate name
Dénomination sociale

## DMCB HOLDINGS INC.

2 Address of registered office
Adresse du siège social

## 12 Amber Place <br> Belleville ON K8P 0B5

3
Additional address
Autre adresse
Care of / À l'attention de: Ivan Avramenko
1034 County Road 3
Belleville ON K8N 4Z1
Members of the board of directors
Membres du conseil d'administration

Ivan Avramenko
12 Amber Place, Belleville ON
Resident Canadian
Résident Canadien K8P 0B5, Canada

Yes / Oui

5 Declaration: I certify that I have relevant knowledge and that I am authorized to sign this form.
Déclaration: J'atteste que je possède une connaissance suffisante et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par Ivan Avramenko

Ivan Avramenko
4169957010

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding $\$ 5000$ or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de $5000 \$$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

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

Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la Loi sur les renseignements personnels permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.

## Certificate of Incorporation

Canada Business Corporations Act

## Certificat de constitution

Loi canadienne sur les sociétés par actions

DMCB HOLDINGS INC.
Corporate name / Dénomination sociale

1329585-1
Corporation number / Numéro de société

I HEREBY CERTIFY that the above-named corporation, the articles of incorporation of which are attached, is incorporated under the Canada Business Corporations Act.

JE CERTIFIE que la société susmentionnée, dont les statuts constitutifs sont joints, est constituée en vertu de la Loi canadienne sur les sociétés par actions.


Raymond Edwards
Director / Directeur
2021-08-26
Date of Incorporation (YYYY-MM-DD)
Date de constitution (AAAA-MM-JJ)

## Canadă

Form 1<br>Articles of Incorporation<br>Canada Business Corporations<br>Act (s. 6)

Formulaire 1
Statuts constitutifs
Loi canadienne sur les sociétés par actions (art. 6)

Corporate name
Dénomination sociale
DMCB HOLDINGS INC.
The province or territory in Canada where the registered office is situated
La province ou le territoire au Canada où est situé le siège social
ON
The classes and any maximum number of shares that the corporation is authorized to issue
Catégories et le nombre maximal d’actions que la société est autorisée à émettre
The corporation is authorized to issue an unlimited number of common shares.
Restrictions on share transfers
Restrictions sur le transfert des actions
None

5
rimum and maximum number of directors
Nombre minimal et maximal d'administrateurs
Min. 1 Max. 10
6
Restrictions on the business the corporation may carry on
Limites imposées à l'activité commerciale de la société
None
Other Provisions
Autres dispositions
None
Incorporator's Declaration: I hereby certify that I am authorized to sign and submit this form.
Déclaration des fondateurs: J'atteste que je suis autorisé à signer et à soumettre le présent formulaire.
Name(s) - Nom(s) Original Signed by - Original signé par

Ivan Avramenko

Ivan Avramenko
Ivan Avramenko

[^1]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

$$
4, K
$$

Commissioner of Oaths in and for Ontario

## Certificate of Incorporation

Canada Business Corporations Act

## Certificat de constitution

Loi canadienne sur les sociétés par actions

Profitly Incorporated
Corporate name / Dénomination sociale

1102222-9
Corporation number / Numéro de société

I HEREBY CERTIFY that the above-named corporation, the articles of incorporation of which are attached, is incorporated under the Canada Business Corporations Act.

JE CERTIFIE que la société susmentionnée, dont les statuts constitutifs sont joints, est constituée en vertu de la Loi canadienne sur les sociétés par actions.


Virginie Ethier
Director / Directeur
2018-10-01
Date of Incorporation (YYYY-MM-DD)
Date de constitution (AAAA-MM-JJ)

## Canadå

Form 1<br>Articles of Incorporation<br>Canada Business Corporations<br>Act (s. 6)

Formulaire 1
Statuts constitutifs
Loi canadienne sur les sociétés par actions (art. 6)

## Corporate name

Dénomination sociale
Profitly Incorporated
La province ou le territoire au Canada où est situé le siège social
ON
The classes and any maximum number of shares that the corporation is authorized to issue Catégories et le nombre maximal d'actions que la société est autorisée à émettre The corporation is authorized to issue an unlimited number of common shares.

Restrictions on share transfers
Restrictions sur le transfert des actions
None

5
nimimum and maximum number of directors
Nombre minimal et maximal d'administrateurs
Min. 1 Max. 10
6
Restrictions on the business the corporation may carry on
Limites imposées à l'activité commerciale de la société
None
Other Provisions
Autres dispositions
None
Incorporator's Declaration: I hereby certify that I am authorized to sign and submit this form.
Déclaration des fondateurs: J'atteste que je suis autorisé à signer et à soumettre le présent formulaire.
Name(s) - Nom(s) Original Signed by - Original signé par

Ivan Avramenko

Ivan Avramenko
Ivan Avramenko

[^2]Form 2

## Initial Registered Office Address

 and First Board of DirectorsCanada 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)

Corporate name
Dénomination sociale
Profitly Incorporated
2 Address of registered office
Adresse du siège social

## 12 Amber Place <br> Belleville ON K8P 0B5

Additional address
Autre adresse

4
Members of the board of directors
Membres du conseil d'administration

Ivan Avramenko
12 Amber Place, Belleville ON K8P 0B5, Canada

Resident Canadian Résident Canadien<br>Yes / Oui

5 Declaration: I certify that I have relevant knowledge and that I am authorized to sign this form.
Déclaration : J'atteste que je possède une connaissance suffisante et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par Ivan Avramenko

Ivan Avramenko
6472307712

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

Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la Loi sur les renseignements personnels permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.

Form 6
Changes Regarding Directors Canada Business Corporations Act (CBCA) (s. 106 and 113)

## Formulaire 6 Changements concernant les administrateurs

Loi canadienne sur les sociétés par actions (LCSA) (art. 106 et 113)
Received Date (YYYY-MM-DD): Date de réception (AAAA-MM-JJ):

1 Corporate name
Dénomination sociale
Profitly Incorporated
Numéro de la société
1102222-9
3 Members of the Board of Directors (new directors in bold)
Membres du conseil d'administration (les nouveaux administrateurs sont indiqués en caractère gras)
$\left.\begin{array}{lclc}\begin{array}{l}\text { Name } \\ \text { Nom }\end{array} \begin{array}{l}\text { Start Date YYYY-MM-DD } \\ \text { Date d'entrée en fonction } \\ \text { AAAA-MM-DD }\end{array} & \begin{array}{l}\text { Address } \\ \text { Adresse }\end{array} & \begin{array}{l}\text { Resident Canadian } \\ \text { Résident Canadien }\end{array} \\ \begin{array}{lll}\text { Richard Michael } \\ \text { Carroll }\end{array} & \text { 2018-10-02 } & \text { 12 Amber Place, Belleville ON }\end{array}\right)$

4 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 |

5 Declaration: I certify that I have relevant knowledge of the corporation and that I am authorized to sign this form. Déclaration: J'atteste que je possède une connaissance suffisante de la société et que je suis autorisé(e) à signer le présent formulaire.

| Original signed by / Original signé par Ivan Avramenko |
| :---: |
| Ivan Avramenko 6472307712 |

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 $5000 \$$ 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.

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

1 Corporate name
Dénomination sociale
Profitly Incorporated
Numéro de la société
1102222-9
3 Members of the Board of Directors (new directors in bold)
Membres du conseil d'administration (les nouveaux administrateurs sont indiqués en caractère gras)

| Name | Start Date YYYY-MM-DD | Address | Resident Canadian <br> Rom <br> Nate d'entrée en fonction |
| :--- | :--- | :--- | :--- |
| AAAA-MM-DD | Adresse |  |  |
| Ivan Avramenko | $2018-10-01$ | 12 Amber Place, Belleville ON | Yes |

4 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 | $2019-10-10$ |

5 Declaration: I certify that I have relevant knowledge of the corporation and that I am authorized to sign this form. Déclaration: J'atteste que je possède une connaissance suffisante de la société et que je suis autorisé(e) à signer le présent formulaire.

Original signed by / Original signé par Ivan Avramenko Ivan Avramenko 4169957010

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de $5000 \$$ 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.

Received Date (YYYY-MM-DD)
Date de réception (AAAA-MM-JJ):

1 Corporate name
Dénomination sociale

## Profitly Incorporated

Numéro de la société
1102222-9
3 Members of the Board of Directors (new directors in bold)
Membres du conseil d'administration (les nouveaux administrateurs sont indiqués en caractère gras)

| Name Start | Start Date YYYY-MM-DD | Address | Resident Canadian |
| :---: | :---: | :---: | :---: |
| Nom Date d | ntrée en fonction M-DD | Adresse | Résident Canadien |
| Alexandra Stinson | 2018-10-01 | 1034 County Road 3, Belleville ON K8N 4Z1, Canada | Yes |
| Ivan Avramenko | 2018-10-01 | 12 Amber Place, Belleville ON K8P 0B5, Canada | Yes |

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

| Name | End Date YYYY-MM-DD |
| :--- | :--- |
| Nom | Date de fin de mandat AAAA-MM-DD |

5 Declaration: I certify that I have relevant knowledge of the corporation and that I am authorized to sign this form. Déclaration: J'atteste que je possède une connaissance suffisante de la société et que je suis autorisé(e) à signer le présent formulaire.

| Original signed by / Original signé par <br> Ivan Avramenko |
| :---: |
| Ivan Avramenko |
| 4169957010 |

Misrepresentation constitutes an offence and, on summary conviction, a person is liable to a fine not exceeding \$5000 or to imprisonment for a term not exceeding six months or both (subsection 250(1) of the CBCA).

Faire une fausse déclaration constitue une infraction et son auteur, sur déclaration de culpabilité par procédure sommaire, est passible d'une amende maximale de $5000 \$$ 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 "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


Commissioner of Oaths in and for Ontario

Canada.ca $\rightarrow$ Innovation, Science and Economic Development Canada $\rightarrow$ Corporations Canada
$\rightarrow$ Search for a Federal Corporation

Federal Corporation Information - 1102222-9
© Beware of scams and other suspicious activities. See Corporations Canada's alerts.

## (i) Note

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

## 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 ( 1

## Registered Office Address

12 Amber Place
Belleville ON K8P 0B5

## (i) Note

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

## Directors

Minimum 1<br>Maximum 10

Alexandra Stinson
1034 County Road 3
Belleville ON K8N 4Z1
Canada
Ivan Avramenko
12 Amber Place
Belleville ON K8P OB5
Canada

## (i) Note

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

## Annual Filings

## Anniversary Date (MM-DD)

10-01

## Date of Last Annual Meeting

Not available
Annual Filing Period (MM-DD)
$10-01$ to $11-30$
Type of Corporation
Not available

## Status of Annual Filings

2022 - Overdue
2021-Overdue
2020 - Overdue

## Corporate History

Corporate Name History

2018-10-01 to Present Profitly Incorporated

## Certificates and Filings

Certificate of Incorporation
2018-10-01

Order copies of corporate documents

Start New Search Return to Search Results

## Date Modified:

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.人
Commissioner of Oaths in and for Ontario

## 7:37

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\text { . } 11
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## = 80 @ BONESTAR 0



Lazyrrank 07/23/2021
All goood! Just successfully threw together the bot + a minting channel for the Canine Country Club. First time l've got to see the minting feed live, pretty fun II
t. 1
(1)

## July 28, 2021

## LazyFrank 07/28/2021

Ayee saw the post today in the chat, looks like some great stuff ahead! ©

```
+t 1
```


## BONESTAR 07/28/2021

hahaha hey i'm SOOOOO sorry for not having replied earlier again 엉 so swamped, some really big updates coming to the site and the roadmap, would really love to have you be part of the team in an even greater capacity that we discussed earlier, I PROMISE i'll message you as soon as we're ready to activate our Discord hope you had a great weekend and a great start to your week, i'll give you my direct line if you ever need to reach me feel free to send a direct text there - everything gets a little lost in here +14169957010
we've partnered with the manifold xyz team as well, they handled the Goats launch that did $\$ 2 \mathrm{M}$ in under 30 minutes, and several other upcomime projects, the dream team coming together ..V

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

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


Commissioner of Oaths in and for Ontario


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

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


Commissioner of Oaths in and for Ontario


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

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


Commissioner of Oaths in and for Ontario


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

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


Commissioner of Oaths in and for Ontario


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

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


Commissioner of Oaths in and for Ontario


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.t
Commissioner of Oaths in and for Ontario
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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


Commissioner of Oaths in and for Ontario


Defendant No. $1 \quad \square$ Additional defendant(s) listed on attached Form 1A. $\square$ Under 18 years of age.

| Last name, or name of company Profitly Incorperated |  |  |
| :---: | :---: | :---: |
| First name | Second name | Also known as Boneheads.io |
| Address (street number, apt., unit) 1034 County Rd 3 |  |  |
| City, town or village Belleville | Province <br> Ontario | Phone no. |
| Postal code  <br> K2H 7A9 Canada |  | Email address |
| Representative |  | Law Society of Ontario no. |
| Address (street number, apt., unit) |  |  |
| City, town or village | Province | Phone no. |
| Postal code |  | Email address |

Les 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.

## 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)

## ADDITIONAL PAGES ARE ATTACHED BECAUSE MORE ROOM WAS NEEDED.

The plaintiff also claims pre-judgment interest from

| (Check only $\quad \checkmark$ the Courts of Justice Act |  |
| :--- | :--- | :--- |
| one box) |  |
| $\square$ | an agreement at the rate of |
| and post-judgment interest, and court costs. |  |

$\qquad$ $20 \quad 22$

Submitted online by: Taylan McRae-Yu
(Signature of plaintiff or representative)

Issued on: $\qquad$ , 20
(Signature of clerk)

| CAUTION TO | IF YOU DO NOT FILE A DEFENCE (Form 9A) and an Affidavit of Service (Form 8A) with <br> DEFENDANT: <br> the court within twenty (20) calendar days after you have been served with this Plaintiff's <br> Claim, judgment may be obtained without notice and enforced against you. Forms and self- <br> help materials are available at the Small Claims Court and on the following website: <br> www.ontariocourtforms.on.ca |
| :--- | :--- |
| CAUTION TO | Unless the court orders or the rules provide otherwise, THIS ACTION WILL BE |
| PARTIES: | AUTOMATICALLY DISMISSED if it has not been disposed of by order or otherwise two (2) <br> years after it was commenced and a trial date or assessment under subrule 11.03(2) has not <br> been requested. |

Telephone: 416-326-2220 / 1-800-518-7901 TTY: 416-326-4012 / 1-877-425-0575

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

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


Commissioner of Oaths in and for Ontario

ONTARIO
Superior Court of Justice
Defence

## Belleville Small Claims Court

Small Claims Court

## 15 Bridge Street West Belleville ON

 K8P 0C7
## Address

613-962-9106
Phone number

| Plaintiff No. 1 | Additional plaintiff(s) listed on attached For | rm 1A. Under 18 years of age. |
| :---: | :---: | :---: |
| Last name, or name of company McRae-Yu |  |  |
| First name <br> Taylan | Second name Alsa | Also known as <br> Taylan 0xTAY |
| Address (street number, apt., unit) <br> 57 Monterey Drive |  |  |
| City/Town <br> Ottawa | Province <br> Ontario | Phone no. 343-550-1828 |
| Postal code <br> K2H 7A9 | Email address <br> yu.taylan@gmail.com |  |
| Representative |  | Law Society of Ontario no. |
| Address (street number, apt., unit) |  |  |
| City/Town | Province | Phone no. |
| Postal code | Email address |  |
| Defendant No. 1 | Additional defendant(s) listed on attached Form 14. | Form 1A. Under 18 years of age. |
| Last name, or name of company Profitly, Incorporated |  |  |
|  |  |  |
| First name <br> Ivan | Second name | Also known as |
| Address (street number, apt., unit) 1034 County Road 3 |  |  |
| City/Town <br> Belleville | Province <br> Ontario | Phone no. |


| Postal code | Email address |  |
| :--- | :--- | :--- |
| K8N4Z1 |  | Law Society of Ontario no. |
| Representative | Province | Phone no. |
| Address (street number, apt., unit) |  |  |
| City/Town | Email address |  |
| Postal code |  |  |

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.

THIS DEFENCE IS BEING FILED ON BEHALF
OF:
(Name(s) of defendant(s))
Profitly, Incorporated - Ivan Avramenko
and I/
we: (Check as many as apply)
Dispute the claim made against me/us.
Admit the full claim and propose the following terms of payment:


Admit part of the claim in the amount of
$\$$ and propose the following terms of payment:
(Amount)
(Amount)
(Week/month)
commencin
(Week/month)

## REASONS FOR DISPUTING THE CLAIM AND DETAILS:

Explain what happened, including where and when. Explain why you do not agree with the claim made against you.

If you are relying on any documents, you MUST attach copies to the Defence. If evidence is lost or unavailable, you MUST explain why it is not attached.

What happened? Please see below.
Where?
When?

Why I/we disagree with all or part of the claim:

The claims brought forth in this claim are baseless and false. Profitly provides 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.


| NOTE: | Within seven (7) calendar days of changing your address for service, notify the court and all other <br> parties in writing. |
| :--- | :--- |

[^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
— A.K
Commissioner of Oaths in and for Ontario

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

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No annual license required

## Our Partnerships

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Liquid Staking Derivatives (or LSD for short) is a...


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What is the difference between crypto hacks and exploits?

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What is the difference between crypto hacks a...
Once in awhile, hacks and exploits happen in crypt...

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    Tools *
    Legal *
Community Activity,
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Knowledge Hub New

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Investigator Directory
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Last Build
5/24/2023

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

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

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Commissioner of Oaths in and for Ontario

Address 0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F

## Buy $\sim$

Exchange $\vee$
Play $\sim$
Gaming $\checkmark$

BONEHEADS: Deployer [ $\triangle$ boneheads.eth (i) \# Contract Deployer M More V

## Overview

ETH BALANCE
© 1.128521689916498263 ETH

ETH VALUE
\$2,036.79 (@ \$1,804.83/ETH)

TOKEN HOLDINGS
\$1,755.51 (71 Tokens)

## More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT
0x3a948f70f932c... from 78 days 23 hrs ago

FIRST TXN SENT
0xc25aded97f965... from 654 days 16 hrs ago

## Multi Chain

MULTICHAIN ADDRESSES
10 addresses found via Blockscan $\vee$

| (3) | Transaction Hash | Method (3) | Age | From |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x3a948f70f932c363f... | Offer Punk Fo... | 78 days 23 hrs ago | BONEHEADS: Deployer | out |
| © | 0xd270c7b2fa6b8b32e... | Set Approval ... | 90 days 5 hrs ago | BONEHEADS: Deployer [ | OUT |
| © | 0xb66ee1f2eedaddd7d... | Set Approval ... | 90 days 5 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x9ea9ece4fc69a245b... | Set Approval ... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0xf1c302bd59dfd73cf... | Set Approval ... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | Oxcaeae89290ae11b0... | Set Approval ... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x35fd9828c2b7f18a5... | Set Approval ... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x4ff1fa0134c5019d7... | Fulfill Availabl... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x324ff417cddcc297b... | Fulfill Availabl... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x8eb3987f040ac89da... | Set Approval ... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0xdc018b20499c3208... | Set Approval ... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x03e8c2f258cfa633a... | Set Approval ... | 90 days 6 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x65967288bdca7507... | Offer Punk Fo... | 90 days 21 hrs ago | BONEHEADS: Deployer [] | OUT |
| © | 0x059403b4febd86d6d... | Transfer | 90 days 22 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x133e15d96d552013... | Offer Punk Fo... | 91 days 3 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0xc6d3daa30b065635... | Punk No Long... | 91 days 3 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0xdd00f0ead87b5eecb... | Offer Punk Fo... | 91 days 3 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0xbb60ed7c97c48f09a... | Transfer | 131 days 6 hrs ago | BONEHEADS: Deployer | OUT |


| (3) | Transaction Hash | Method (3) | Age | From |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x65193673a3b8169d... | Approve | 163 days 21 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x2e42f539eaadaba6b... | Deposit | 163 days 21 hrs ago | BONEHEADS: Deployer | OUT |
| © | Oxf0d8762144150c54e... | Fulfill Availabl... | 163 days 23 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0xff38312796bf97d65... | Set Approval ... | 166 days 23 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x6d0f5d914d97ee9d5... | Transfer | 214 days 4 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x1f9ed35db2d691efb... | Transfer | 214 days 4 hrs ago | BONEHEADS: Deployer | OUT |
| © | 0x2f450832c3f2f1693... | Set Approval ... | 214 days 4 hrs ago | BONEHEADS: Deployer | OUT |
| VIEW ALL TRANSACTIONS $\rightarrow$ |  |  |  |  |  |
| [ Download: CSV Export 山夏] |  |  |  |  |  |
| EO: 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
— A.K
Commissioner of Oaths in and for Ontario


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

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

```
Table 1 - BONEHEADS TEAM: OUTGOING TRANSACTIONS*
Exhibit Transaction Information
"BONEHEADS: Deployer" / Boneheads.eth (0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F)
    "BE" - Receiving Address: 0x6ce6afb735ddc2d6c3ac0187a1919fc20b720991 ("Coinbase Exchange 1")
    - Transactions:
    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")
            - Transactions:
                            - 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
controlled by the Boneheads team, into "Kraken Exchange 1", centralized exchange address.
    "BG" - Receiving Address: 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 ("BNHDZVAULT").
    - Transactions:
                            ○ 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, }202
                            - 262.115 ETH ($1,032,680.58 USD ($1,293,535.69 CAD)) on September 3, }202
                            - 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, }202
                            - 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, }202
                            - 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, }202
```

|  | - 0.1 ETH (\$281.63 USD (\$355.72 CAD)) on March 17, 2022 <br> - 168 ETH $(\$ 494,141.76$ USD $(\$ 622,865.68 \mathrm{CAD}))$ on March 18, 2022 <br> - 29.7 ETH $(\$ 99,028.41$ USD $(\$ 123,973.66 \mathrm{CAD}))$ on March 28, 2022 <br> - 12.5 ETH $(\$ 19,135.88$ USD $(\$ 26,296.52 \mathrm{CAD}))$ on November 3, 2022 <br> - $8 \mathrm{ETH}(\$ 12,887.52$ USD $(\$ 17,244.79 \mathrm{CAD}))$ on January 25, 2023  <br> - 0.1 ETH (\$281.63 USD (\$355.72 CAD)) on March 17, 2022 <br> - 168 ETH (\$494,141.76 USD (\$622,865.68 CAD)) on March 18, 2022 <br> - 29.7 ETH (\$99,028.41 USD (\$123,973.66 CAD)) on March 28, 2022 <br> - 12.5 ETH ( $\$ 19,135.88$ USD ( $\$ 26,296.52$ CAD)) on November 3, 2022 <br> - $8 \mathrm{ETH}(\$ 12,887.52$ USD ( $\$ 17,244.79$ CAD)) on January 25, 2023 <br> - 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") <br> - Transactions: <br> - Total: 0.6 ETH (\$1,695.62 USD (\$2,178.02 CAD)) <br> - 0.6 ETH ( $\$ 1,695.62$ USD ( $\$ 2,178.02$ CAD)) on May 1,2022 <br> - 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") <br> - Transactions: <br> - Total: $\mathbf{1 5}$ ETH ( $\mathbf{\$ 6 5 , 1 1 7 . 5 5}$ USD ( $\mathbf{\$ 8 2}, 549.51$ CAD) ) <br> - 5 ETH (\$21,705.85 USD (\$27,516.50 CAD)) on November 23, 2021 <br> - 10 ETH ( $\$ 43,411.70$ USD ( $\$ 55,033.01 \mathrm{CAD})$ ) on November 23, 2021 <br> - 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") <br> - Transactions: <br> - Total: 0.23346 ETH (\$1,095.56 USD (\$1,362.05 CAD)) <br> - 0.02296 ETH ( $\$ 99.29$ USD ( $\$ 122.99$ CAD)) on October 30, 2021 <br> - 0.2105 ETH ( $\$ 996.27$ USD (\$1,239.06 CAD)) on November 9, 2021 <br> - Notes: Exhibit "BJ" attached shows all transactions involving the " 3 C 85 " 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") <br> - Transactions: <br> - Total: 0.0518 ETH (\$230.47 USD (\$286.19 CAD)) <br> - 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 <br> - 0.01 ETH ( $\$ 31.24$ USD ( $\$ 39.66$ CAD) on February 16, 2022 <br> - 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") <br> - Transactions: <br> ○ Total: $\mathbf{1 4 . 2 5}$ ETH ( $\mathbf{\$ 4 3 , 5 5 1 . 7 5}$ USD ( $\mathbf{\$ 5 5 , 1 1 2 . 5 4 ~ C A D ) ) ~}$ <br> - 1 ETH ( $\$ 3,093.62$ USD ( $\$ 3,923.94$ CAD)) on August 26, 2021 <br> - 5 ETH ( $\$ 16,126.50$ USD ( $\$ 20,341.96$ CAD)) on August 29, 2021 <br> - 5 ETH ( $\$ 15,321.05$ USD ( $\$ 19,388.78$ CAD)) on September 26, 2021 <br> - 0.15 ETH (\$363.87 USD (\$463.68 CAD)) on January 27, 2022 <br> - 2 ETH ( $\$ 5,788.84$ USD ( $\$ 7,355.30$ CAD)) on February 17, 2022 <br> - 1 ETH ( $\$ 2,580.97$ USD ( $\$ 3,286.86$ CAD)) on February 23, 2022 <br> - 0.1 ETH (\$276.90 USD (\$352.02 CAD)) on February 25, 2022 <br> - 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. |
| "BNHDZVAULT" (0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317) |  |
| "BG" | - Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer") <br> - Transactions: <br> ○ Total: 996.409 ETH (\$4,021,741.55 USD (\$5,123,642.36 CAD)) <br> - 7 ETH ( $\$ 27,498.80$ USD ( $\$ 34,466.99$ CAD)) on September 6, 2021 <br> - 16.9 ETH ( $\$ 73,074.59$ USD $(\$ 90,517.49 \mathrm{CAD})$ ) on October 30, 2021 <br> - 10 ETH ( $\$ 44,484.90$ USD ( $\$ 56,664.86$ CAD)) on November 29, 2021 <br> - 2.7639 ETH (\$12,295.21 USD (\$15,661.63 CAD)) on November 29, 2021 <br> - 55 ETH ( $\$ 244,666.95$ USD ( $\$ 311,656.76$ CAD)) on November 29, 2021 <br> - 50 ETH ( $\$ 82,205.50$ USD ( $\$ 104,713.36$ CAD)) on November 29, 2021 <br> - 240.529 ETH ( $\$ 1,069,992.40$ USD ( $\$ 1,362,956.32$ CAD)) on November 29, 2021 <br> - 0.339 ETH ( $\$ 1,508.65$ USD ( $\$ 1,921.71 \mathrm{CAD})$ ) on November 29, 2021 <br> - 23.5738 ETH ( $\$ 109,438.86$ USD ( $\$ 139,830.03$ CAD)) on November 30, 2021 <br> - 11.2577 ETH (\$52,262.76 USD (\$66,776.12 CAD)) on November 30, 2021 <br> - 236 ETH ( $\$ 1,081,014.52$ USD ( $\$ 1,384,887.70$ CAD)) on December 1, 2021 <br> - 65 ETH ( $\$ 268,076.90$ USD ( $\$ 344,210.74$ CAD)) on December 4, 2021 <br> - 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 <br> - 2.1 ETH $(\$ 6,712.59$ USD $(\$ 8,484.71$ CAD $))$ on January 7, 2022 <br> - 1.01 ETH $(\$ 2,466.69$ USD $(\$ 3,114.68$ CAD $))$ on January 24, 2022 <br> - 0.01766 ETH $(\$ 54.02$ USD $(\$ 68.94$ CAD $))$ on February 6, 2022 <br> - 104.919 ETH $(\$ 295,479.41$ USD $(\$ 373,220.04$ CAD $))$ on March 17, 2022 <br> - 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") <br> - Transactions: <br> - Total: 75.21 ETH (\$227,210.45 USD (\$285,743.94 CAD)) <br> - $55 \mathrm{ETH}(\$ 157,369.30$ USD ( $\$ 198,316.79 \mathrm{CAD})$ ) on March 20, 2022 <br> - 20.21 ETH (\$69,841.15 USD (\$87,427.15 CAD)) on April 1, 2022 <br> - Notes: Exhibit "BJ" attached shows a total of 75.21 ETH received by the " 3 C 85 " wallet from the "BNHDZVAULT", both of which are controlled by the Boneheads team. |
| "BM" | - Receiving Address: 0xc59ef925b947473b85b85f7583d29487ee2e8620 ("Kraken Exchange 2") <br> - Transactions: <br> ○ Total: 25.358 ETH (\$98,567.28 USD (\$123,475.23 CAD)) <br> - 25.358 ETH ( $\$ 98,567.28$ USD ( $\$ 123,475.23$ CAD)) on September 4, 2021 <br> - 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") <br> - Transactions: <br> - Total: 94.45 ETH ( $\mathbf{\$ 1 6 0 , 0 0 8 . 3 5}$ USD $\mathbf{( \$ 2 1 2 , 7 3 4 . 0 8 ~ C A D )})$ <br> - 25 ETH ( $\$ 49,267.50$ USD ( $\$ 62,993.42 \mathrm{CAD})$ ) on May 23, 2022 <br> - 4.2 ETH (\$7,122.57 USD (\$9,213.04 CAD)) on August 25, 2022 <br> - 5 ETH ( $\$ 6,615.35$ USD ( $\$ 8,846.04$ CAD)) on September 20, 2022 <br> - 14.75 ETH ( $\$ 19,704.53$ USD ( $\$ 26,953.82$ CAD)) on September 29, 2022 <br> - 12.5 ETH ( $\$ 19,135.88$ USD ( $\$ 26,296.52 \mathrm{CAD})$ ) on November 3, 2022 <br> - 8 ETH ( $\$ 12,887.52$ USD ( $\$ 17,622.39$ CAD)) on January 25,2023 <br> - 25 ETH ( $\$ 45,275.00$ USD ( $\$ 60.808 .85 \mathrm{CAD}$ )) on April 3, 2023 <br> - 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") <br> - Transactions: <br> - Total: 4.78 ETH (\$14,608.64 USD (\$18,412.73 CAD)) <br> - 4.78 ETH ( $\$ 14,608.64$ USD ( $\$ 18,412.73$ CAD)) on April 18, 2022 <br> - 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") <br> - Transactions: <br> - Total: 1 ETH ( $\mathbf{\$ 2 , 8 2 6 . 0 4}$ USD ( $\mathbf{\$ 3 , 6 3 0 . 0 4} \mathbf{C A D}$ )) <br> - 1 ETH ( $\$ 2,826.04$ USD ( $\$ 3,630.04$ CAD)) on May 1, 2022 <br> - 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") <br> - Transactions: <br> - Total: 1 ETH ( $\mathbf{\$ 2 , 8 2 6 . 0 4}$ USD ( $\mathbf{\$ 3 , 6 3 0 . 0 4} \mathbf{C A D}$ )) <br> - 1 ETH ( $\$ 2826.04$ ETH ( $\$ 3,630.04$ CAD) )) on May 1, 2022 <br> - 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") <br> - Transactions: <br> ○ Total: 1.17804 ETH (\$3,339.76 USD (\$4,198.62 CAD)) <br> - 0.9168 ETH ( $\$ 2,758.31$ USD ( $\$ 3,448.16$ CAD)) on January 20, 2022 <br> - 0.0600 ETH ( $\$ 160.88$ USD ( $\$ 204.09$ CAD)) on February 2, 2022 <br> - 0.12434 ETH ( $\$ 320.94$ USD ( $\$ 408.71$ CAD)) on February 23, 2022 <br> - 0.0769 ETH ( $\$ 99.63$ USD ( $\$ 137.66$ CAD)) on October 12, 2022 <br> - 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 the Boneheads team. |
| "BG" | - Receiving Address: 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317 ("BNHDZVAULT"). <br> - Transactions: <br> - Total: 0.45 ETH (\$763.13 USD (\$987.10 CAD)) |


|  | - 0.45 ETH (\$763.13 USD (\$987.10 CAD)) on August 25, 2022 <br> - 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 |
| :---: | :---: |
| "BH" | - Receiving Address: 0xa1e43fcb51656354931d47458eceadbc6545df57 ("ivybone.eth") <br> - Transactions: <br> Total: $\mathbf{0 . 8 8 3 8}$ ETH ( $\mathbf{\$ 2 , 4 9 7 . 6 8}$ USD ( $\mathbf{\$ 3 , 2 0 8 . 2 6}$ CAD)) <br> - 0.8838 ETH ( $\$ 2,497.68$ USD ( $\$ 3,208.26$ CAD) ) on May 1, 2022 <br> - 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. |
| "BR" | - Receiving Address: 0x0bc42633195913892c48a224a846ddae067898ed ("bonestar.eth") <br> - Transactions: <br> ○ Total: 0.15 ETH (\$648.59 USD (\$803.40 CAD)) <br> - 0.15 ETH ( $\$ 648.59$ USD ( $\$ 803.40 \mathrm{CAD})$ ) on October 30, 2021 <br> - 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. |
| "BS" | - Receiving Address: 0xea415b3b5e02b2259019763e2e81c48668b80f0e ("bonestars.eth") <br> - Transactions: <br> $\bigcirc$ Total: 0.03 ETH (\$129.72 USD (\$160.68 CAD)) <br> - $\quad 0.03 \mathrm{ETH}$ ( $\$ 129.72$ USD ( $\$ 160.68 \mathrm{CAD})$ ) on October 30, 2021 <br> - 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. |
| "ivybone.eth" (0xa1e43fcb51656354931d47458eceadbc6545df57) |  |
| "BH" | - Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer") <br> - Transactions: <br> - Total: 0.02935 ETH (\$127.09 USD (\$158.25 CAD)) <br> - 0.02198 ETH ( $\$ 95.06$ USD ( $\$ 117.75 \mathrm{CAD})$ ) on October 30, 2021 <br> - $0.00737 \mathrm{ETH}(\$ 32.03$ USD ( $\$ 40.50 \mathrm{CAD})$ ) 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"). <br> - Transactions: <br> - Total: $\mathbf{3 7 . 5 3}$ ETH ( $\mathbf{\$ 7 9 , 9 5 1 . 0 1}$ USD ( $\mathbf{\$ 1 0 2 , 6 9 0 . 9 2} \mathbf{C A D}$ )) <br> - 4.5 ETH ( $\$ 18,760.32$ USD ( $\$ 23,202.76 \mathrm{CAD})$ ) on October 23, 2021 <br> - 23.25 ETH ( $\$ 45,818.78$ USD ( $\$ 58,583.89 \mathrm{CAD})$ ) on May 23, 2022 <br> - $0.2 \mathrm{ETH}(\$ 339.17$ USD ( $\$ 438.71 \mathrm{CAD}$ )) on August 25, 2022 <br> - 3.6 ETH ( $\$ 5,637.28$ USD ( $\$ 7,674.59$ CAD)) on March 6, 2023. <br> - 6 ETH ( $\$ 9,395.46$ USD ( $\$ 12,790.97$ CAD)) on March 6, 2023. <br> - 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") <br> - Transactions: <br> - Total: 1.25 ETH (\$4,682.68 USD (\$5,697.62 CAD)) <br> - $1 \operatorname{ETH}(\$ 3,746.14$ USD (\$4,538.09 CAD)) on October 18, 2021 <br> - 0.25 ETH ( $\$ 936.54$ USD ( $\$ 1,159.53$ CAD)) on October 18, 2021 <br> - 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") <br> - Transactions: <br> - Total: $\mathbf{1 5 . 2 5}$ ETH $\mathbf{( \$ 2 3 , 8 8 0 . 1 3}$ USD $\mathbf{( \$ 3 1 , 5 1 0 . 4 1 ~ C A D )}$ <br> - 15.25 ETH ( $\$ 23,880.13$ USD ( $\$ 31,510.41 \mathrm{CAD}$ )) on March 6, 2023. <br> - Notes: Exhibit "BN" attached shows a total of 15.25 ETH have been sent from the cryptocurrency wallet address "ivybone.eth", which is controlled by the Boneheads team, to "Kraken Exchange 3", a centralized exchange. |
| "3C85" (0xbaf331f090320502380ea975562c0c72e2da3c85) |  |
| "BJ" | - Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer") <br> - Transactions: <br> - Total: 0.338 ETH (\$1,043.26 USD (\$1,334.81 CAD)) <br> - 0.00417 ETH (\$19.75 USD (\$24.56 CAD)) on November 9, 2021 |


|  | - 0.21 ETH (\$911.72 USD (\$1,155.78 CAD)) on November 23, 2021 <br> - 0.08636 ETH ( $\$ 111.79$ USD ( $\$ 154.47$ CAD)) on October 12, 2022 <br> - 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"). <br> - Transactions: <br> - Total: 22 ETH ( $\mathbf{\$ 3 5 , 3 9 9 . 1 0}$ USD ( $\mathbf{\$ 4 5 , 9 7 9 . 8 9} \mathbf{C A D}$ )) <br> - 22 ETH ( $\$ 35,399.10$ USD ( $\$ 45,979.89$ CAD)) on August 19, 2022 <br> - 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") <br> - Transactions: <br> - Total: 2.3 ETH (\$6499.89 USD (\$8,349.09 CAD)) <br> - 2.2 ETH ( $\$ 6,217.29$ USD ( $\$ 7,986.10$ CAD) $)$ on May 1, 2022 <br> - 0.1 ETH ( $\$ 282.60$ USD ( $\$ 362.99$ CAD)) on May 1,2022 <br> - 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") <br> - Transactions: <br> - Total: 72.877 ETH (\$220,516.21 USD (\$277,308.80 CAD)) <br> - 1 ETH ( $\$ 2,861.26$ USD ( $\$ 3,605.75$ CAD)) on March 20, 2022 <br> - 25.85 ETH ( $\$ 73,963.57$ USD ( $\$ 93,208.89$ CAD) ) on March 20, 2022 <br> - 25.85 ETH (\$73,963.57 USD ((\$93,208.89 CAD)) on March 20, 2022 <br> - 20.177 ETH ( $\$ 69,727.81$ USD ( $\$ 87,285.27 \mathrm{CAD}$ )) on April 1, 2022 <br> - 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.eth" (0x652aa165Ee33ba02570C4FC7d41B0a05B4fD8147) |  |
| "BL" | - Receiving Address: 0x8c0ff426dfa77a87be3729456d1d27fdc8f2de5f ("BONEHEADS: Deployer") <br> - Transactions: <br> - Total: 0.10 ETH (\$246.19 USD (\$311.14 CAD)) |


|  | - 0.05 ETH (\$122.98 USD (\$155.17 CAD)) on January 25, 2022 <br> - 0.05 ETH ( $\$ 123.21$ USD ( $\$ 155.97 \mathrm{CAD})$ ) on January 26, 2022 <br> - 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") <br> - Transactions: <br> - Total: 3 ETH ( $\mathbf{\$ 1 2 , 8 7 0 . 3 0}$ USD $(\$ 15,937.29$ CAD) ) <br> - 3 ETH ( $\$ 12,870.30$ USD ( $\$ 15,937.29$ CAD)) on October 31, 2021 <br> - 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 table presents outgoing transactions from the Ethereum address under each sub-heading. |  |

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

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


Commissioner of Oaths in and for Ontario

## Overview

ETH BALANCE
乞 0.000553168979748 ETH
eth value
\$1.00 (@ \$1,811.54/ETH)

## More Info

PRIVATE NAME TAGS

## + Add

LAST TXN SENT
$0 \times 24$ fbe5eaa6a5e... from 618 days 2 hrs ago

FIRST TXN SENT
0xa524ab1d1c97... from 645 days 1 hr ago

## Multi Chain

MULTICHAIN ADDRESSES
0 address found via Blockscan $\vee$


| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xc2bffc7197abcf3dd1... | Transfer | 13123271 | 645 days 58 mins ago | 0x6CE6AF...0B720991 | OUT | Coinbase 3 | 29.99823513 ETH | 0.00232441 |
| $\bigcirc$ | 0xc53a9e0ab970a8a6... | Transfer | 13123257 | 645 days 1 hr ago | BONEHEADS: Deployer [ | in | 0x6CE6AF...0B720991 | 30 ETH | 0.00272539 |
| © | 0xa524ab1d1c9755e1... | Transfer | 13123256 | 645 days 1 hr ago | 0x6CE6AF...0B720991 | OUT | Coinbase 3 | 0.995359 ETH | 0.00243686 |
| © | 0x543b3ad5d289cef80... | Transfer | 13123252 | 645 days 1 hr ago | BONEHEADS: Deployer [] | in | 0x6CE6AF...0B720991 [ | 1 ETH | 0.00236099 |

 Base.

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

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


Commissioner of Oaths in and for Ontario

Address 0x270c21BFB99A14E41408568570C3A4f481253EE6

## Overview

ETH BALANCE
乞 0.000342664144354516 ETH
Eth Value
\$0.62 (@ \$1,811.54/ETH)

## More Info

PRIVATE NAME TAGS

## + Add

LAST TXN SENT
$0 x 5991$ bf3c $72656 \ldots$ from 640 days 22 hrs ago
FIRST TXN SENT
0x5991bf3c72656... from 640 days 22 hrs ago

## Multi Chain

MULTICHAIN ADDRESSES
0 address found via Blockscan $\sim$


| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xb8d7e06ab943b757... | Transfer | 13149810 | 640 days 22 hrs ago | BONEHEADS: Deployer [] | IN | 0x270c21...81253EE6 | 28 ETH | 0.00180475 |
|  |  |  |  |  |  |  |  |  | CSV Export 光] |

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

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


Commissioner of Oaths in and for Ontario

## Transactions

For 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fe |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xf9cfeb1ef43236f6e0．．． | Transfer | 16484521 | 131 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目0xE66F9e．．．Aa8b82aC［ | 8 ETH | 0.0009 |
| © | 0xbb60ed7c97c48f09a．．． | Transfer | 16484473 | 131 days 9 hrs ago | （）boneheads．eth | in | 0xa8c2bC．．．f7281317 | 8 ETH | 0.0004 |
| © | 0x06529b13954949d3．．． | Transfer | 15891262 | 214 days 5 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目Centre：USD Coin［ | 0 ETH | 0.0014 |
| © | 0x42a1857738dc6a7c．．． | Transfer | 15891260 | 214 days 5 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目0xE66F9e．．．Aa8b82aC | 12.5 ETH | 0.0012 |
| © | 0x1f9ed35db2d691efb．．． | Transfer | 15890672 | 214 days 7 hrs ago | （）boneheads．eth | IN | 0xa8c2bc．．．f7281317 | 12.5 ETH | 0.0006 |
| © | 0xb72bbb8d97fb04a20．．． | Set Approval ．．． | 15725020 | 237 days 10 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目RTFKT SKIN VIAL：Token | 0 ETH | 0.0011 |
| © | 0x523305351ddb676a．．． | Set Approval ．．． | 15724982 | 237 days 11 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目RTFKT：CloneX Token | 0 ETH | 0.0012 |
| © | 0x645d8086c64afb7a9．．． | Transfer | 15640212 | 249 days 7 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国0xE66F9e．．．Aa8b82aC［ | 14.75 ETH | 0.0016 |
| © | 0x19a350762fb9d52a0．．． | Transfer | 15575428 | 258 days 8 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目0xE66F9e．．．Aa8b82aC［ | 5 ETH | 0.0015 |
| © | 0xa79596441abd5783．．． | Transfer | 15409569 | 284 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目0xE66F9e．．．Aa8b82aC［ | 4．2 ETH | 0.0014 |
| © | 0xbee5790a39100731f．．． | Transfer | 15409444 | 284 days 10 hrs ago | （ivybone．eth | in | 0xa8c2bc．．．f7281317 | 0．2 ETH | 0.0002 |
| © | 0x975e17f1739b504ac．．． | Transfer | 15409444 | 284 days 10 hrs ago | 0x3acEf2．．．87dda4fa ¢ | וn | 0xa8c2bC．．．f7281317 | 0.45 ETH | 0.0002 |
| © | 0x4e4e3ad99b9342d6．．． | Transfer | 15368935 | 290 days 20 hrs ago | 0xbAF331．．．E2Da3C85［ | in | 0xa8c2bC．．．f7281317［ | 22 ETH | 0.0001 |
| © | 0x6d5ae51637196ecc．．． | Transfer | 14832026 | 378 days 1 hr ago | 0xa8c2bc．．．f7281317 | OUT | 目0xE66F9e．．．Aa8b82aC | 25 ETH | 0.0013 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fe， |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x4d2e9795daf0ca61f．．． | Transfer | 14831654 | 378 days 3 hrs ago | 0x8F507c．．．B053F470 | in | 0xa8c2bc．．．f7281317 | 0.08 ETH | 0.0004 |
| © | 0x33401d4a7c714109．．． | Transfer | 14831652 | 378 days 3 hrs ago | 0xe55382．．．E93d453F | in | 0xa8c2bc．．．f7281317 | 0.08 ETH | 0.0004 |
| © | 0xc68d766e32fb73fdc．．． | Transfer | 14831652 | 378 days 3 hrs ago | 0x944153．．．1aA9708C | in | 0xa8c2bc．．．f7281317 | 0.08 ETH | 0.0004 |
| ® | 0x184ed12a3bb2dfeb6．．． | Transfer | 14831649 | 378 days 3 hrs ago | 0x90fA1d．．．48133E64［］ | וn | 0xa8c2bc．．．f7281317 | 0.08 ETH | 0.0005 |
| © | 0x99610ee568a088bc．．． | Transfer | 14831606 | 378 days 3 hrs ago | （）ivybone．eth | in | 0xa8c2bC．．．f7281317 | 23.25 ETH | 0.0005 |
| ® | 0xc3fc00dbaf1fbbb67f．．． | Transfer | 14712528 | 397 days 5 hrs ago | 0x82eF36．．．972D58B8 | וn | 0xa8c2bC．．．f7281317 | 0.05 ETH | 0.0010 |
| © | 0x9936a7a2bdd8d324．．． | Migrate Token | 14691001 | 400 days 15 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目 RTFKT：MNLTH Token | 0 ETH | 0.0132 |
| © | 0x9fb0a28e72f17b2ed．．． | Migrate Token | 14690996 | 400 days 15 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目 RTFKT：MNLTH Token | 0 ETH | 0.0161 |
| © | 0xe63fd2320ed57e1c4．．． | Migrate Token | 14690990 | 400 days 15 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目 RTFKT：MNLTH Token | 0 ETH | 0.0178 |
| $\bigcirc$ | 0xb979c94c7e2369d5．．． | Transfer | 14690094 | 400 days 18 hrs ago | 0x82eF36．．．972D58B8［］ | וn | 0xa8c2bC．．．f7281317 | 0.95 ETH | 0.0054 |
| © | 0xda4c9a4bab0ff76fa．．． | Transfer | 14689965 | 400 days 18 hrs ago | （ praisegod．eth | in | 0xa8c2bC．．．f7281317 | 0.92 ETH | 0.0087 |
| $\bigcirc$ | $0 \times 0 \mathrm{ccfbc} 1 \mathrm{bc} 784 \mathrm{e} 94 \mathrm{~d} 6 .$. | Transfer | 14689600 | 400 days 20 hrs ago | 0xa8c2bc．．．f7281317 | OUT | O ivybone．eth | 5 ETH | 0.0814 |
| © | 0x2b5808a710b4ab0bf．．． | Transfer | 14688873 | 400 days 22 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目Apecoin：APE Token［ | 0 ETH | 0.0078 |
| $\bigcirc$ | 0x3308cd7fcc6180290．．． | Transfer | 14688785 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317 | OUT | O prismo．eth | 1 ETH | 0.0026 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fe， |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | 0x3c63e11f81d114b85．．． | Transfer | 14688785 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 0x82eF36．．．972D58B8 | 1 ETH | 0.0025 |
| $\bigcirc$ | 0x473451b6a5c8ade4f．．． | Transfer | 14688785 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）praisegod．eth | 1 ETH | 0.0024 |
| $\bigcirc$ | 0x8b29044903eb4569．．． | Transfer | 14688760 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 0x15F821．．．8e60e907 | 1 ETH | 0.0021 |
| $\bigcirc$ | 0xac50709ac1cccec4f．．． | Transfer | 14688683 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）prismo．eth［ | 0.02 ETH | 0.0012 |
| $\bigcirc$ | 0x770e2e97aab4af9b4．．． | Transfer | 14688624 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目Apecoin：APE Token | 0 ETH | 0.0031 |
| $\bigcirc$ | 0xab51a99e98c63545．．． | Transfer | 14688620 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317［ | OUT | 国Apecoin：APE Token | 0 ETH | 0.0036 |
| $\bigcirc$ | 0x070c56f5706834644．．． | Transfer | 14688619 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国Apecoin：APE Token［ | 0 ETH | 0.0035 |
| $\bigcirc$ | 0x8be56bef915496326．．． | Transfer | 14688604 | 400 days 23 hrs ago | 0xa8c2bC．．．f7281317［］ | OUT | 目Apecoin：APE Token | 0 ETH | 0.0039 |
| $\bigcirc$ | 0x105a52ac22e5c253．．． | Swap | 14686919 | 401 days 6 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 Metamask：Swap Router | 45 ETH | 0.0125 |
| © | 0x9eb7ce89447beb94．．． | Swap | 14681409 | 402 days 3 hrs ago | 0xa8c2bC．．．f7281317［］ | OUT | 国 Metamask：Swap Router | 0 ETH | 0.0248 |
| $\bigcirc$ | 0x103f75a9d082da3eb．．． | Approve | 14681409 | 402 days 3 hrs ago | 0xa8c2bC．．．f7281317［］ | OUT | 国 Centre：USD Coin | 0 ETH | 0.0035 |
| © | 0x6ce2fc714264dc3f3．．． | Transfer | 14612936 | 412 days 21 hrs ago | 0xa8c2bC．．．f7281317［］ | OUT | 目 Centre：USD Coin | 0 ETH | 0.0015 |
| © | 0xdfb3707089c5793d9．．． | Transfer | 14610338 | 413 days 7 hrs ago | 0xa8c2bC．．．f7281317［］ | OUT | 0xF38269．．．73C940fc［ | 4.78 ETH | 0.0008 |
| $\bigcirc$ | 0xa5e3a0a2add812d9．．． | Transfer | 14502129 | 430 days 4 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 0xbAF331．．．E2Da3C85［ | 20．210302634 ETH | 0.0016 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fe， |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x9a060aae05b80740f．．． | Transfer | 14472233 | 434 days 20 hrs ago | （）boneheads．eth | IN | 0xa8c2bC．．．f7281317 | 29.7 ETH | 0.0008 |
| © | 0x14635f720e6420e48．．． | Transfer | 14425178 | 442 days 4 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 0xbAF331．．．E2Da3C85［ | 55 ETH | 0.0007 |
| © | 0x5d155146a0348ab9f．．． | Swap | 14418134 | 443 days 6 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 國 Metamask：Swap Router［ | 100 ETH | 0.0045 |
| © | 0x5a56aee30fdc61289．．． | Transfer | 14411929 | 444 days 5 hrs ago | （）boneheads．eth | in | 0xa8c2bc．．．f7281317 | 168 ETH | 0.0012 |
| © | 0xa2351c4f29cff1b1fc．．． | Transfer | 14411905 | 444 days 5 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 Centre：USD Coin | 0 ETH | 0.0044 |
| © | 0x259191734e25f9076．．． | Transfer | 14402123 | 445 days 18 hrs ago | （ boneheads．eth | IN | 0xa8c2bc．．．f7281317 | 0.1 ETH | 0.0004 |
| $\bigcirc$ | 0xd034f5fe3afa15531．．． | Transfer | 14402111 | 445 days 18 hrs ago | 0xa8c2bC．．．f7281317 ¢ | OUT | （）boneheads．eth | 104.919081832 ETH | 0.0006 |
| © | 0x4c1b130e04a24248．．． | Cancel Order＿ | 14325502 | 457 days 16 hrs ago | 0xa8c2bC．．．f7281317 ¢ | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.0018 |
| $\bigcirc$ | 0xcda370a2afcdb2c3a．．． | Set Approval ．．． | 14325455 | 457 days 16 hrs ago | 0xa8c2bC．．．f7281317 ¢ | OUT | 目RTFKT：CloneX Token［ | 0 ETH | 0.0011 |
| © | 0x365b715b6533658e．．． | Transfer | 14271307 | 466 days 2 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目 Centre：USD Coin $\square$ | 0 ETH | 0.0046 |
| $\bigcirc$ | 0x390584e6ae74b662．．． | Transfer | 14260254 | 467 days 19 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 Centre：USD Coin | 0 ETH | 0.0066 |
| © | 0xc3a653eaa975f2536．．． | Transfer | 14260204 | 467 days 19 hrs ago | 0xa8c2bC．．．f7281317［］ | OUT | 目 Centre：USD Coin | 0 ETH | 0.0067 |
| © | 0xc0ca526380c1f335f．．． | Transfer | 14257997 | 468 days 3 hrs ago | 0xa8c2bC．．．f7281317［］ | OUT | 国 Centre：USD Coin | 0 ETH | 0.0081 |
| $\bigcirc$ | 0xd8296a68c169b28a．．． | Transfer | 14230733 | 472 days 9 hrs ago | 0xa8c2bC．．．f7281317［ | OUT | 国Centre：USD Coin | 0 ETH | 0.0090 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fe |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x5700b9af0059e7487．．． | Transfer | 14220223 | 474 days ago | 0xa8c2bC．．．f7281317 | OUT | 目 Centre：USD Coin | 0 ETH | 0.0038 |
| © | 0xf2a98f3e518cd5182．．． | Transfer From | 14198187 | 477 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 Bored Ape Yacht Club：．．． | 0 ETH | 0.0058 |
| ® | 0x167d8f8baf07ad403．．． | Transfer From | 14198179 | 477 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 Bored Ape Yacht Club：．．． | 0 ETH | 0.0066 |
| ® | 0xb76a27cd5719b0c9．．． | Set Approval ．．． | 14198177 | 477 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 Bored Ape Yacht Club：．．． | 0 ETH | 0.0025 |
| © | （1）0x7a8e7719951c9e7b．．． | Register Proxy | 14198170 | 477 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 OpenSea：Registry［ | 0 ETH | 0.0013 |
| © | 0xa89b0c1294e7f5a25．．． | Register Proxy | 14198170 | 477 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 国 OpenSea：Registry［ | 0 ETH | 0.0223 |
| © | 0xf767549f5e7d8ed3b．．． | Transfer | 14198158 | 477 days 10 hrs ago | －boneheads．eth［ | in | 0xa8c2bC．．．f7281317 | 0.5 ETH | 0.0011 |
| © | 0x160d84e9c5f6aad00．．． | Transfer | 14149395 | 484 days 22 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）boneheads．eth | 0.017667352 ETH | 0.0012 |
| © | 0x46e981b6c8630c37．．． | Transfer | 14066508 | 497 days 18 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）boneheads．eth $\square$ | 1.01 ETH | 0.0021 |
| © | 0xe751c51f3633cf07a．．． | Transfer | 13957062 | 514 days 16 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）boneheads．eth | 2.1 ETH | 0.0027 |
| © | 0x8a8e513dee5792b5．．． | Transfer | 13927916 | 519 days 4 hrs ago | 0xa8c2bC．．．f7281317 | OUT | ）boneheads．eth | 150 ETH | 0.0038 |
| © | 0x017730d211d481f1．．． | Transfer | 13894342 | 524 days 9 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）boneheads．eth ¢ | 20 ETH | 0.0019 |
| © | 0xb1520ffcebd9e574e．．． | Transfer | 13741255 | 548 days 5 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）boneheads．eth［ | 65 ETH | 0.0026 |
| $\bigcirc$ | 0x74f8863e7e86b102d．．． | Transfer | 13725275 | 550 days 19 hrs ago | （）boneheads．eth | in | 0xa8c2bC．．．f7281317 | 238 ETH | 0.0018 |


| (3) | Txn Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fe |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x771e4fff4ab5ac71f9... | Transfer | 13723255 | 551 days 3 hrs ago | 0xa8c2bC...f7281317 [ | OUT | 目Centre: USD Coin | 0 ETH | 0.0131 |
| © | 0x6aac03c3e5751afb2... | Transfer | 13718737 | 551 days 20 hrs ago | 0xa8c2bC...f7281317 [] | OUT | () boneheads.eth | 236 ETH | 0.0064 |
| © | 0xc71caf7061f808a26... | Transfer | 13714726 | 552 days 11 hrs ago | () boneheads.eth [] | IN | 0xa8c2bc...f7281317 | 1 ETH | 0.0017 |
| © | 0xd426ec3c37d69d8fe... | Transfer | 13714718 | 552 days 11 hrs ago | () boneheads.eth [] | IN | 0xa8c2bC...f7281317 | 34 ETH | 0.0016 |
| © | 0x093dbf92c46d1edcc... | Transfer | 13713012 | 552 days 18 hrs ago | 0xa8c2bC...f7281317 | OUT | () boneheads.eth [ | 11.257751843 ETH | 0.0028 |
| $\bigcirc$ | 0x497ef0205750de5e6... | Transfer | 13712927 | 552 days 18 hrs ago | 0xa8c2bC...f7281317 | OUT | () boneheads.eth | 23.573869588 ETH | 0.0029 |
| © | 0x283e72d624830f952... | Transfer | 13709799 | 553 days 6 hrs ago | > boneheads.eth [ | IN | 0xa8c2bc...f7281317 | 236 ETH | 0.0030 |
| © | 0x323be1195bf403d19... | Transfer | 13709739 | 553 days 6 hrs ago | 0xa8c2bC...f7281317 | OUT | () boneheads.eth [ | 0.339137431 ETH | 0.0037 |
| © | 0x191d964bd04258b0... | Transfer | 13709732 | 553 days 6 hrs ago | 0xa8c2bC...f7281317 | OUT | 国 Centre: USD Coin [ | 0 ETH | 0.0108 |
| © | 0x8d7d38f994f20bbc2... | Transfer | 13709720 | 553 days 7 hrs ago | - boneheads.eth [ | in | 0xa8c2bC...f7281317 | 0.353745335 ETH | 0.0028 |
| © | 0xa360f47046957f9ef... | Transfer | 13706448 | 553 days 19 hrs ago | 0xa8c2bC...f7281317 | OUT | () boneheads.eth [ | 240.529347267 ETH | 0.0029 |
| © | 0x827fd462b259f23c8... | Transfer | 13706018 | 553 days 21 hrs ago | 0xa8c2bC...f7281317 | OUT | () boneheads.eth | 50 ETH | 0.0035 |
| © | 0x2a79f4bc6438f3bef... | Transfer | 13705986 | 553 days 21 hrs ago | 0xa8c2bC...f7281317 | OUT | () boneheads.eth | 55 ETH | 0.0033 |
| © | 0x57b1b372a0ae6d2a... | Transfer | 13705965 | 553 days 21 hrs ago | 0xa8c2bC...f7281317 | OUT | () boneheads.eth | 2.763907394 ETH | 0.0032 |


| （3） | Txn Hash |  | Method（3） | Block | Age | From |  | To | Value |  | Txn Fe |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | 0xe11d258c492a6538．．． |  | Transfer | 13705954 | 553 days 21 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）boneheads．eth $\square$ | 10 ETH |  | 0.0031 |
| ® | 0x760f28fb4af2ef17ba．．． |  | Transfer | 13705927 | 553 days 21 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目 Centre：USD Coin $\square$ | 0 ETH |  | 0.0086 |
| ® | 0xeaad7f847061b78e4．．． |  | Transfer | 13697285 | 555 days 6 hrs ago | （）boneheads．eth $\square$ | IN | 0xa8c2bc．．．f7281317 | 358.1736284 | ETH | 0.0026 |
| ® | $0 \times 35 c 59 f 46873$ dadcfc．．． |  | Transfer | 13697262 | 555 days 6 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目Centre：USD Coin | 0 ETH |  | 0.0063 |
| $\bigcirc$ | 0xe4eafff0292cd96fcc．．． |  | Transfer | 13697236 | 555 days 6 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 目 Centre：USD Coin | 0 ETH |  | 0.0063 |
| © | 0xfa3405767fb80f498．．． |  | Transfer | 13515728 | 583 days 21 hrs ago | 0xa8c2bC．．．f7281317 | OUT | （）boneheads．eth | 16.9 ETH |  | 0.0033 |
| Show： | 100 V | Records |  |  |  |  |  | First | ＜Page 1 of 2 | ＞ | Last |

［ Download：CSV Export $\boldsymbol{\downarrow}_{\text {a }}$ ］


## Transactions

For 0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317


| （3） | Txn Hash | Method（3） | Block | Age | From |  | то |  | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0xd0cc787d66048d72．．． | Exact Input | 13163628 | 638 days 19 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目Uniswap V3：Router［ |  | 50 ETH | 0.02091393 |
| ® | 0xcd063410d1bf1cbc8．．． | Exact Input | 13163628 | 638 days 19 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目Uniswap V3：Router |  | 50 ETH | 0.01879515 |
| © | 0x88d380a4091a2878．．． | Exact Input Si．．． | 13163622 | 638 days 19 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目Uniswap V3：Router |  | 50 ETH | 0.01297215 |
| © | 0xf5eae6cb6f2b83600．．． | Exact Input Si．．． | 13163619 | 638 days 19 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 国Uniswap V3：Router［ |  | 50 ETH | 0.01335495 |
| ® | 0x3400c340147be99c．．． | Exact Input Si．．． | 13163494 | 638 days 19 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目Uniswap V3：Router［ |  | 46 ETH | 0.0315365 |
| ® | 0x15d08f1ce6130db91．．． | Exact Input | 13163431 | 638 days 19 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目Uniswap V3：Router［ |  | 46 ETH | 0.02906775 |
| ® | 0x9c2ad07717e796f42．．． | Exact Input | 13163419 | 638 days 20 hrs ago | 0xa8c2bc．．．f7281317 | OUT | 目Uniswap V3：Router |  | ． 5 ETH | 0.02059349 |
| ® | 0x5780bcfd00dfcab7a．．． | Transfer | 13156688 | 639 days 20 hrs ago | 0xa8c2bC．．．f7281317 | OUT | 0xC59Ef9．．．Ee2e8620 |  | 5．358124104 ETH | 0.0029715 |
| © | 0xe1c1ccae0e2f71945．．． | Transfer | 13153164 | 640 days 9 hrs ago | （）boneheads．eth［ | in | 0xa8c2bC．．．f7281317 |  | 3.046296156 ETH | 0.00922627 |
| © | 0xecf25c48b96da5d03．．． | Transfer | 13150694 | 640 days 18 hrs ago | （）boneheads．eth［ | in | 0xa8c2bC．．．f7281317 |  | 5.533204363 ETH | 0.00250977 |
| © | 0xa3d3f3dc5e377ef96．．． | Transfer | 13150662 | 640 days 19 hrs ago | ）boneheads．eth［ | in | 0xa8c2bC．．．f7281317 |  | 262．115640178 ETH | 0.00191234 |
| ® | 0xfa5589312c39484a8．．． | Transfer | 13150658 | 640 days 19 hrs ago | ）boneheads．eth | in | 0xa8c2bc．．．f7281317 |  | 6．211564017 ETH | 0.00210737 |
| ® | 0x2681983d4a854f97．．． | Transfer | 13150413 | 640 days 20 hrs ago | （）boneheads．eth | in | 0xa8c2bc．．．f7281317 |  | 0．3 ETH | 0.00407257 |
| Show： | 100 ～Records |  |  |  |  |  |  | First | ＜Page 2 of 2 | ＞Last |

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

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

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


Commissioner of Oaths in and for Ontario

## Transactions

For 0xa1e43fcb51656354931d47458eceadbc6545df57 () ivybone.eth


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fi |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x50663c3444865a98f．．． | Set Approval ．．． | 16771995 | 91 days 2 hrs ago | （）ivybone．eth | OUT | 国 The Otherside：OTHR T．．．［ | 0 ETH | 0.002 |
| © | 0x0e9e8927ff89723db．．． | Transfer | 16727253 | 97 days 9 hrs ago | （）ivybone．eth | OUT | 目 Centre：USD Coin | 0 ETH | 0.001 |
| $\bigcirc$ | 0x0a03e3c68232c10e．．． | Swap | 16727250 | 97 days 9 hrs ago | （）ivybone．eth | OUT | 国 Metamask：Swap Router［ | 0 ETH | 0.004 |
| © | 0x8e9ed63d940dcf2e5．．． | Withdraw | 15778878 | 229 days 22 hrs ago | （）ivybone．eth | OUT | 目Wrapped Ether［ | 0 ETH | 0.000 |
| $\bigcirc$ | 0x7eabbbc9a1cc8d93．．． | Fulfill Advanc．．． | 15778858 | 229 days 22 hrs ago | （）ivybone．eth | OUT | 国Seaport 1.1 ［ | 0 ETH | 0.003 |
| © | 0xcf8081fdfe31d0d8d．．． | Approve | 15778857 | 229 days 22 hrs ago | （）ivybone．eth | OUT | 目 Wrapped Ether［ | 0 ETH | 0.000 |
| © | 0xab0b8255c5142002．．． | Cancel | 15778855 | 229 days 22 hrs ago | （）ivybone．eth | OUT | 目Seaport 1.1 ［ | 0 ETH | 0.000 |
| © | 0xfa158aad50f740825．．． | Set Approval ．．． | 15778849 | 229 days 22 hrs ago | （）ivybone．eth | OUT | 国 Non Fungible Tools Lif．．． | 0 ETH | 0.000 |
| © | 0xc0d4f0fd5bc50dea8．．． | Transfer | 15732233 | 236 days 10 hrs ago | （）ivybone．eth | OUT | 国Apecoin：APE Token［ | 0 ETH | 0.000 |
| ® | 0xbee5790a39100731f．．． | Transfer | 15409444 | 284 days 10 hrs ago | （）ivybone．eth | OUT | 0xa8c2bc．．．f7281317 | 0．2 ETH | 0.000 |
| ๑ | 0x99610ee568a088bc．．． | Transfer | 14831606 | 378 days 3 hrs ago | （）ivybone．eth | OUT | 0xa8c2bC．．．f7281317 | 23．25 ETH | 0.000 |
| $\bigcirc$ | 0x337fea71b92a5c3bf．．． | Transfer | 14713787 | 397 days 44 mins ago | （）praisegod．eth | in | （）ivybone．eth | 0.071285111 ETH | 0.000 |
| $\bigcirc$ | 0x007dd57e73c525aaf．．． | Transfer | 14693578 | 400 days 5 hrs ago | 0x15F821．．．8e60e907［ | in | （）ivybone．eth | 0.99015533 ETH | 0.001 |
| $\bigcirc$ | 0x9a44b33fda84c16af．．． | Transfer | 14692668 | 400 days 8 hrs ago | （）prismo．eth［ | in | （）ivybone．eth | 0.63 ETH | 0.001 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn F |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xf5c06b3af0226848f．．． | Atomic Match＿ | 14690658 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 18.67 ETH | 0.015 |
| © | 0x38cc3a4abe92c8b0．．． | Swap | 14690646 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 國 Metamask：Swap Router | 0 ETH | 0.047 |
| $\bigcirc$ | 0x6ad94b5eca1e997ff．．． | Atomic Match＿ | 14690639 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 17.99 ETH | 0.021 |
| © | 0xf1a61949cc6427574．．． | Swap | 14690636 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 國 Metamask：Swap Router［ | 0 ETH | 0.017 |
| © | 0xa71ea7b78984df77b．．． | Approve | 14690636 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 目Apecoin：APE Token | 0 ETH | 0.004 |
| © | 0x9fad3023ccac9faa1．．． | Cancel Order＿ | 14690633 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0 ETH | 0.005 |
| © | 0x450a60e92c0cc4e5．．． | Atomic Match＿ | 14690630 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.017 |
| © | 0x4e4d49c4d289a1e1．．． | Cancel Order＿ | 14690620 | 400 days 16 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.006 |
| © | 0xd3456de91123f6904．．． | Cancel Order＿ | 14690131 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.017 |
| © | 0xb8dc192322ff03217．．． | Cancel Order＿ | 14690131 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.017 |
| © | 0xe6a1db411cc93b7e．．． | Cancel Order＿ | 14690130 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.015 |
| © | 0x2c75fe39b4a151725．．． | Cancel Order＿ | 14690127 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.018 |
| © | （1）0xafb056aba65c5fd8e．．． | Atomic Match＿ | 14690066 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.017 |
| $\bigcirc$ | （1） $0 \times 122487802084 \mathrm{~cd} 24 .$. | Atomic Match＿ | 14690062 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.020 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fi |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0x46eb2ae2d570a26fa．．． | Atomic Match＿ | 14690027 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.043 |
| ® | 0xcff5bc2355b0d533f．．． | Atomic Match＿ | 14690024 | 400 days 18 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.048 |
| ® | 0x4d404fcea9a7f5309．．． | Transfer | 14690001 | 400 days 19 hrs ago | 0xbAF331．．．E2Da3C85［ | IN | （）ivybone．eth | 0.1 ETH | 0.005 |
| ® | 0x3b0ad277f49128a95．．． | Transfer | 14689999 | 400 days 19 hrs ago | 0x3acEf2．．．87dda4fa | IN | （）ivybone．eth | 0.88381078 ETH | 0.004 |
| ® | 0x2cb5685fe79503504．．． | Transfer | 14689996 | 400 days 19 hrs ago | （）boneheads．eth［ | IN | （）ivybone．eth［］ | 0．6 ETH | 0.005 |
| © | 0xb98fb44dad5c00c7f．．． | Transfer | 14689993 | 400 days 19 hrs ago | 0xbAF331．．．E2Da3C85［ | in | （ ivybone．eth | 2．2 ETH | 0.005 |
| © | 0xe81df3f880e19737b．．． | Cancel Order＿ | 14689972 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.028 |
| ๑ | （1） $0 \times 59 \mathrm{~d} 7546 \mathrm{c} 1 \mathrm{fd} 95 \mathrm{~d} 4 \mathrm{~d} 4 \ldots$ | Atomic Match＿ | 14689963 | 400 days 19 hrs ago | （）ivybone．eth | оUt | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.023 |
| ๑ | （1）0x531274bccdf64b1af．．． | Atomic Match＿ | 14689963 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.023 |
| © | （1）0x46efcf0e9a9839f15．．． | Atomic Match＿ | 14689960 | 400 days 19 hrs ago | （ ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.023 |
| ® | （1）0x828c95defe45ec19d．．． | Atomic Match＿ | 14689952 | 400 days 19 hrs ago | （ ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.022 |
| © | 0x1b84fdc05e42a755d．．． | Cancel Order＿ | 14689929 | 400 days 19 hrs ago | （ ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.026 |
| © | 0x4a02698b2ccf2bd82．．． | Cancel Order＿ | 14689928 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.023 |
| $\bigcirc$ | 0xbc14e657325c84d9．．． | Cancel Order＿ | 14689928 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.023 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fi |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x5416865985cdbcf17．．． | Atomic Match＿ | 14689917 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.073 |
| © | 0x245e19c8434621a4．．． | Atomic Match＿ | 14689839 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.096 |
| © | （1）0x98ef37c9ac489a948．．． | Atomic Match＿ | 14689838 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.026 |
| ® | 0x604d504361abb253．．． | Atomic Match＿ | 14689834 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.088 |
| © | 0xd9dafa292d041f2b8．．． | Atomic Match＿ | 14689816 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.116 |
| ® | （1）0x4fd81029e567db8fd．．． | Atomic Match＿ | 14689814 | 400 days 19 hrs ago | （ ivybone．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.035 |
| © | 0xb03baaa2a82ba508．．． | Atomic Match＿ | 14689812 | 400 days 19 hrs ago | （ ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.123 |
| © | （1）0x056482ff88c7be962．．． | Atomic Match＿ | 14689810 | 400 days 19 hrs ago | （ ivybone．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.034 |
| © | 0xeac6a5df214c392ae．．． | Atomic Match＿ | 14689809 | 400 days 19 hrs ago | （ ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.111 |
| $\bigcirc$ | 0x229ccaf4fd19efeddd．．． | Atomic Match＿ | 14689804 | 400 days 19 hrs ago | （）ivybone．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.102 |
| © | 0x7e590a64b12bc55c．．． | Atomic Match＿ | 14689802 | 400 days 19 hrs ago | O ivybone．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.109 |
| $\bigcirc$ | 0x328b15f8b5eba6206．．． | Approve | 14689781 | 400 days 19 hrs ago | （ivybone．eth | OUT | 目Apecoin：APE Token | 0 ETH | 0.021 |
| $\bigcirc$ | 0x0ccfbc1bc784e94d6．．． | Transfer | 14689600 | 400 days 20 hrs ago | 0xa8c2bc．．．f7281317 | in | （ ivybone．eth | 5 ETH | 0.081 |
| $\bigcirc$ | 0xca0fe7fe03e32ad99f．．． | Transfer From | 14220224 | 474 days 12 mins ago | （）ivybone．eth | OUT | 目 Jadu Hoverboard：Hov．．． | 0 ETH | 0.005 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fi |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 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 | 目Index Protocol：INDEX ．．． | 0 ETH | 0.008 |
| © | 0x01f5628d7d2da9f82．．． | Transfer | 13583883 | 573 days 5 hrs ago | （）ivybone．eth | OUT | 目Index Protocol：Metave．．． | 0 ETH | 0.008 |
| © | 0x964b1e2165c73e89．．． | Transfer | 13583848 | 573 days 5 hrs ago | （）ivybone．eth | OUT | 目ENS：ENS Token | 0 ETH | 0.006 |
| © | 0x167e74e535828a39．．． | Claim Tokens | 13583811 | 573 days 5 hrs ago | （）ivybone．eth | OUT | 目ENS：ENS Token | 0 ETH | 0.025 |
| © | 0xa425cdcaf57580f12．．． | Set Owner | 13583480 | 573 days 6 hrs ago | （ ivybone．eth | OUT | 国 ENS：Registry with Fall．．． | 0 ETH | 0.004 |
| © | 0x4aOfd2984c718ed70．．． | 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 | 国 Bored Ape Yacht Club：．．．－ | 0 ETH | 0.016 |
| $\bigcirc$ | 0x816c70444ce99a19．．． | Transfer | 13475301 | 590 days 6 hrs ago | （）ivybone．eth | OUT | 0xa8c2bc．．．f7281317［ | 4．5 ETH | 0.001 |
| © | 0x90e3424705346524．．． | Safe Transfer ．．． | 13475289 | 590 days 6 hrs ago | （ ivybone．eth | OUT | 目ENS：Base Registrar Im．．． | 0 ETH | 0.004 |
| © | 0x2e48a877248c57b3．．． | Safe Transfer ．．． | 13475289 | 590 days 6 hrs ago | （）ivybone．eth | OUT | 圁ENS：Base Registrar Im．．． | 0 ETH | 0.006 |
| © | 0xafc7bcf45f835707a．．． | Commit | 13475287 | 590 days 6 hrs ago | （）ivybone．eth | OUT | 目ENS：Old ETH Registrar．．． | 0 ETH | 0.003 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fi |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | （1）0x6beed38e88edf85f2．．． | Mint | 13475283 | 590 days 6 hrs ago | （）ivybone．eth ¢ | OUT | 目Doodles：DOODLE Token | 0.615 ETH | 0.001 |
| © | （1）0x6e717385d97e920d．．． | Mint | 13439224 | 595 days 21 hrs ago | （）ivybone．eth | OUT | 目Doodles：DOODLE Token | 0.615 ETH | 0.002 |
| © | （1）0xbfce3358ea4663fb5．．． | Mint | 13439224 | 595 days 21 hrs ago | （）ivybone．eth | OUT | 目Doodles：DOODLE Token | 0.615 ETH | 0.002 |
| ® | （1）0x1ad4705cc6efc935b．．． | Mint | 13439224 | 595 days 21 hrs ago | （）ivybone．eth | OUT | 目 Doodles：DOODLE Token［ | 0.615 ETH | 0.002 |
| © | （1）0x61a6b4d8b3089a36．．． | Mint | 13439224 | 595 days 21 hrs ago | （）ivybone．eth | OUT | 国 Doodles：DOODLE Token | 0.615 ETH | 0.002 |
| ® | 0xf6bff1f236c20d0871．．． | Transfer | 13439104 | 595 days 21 hrs ago | （ ivybone．eth | SELF | （ivybone．eth | 0 ETH | 0.092 |
| ® | 0xd39a60ba0d1515ad．．． | Transfer | 13439038 | 595 days 22 hrs ago | （ ivybone．eth | OUT | －ticasso．eth | 0.25 ETH | 0.001 |
| © | 0x481230f1faf35045c．．． | Transfer | 13439035 | 595 days 22 hrs ago | （ ivybone．eth | OUT | （）ticasso．eth | 1 ETH | 0.001 |
| © | 0x5e34200ab1511d1a．．． | Register With ．．． | 13430122 | 597 days 7 hrs ago | （）ivybone．eth | OUT | 目ENS：Old ETH Registrar．．．［］ | 0.014085245 ETH | 0.017 |
| $\bigcirc$ | 0xacba75b532338390．．． | Commit | 13430106 | 597 days 7 hrs ago | （）ivybone．eth | OUT | 目ENS：Old ETH Registrar．．． | 0 ETH | 0.003 |
| © | 0x4e4ebf2e01cb70542．．． | Transfer | 13430095 | 597 days 7 hrs ago | （）boneheads．eth［ | in | （ ivybone．eth | 5 ETH | 0.001 |
| $\bigcirc$ | 0xdb9f3bc894eedba25．．． | Multiplex Batc．．． | 13418452 | 599 days 3 hrs ago | （ ivybone．eth | OUT | 国0x：Exchange Proxy | 13.222 ETH | 0.055 |
| © | 0xb810ed2984c9682d．．． | Transfer | 13418433 | 599 days 3 hrs ago | （）boneheads．eth［ | in | （ ivybone．eth | 13.257851962 ETH | 0.003 |
| $\bigcirc$ | 0x86cf70972738e467c．．． | Approve | 13416627 | 599 days 10 hrs ago | （）ivybone．eth | OUT | 目Uniswap V2：MVI ¢ | 0 ETH | 0.004 |


| （2） | Txn Hash |  | Method（3） | Block | Age | From | To |  | Value |  |  | Txn F |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0xe6764 | c2db09c518．．． | Sell To Uniswap | 13416597 | 599 days 10 hrs ago | （）ivybone．eth | OUT | 目0x：Exchange Proxy［ |  | 4 ETH |  | 0.014 |
| ® | 0xbd496 | 60da527540．．． | Set Name | 13341325 | 611 days 6 hrs ago | （）ivybone．eth | OUT | 目ENS：Old Reverse Regis．．．［ |  | 0 ETH |  | 0.007 |
| © | 0xa4bda | 733126a3c9．．． | Set Addr | 13341323 | 611 days 6 hrs ago | （）ivybone．eth | OUT | 目ENS：Public Resolver 2 ［ |  | 0 ETH |  | 0.002 |
| $\bigcirc$ | 0x1ff141 | e4bca156ca．．． | 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 | ＞ | Last |

［ Download：CSV Export 当］


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


Commissioner of Oaths in and for Ontario

## Transactions

For 0x3acef2d359f430cee5e205262a884d6087dda4fa

| A total of 48 transactions found |  |  |  |  |  |  | First | < | Page 1 of 1 | > | Last | $\nabla \vee$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (3) | Txn Hash | Method (3) | Block | Age | From | To |  |  | Value |  |  | Txn Fee |
| ® | 0x757c0b9e94e4b180... | Transfer | 15732243 | 236 days 11 hrs ago | 0x3acEf2...87dda4fa | OUT | O boneheads.eth |  | 0.076975721 ETH |  |  | 0.00035564 |
| ® | 0x9b2e09c0e31b76c7... | Withdraw | 15732236 | 236 days 11 hrs ago | 0x3acEf2...87dda4fa | OUT | 目 Wrapped Ether [ |  | 0 ETH |  |  | 0.00061573 |
| © | 0x975e17f1739b504ac... | Transfer | 15409444 | 284 days 10 hrs ago | 0x3acEf2...87dda4fa | OUT | 0xa8c2bc...f7281317 |  | 0.45 ETH |  |  | 0.00029052 |
| © | 0x282e34cc8fe251d0e... | Transfer | 15230840 | 312 days 12 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa |  | 0.04196 ETH |  |  | 0.000294 |
| ® | 0x637abdd3e3feaad93... | Transfer | 15116589 | 330 days 5 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa |  | 0.058955922 ETH |  |  | 0.00057388 |
| $\bigcirc$ | 0xf385e1ad25fa03f09... | Transfer | 14818070 | 380 days 9 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa |  | 0.0407995 ETH |  |  | 0.0005202 |
| ® | 0x80687ccfcdeb6a037... | Transfer | 14730155 | 394 days 10 hrs ago | 0x0B7a43...A4173B22 [] | in | 0x3acEf2...87dda4fa |  | 0.0504 ETH |  |  | 0.00074179 |
| $\bigcirc$ | 0xda282833689878eb... | Transfer | 14700469 | 399 days 4 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa |  | 0.02311 ETH |  |  | 0.00167297 |
| $\bigcirc$ | 0x3b0ad277f49128a95... | Transfer | 14689999 | 400 days 19 hrs ago | 0x3acEf2...87dda4fa | out | O ivybone.eth |  | 0.88381078 ETH |  |  | 0.0049599 |
| ® | 0xb56affb1100017a4f... | Withdraw | 14689989 | 400 days 19 hrs ago | 0x3acEf2...87dda4fa | OUT | 目 Wrapped Ether [ |  | 0 ETH |  |  | 0.00809699 |


| (3) | Txn Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x514d41c8a60743b5... | Transfer | 14615582 | 412 days 11 hrs ago | 0x0B7a43...A4173B22 [ | IN | 0x3acEf2 ...87dda4fa | 0.032765 ETH | 0.00072138 |
| © | 0xc87f7219fb5310ec6... | Transfer | 14547482 | 423 days 3 hrs ago | 0x0B7a43...A4173B22 | in | 0x3acEf2...87dda4fa | 0.0267895 ETH | 0.00106733 |
| © | 0xe978cd01b4aa234b... | Transfer | 14516927 | 427 days 21 hrs ago | 0x0B7a43...A4173B22 | in | 0x3acEf2...87dda4fa | 0.03815 ETH | 0.00172432 |
| © | 0xbd1894484b99109c... | Transfer | 14422910 | 442 days 13 hrs ago | 0x0B7a43...A4173B22 | in | 0x3acEf2...87dda4fa | 0.0344595 ETH | 0.00039289 |
| ® | 0x2de4cb49033ba833... | Transfer | 14390671 | 447 days 14 hrs ago | 0x0B7a43...A4173B22 | in | 0x3acEf2 ...87dda4fa | 0.055735 ETH | 0.00055287 |
| © | 0xcbe5c059ecfc72abe... | Transfer | 14339714 | 455 days 12 hrs ago | 0x0B7a43...A4173B22 [ | IN | 0x3acEf2...87dda4fa | 0.03208 ETH | 0.00071895 |
| $\bigcirc$ | 0xdb705ab6fbfe1ed83... | Transfer | 14313303 | 459 days 14 hrs ago | 0x0B7a43...A4173B22 [ | IN | 0x3acEf2...87dda4fa | 0.1735455 ETH | 0.00063712 |
| © | 0x45aa01a443553f82b... | Transfer | 14265106 | 467 days 2 hrs ago | 0x3acEf2...87dda4fa | out | ( boneheads.eth | 0.124347308 ETH | 0.00352797 |
| © | 0x9c5282cff7c47fcd48... | Transfer | 14259194 | 467 days 23 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa | 0.02745 ETH | 0.001848 |
| © | 0xfbcd2ee93d3d26fc8... | Transfer | 14218961 | 474 days 5 hrs ago | 0x0B7a43...A4173B22 [] | in | 0x3acEf2...87dda4fa [ | 0.0302995 ETH | 0.00317749 |
| © | 0xda471a682eca9da7... | Transfer | 14180037 | 480 days 5 hrs ago | 0x0B7a43...A4173B22 | IN | 0x3acEf2...87dda4fa | 0.069955 ETH | 0.00215503 |
| $\bigcirc$ | 0xe34ae6fc88d6878d8... | Transfer | 14128680 | 488 days 4 hrs ago | 0x3acEf2...87dda4fa | OUT | ( boneheads.eth | 0.060003665 ETH | 0.0044462 |
| $\bigcirc$ | 0x879bbbe1f62361ad7... | Transfer | 14112695 | 490 days 15 hrs ago | 0x0B7a43...A4173B22 ¢ | in | 0x3acEf2...87dda4fa | 0.0646245 ETH | 0.00160607 |
| $\bigcirc$ | 0x46458afaa62f1d3bc... | Transfer | 14045195 | 501 days 2 hrs ago | 0x3acEf2...87dda4fa | OUT | () boneheads.eth [ | 0.918691399 ETH | 0.00415268 |


| (3) | Txn Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | 0xff09b88edffdb770d3... | Transfer | 14039482 | 501 days 23 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa | 0.459295 ETH | 0.00214504 |
| © | 0xd2bdbb17d7f91261... | Transfer | 13981751 | 510 days 21 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa | 0.461265 ETH | 0.00481281 |
| © | 0x9917e6ad33613386... | Deposit | 13955698 | 514 days 22 hrs ago | 0x3acEf2...87dda4fa | OUT | 目 Wrapped Ether | 0.504586576 ETH | 0.00719634 |
| $\bigcirc$ | 0x56113f51399e2e68a... | Transfer | 13931111 | 518 days 17 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa | 0.514339472 ETH | 0.00159055 |
| © | 0xb63521d9cc620931... | Transfer | 13894239 | 524 days 10 hrs ago | 0x3acEf2...87dda4fa ¢ | OUT | Oboneheads.eth | 0.056505701 ETH | 0.00139563 |
| © | 0xbc82c3a641db772d... | Transfer | 13893954 | 524 days 11 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa | 0.03690012 ETH | 0.00218919 |
| $\bigcirc$ | 0x4028f243005c9ad64... | Transfer | 13867416 | 528 days 14 hrs ago | 0x0B7a43...A4173B22 [ | in | 0x3acEf2...87dda4fa | 0.0211 ETH | 0.00087081 |
| $\bigcirc$ | 0x209760eea5fe3d4cd... | Transfer | 13857863 | 530 days 1 hr ago | 0x3acEf2...87dda4fa | OUT | () boneheads.eth $\square$ | 0.188620132 ETH | 0.0022528 |
| $\bigcirc$ | 0x0473cc0d5db96ea4... | Transfer | 13808502 | 537 days 16 hrs ago | 0x0B7a43...A4173B22 ¢ | in | 0x3acEf2...87dda4fa | 0.02209 ETH | 0.00155646 |
| © | 0xd6840143f14dec1a6... | Transfer | 13777654 | 542 days 11 hrs ago | 0x0B7a43...A4173B22 ¢ | in | 0x3acEf2...87dda4fa | 0.03646 ETH | 0.00159398 |
| © | 0x802758c3b478b19c... | Transfer | 13735443 | 549 days 5 hrs ago | 0x0B7a43...A4173B22 [] | in | 0x3acEf2...87dda4fa [] | 0.049769 ETH | 0.0018783 |
| © | 0x3888d4b9837340d5... | Transfer | 13685123 | 557 days 6 hrs ago | 0x0B7a43...A4173B22 [] | ı | 0x3acEf2...87dda4fa | 0.08223 ETH | 0.00233103 |
| © | 0xd966e8e238d45977... | Transfer | 13672198 | 559 days 7 hrs ago | 0x3acEf2...87dda4fa [] | OUT | O boneheads.eth | 2.420333592 ETH | 0.00291026 |
| © | 0x61d03992de04cba6f... | Buy | 13667775 | 559 days 23 hrs ago | 0x3acEf2...87dda4fa | OUT | 国BaboonBet: BBET Token [ | 5 ETH | 2.24448418 |


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[^4]This is Exhibit "BJ" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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


Commissioner of Oaths in and for Ontario

## Overview

ETH BALANCE
乞 0.000130320919638 ETH

ETH VALUE
\$0.24 (@ \$1,811.56/ETH)

## More Info

PRIVATE NAME TAGS

+ Add

LAST TXN SENT
0x00235ebd207a... from 236 days 11 hrs ago

FIRST TXN SENT
0x83ec7f251abe6... from 583 days 22 hrs ago

## Multi Chain

MULTICHAIN ADDRESSES
1 address found via Blockscan $\checkmark$


| (3) | Transaction Hash | Method (? | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x466da17442f94a013... | Bulk Transfer | 15732283 | 236 days 11 hrs ago | OxbAF331...E2Da3C85 | OUT | © OpenSea: Transfer H... | 0 ETH | 0.00630209 |
| © | 0x8be77df9daf53b370... | Set Approval ... | 15732281 | 236 days 11 hrs ago | 0xbAF331...E2Da3C85 | OUT | $\square$ Doodles: GBOX Token | 0 ETH | 0.00086376 |
| © | 0x4e4e3ad99b9342d6... | Transfer | 15368935 | 290 days 21 hrs ago | OxbAF331...E2Da3C85 [ | OUT | 0xa8c2bC...f7281317 [ | 22 ETH | 0.00017457 |
| (2) | 0x4c8a5c6c27b9c841... | Bid | 15052639 | 340 days 3 hrs ago | OxbAF331...E2Da3C85 [ | OUT | $\square$ Doodles: GBOX Token | 5 ETH | 0.00128056 |
| © | Oxdede71aa49bf7df29... | Transfer | 14870432 | 371 days 20 hrs ago | 0xF38269...73C940fc [a | IN | 0xbAF331...E2Da3C85 | 8 ETH | 0.0007917 |
| © | 0x038780b173dde936... | Transfer | 14870363 | 371 days 20 hrs ago | 0xF38269...73C940fc [] | IN | 0xbAF331...E2Da3C85 | 18.6 ETH | 0.00084 |
| © | 0x1044bc6158626635... | Transfer | 14870230 | 371 days 21 hrs ago | 0xF38269...73C940fc | IN | 0xbAF331...E2Da3C85 | 0.05318243 ETH | 0.0009576 |
| © | 0x4d404fcea9a7f5309... | Transfer | 14690001 | 400 days 19 hrs ago | OxbAF331...E2Da3C85 [ | OUT | () ivybone.eth [ | 0.1 ETH | 0.00527207 |
| © | 0xb98fb44dad5c00c7f... | Transfer | 14689993 | 400 days 19 hrs ago | 0xbAF331...E2Da3C85 [ | OUT | () ivybone.eth | 2.2 ETH | 0.00511087 |
| © | 0x7519c63617ee2a23... | Transfer | 14502137 | 430 days 5 hrs ago | 0xbAF331...E2Da3C85 [ | OUT | 0xF38269...73C940fc [ | 20.17750438 ETH | 0.00143066 |
| © | 0xa5e3a0a2add812d9... | Transfer | 14502129 | 430 days 5 hrs ago | 0xa8c2bC...f7281317 [] | IN | 0xbAF331...E2Da3C85 | 20.21030263 ETH | 0.00162457 |
| © | 0xa0e9d63bdd91640d... | Transfer | 14425392 | 442 days 4 hrs ago | OxbAF331...E2Da3C85 | OUT | 0xF38269...73C940fc | 25.85 ETH | 0.00057413 |
| © | 0x185fa63d7408849d... | Transfer | 14425388 | 442 days 4 hrs ago | OxbAF331...E2Da3C85 | OUT | 0xF38269...73C940fc | 25.85 ETH | 0.00051945 |
| © | 0x0cb80ca03beb2d77f... | Transfer | 14425370 | 442 days 4 hrs ago | OxbAF331...E2Da3C85 [ | OUT | 0xF38269...73C940fc | 1 ETH | 0.00070343 |


| （3） | Transaction Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0x14635f720e6420e48．．． | Transfer | 14425178 | 442 days 5 hrs ago | 0xa8c2bC．．．f7281317［ | IN | 0xbAF331．．．E2Da3C85 | 55 ETH | 0.0007238 |
| ® | 0xc2a4d39fbbdfac95fc．．． | Transfer | 13672205 | 559 days 7 hrs ago | 0xbAF331．．．E2Da3C85 | OUT | BONEHEADS：Deployer［ | 0.21001781 ETH | 0.00275758 |
| © | 0x2bed9188aad5b88fe．．． | Transfer | 13583428 | 573 days 7 hrs ago | BONEHEADS：Deployer［］ | ı | 0xbAF331．．．E2Da3C85 | 0.21053606 ETH | 0.00322067 |
| © | 0xd1ec087330798020．．． | Transfer | 13579791 | 573 days 21 hrs ago | OxbAF331．．．E2Da3C85 | OUT | BONEHEADS：Deployer $\square$ | 0.004173 ETH | 0.00334901 |
| © | 0x83ec7f251abe6c6c8．．． | Transfer From | 13515802 | 583 days 22 hrs ago | OxbAF331．．．E2Da3C85 | OUT | © Mutant Ape Yacht Cl．．． | 0 ETH | 0.01294398 |
| ® | 0xbf06da00a28690e1f．．． | Transfer | 13515788 | 583 days 22 hrs ago | BONEHEADS：Deployer［］ | in | 0xbAF331．．．E2Da3C85 | 0.0229629 ETH | 0.00366898 |

［ Download：CSV Export 山⿶凵
 Base．

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

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


Commissioner of Oaths in and for Ontario

## () blockbone.eth (ㄹ)

## Overview

eth balance

- 0.006483073233533152 ETH


## More Info

private name tags

+ Add
ETH VALUE
\$11.74 (@ \$1,811.53/ETH)
LAST TXN SENT
$0 \times 05 d d f e 5$ efb 1 db ... from 474 days 49 mins ago
FIRST TXN SENT
0x2b5313536b9f9... from 573 days 21 hrs ago


## Multi Chain

MULTICHAIN ADDRESSES
1 address found via Blockscan $\checkmark$

| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x05ddfe5efb1dba1e6... | Transfer From | 14220269 | 474 days 49 mins ago | ) blockbone.eth | OUT | ( ${ }^{\text {J Jadu }}$ 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 |
| $\bigcirc$ | Oxadbeca42ed9bd3c3... | Transfer | 13583547 | 573 days 7 hrs ago | () blockbone.eth | OUT | ( bonestar.eth [ | 0.03147015 ETH | 0.00389289 |
| $\bigcirc$ | 0x91e10e9047d38e93... | Transfer | 13583532 | 573 days 7 hrs ago | ) bonestar.eth [ | ı | () blockbone.eth | 0.13954942 ETH | 0.00397629 |
| $\bigcirc$ | 0x2a51373fe7908203b... | Set Addr | 13583512 | 573 days 7 hrs ago | ) blockbone.eth | OUT | [ENS: Public Resolver 2 ¢ | 0 ETH | 0.00693386 |
| $\bigcirc$ | 0xa89b7a7dd409b9fc3... | Transfer | 13583505 | 573 days 7 hrs ago | BONEHEADS: Deployer [] | in | () blockbone.eth | 0.02101635 ETH | 0.00314671 |
| $\bigcirc$ | 0x2b5313536b9f943bc... | Transfer From | 13579842 | 573 days 21 hrs ago | () blockbone.eth | OUT | E 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 |

[ Download: CSV Export $\boldsymbol{\nu}_{\text {u }}$ ]
 Base.

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

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


Commissioner of Oaths in and for Ontario

## Transactions

For 0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147 (ticasso.eth

| (3) | Txn Hash | Method (3) | Block | Age | From |  | To |  | Value |  | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xf5c1dd9d94dacda99... | Claim | 14905434 | 366 days 3 hrs ago | () ticasso.eth [ | OUT | ( Fear City: FEARCITY To... |  | 0.1554 ETH |  | 0.006521 |
| © | 0xbd22b5898fbc126fa... | Multicall | 14900490 | 366 days 23 hrs ago | () ticasso.eth [ | OUT | 目 Uniswap V3: Router 2 [ |  | 0 ETH |  | 0.00759: |
| (0) | 0x7d13c7eb9dbe8aafd... | Approve | 14900487 | 366 days 23 hrs ago | () ticasso.eth [ | OUT | \# Apecoin: APE Token $\square$ |  | 0 ETH |  | 0.00311 ، |
| © | 0x2af88b05ce62e7857... | Transfer | 14900457 | 366 days 23 hrs ago | 0x15F821...8e60e907 [] | IN | () ticasso.eth |  | 0.020897641 ETH |  | 0.00146 |
| © | 0x8fb53182adebd2196... | Swap | 14693689 | 400 days 5 hrs ago | ( ticasso.eth [] | OUT | \# Metamask: Swap Router [ [ |  | 0.27 ETH |  | 0.007481 |
| (2) | 0xf46e7e7e57680a659... | Withdraw | 14472120 | 434 days 21 hrs ago | () ticasso.eth [ | OUT | O Wrapped Ether [] |  | 0 ETH |  | 0.00115: |
| © | Oxcbec20d813e6705d... | Transfer | 14316470 | 459 days 3 hrs ago | 0xDf3285...177a83b3 [] | IN | () ticasso.eth |  | 0.045 ETH |  | 0.00067 |
| © | 0x56379e13153c4473... | Transfer | 14316467 | 459 days 3 hrs ago | 0x15F821...8e60e907 [] | IN | () ticasso.eth $\square$ |  | 0.04 ETH |  | 0.00088 |
| © | 0x8a3e6880f834f32ba... | Multicall | 14308530 | 460 days 8 hrs ago | ( ticasso.eth [] | OUT | O Uniswap V3: Router 2 [ |  | 0.08 ETH |  | 0.01157 |
| © | 0xb523a2ab2c408a89... | Set Approval ... | 14288926 | 463 days 9 hrs ago | () ticasso.eth [ | OUT | 目 The Doggies: TD Token [ |  | 0 ETH |  | 0.001101 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xe58e261031144f4d7．．． | Transfer From | 14275977 | 465 days 9 hrs ago | （ ticasso．eth | OUT | 目 Jadu Hoverboard：Hov．．． | 0 ETH | 0．00739 |
| © | 0xd13a51b1c63b1b9d．．． | Transfer | 14275889 | 465 days 10 hrs ago | （）ticasso．eth | OUT | 0xDf3285．．．177a83b3 | 0.05 ETH | 0.00084 |
| © | 0xcbacc10d4fae1a125．．． | Transfer | 14275888 | 465 days 10 hrs ago | （）ticasso．eth | OUT | 0x15F821．．．8e60e907 | 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 | 目The Sandbox：SAND To．．． | 0 ETH | 0.00211 |
| © | 0x92f96c46f1b692d9c．．． | Transfer From | 14265747 | 466 days 23 hrs ago | （）ticasso．eth | OUT | 目The Doggies：TD Token | 0 ETH | 0．00573： |
| © | 0x27b74eb64dbb51e4．．． | Approve And ．．． | 14265005 | 467 days 2 hrs ago | （）ticasso．eth | OUT | 目The Sandbox：SAND To．．． | 0 ETH | 0.15336 |
| © | 0xe592d1e2195598e8f．．． | Transfer | 14264891 | 467 days 2 hrs ago | （）ticasso．eth | OUT | 0xDf3285．．．177a83b3［ | 0.4 ETH | 0.00165 |
| © | 0xaf7fa061046c09749．．． | Transfer | 14264887 | 467 days 2 hrs ago | （）ticasso．eth | OUT | 0x15F821．．．8e60e907［ | 0.38 ETH | 0．00178： |
| © | 0x39db809ad1e2a6c7．．． | Transfer | 14264885 | 467 days 2 hrs ago | （）ticasso．eth | OUT | 目The Sandbox：SAND To．．． | 0 ETH | 0.00410 |
| © | 0xf206c2792022d7cff．．． | Transfer | 14264884 | 467 days 2 hrs ago | （ ticasso．eth | OUT | 目The Sandbox：SAND To．．． | 0 ETH | 0.00365 |
| © | 0xbdd88a6930b7b93a．．． | Transfer | 14264872 | 467 days 3 hrs ago | （）boneheads．eth［］ | וn | （）ticasso．eth | 1 ETH | 0.00172 |
| © | 0xd162b98423d3f12fe．．． | Transfer | 14258840 | 468 days 1 hr ago | 0x15F821．．．8e60e907［ | וn | （）ticasso．eth | 0.1 ETH | 0.00237 |
| © | 0x2c438411f9461429f．．． | Approve And ．．． | 14258421 | 468 days 2 hrs ago | （）ticasso．eth | OUT | 目The Sandbox：SAND To．．． | 0 ETH | 0．07737： |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x4d855c39e857caf37．．． | Transfer | 14258033 | 468 days 4 hrs ago | （）ticasso．eth［ | OUT | 0x15F821．．．8e60e907 | 0.2 ETH | 0．00487： |
| © | 0x5efc6a9cbb2153b16．．． | Atomic Match＿ | 14258019 | 468 days 4 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.85 ETH | 0.022701 |
| © | 0xa28b66bdd18ec769．．． | Transfer | 14257908 | 468 days 4 hrs ago | （）ticasso．eth | OUT | 目The Sandbox：SAND To．．． | 0 ETH | 0．00433： |
| © | 0x3a78e9d54d266452．．． | Approve | 14244971 | 470 days 4 hrs ago | （）ticasso．eth | OUT | 目 Wrapped Ether［ | 0 ETH | 0.00147 |
| © | 0xbc6b8036f0e7e651d．．． | Set Approval ．．． | 14244847 | 470 days 5 hrs ago | （）ticasso．eth | OUT | 目Crypto．Chicks：CCH To．．． | 0 ETH | 0.00426 |
| $\bigcirc$ | 0xe852926563585e45．．． | Set Approval ．．． | 14244741 | 470 days 5 hrs ago | （）ticasso．eth | OUT | 目Adam Bomb Squad：AB．．．［ | 0 ETH | 0．00238： |
| © | 0x46905ad0320742f8．．． | Transfer From | 14220363 | 474 days 28 mins ago | －ticasso．eth | OUT | 目Jadu Hoverboard：Hov．．． | 0 ETH | 0.005211 |
| © | 0xfed34c425621c72e2．．． | Atomic Match＿ | 14220354 | 474 days 29 mins ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.92 ETH | 0.01924 |
| © | 0x8d17a1e51b4121cb．．． | Atomic Match＿ | 14220317 | 474 days 39 mins ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.9 ETH | 0．02244： |
| © | 0xb51089a51 afd4b8b2．．． | Transfer | 14220312 | 474 days 41 mins ago | （）boneheads．eth | in | （）ticasso．eth $\square$ | 2 ETH | 0．00153： |
| © | 0x6657eb13099b0588．．． | Set Approval ．．． | 14220121 | 474 days 1 hr ago | －ticasso．eth | OUT | 目CC Time Machine Poti．．． | 0 ETH | 0.00375 |
| © | 0x2795a4c154d22c0fb．．． | Claim | 14219903 | 474 days 2 hrs ago | －ticasso．eth | OUT | 目CC Time Machine Poti．．． | 0 ETH | 0.00969 |
| © | （1）0xa92fc4553b3d3ca98．．． | Cancel Order＿ | 14166393 | 482 days 8 hrs ago | （）ticasso．eth $\square$ | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00514 |
| © | 0x832e7be78867568f6．．． | Cancel Order＿ | 14166393 | 482 days 8 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00810 ， |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xc26d2039cd2980bd．．． | Cancel Order＿ | 14166391 | 482 days 8 hrs ago | （ ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.008831 |
| © | 0xb244f763c09d7aa55．．． | Cancel Order＿ | 14122408 | 489 days 3 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0．01222： |
| © | 0x2e8c1561f4d654d5a．．． | Cancel Order＿ | 14110528 | 490 days 23 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00590 |
| © | 0xc105a0c3b7f526a66．．． | Cancel Order＿ | 14102558 | 492 days 5 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00630 |
| © | 0x7c750f083268ac371．．． | Cancel Order＿ | 14099134 | 492 days 18 hrs ago | －ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0．00762： |
| © | 0x580b7f35de2d1bec5．．． | Atomic Match＿ | 14096422 | 493 days 3 hrs ago | －ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.29 ETH | 0．03119： |
| © | 0x182cf8c3013f831ec．．． | Atomic Match＿ | 14096421 | 493 days 3 hrs ago | －ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.278 ETH | 0.02703 |
| © | 0xf37e9eb8fbc0a69cd．．． | Atomic Match＿ | 14096418 | 493 days 4 hrs ago | （）ticasso．eth［ | OUT | 目 OpenSea：Wyvern Exch．．． | 0.279 ETH | 0．02421 |
| © | 0x868a4aa9c897d8dfe．．． | Atomic Match＿ | 14096417 | 493 days 4 hrs ago | （）ticasso．eth［ | OUT | 国 OpenSea：Wyvern Exch．．． | 0.278 ETH | 0.02212 |
| © | 0x93c781cd8abeca59．．． | Atomic Match＿ | 14096412 | 493 days 4 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.27 ETH | 0.02088 |
| © | 0x97f0708a3c569b7ce．．． | Atomic Match＿ | 14096400 | 493 days 4 hrs ago | －ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.269 ETH | 0.02970 ！ |
| © | 0xccc70211b21cb4b0．．． | Set Approval ．．． | 14095205 | 493 days 8 hrs ago | －ticasso．eth | OUT | 目ZombieFrens：ZFREN T．．． | 0 ETH | 0．00860： |
| © | 0x69852809aeaac5df9．．． | Mint | 14095155 | 493 days 8 hrs ago | （）ticasso．eth | OUT | 目ZombieFrens：ZFREN T．．． | 0 ETH | 0.076921 |
| $\bigcirc$ | 0xe79917e8b14d1f357．．． | Cancel Order＿ | 14092454 | 493 days 18 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00846 ！ |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | （1） $0 \times 91 \mathrm{e} 48 \mathrm{f} 276522 f 08 a 4 . .$. | Cancel Order＿ | 14092449 | 493 days 18 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00545 ، |
| ® | 0x74cfce844e5177bd3．．． | Atomic Match＿ | 14086067 | 494 days 18 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.39 ETH | 0．01538： |
| ® | 0xc3a0a0d613353f626．．． | Atomic Match＿ | 14086058 | 494 days 18 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.38 ETH | 0．01752： |
| © | 0x43c4859aff77aca22．．． | Atomic Match＿ | 14085969 | 494 days 18 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．．［］ | 0.339 ETH | 0．01845 |
| $\bigcirc$ | （1）0xb97b5c8584b8805d．．． | Cancel Order＿ | 14085772 | 494 days 19 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00618 |
| $\bigcirc$ | 0xd2041c93dc395edb．．． | Cancel Order＿ | 14085771 | 494 days 19 hrs ago | －ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.008661 |
| $\bigcirc$ | 0x5e268eeaf174e4b8f．．． | Cancel Order＿ | 14085771 | 494 days 19 hrs ago | －ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00866 |
| ® | 0x5c75f32b810f4458a．．． | Atomic Match＿ | 14085303 | 494 days 21 hrs ago | （）ticasso．eth | OUT | 目 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 $\square$ | 0.05 ETH | 0.00384 |
| © | 0x8aa98b86665db574．．． | Atomic Match＿ | 14078289 | 495 days 23 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.275 ETH | 0．02325： |
| © | 0xe7e64eece09f7ed73．．． | Atomic Match＿ | 14078278 | 495 days 23 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.26 ETH | 0.02130 |
| © | 0xd70ae2a5363ecab5．．． | Atomic Match＿ | 14078265 | 495 days 23 hrs ago | （）ticasso．eth $\square$ | OUT | 目 OpenSea：Wyvern Exch．．． | 0.25 ETH | 0.02128 |
| © | 0x09d266e6b650bbdd．．． | Atomic Match＿ | 14078261 | 495 days 23 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.25 ETH | 0.02173 ， |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x263d5997da4a55bb．．． | Atomic Match＿ | 14078239 | 495 days 23 hrs ago | （ ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.25 ETH | 0.02115 |
| © | 0xbb757efed31ad5360．．． | Multicall | 14078171 | 495 days 23 hrs ago | （）ticasso．eth | OUT | 目Uniswap V3：Router 2 ［ | 0 ETH | 0.016111 |
| © | 0x650c71d5fe93e51c9．．． | Approve | 14078167 | 495 days 23 hrs ago | （）ticasso．eth | OUT | 目LooksRare：LOOKS Tok．．． | 0 ETH | 0.005581 |
| © | 0x8eac6b8ac9e617c1．．． | Withdraw All | 14078155 | 495 days 23 hrs ago | （）ticasso．eth | OUT | 目LooksRare：Fee Sharing［］ | 0 ETH | 0．01624： |
| © | 0xcd8dab52400cd791．．． | Multicall | 14078057 | 496 days 14 mins ago | －ticasso．eth | OUT | 目Uniswap V3：Router 2 － | 0 ETH | 0.015181 |
| © | 0x7ecb29eedbecf09ed．．． | Approve | 14078055 | 496 days 15 mins ago | －ticasso．eth | OUT | 目The OpenDAO：SOS To．．． | 0 ETH | 0．00573： |
| © | 0xc1a789139fe7c3a00．．． | Leave | 14077991 | 496 days 29 mins ago | －ticasso．eth | OUT | 目The OpenDAO：Staking ．．． | 0 ETH | 0.007771 |
| © | 0xc4bce54675744bb6．．． | Set Approval ．．． | 14077532 | 496 days 2 hrs ago | （）ticasso．eth［ | OUT | 目Crypto．Chicks：CCH To．．． | 0 ETH | 0.004951 |
| © | （1） $0 x 867 \mathrm{e} 1 \mathrm{f} 845 \mathrm{f} 38 \mathrm{f} 2 \mathrm{a} 7 \mathrm{~F}$ ．．． | Set Approval ．．． | 14077523 | 496 days 2 hrs ago | （）ticasso．eth［］ | OUT | 目Crypto．Chicks：CCH To．．． | 0 ETH | 0.00485 |
| © | 0x21f090b3a6f119152．．． | Transfer | 14077155 | 496 days 3 hrs ago | －ticasso．eth | OUT | －boneheads．eth $\square \square$ | 0.05 ETH | 0.00489 |
| © | 0x552f4ad87fb4b786b．．． | Multicall | 14076452 | 496 days 5 hrs ago | －ticasso．eth | OUT | 目Uniswap V3：Router 2 － | 0 ETH | 0.018601 |
| © | 0xf6a9eb365a616847a．．． | Multicall | 14076419 | 496 days 6 hrs ago | －ticasso．eth | OUT | 目Uniswap V3：Router 2 － | 0.35 ETH | 0.02265 |
| © | 0xddc23a423806ae3df．．． | Approve | 14076282 | 496 days 6 hrs ago | （ ticasso．eth | OUT | 目 Virtue Poker：VPP Token | 0 ETH | 0．00851 |
| $\bigcirc$ | 0x062c23cad84c822e．．． | Multicall | 14076216 | 496 days 6 hrs ago | （）ticasso．eth | OUT | 目Uniswap V3：Router 2 ［ | 0 ETH | 0.02144 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x570529973879e791．．． | Approve | 14076213 | 496 days 6 hrs ago | （）ticasso．eth | OUT | 国Polkacity：POLC Token［ | 0 ETH | 0．00952： |
| $\bigcirc$ | 0xdca5565b8f816bd2e．．． | Atomic Match＿ | 14066535 | 497 days 18 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.195 ETH | 0.01592 |
| © | 0x8c503dfd0ffdf1ad10．．． | Withdraw | 14066525 | 497 days 18 hrs ago | （）ticasso．eth | OUT | 国Wrapped Ether | 0 ETH | 0.00313 |
| © | 0xc09bb6c0f182b8fc3．．． | Harvest | 14066500 | 497 days 19 hrs ago | （）ticasso．eth | OUT | 国LooksRare：Fee Sharing | 0 ETH | 0.01659 |
| © | 0xd26e981f904b1d0a6．．． | Set Name | 14046299 | 500 days 22 hrs ago | （）ticasso．eth | OUT | 国ENS：Old Reverse Regis．．．［ | 0 ETH | 0.021941 |
| © | 0xe4d82750da5f1e764．．． | Register With ．．． | 14046296 | 500 days 22 hrs ago | （ ticasso．eth | OUT | 目ENS：Old ETH Registrar．．． | 0.018726685 ETH | 0.04686 |
| $\bigcirc$ | 0xdc0ba783b18745a6．．． | Commit | 14046269 | 500 days 22 hrs ago | －ticasso．eth | оUT | 目ENS：Old ETH Registrar．．． | 0 ETH | 0.00973 |
| $\bigcirc$ | 0x47fd3cdbd1627e3ce．．． | Withdraw | 14024515 | 504 days 6 hrs ago | （）ticasso．eth | OUT | 国Wrapped Ether | 0 ETH | 0.00351 |
| © | 0x01cf67316adeec314．．． | Match Ask Wi．．． | 13993142 | 509 days 3 hrs ago | （）ticasso．eth | OUT | 国LooksRare：Exchange［ | 0.134 ETH | 0．03426i |
| © | 0x2315954ebc93ad75．．． | Mint | 13992442 | 509 days 6 hrs ago | （）ticasso．eth［ | OUT | 国Stapleverse Feed Clan：．．．［ | 0.1 ETH | 0.01860 |
| © | 0x07bb11d37cef9867f．．． | Multicall | 13992435 | 509 days 6 hrs ago | －ticasso．eth | OUT | 国Uniswap V3：Router 2 － | 0 ETH | 0．02123： |
| © | 0x6925d65834f528a0．．． | Approve | 13992430 | 509 days 6 hrs ago | －ticasso．eth | OUT | 国Phantasma：Old SOUL ．．． | 0 ETH | 0．00615： |
| © | 0x52ae7572590f3c335．．． | Multicall | 13992408 | 509 days 6 hrs ago | （）ticasso．eth | OUT | 国Uniswap V3：Router 2 － | 0 ETH | 0.01925 ، |
| © | 0x7a19841ee257221a．．． | Approve | 13992360 | 509 days 6 hrs ago | （）ticasso．eth | OUT | 国Polkadomain：NAME T．．． | 0 ETH | 0．00757： |


| （3） | Txn Hash |  | Method（3） | Block | Age | From | то |  | Value |  | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xb4810b72b4ddc478．．． |  | Deposit | 13989575 | 509 days 16 hrs ago | （）ticasso．eth | OUT | 目LooksRare：Fee Sharing［ | 0 ETH |  | 0.02054 |
| © | 0x76ceed9e9c48aae57．．． |  | Approve | 13979635 | 511 days 5 hrs ago | （）ticasso．eth | OUT | 目LooksRare：LOOKS Tok．．． | 0 ETH |  | 0.01108 |
| © | 0xb902592fea269d80b．．． |  | Claim | 13978854 | 511 days 8 hrs ago | （）ticasso．eth | OUT | 目LooksRare：Airdrop | 0 ETH |  | 0.02873 |
| © | 0xd7f0531a80acf5351．．． |  | Set Approval ．．． | 13978830 | 511 days 8 hrs ago | （）ticasso．eth | OUT | 目Rogue Society Bots：RS．．．［ | 0 ETH |  | 0.01348 |
| ๑ | 0x2284d29f6a4407db．．． |  | Enter | 13956298 | 514 days 19 hrs ago | （）ticasso．eth | OUT | 目The OpenDAO：Staking ．．． | 0 ETH |  | 0．01439： |
| ® | 0xc60956eadaae6492．．． |  | Approve | 13956006 | 514 days 20 hrs ago | （ ticasso．eth | OUT | 目The OpenDAO：SOS To．．． | 0 ETH |  | 0．00843： |
| Show： | 100 V | Records |  |  |  |  |  | First＜ | Page 1 of 3 | ＞ | Last |

［ Download：CSV Export $\boldsymbol{\downarrow}_{\text {a }}$ ］


## Transactions

For 0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147 ( ) ticasso.eth


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x2bad46a170c4dd0a．．． | Mint Free | 13542317 | 579 days 18 hrs ago | （）ticasso．eth | OUT | 目Wicked Monsters：WM．．． | 0 ETH | 0.0477414 |
| © | 0x5f76d4ecf6a1150c2．．． | Swap Exact E．．． | 13542298 | 579 days 18 hrs ago | （）ticasso．eth | OUT | 目Uniswap V2：Router 2 ［ | 0．7 ETH | 0.0159836 |
| © | 0xf14db15d4090f88c7．．． | Multicall | 13541761 | 579 days 20 hrs ago | （）ticasso．eth | OUT | 目Uniswap V3：Router［ | 0 ETH | 0.0206418 |
| © | 0xb1ee795a81f9bd6b1．．． | Approve | 13541758 | 579 days 20 hrs ago | （）ticasso．eth | OUT | 目UFO Gaming：UFO Token［ | 0 ETH | 0.0071228 |
| © | 0xc2ac29e77bb6bab8．．． | Swap Exact E．．． | 13540944 | 579 days 23 hrs ago | （）ticasso．eth ¢ | OUT | 目Uniswap V2：Router 2 ［ | 0.45 ETH | 0.0192578 |
| © | （1）0xd997707317089ba7．．． | Swap Exact E．．． | 13540898 | 579 days 23 hrs ago | （）ticasso．eth | OUT | 目Uniswap V2：Router 2 ［ | 0.45 ETH | 0.0065885 |
| © | 0x99bf49f92726339cc．．． | Transfer | 13540535 | 580 days 1 hr ago | KuCoin 4 | in | （ticasso．eth | 0.4016594 ETH | 0.0044659 |
| © | 0x24214be0a98c8295．．． | Approve | 13539162 | 580 days 6 hrs ago | （）ticasso．eth［ | OUT | 目0x34B6F5．．．dBef2bCd［ | 0 ETH | 0.008765 |
| © | 0x6ae353a7421cc494．．． | Mint For User | 13539156 | 580 days 6 hrs ago | （）ticasso．eth | OUT | 目0x34B6F5．．．dBef2bCd［ | 0 ETH | 0.0155784 |
| © | 0x6a1289214600ebeaf．．． | Swap Exact E．．． | 13527237 | 582 days 3 hrs ago | （）ticasso．eth $\square$ | OUT | 目Uniswap V2：Router 2 ［ | 0.45 ETH | 0.0122180 |
| © | 0xf43a4df6a2e2741cf．．． | Transfer | 13526400 | 582 days 6 hrs ago | （）ticasso．eth［］ | OUT | 0x05B0e9 ．．．6AE4bc8c［ | 3 ETH | 0.0034852 |
| © | （1） $0 \times 86 \mathrm{c} 5 f 45 \mathrm{~d} 3 \mathrm{fb} 4 \mathrm{e} 97 \mathrm{bf} . .$. | Swap Exact E．．． | 13526384 | 582 days 6 hrs ago | （）ticasso．eth | OUT | 目Uniswap V2：Router 2 ［ | 3 ETH | 0.0052010 |
| © | （1） $0 \times 5 \mathrm{e} 504 \mathrm{e} 29804 \mathrm{be9ac} . .$. | Swap Exact E．．． | 13526363 | 582 days 6 hrs ago | （）ticasso．eth | OUT | 目Uniswap V2：Router 2 ［ | 3 ETH | 0.0050499 |
| © | （1） $0 x 9 d 914 \mathrm{c} 4475 \mathrm{bb} 1 \mathrm{a93} . .$. | Swap Exact E．．． | 13523268 | 582 days 18 hrs ago | （）ticasso．eth | OUT | 目Uniswap V2：Router 2 ［ | 3 ETH | 0.0039050 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x7724ce43fc452c20e．．． | Transfer | 13522970 | 582 days 19 hrs ago | 0x39Cc8b．．．D518770e | in | （）ticasso．eth | 0.5 ETH | 0.0026722 |
| © | 0xa9f31d54f6df81497f．．． | Swap Exact E．．． | 13522457 | 582 days 21 hrs ago | （）ticasso．eth | OUT | 目Uniswap V2：Router 2 － | 0.63 ETH | 0.0148459 |
| © | 0xb2348a5e1815bd20．．． | Set Approval ．．． | 13522300 | 582 days 21 hrs ago | （）ticasso．eth | OUT | 目The Doge Pound：DOG．．． | 0 ETH | 0.0074920 |
| © | 0x295f6a063cb1ab8f6．．． | Swap Exact E．．． | 13522224 | 582 days 22 hrs ago | （）ticasso．eth［ | OUT | 目Uniswap V2：Router 2 ［ | 0.75 ETH | 0.0139877 |
| © | 0xaa1dda048b4fa09b0．．． | Swap Exact E．．． | 13522065 | 582 days 22 hrs ago | （ ticasso．eth | OUT | 目Uniswap V2：Router 2 ［ | 0.25 ETH | 0.0158090 |
| © | 0x30c8f8eeb349243e9．．． | Set Approval ．．． | 13515192 | 584 days 52 mins ago | －ticasso．eth | OUT | 国RoaringLeaders：ROAR ．．． | 0 ETH | 0.0060575 |
| © | 0xcaeb368ed5e77052．．． | Transfer | 13502456 | 586 days 44 mins ago | 0x39Cc8b．．．D518770e | IN | －ticasso．eth | 0.16 ETH | 0.0032635 |
| © | 0xc80c276dd8a1ecb0．．． | Transfer | 13490426 | 587 days 22 hrs ago | （）ticasso．eth | OUT | 0x39Cc8b．．．D518770e | 0.16 ETH | 0.0017765 |
| © | 0x88cedb4ebecc658fc．．． | Transfer | 13490312 | 587 days 22 hrs ago | （）ticasso．eth | OUT | 0x39Cc8b．．．D518770e［ | 0.16 ETH | 0.0026064 |
| © | 0x3b4ad3eca165cdb2．．． | 0xd42d47ae | 13456862 | 593 days 3 hrs ago | （）ticasso．eth | OUT | 目Bored Mummy Hallowe．．．［ | 0 ETH | 0.0126532 |
| © | （1）0xe50cfb5e1239830de．．． | Mint | 13439224 | 595 days 22 hrs ago | －ticasso．eth | OUT | 目 Doodles：DOODLE Token | 0.615 ETH | 0.0024268 |
| © | （1）0x47baf47a103f99c59．．． | Mint | 13439224 | 595 days 22 hrs ago | －ticasso．eth | OUT | 国 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 |
| $\bigcirc$ | 0x481230f1faf35045c．．． | Transfer | 13439035 | 595 days 22 hrs ago | （）ivybone．eth［］ | in | （）ticasso．eth | 1 ETH | 0.0019395 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0xbffd81ffe82063ce27．．． | Mint By Signa．．． | 13426816 | 597 days 20 hrs ago | （）ticasso．eth | OUT | 目0x46f101．．．62e72A37［ | 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 | 目ZombieToadz：BRAINZ ．．． | 0 ETH | 0.0058582 |
| © | 0xcbb355427ef26b14b．．． | Safe Mint | 13381935 | 604 days 22 hrs ago | （）ticasso．eth | OUT | 目INFAMOUSSKULLZ：IN．．． | 0.18 ETH | 0.0251935 |
| ® | 0xdcbbf69fd2f89dff15．．． | Atomic Match＿ | 13381701 | 604 days 23 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.087 ETH | 0.0177823 |
| © | 0xbb4e72343a0a979f7．．． | Atomic Match＿ | 13376465 | 605 days 18 hrs ago | （ ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.06 ETH | 0.0153649 |
| © | 0xd31bf30caaccbf014．．． | Atomic Match＿ | 13376415 | 605 days 18 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.125 ETH | 0.0206801 |
| © | 0xb28ef01b5b54420df．．． | Atomic Match＿ | 13376375 | 605 days 19 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.128 ETH | 0.0200711. |
| © | 0x379e406797efe453b．．． | Atomic Match＿ | 13376305 | 605 days 19 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.0555 ETH | 0.0150834 |
| © | 0x0fb995cbb5f603847．．． | Atomic Match＿ | 13376103 | 605 days 20 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.115 ETH | 0.0203602 |
| © | （1） $0 \times 875074 \mathrm{a} 2 \mathrm{~d} 06 \mathrm{ec} 52 .$. | Atomic Match＿ | 13376073 | 605 days 20 hrs ago | －ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.1099 ETH | 0.0053337 |
| © | 0x8875d02df183038b．．． | Atomic Match＿ | 13376043 | 605 days 20 hrs ago | （ ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.1 ETH | 0.0183476 |
| © | 0xfbd398ac96283ebe6．．． | Atomic Match＿ | 13376011 | 605 days 20 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.109 ETH | 0.0155836 |
| © | 0xd78ac1f118bbdba25．．． | Set Approval ．．． | 13353864 | 609 days 7 hrs ago | （）ticasso．eth | OUT | 目ZombieToadz：BRAINZ ．．．－ | 0 ETH | 0.0038185 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | 0x04578adf5da2e7b97．．． | Cancel Order＿ | 13350875 | 609 days 18 hrs ago | （ ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0 ETH | 0.0047271 |
| © | 0xfe3eaea689341d187．．． | Atomic Match＿ | 13344025 | 610 days 20 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.09 ETH | 0.0111821 |
| © | 0x5ca1aa9f3c946b979．．． | Swap | 13344001 | 610 days 20 hrs ago | （）ticasso．eth | OUT | 国 Metamask：Swap Router［ | 0 ETH | 0.0059331 |
| © | 0x0e640147a2cc40a5．．． | Approve | 13344001 | 610 days 20 hrs ago | （）ticasso．eth | OUT | 目Wrapped Ether | 0 ETH | 0.0020095 |
| © | （1）0xd785aa6e607deb91．．． | Cancel Order＿ | 13342234 | 611 days 3 hrs ago | －ticasso．eth | OUT | 国OpenSea：Wyvern Exch．．． | 0 ETH | 0.0023469 |
| © | 0x1c51ae6a5e577201．．． | Cancel Order＿ | 13342232 | 611 days 3 hrs ago | －ticasso．eth | OUT | 目 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 | 目OpenSea：Wyvern Exch．．． | 0.25 ETH | 0.0119964 |
| $\bigcirc$ | 0xae10dc3a8e5aa15b．．． | Atomic Match＿ | 13337116 | 611 days 22 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.195 ETH | 0.0127715 |
| $\bigcirc$ | 0xa1e7cb84656aa4c8．．． | Atomic Match＿ | 13337017 | 611 days 22 hrs ago | －ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.2 ETH | 0.0173052 |
| © | 0x1195e5a132307b4c．．． | Atomic Match＿ | 13336987 | 611 days 23 hrs ago | （）ticasso．eth［ | OUT | 国 OpenSea：Wyvern Exch．．． | 0.1997 ETH | 0.0140356 |
| © | 0x8ca8082cf9819ca44．．． | Atomic Match＿ | 13336978 | 611 days 23 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.19 ETH | 0.0169264 |
| © | 0x19bb8ce9b73b967d．．． | Cancel Order＿ | 13336610 | 612 days 43 mins ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.0057385 |
| © | 0x25d2a071c8236207．．． | Atomic Match＿ | 13323134 | 614 days 3 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.1498 ETH | 0.0155652 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xe9cc499bf068afa23．．． | Atomic Match＿ | 13323065 | 614 days 3 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.11 ETH | 0.0222853 |
| ® | 0x1379491f46054c70f．．． | Atomic Match＿ | 13321605 | 614 days 8 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.395 ETH | 0.0248556 |
| ® | 0x4b01323340f2d508e．．． | Atomic Match＿ | 13314983 | 615 days 9 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.18 ETH | 0.0213593 |
| ® | （1）0x5f0227df8c9a507c3．．． | Atomic Match＿ | 13314977 | 615 days 9 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.18 ETH | 0.0066997 |
| © | 0x23dac7db6ad00eac．．． | Set Approval ．．． | 13314664 | 615 days 10 hrs ago | （）ticasso．eth | OUT | 国 Canine Cartel：CARTEL ．．．［ | 0 ETH | 0.0037378 |
| © | 0x0b3cdcd4be3f2b64f．．． | Atomic Match＿ | 13314563 | 615 days 11 hrs ago | （ ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.75 ETH | 0.0160906 |
| ® | 0xb6448f6a2cbc42078．．． | Atomic Match＿ | 13310558 | 616 days 2 hrs ago | －ticasso．eth | out | 国 OpenSea：Wyvern Exch．．． | 0.05 ETH | 0.0158946 |
| © | 0xdcce2fdd0e64f1722．．． | Set Approval ．．． | 13310512 | 616 days 2 hrs ago | （）ticasso．eth | OUT | 国Adam Bomb Squad：AB．．．［ | 0 ETH | 0.0030273 |
| © | 0xb9c9d6089f1fec55c．．． | Atomic Match＿ | 13308917 | 616 days 8 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 1.45 ETH | 0.0242372 |
| © | 0x43f5faf1c63d021ef3．．． | Atomic Match＿ | 13308753 | 616 days 8 hrs ago | （）ticasso．eth［ | out | 国 OpenSea：Wyvern Exch．．． | 1.5 ETH | 0.0161760 |
| © | 0xd394c485fee773de7．．． | Set Approval ．．． | 13306119 | 616 days 18 hrs ago | （ ticasso．eth | OUT | 国 Wicked Ape Bone Club：．．． | 0 ETH | 0.0022430 |
| © | 0x97143b9fa6cc69650．．． | Atomic Match＿ | 13306100 | 616 days 18 hrs ago | （ ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.61 ETH | 0.0108805 |
| ® | 0x829340958dd768b6．．． | Atomic Match＿ | 13305810 | 616 days 20 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0 ETH | 0.0169857 |
| © | 0x58cdc7b345b9c65fa．．． | Atomic Match＿ | 13305751 | 616 days 20 hrs ago | （）ticasso．eth | OUT | 国 OpenSea：Wyvern Exch．．． | 0.18 ETH | 0.0151117 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | 0xe4220e8bd075116b．．． | Atomic Match＿ | 13305580 | 616 days 20 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.1 ETH | 0.0177282 |
| © | 0x201f4a388a4739672．．． | Approve | 13305520 | 616 days 21 hrs ago | （）ticasso．eth | OUT | 目Wrapped Ether | 0 ETH | 0.0029583 |
| © | 0x5c0a17ee6bf7cb990．．． | Set Approval ．．． | 13305516 | 616 days 21 hrs ago | （）ticasso．eth | OUT | 目The Ninja Hideout：TN．．． | 0 ETH | 0.0031476 |
| © | 0x76e9cde2f2117a48d．．． | Mint Public Sa．．． | 13303993 | 617 days 2 hrs ago | （）ticasso．eth | OUT | 目The Ninja Hideout：TN．．． | 0.15 ETH | 0.0525022 |
| © | 0x095deccc07af3ddd4．．． | Presale Mint | 13302623 | 617 days 7 hrs ago | O ticasso．eth | OUT | 目0x345dfA．．．Ee952c7F［ | 0.207 ETH | 0.0353566 |
| $\bigcirc$ | 0x517a8b2dfd54ebd0e．．． | Transfer | 13302592 | 617 days 7 hrs ago | ）boneheads．eth［ | in | （）ticasso．eth | 5 ETH | 0.0013554 |
| © | 0x20489e03b6fb $7 \mathrm{~b} 550 . .$. | Set Approval ．．． | 13252270 | 625 days 2 hrs ago | －ticasso．eth | OUT | 目The Doge Pound：PUP．．． | 0 ETH | 0.0030127. |
| © | 0xdd615c8bcd62cfb8f．．． | Set Approval ．．． | 13214760 | 630 days 22 hrs ago | （）ticasso．eth | OUT | 目Wicked Hound Bone Cl．．． | 0 ETH | 0.0041648 |
| $\bigcirc$ | 0x9c3e09f3b93eb04d4．．． | Mint Free | 13214650 | 630 days 22 hrs ago | （）ticasso．eth | OUT | 目Wicked Hound Bone Cl．．． | 0 ETH | 0.0151652 |
| $\bigcirc$ | 0x2e7c45b2ffcbb1d48．．． | Atomic Match＿ | 13172925 | 637 days 9 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.2 ETH | 0.0152753 |
| © | 0x61382c6838abb3f32．．． | Atomic Match＿ | 13172897 | 637 days 9 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.1999 ETH | 0.0179642 |
| © | （1）0x86b2668fbcad43bc6．．． | Atomic Match＿ | 13172886 | 637 days 9 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.199 ETH | 0.0072254 |
| © | 0xfb132eb796ced1e1d．．． | Atomic Match＿ | 13172873 | 637 days 9 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.199 ETH | 0.0296438 |
| © | 0x71c5afa2fe0d5bfe95．．． | Atomic Match＿ | 13169146 | 637 days 23 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.159 ETH | 0.0197555 |


[ Download: CSV Export $\boldsymbol{\nu}_{\text {u }}$ ]


## Transactions

For 0x652aa165ee33ba02570c4fc7d41b0a05b4fd8147 ( ) ticasso.eth


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | 0x574b87080315a487f．．． | Atomic Match＿ | 13099365 | 648 days 18 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.15 ETH | 0.01192871 |
| $\bigcirc$ | 0xeaf375ebf2daeff6a8．．． | Atomic Match＿ | 13099178 | 648 days 19 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.4888 ETH | 0.01846394 |
| $\bigcirc$ | 0x4a5e8a7e54389058．．． | Atomic Match＿ | 13098932 | 648 days 19 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.168 ETH | 0.01149968 |
| © | （1） $0 \times 38 \mathrm{fc} 9375 \mathrm{ceb} 582 \mathrm{aa} 0 . .$. | Atomic Match＿ | 13098921 | 648 days 19 hrs ago | （）ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.168 ETH | 0.00529919 |
| ® | 0x6a31c0e9745513b9．．． | Transfer | 13098725 | 648 days 20 hrs ago | （）boneheads．eth［］ | IN | （）ticasso．eth | 1 ETH | 0.00174843 |
| $\bigcirc$ | 0x13c15ac4f9cf17261．．． | Atomic Match＿ | 13065809 | 653 days 23 hrs ago | （）ticasso．eth | OUT | 目 OpenSea：Wyvern Exch．．． | 0.0239108 ETH | 0.00507672 |
| ® | 0xec9c3ecb1652a98d．．． | Atomic Match＿ | 13065708 | 653 days 23 hrs ago | 》 ticasso．eth | OUT | 目OpenSea：Wyvern Exch．．． | 0.025 ETH | 0.01041266 |
| ® | 0x9ec60e21859546e6．．． | Transfer | 13065557 | 653 days 23 hrs ago | Binance 15 | in | （）ticasso．eth | 0.05492168 ETH | 0.00252 |
| Show： | 100 V Records |  |  |  |  |  | First | ＜Page 3 of 3 | Last |

[^5]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

$$
4, k
$$

Commissioner of Oaths in and for Ontario
(?) Transaction Hash:
(?) Status:
(?) Block:
(?) Timestamp:
(?) Sponsored:
(?) From:
(? To:
(3) Value:
(3) Transaction Fee:
(?) Gas Price:
(?) Ether Price:
(?) Gas Limit \& Usage by Txn:

0x5780bcfd00dfcab7a4ef2017cfc3ad7aa04d7d23f58cd022e58607d3afd72a60 ㄷ
© Success

* 131566884261329 Block Confirmations
(1) 639 days 21 hrs ago (Sep-04-2021 03:04:45 AM +UTC)

0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317 []
0xC59Ef925B947473b85b85f7583D29487Ee2e8620 []
\& 25.3581241041767 ETH (1) \$98,567.28
0.0029715 ETH $\$ 5.38$
141.5 Gwei (0.0000001415 ETH)
(?) Gas Fees:
Base: 93.692548673 Gwei
(?) Burnt Fees:
(?) Other Attributes:
(?) Input Data:

More Details:
(?) Private Note:

Burnt: 0.001967543522133 ETH (\$3.56)

## Txn Type: $\mathbf{0}$ (Legacy) Nonce: $\mathbf{0}$ Position In Block: 12

0x

- Click to show less

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

[^6]This is Exhibit "BN" to the Affidavit of Taylan McRae-Yu (Sworn June 6, 2023)

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


Commissioner of Oaths in and for Ontario

## Overview

ETH BALANCE
$\triangle 0$ ETH

ETH VALUE
$\$ 0.00$

## More Info

PRIVATE NAME TAGS

## + Add

CREATOR
0xFC9161...c969B7B9 at txn 0xee89e4b51463a84d...

## Multi Chain

MULTICHAIN ADDRESSES
1 address found via Blockscan $\vee$

## Transactions

## Internal Transactions

## $\downarrow \equiv$ Latest 8 from a total of 8 transactions

| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x175b117ea8fe8df96... | Transfer | 16968779 | 63 days 11 hrs ago | 0xa8c2bC...f7281317 | IN | - $0 \times 666 F 9 \mathrm{e}$...Aa8b82aC | 25 ETH | 0.00156508 |
| © | 0xcc096356f7c94c60c... | Transfer | 16772092 | 91 days 3 hrs ago | () ivybone.eth | IN | E0xE66F9e...Aa8b82aC | 15.25 ETH | 0.00217517 |


| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0xf9cfeb1ef43236f6e0... | Transfer | 16484521 | 131 days 10 hrs ago | 0xa8c2bC...f7281317 | (1) | E0xE66F9e...Aa8b82aC | 8 ETH | 0.00091281 |
| © | 0x42a1857738dc6a7c... | Transfer | 15891260 | 214 days 6 hrs ago | 0xa8c2bC...f7281317 | IN | ®0xE66F9e...Aa8b82aC | 12.5 ETH | 0.0012625 |
| © | 0x645d8086c64afb7a9... | Transfer | 15640212 | 249 days 8 hrs ago | 0xa8c2bC...f7281317 | IN | ®0xE66F9e...Aa8b82aC | 14.75 ETH | 0.00162606 |
| ® | 0x19a350762fb9d52a0... | Transfer | 15575428 | 258 days 10 hrs ago | 0xa8c2bC...f7281317 | (1) | ®0xE66F9e...Aa8b82aC | 5 ETH | 0.00152397 |
| ® | 0xa79596441abd5783... | Transfer | 15409569 | 284 days 10 hrs ago | 0xa8c2bc...f7281317 | (1) | E0xE66F9e...Aa8b82aC | 4.2 ETH | 0.00149907 |
| ® | 0x6d5ae51637196ecc... | Transfer | 14832026 | 378 days 3 hrs ago | 0xa8c2bc...f7281317 | (1) | E0xE66F9e...Aa8b82aC | 25 ETH | 0.00134966 |

©O: 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 Knowle

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

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


Commissioner of Oaths in and for Ontario
(?) Transaction Hash:
(?) Status:
(?) Block:
(?) Timestamp:
(?) Sponsored:

## (3) From:

(? To:

## (3) Value:

(3) Transaction Fee:
(?) Gas Price:

0xdfb3707089c5793d9057fc814423a592d0b10e122714d2dfa1a11bb5ca45be8d 다
© Success

* 146103382807713 Block Confirmations
(1) 413 days 8 hrs ago (Apr-18-2022 04:51:15 PM +UTC)

0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317 []
0xF38269dae289DcF9b2D3372c26181cE473C940fc [a

## * 4.78 ETH $\$ 8,654.38$

0.000897369281571 ETH $\$ 1.62$
42.731870551 Gwei (0.000000042731870551 ETH)


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
— H.K
Commissioner of Oaths in and for Ontario

## Transactions

For 0x82ef36b1c710e4384eb20d70074bc972972d58b8


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\bigcirc$ | 0xf0e6340e191bdb2da．．． | Approve | 14688744 | 401 days 42 mins ago | 0x82eF36．．．972D58B8 | OUT | 目 Apecoin：APE Token | 0 ETH | 0.00485 |
| © | 0x0bf2a8b46b1808e68．．． | Transfer | 14688739 | 401 days 43 mins ago | （）boneheads．eth | in | 0x82eF36．．．972D58B8 | 0.02 ETH | 0.00173 |
| © | 0xec1f6422c53816f7e．．． | Transfer | 13857385 | 530 days 3 hrs ago | 0x82eF36．．．972D58B8 | OUT | （ grooves．eth | 0.015 ETH | 0.00195 |
| © | 0xd76e29c5836cbf8f8．．． | Transfer | 13834344 | 533 days 17 hrs ago | 0x82eF36．．．972D58B8 | OUT | （ grooves．eth | 0.02 ETH | 0.00091 |
| ® | 0x0cbb64f2cce70d7b7．．． | Transfer From | 13834261 | 533 days 17 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目Superlative Apes：SLAP．．． | 0 ETH | 0.00211 |
| ® | 0xd10270af0248d5c8c．．． | Atomic Match＿ | 13820882 | 535 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目 OpenSea：Wyvern Exch．．． | 0.055 ETH | 0.01192 |
| $\bigcirc$ | 0x86d4ceff5b5b4143d．．． | Transfer From | 13820811 | 535 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目Adam Bomb Squad：AB．．． | 0 ETH | 0.00619 |
| $\bigcirc$ | 0xe6331840c31f0456b．．． | Atomic Match＿ | 13820800 | 535 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目 OpenSea：Wyvern Exch．．． | 0.245 ETH | 0.01500 |
| $\bigcirc$ | 0xa97a5fc9bc504721a．．． | Stake | 13820771 | 535 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目0xB63cac．．．607a8020［ | 0 ETH | 0.00485 |
| © | 0xa86a1122fdac8a8c5．．． | Swap ETH For．．． | 13820742 | 535 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目SushiSwap：Router［ | 0.09744279 ETH | 0.00693 |
| © | 0x74bef1942b62c0d83．．． | Approve | 13820719 | 535 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目 OlympusDAO：OHM To．．． | 0 ETH | 0.00387 |
| © | 0x71f9883a22e5f6cb9．．． | Transfer Toke．．． | 13814425 | 536 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目 Wormhole：Portal Toke．．． | 0 ETH | 0.00565 |
| © | 0xe54ee6bad0bedd3a．．． | Approve | 13814422 | 536 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目Centre：USD Coin | 0 ETH | 0.00361 |
| © | 0x8b0c6a1723afd76bd．．． | Swap | 13814405 | 536 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目 Metamask：Swap Router［ | 0.08 ETH | 0.01155 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0x55e6d29350c5b692．．． | Transfer | 13813602 | 536 days 22 hrs ago | 0x51496e．．．2725fB61［］ | in | 0x82eF36．．．972D58B8 | 0.5 ETH | 0.00148 |
| ® | 0x25b3eca90948bcf4a．．． | Deposit ETH | 13813587 | 536 days 22 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目zkSync | 0.02 ETH | 0.00494 |
| ® | 0x79182b2aeef4b01ff．．． | Transfer | 13807925 | 537 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | （）arthurfleck．eth | 1．1 ETH | 0.00199 |
| $\bigcirc$ | 0xb37fa69b9121689eb．．． | Withdraw | 13807915 | 537 days 19 hrs ago | 0x82eF36．．．972D58B8 | OUT | 国 Wrapped Ether［ | 0 ETH | 0.00243 |
| ® | 0xd312a64e89c24851．．． | Deposit | 13807479 | 537 days 21 hrs ago | 0x82eF36．．．972D58B8 | OUT | 国 Wrapped Ether［ | 1．1 ETH | 0.00402 |
| ® | 0x336aa01c85f564f84．．． | Transfer | 13807477 | 537 days 21 hrs ago | 0x51496e．．．2725fB61 ¢ | in | 0x82eF36．．．972D58B8 | 1 ETH | 0.00223 |
| ® | 0xcdf793e3ea8f5922e．．． | Wrap And Tra．．． | 13794258 | 539 days 22 hrs ago | 0x82eF36．．．972D58B8 | OUT | 国 Wormhole：Portal Toke．．． | 0.02 ETH | 0.00626 |
| © | 0xf42e48691a22c2fc5．．． | Transfer | 13794209 | 539 days 22 hrs ago | （）grooves．eth［］ | IN | 0x82eF36．．．972D58B8［ | 0.25 ETH | 0.00196 |
| © | 0x058e0ede9371f1006．．． | Transfer | 13094612 | 649 days 12 hrs ago | 0x82eF36．．．972D58B8 | OUT | （）grooves．eth［］ | 0．014 ETH | 0.00109 |
| © | 0xb63784ca9666c207f．．． | Transfer | 13073144 | 652 days 20 hrs ago | 0x82eF36．．．972D58B8 | OUT | （）grooves．eth［］ | 0.18 ETH | 0.00045 |
| © | 0x9f265776755a5b4cf．．． | Transfer From | 13073138 | 652 days 20 hrs ago | 0x82eF36．．．972D58B8 | OUT | BONEHEADS：BONE To．．．［］ | 0 ETH | 0.00199 |
| © | 0x436fd87a9fb5b75a3．．． | Transfer From | 13073119 | 652 days 20 hrs ago | 0x82eF36．．．972D58B8 | OUT | BONEHEADS：BONE To．．．［］ | 0 ETH | 0.00170 |
| © | 0x8381875280aa003b．．． | Transfer From | 13073108 | 652 days 20 hrs ago | 0x82eF36．．．972D58B8 | OUT | BONEHEADS：BONE To．．．［† | 0 ETH | 0.00216 |
| © | 0xca7eea4b6959b34e．．． | Transfer From | 13073099 | 652 days 20 hrs ago | 0x82eF36．．．972D58B8 | out | BONEHEADS：BONE To．．． | 0 ETH | 0.00209 |


| （3） | Txn Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x56d2fe2d4db999d17．．． | Transfer | 13073097 | 652 days 20 hrs ago | Coinbase 3 | in | 0x82eF36．．．972D58B8 | 0.19957099 ETH | 0.00059 |
| © | 0xbdcbbd04b7549c45．．． | Transfer From | 13073082 | 652 days 20 hrs ago | 0x82eF36．．．972D58B8 | OUT | BONEHEADS：BONE To．．． | 0 ETH | 0.00164 |
| © | 0x010ef3a9c08ee9343．．． | Transfer | 13073053 | 652 days 20 hrs ago | （）grooves．eth | in | 0x82eF36．．．972D58B8 | 0.006898489 ETH | 0.00052 |
| ® | 0x02b59202c1fe7e041．．． | Transfer | 13070709 | 653 days 4 hrs ago | 0x82eF36．．．972D58B8 | OUT | （）grooves．eth $\square$ | 0.007560131 ETH | 0.00100 |
| $\bigcirc$ | 0x037688f13f8cc5202．．． | Atomic Match＿ | 13070630 | 653 days 5 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目 OpenSea：Wyvern Exch．．． | 0.12 ETH | 0.00626 |
| ๑ | 0xfcf181f0ba7ef99cdf．．． | Transfer | 13070602 | 653 days 5 hrs ago | Coinbase 5 | in | 0x82eF36．．．972D58B8 | 0.12 ETH | 0.00099 |
| © | 0x4b67307d4e0d501e．．． | Atomic Match＿ | 13069797 | 653 days 8 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目OpenSea：Wyvern Exch．．． | 0.11 ETH | 0.01236 |
| ® | 0xe4f60430f1a9671e8．．． | Withdraw | 13069780 | 653 days 8 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目Wrapped Ether［ | 0 ETH | 0.00177 |
| ® | 0xbf3b5ad808600461．．． | Transfer | 13069632 | 653 days 9 hrs ago | Coinbase 4 | וn | 0x82eF36．．．972D58B8 | 0.0088 ETH | 0.00101 |
| © | 0x0f6488a662dbdf9b1．．． | Cancel Order＿ | 13068704 | 653 days 12 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目 OpenSea：Wyvern Exch．．． | 0 ETH | 0.00180 |
| © | 0x95c4e382ab0366de．．． | Deposit | 13068693 | 653 days 12 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目Wrapped Ether | 0.06 ETH | 0.00064 |
| © | 0x5505e906bbf830f08．．． | Approve | 13066422 | 653 days 21 hrs ago | 0x82eF36．．．972D58B8 | OUT | 目Wrapped Ether | 0 ETH | 0.00061 |
| Show： | $50 \sim$ 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


Commissioner of Oaths in and for Ontario
(?) Transaction Hash:
(3) Status:
(3) Block:
(3) Timestamp:
(3) Sponsored:
(3) From:
(3) To :
(3) Value:
(3) Transaction Fee:
(?) Gas Price:

0x473451b6a5c8ade4f8784d096a2927164446c3ee72fec2567492767ae7afaef1 []
© Success

- 146887852729292 Block Confirmations
(1) 401 days 36 mins ago (May-01-2022 12:36:32 AM +UTC)

0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317 [
() praisegod.eth

- 1 ETH © $\$ 2,826.04$
0.002478 ETH $\$ 4.48$

118 Gwei (0.000000118 ETH)
(3) Ether Price:
(?) Gas Limit \& Usage by Txn:
\$2,826.04 / ETH
$21,000 \mid 21,000(100 \%)$
(?) Gas Fees:
Base: 102.320533594 Gwei
(?) Burnt Fees:
(?) Other Attributes:
(?) Input Data:

More Details:
(?) Private Note:

B Burnt: 0.002148731205474 ETH (\$3.89)

## Txn Type: 0 (Legacy) Nonce: 66 Position In Block: 53

$0 x$

- Click to show less

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

[^7]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

$$
4, x
$$

Commissioner of Oaths in and for Ontario


## Multi Chain

MULTICHAIN ADDRESSES
2 addresses found via Blockscan $\vee$

| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x220597a30641bc1d... | Transfer From | 14220253 | 474 days 1 hr ago | ) bonestar.eth | OUT | [ Jadu Hoverboard: H... | 0 ETH | 0.00474775 |
| © | 0x407f050240fb55ee4... | Transfer | 14220232 | 474 days 1 hr ago | BONEHEADS: Deployer [ | in | () bonestar.eth | 0.01 ETH | 0.00110579 |
| © | 0x1ab2efbb5ce55252b... | Transfer | 13999176 | 508 days 5 hrs ago | () bonestar.eth ¢ | OUT | BONEHEADS: Deployer | 0.0141765 ETH | 0.0029778 |
| © | 0x49cc4e270581c009... | Transfer From | 13999165 | 508 days 5 hrs ago | () bonestar.eth | OUT | [日B Bored Ape Yacht Clu... | 0 ETH | 0.01321849 |
| © | 0x1aa83b9c10fff45ef6... | Transfer | 13999157 | 508 days 5 hrs ago | BONEHEADS: Deployer [] | in | () bonestar.eth | 0.03056514 ETH | 0.00337707 |
| © | 0x224df8f3b4a7266ed... | Transfer | 13673131 | 559 days 4 hrs ago | > bonestar.eth | OUT | BONEHEADS: Deployer | 0.00903088 ETH | 0.00247201 |
| © | 0x9f15b58134084370e... | Transfer | 13583848 | 573 days 7 hrs ago | () bonestar.eth ${ }_{\square}^{\text {c }}$ | OUT | [ ENS: ENS Token | 0 ETH | 0.00603329 |
| © | 0x15afd853e17ae65d4... | Claim Tokens | 13583799 | 573 days 7 hrs ago | () bonestar.eth [ | OUT | [ENS: ENS Token | 0 ETH | 0.02676644 |
| © | 0x0ec9c695f89b7f35d... | Transfer | 13583797 | 573 days 7 hrs ago | BONEHEADS: Deployer [] | in | () bonestar.eth | 0.02096308 ETH | 0.00314379 |
| © | 0xde064647342ff2a8e... | Set Name | 13583578 | 573 days 8 hrs ago | > bonestar.eth | OUT | [ ENS: Old Reverse Re... | 0 ETH | 0.00929056 |
| © | 0xfefec0847b85da65a... | Set Name | 13583560 | 573 days 8 hrs ago | () bonestar.eth [ | OUT | EENS: Old Reverse Re... | 0 ETH | 0.02218645 |
| © | 0xadbeca42ed9bd3c3... | Transfer | 13583547 | 573 days 8 hrs ago | () blockbone.eth [ | וn | () bonestar.eth $\square$ | 0.03147015 ETH | 0.00389289 |
| © | 0x91e10e9047d38e93... | Transfer | 13583532 | 573 days 8 hrs ago | > bonestar.eth | OUT | $\bigcirc$ blockbone.eth | 0.13954942 ETH | 0.00397629 |
| © | 0x5f71717013da60d6c... | Transfer | 13583530 | 573 days 8 hrs ago | BONEHEADS: Deployer [] | in | () bonestar.eth | 0.04197456 ETH | 0.00409733 |


| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ® | 0xbe890c3856534f79d... | Transfer From | 13579656 | 573 days 22 hrs ago | $\bigcirc$ bonestar.eth | OUT | E Bored Ape Yacht Clu... | 0 ETH | 0.0192293 |
| $\bigcirc$ | 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 | 0x3acEf2...87dda4fa | in | () bonestar.eth | 0.15 ETH | 0.00278139 |

 Base.

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

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


Commissioner of Oaths in and for Ontario


| （3） | Transaction Hash | Method（3） | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0xf7eeb7cd2c3a3edaa．．． | Transfer From | 14220277 | 474 days 1 hr ago | （ bonestars．eth | OUT | E 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 |
| $\bigcirc$ | 0xe84d42f4ba39e8279．．． | Set Name | 13583457 | 573 days 8 hrs ago | （）bonestars．eth | OUT | EENS：Old Reverse Re．．． | 0 ETH | 0.02438028 |
| © | 0x296a5feaa370b7816．．． | Register With ．．． | 13583450 | 573 days 8 hrs ago | －bonestars．eth | OUT | EENS：Old ETH Registr．．． | 0.03471468 ETH | 0.04854378 |
| © | 0x97c14d43312167ed．．． | Commit | 13583422 | 573 days 8 hrs ago | －bonestars．eth | OUT | E 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 | E Bored Ape Yacht Clu．．． | 0 ETH | 0.01706184 |
| $\bigcirc$ | 0xec460e0490702527．．． | Transfer | 13515619 | 584 days 19 mins ago | 0x3acEf2．．．87dda4fa | in | ）bonestars．eth | 0.03 ETH | 0.0026574 |

［ Download：CSV Export 山⿶凵 山
 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


Commissioner of Oaths in and for Ontario

## Overview

ETH BALANCE
乞 71.694897897438618732 ETH
ETH VALUE
\$130,034.47 (@ \$1,813.72/ETH)

TOKEN HOLDINGS
\$87,302.02 (>114 Tokens)

Multi Chain
MULTICHAIN ADDRESSES
6 addresses found via Blockscan $\sim$

## More Info

PRIVATE NAME TAGS

## + Add

LAST TXN SENT
$0 \times 87618907 \mathrm{e} 1 \mathrm{a} 1 .$. from 439 days 13 hrs ago
FIRST TXN SENT
0x7a5953adf5238... from 494 days 9 hrs ago

| (?) | Transaction Hash | Method (? | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| © | 0x87618907e1a120ae... | Transfer | 14442701 | 439 days 13 hrs ago | 0x7D7e14...8Ab7Ec05 [] | OUT | BONEHEADS: Deployer [] | 30 ETH | 0.00029135 |
| © | 0x430030ad65ee7e0e... | Swap | 14413242 | 444 days 3 hrs ago | 0x7D7e14...8Ab7Ec05 [] | OUT | @ Metamask: Swap Ro... | 30 ETH | 0.01074153 |
| © | 0x78bb940661b85bc6... | Swap | 14411018 | 444 days 12 hrs ago | 0x7D7e14...8Ab7Ec05 [] | OUT | \# Metamask: Swap Ro... | 0 ETH | 0.02080182 |
| © | Oxcaf119cbd20152a45... | Approve | 14411018 | 444 days 12 hrs ago | 0x7D7e14...8Ab7Ec05 [] | OUT | $\square$ Apecoin: APE Token $\square$ | 0 ETH | 0.00235853 |
| © | 0x30b66154f501d971e... | Cancel Order_ | 14406704 | 445 days 4 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | $\square$ OpenSea: Wyvern Ex... | 0 ETH | 0.00432431 |
| © | Oxbbcc6e7a162911e2... | Cancel Order_ | 14406642 | 445 days 4 hrs ago | 0x7D7e14...8Ab7Ec05 [ | OUT | $\square$ OpenSea: Wyvern Ex... | 0 ETH | 0.00399253 |
| © | 0x011dedb1bddb7496... | Cancel Order_ | 14404641 | 445 days 12 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | $\square$ OpenSea: Wyvern Ex... | 0 ETH | 0.00850371 |
| © | 0x9e1724664c987906... | Cancel Order_ | 14404637 | 445 days 12 hrs ago | 0x7D7e14...8Ab7Ec05 [] | OUT | $\square$ OpenSea: Wyvern Ex... | 0 ETH | 0.00777403 |
| © | 0x9dff406d4fe311428... | Cancel Order_ | 14404630 | 445 days 12 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | \# OpenSea: Wyvern Ex... | 0 ETH | 0.00745404 |
| © | 0x9bdea44a0481f48cf... | Claim Tokens | 14404077 | 445 days 14 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | G0x025C6d...4B205a1F [ | 0 ETH | 0.03162163 |
| © | 0x7e6b2f02404c933d8... | Cancel Order_ | 14400077 | 446 days 4 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | $\square$ OpenSea: Wyvern Ex... | 0 ETH | 0.00363483 |
| © | 0x0302be3fe087bb927... | Transfer | 14329533 | 457 days 4 hrs ago | OxfcFa78...A74CCd2b | IN | 0x7D7e14...8Ab7Ec05 | 1.93668683 ETH | 0.00099929 |
| © | 0x1a98ebdfed429b27b... | Transfer | 14286189 | 463 days 21 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | 0xfcFa78...A74CCd2b | 0.1227554 ETH | 0.00062756 |
| © | 0x0a2c93748ae136fe4... | Transfer | 14252602 | 469 days 2 hrs ago | 0x7D7e14...8Ab7Ec05 [] | OUT | 0xab8e87...a9664dEe [] | 0.02 ETH | 0.00192908 |


| (3) | Transaction Hash | Method (3) | Block | Age | From |  | To | Value | Txn Fee |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| - | 0xa141b5847eb826cd... | Cancel Order_ | 14109836 | 491 days 4 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | [ OpenSea: Wyvern Ex... | 0 ETH | 0.00852347 |
| © | 0x4dec3b771d44d821 ... | Atomic Match_ | 14098384 | 492 days 22 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | [ OpenSea: Wyvern Ex... | 0.26 ETH | 0.02106258 |
| © | 0x80ed1838ef76df38d... | Cancel Order_ | 14098335 | 492 days 22 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | © OpenSea: Wyvern Ex... | 0 ETH | 0.0077808 |
| © | 0x999b73da6ee6d9a2... | Set Approval ... | 14088892 | 494 days 9 hrs ago | 0x7D7e14...8Ab7Ec05 | OUT | [日] Bored Ape Yacht Clu... | 0 ETH | 0.00633977 |
| © | 0x7a5953adf5238046d... | Register Proxy | 14088886 | 494 days 9 hrs ago | 0x7D7e14...8Ab7Ec05 [ | OUT | © OpenSea: Registry | 0 ETH | 0.05082035 |
| ® | 0xfdd8f7d3130e64984... | Transfer | 14084662 | 495 days 1 hr ago | BONEHEADS: Deployer [] | in | 0x7D7e14...8Ab7Ec05 | 0.5 ETH | 0.0026821 |

 Base.

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

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


Commissioner of Oaths in and for Ontario

| Table 2 - BONEHEADS TEAM: SELECT NFT PURCHASES |  |
| :---: | :---: |
| Exhibit | Information |
| "BONEHEADS: Deployer" (0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F) |  |
| "BV" | - Collection: CryptoPunks <br> - Quantity: 1 <br> - Purchase Price: <br> - Total: $\mathbf{6 4}$ ETH (\$204,574.08 USD $\mathbf{( \$ 2 5 8 , 5 8 1 . 6 3} \mathbf{C A D})$ ) <br> - Cryptopunk \#5183-64 ETH (\$204,574.08 USD (\$258,581.63 CAD)) on January 7, 2022. |
| "BW" | - Collection: The Doggies (Snoop Dogg) <br> - Quantity: 17 <br> - Purchase Price: <br> Total: 19.7099 ETH + 1,500 SAND (\$56,385.78 USD (\$70,659.13 CAD)) <br> - Doggy \#9275 - 8.880 ETH ( $\$ 23,069.71$ USD ( $\$ 28,860.20$ CAD) ) on February 24, 2022 <br> - Doggy \#5492 - 5 ETH ( $\$ 12,989.70$ USD (\$16,250.11 CAD)) on February 24, 2022 <br> - Doggy \#4008 - 2.7 ETH (\$7,476.30 USD (\$9,429.10 CAD)) on February 25, 2022 <br> - Doggy \#3791 - 1.4 ETH (\$3,637.12 USD (\$4,550.03 CAD) on February 24, 2022 <br> - Doggy \#5634-0.6 ETH (\$1,558.76 USD (\$1,950.00 CAD)) on February 24, 2022 <br> - Doggy \#6969 - 0.59 ETH (\$1,532.78 USD (\$1,917.50 CAD)) on February 24, 2022 <br> - Doggy \#0879 - 0.5399 ETH (\$1,402.63 USD (\$1,753.69 CAD)) on February 24, 2022 <br> - Doggy \#7706 - 150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 <br> - Doggy \#1084-150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 <br> - Doggy \#6984-150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 <br> - Doggy \#8867 - 150 SAND (\$452.67 USD (\$570.09 CAD) on February 23, 2022 <br> - Doggy \#0250-150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 <br> - Doggy \#2322-150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 <br> - Doggy \#3694-150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 <br> - Doggy \#9202-150 SAND (\$452.67 USD (\$570.09 CAD)on February 23, 2022 <br> - Doggy \#1736-150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 <br> - Doggy \#6499-150 SAND (\$476.68 USD (\$601.04 CAD)) on February 22, 2022 |
| "BX" | - Collection: Inhabitants: Generative Identities (Metahero) <br> - Quantity: 25 <br> - Purchase Price: <br> ○ 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 <br> - Identity \#1792 - 5.39 ETH (\$23,977.36 USD (\$30,542.36 CAD)) on November 29, 2021 <br> - Identity \#5660 - 5.33 ETH (\$23,710.45 USD (\$30,203.37 CAD)) on November 29, 2021 <br> - Identity \#5727 - 5.3 ETH (\$23,577.00 USD (\$30,032.38 CAD)) on November 29, 2021 <br> - Identity \#3107-5.27 ETH (\$23,443.54 USD (\$29,862.38 CAD)) on November 29, 2021 <br> - Identity \#149 - 5.25 ETH (\$23,354.57 USD (\$29,749.05 CAD)) on November 29, 2021 <br> - Identity \#437-5.25 ETH (\$23,354.57 USD (\$29,749.05 CAD)) on November 29, 2021 <br> - Identity \#156 - 5.25 ETH (\$23,354.57 USD (\$29,749.05 CAD)) on November 29, 2021 <br> - Identity \#2062 - 5.2 ETH (\$23,132.15 USD (\$29,465.73 CAD) on November 29, 2021 <br> - Identity \#2670 - 5 ETH ( $\$ 22,242.45$ USD ( $\$ 28,332.43$ CAD)) on November 29, 2021 <br> - Identity \#2928-5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 <br> - Identity \#2270-5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 <br> - Identity \#849-5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 <br> - Identity \#2409-5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 <br> - Identity \#2535-5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 <br> - Identity \#1532-5 ETH (\$22,242.45 USD (\$28,332.43 CAD )) on November 29, 2021 <br> - Identity \#3265-5 ETH (\$22,242.45 USD (\$28,332.43 CAD)) on November 29, 2021 <br> - Identity \#1385-4.99 ETH (\$22,197.97 USD (\$28,275.77 CAD)) on November 29, 2021 <br> - Identity \#780 - 4.95 ETH (\$22,020.03 USD (\$28,049.11 CAD)) on November 29, 2021 <br> - Identity \#1405-4.95 ETH (\$22,020.03 USD (\$28,049.11 CAD)) on November 29, 2021 <br> - Identity \#6207-0 ETH on January 9, 2022 <br> - Identity \#6203 - 0 ETH on January 9, 2022 <br> - Identity \#6206-0 ETH on January 9, 2022 <br> - Identity \#6205-0 ETH on January 9, 2022 <br> - Identity \#6204-0 ETH on January 9, 2022 |
| :---: | :---: |
| "BY" | - Collection: NounPunks.eth <br> - Quantity: 30 <br> - Purchase Price: <br> ○ Total: 11.14871 ETH (\$39,430.47 USD (\$50,301.45 CAD)) <br> - NounPunks \#2366 - 4.2069 ETH (\$14,878.84 USD (\$18,980.93 CAD)) on January 5, 2022 <br> - NounPunks \#8640 - 0.69 ETH (\$2,440.37 USD (\$3,113.18 CAD)) on January 5, 2022 <br> - NounPunks \#9010 - 0.6 ETH (\$2,122.06 USD (\$2,707.11 CAD)) on January 5, 2022 <br> - NounPunks \#9435 - 0.589 ETH (\$2,083.16 USD (\$2,657.48 CAD)) on January 5, 2022 |


|  |  |
| :---: | :---: |
| "BZ" | - Collection: Bloot (not for Weaks) <br> - Quantity: 12 <br> - Purchase Price: <br> ○ Total: $\mathbf{1 6 . 9 5 8 8}$ ETH ( $\mathbf{\$ 6 5 , 9 1 9 . 0 0}$ USD ( $\mathbf{\$ 8 2 , 5 7 6 . 7 3 ~ C A D ) ) ~}$ <br> - Bloot \#7948 - 1.45 ETH (\$5,636.16 USD (\$7,060.41 CAD)) on September 4, 2021 <br> - Bloot \#5074 - 1.45 ETH (\$5,636.16 USD (\$7,060.41 CAD)) on September 4, 2021 <br> - 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 <br> - Bloot \#521 - 1.4 ETH (\$5,441.81 USD (\$6,816.95 CAD)) on September 4, 2021 <br> - Bloot \#6318 - 1.4 ETH (\$5,441.81 USD (\$6,816.95 CAD)) on September 4, 2021 <br> - Bloot \#6993 - 1.4 ETH (\$5,441.81 USD (\$6,816.95 CAD)) on September 4, 2021 <br> - Bloot \#86 - 1.3999 ETH (\$5,441.43 USD (\$6,816.47 CAD)) on September 4, 2021 <br> - Bloot \#5996 - 1.3999 ETH (\$5,441.43 USD (\$6,816.47 CAD)) on September 4, 2021 <br> - Bloot \#3102 - 1.399 ETH (\$5,437.93 USD (\$6,812.09 CAD)) on September 4, 2021 <br> - Bloot \#2339 - 1.39 ETH (\$5,402.94 USD (\$6,768.26 CAD)) on September 4, 2021 <br> - Bloot \#1668 - 1.39 ETH (\$5,402.94 USD (\$6,768.26 CAD)) on September 4, 2021 |
| :---: | :---: |
| "CA" | - Collection: Jadu Hoverboard <br> - Quantity: 7 <br> - Purchase Price: <br> ○ Total: 5.945 ETH (\$17,339.53 USD (\$22,505.95 CAD)) <br> - Hoverboard 2219 - 0.99 ETH (\$2,865.48 USD (\$3,640.87 CAD)) on February 17, 2022 <br> - Hoverboard 4989 - 0.98 ETH (\$2,570.25 USD (\$3,279.12 CAD)) on February 20, 2022 <br> - Hoverboard $925-0.92$ ETH (\$2,662.87 USD (\$3,383.44 CAD)) on February 17, 2022 <br> - Hoverboard 515 - 0.9 ETH (\$2,604.98 USD (\$3,309.88 CAD)) on February 17, 2022 <br> - Hoverboard 3939 - 0.89 ETH (\$2,576.03 USD (\$3,273.10 CAD)) on February 17, 2022 <br> - Hoverboard $4646-0.89$ ETH ( $\$ 2,576.03$ USD ( $\$ 3,273.10$ CAD)) on February 17, 2022 <br> - Hoverboard 838 - 0.375 ETH (\$1,483.89 USD (\$1,896.41 CAD)) on December 16, 2021 |
| "CB" | - Collection: GEVOLs <br> - Quantity: 12 <br> - Purchase Price: <br> Total: 5.468 ETH ( $\mathbf{\$ 1 9 , 5 5 4 . 0 4}$ USD ( $\mathbf{\$ 2 4 , 6 2 2 . 4 4 ~ C A D ) ) ~}$ <br> - EVOL \#5826 - 0.5 ETH (\$1,788.04 USD (\$2,251.49 CAD)) on October 6, 2021 <br> - EVOL \#6001 - 0.5 ETH (\$1,788.04 USD (\$2,251.49 CAD)) on October 6, 2021 <br> - EVOL \#1149 - 0.46 ETH (\$1,645.00 USD (\$2,071.34 CAD)) on October 6, 2021 <br> - EVOL \#1214 - 0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 <br> - EVOL \#7647-0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 <br> - EVOL \#3623 - 0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 <br> - EVOL \#0878 - 0.45 ETH (\$1,609.24 USD (\$2,026.35 CAD)) on October 6, 2021 <br> - EVOL \#4846 - 0.449 ETH (\$1,605.66 USD (\$2,021.84 CAD)) on October 6, 2021 <br> - 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 <br> - EVOL \#7461 - 0.440 ETH (\$1,573.48 USD (\$1,981.32 CAD)) on October 6, 2021 <br> - EVOL \#3680 - 0.439 ETH (\$1,569.90 USD (\$1,976.81 CAD)) on October 6, 2021 |
| :---: | :---: |
| "CC" | - Collection: Pixel Vault Founder's DAO <br> - Quantity: 2 <br> - Purchase Price: <br> ○ Total: 7.729 ETH (\$33,253 USD (\$42,324.41 CAD)) <br> - Pixel Vault \#5109 - 3.88 ETH (\$16,710.31 USD (\$21,268.88 CAD)) on November 28, 2021 <br> - Pixel Vault \#845-3.849 ETH (\$16,542.69 USD (\$21,055.53 CAD)) on November 28, 2021 |
| "CD" | - Collection: Larva Chads <br> - Quantity: 1 <br> - Purchase Price: <br> - Total: 0.75 ETH (\$2,554.86 USD (\$3,252.08 CAD)) <br> - Larva Chad \#2848 - 0.75 ETH (\$2,554.86 USD (\$3,252.08 CAD)) on January 6, 2022 |
| "CE" | - Collection: Adam Bomb Squad <br> - Quantity: 1 <br> - Purchase Price: <br> - Total: 1 ETH ( $\mathbf{\$ 2 , 4 2 5 . 8 3}$ USD ( $\mathbf{\$ 3 , 0 9 1 . 9 6} \mathbf{C A D}$ )) <br> - ABS \#24913 - 1 ETH (\$2,425.83 USD (\$3,091.96 CAD)) on January 27, 2022 |
| "CF" | - Collection: MEV Army <br> - Quantity: 80 <br> - Purchase Price: <br> - Total: 31.3942 ETH (\$76,054.01 USD (\$96,460.83 CAD)) <br> - 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. |
| "BNHDZVAULT" (0xa8c2bc23c4d51642c7c8767e1d2d6647f7281317) |  |
| "CG" | - Collection: CLONE X - X TAKASHI MURAKAMI <br> - Quantity: 3 <br> - Purchase Price: <br> ○ Total: 31.9105 ETH (\$81,277.00 USD (\$103,758.21 CAD)) <br> - 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 <br> - CloneX \#4959-0 ETH |
| :---: | :---: |
| "ivybone.eth" (0xale43fcb51656354931d47458eceadbc6545df57) |  |
| "CH" | - Collection: Otherdeed for Otherside <br> - Quantity: 14 <br> - Purchase Price: <br> Total: 36.66 ETH + 15,407 APE Tokens (\$347,593.31 USD (\$446,483.60 CAD)) <br> - \#11716 - 18.67 ETH (\$52,762.17 USD (\$67,773.00 CAD)) on May 1, 2022 <br> - \#13172 - 17.99 ETH (\$50,840.46 USD (\$65,304.57 CAD)) on May 1, 2022 <br> - \#14381-3,000 APE Tokens (\$47,509.06 USD (\$61,025.38 CAD)) on May 1, 2022 <br> - \#72046 - 1,368 APE Tokens (\$21,664.13 USD (\$27,827.57 CAD)) on May 1, 2022 <br> - \#81119-1,389 APE Tokens (\$21,996.69 USD (\$28,254.74 CAD)) on May 1, 2022 <br> - \#73727 - 1,250 APE Tokens (\$19,795.44 USD (\$25,427.24 CAD)) on May 1, 2022 <br> - \#79855 - 1,250 APE Tokens (\$19,795.44 USD (\$25,427.24 CAD)) on May 1, 2022 <br> - \#65722 - 1,260 APE Tokens (\$19,953.80 USD (\$25,630.65 CAD)) on May 1, 2022 <br> - \#78273 - 1,200 APE Tokens (\$19,003.62 USD (\$24,410.14 CAD)) on May 1, 2022 <br> - \#82865-1,150 APE Tokens (\$18,211.81 USD (\$23,393.06 CAD)) on May 1, 2022 <br> - \#69026 - 1,250 APE Tokens (\$19,795.44 USD (\$25,427.24 CAD)) on May 1, 2022 <br> - \#77827 - 1,190 APE Tokens (\$18,845.26 USD (\$24,206.73 CAD)) on May 1, 2022 <br> - \#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


Commissioner of Oaths in and for Ontario
(?) Transaction Hash:
0x3c0b4a854fb42655abe44d1fc28da2111fd976f627872425f74a005e2b4b2f58
? Status:
Success
(?) Block:

- 139570812785482 Block ConfirmationsTimestamp:
(1) 419 days 10 hrs ago (Jan-07-2022 07:48:34 AM +UTC) | ©ỉ Confirmed within 30 secs
(?) Sponsored:
(?) From:
0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F (BONEHEADS: Deployer)
? To :
© 0xb47e3cd837dDF8e4c57F05d70Ab865de6e193BBB (CryptoPunks: © Token)
(?) ERC-20 Tokens Transferred:
- From 0x54B174...83CD40ae To BONEHEADS: Deployer For 1 CRYPTOPUNKS... (Є...)
(3) Value:
- 64 ETH (1) \$204,574.08
(?) Transaction Fee:
0.009264192 ETH \$15.05
(3) Gas Price:

122 Gwei (0.000000122 ETH)
(?) Ether Price:
\$3,196.47 / ETH
(?) Gas Limit \& Usage by Txn:
200,000 | 75,936 (37.97\%)
(?) Gas Fees:
Base: 74.528741205 Gwei | Max: 122 Gwei | Max Priority: 122 Gwei

## (?) Burnt \& Txn Savings Fees:

及 Burnt: 0.00565941449214288 ETH ( $\$ 9.19$ ) Txn Savings: 0 ETH ( $\$ 0.00$ )
(?) Other Attributes:
Txn Type: 2 (EIP-1559) Nonce: 1958 Position In Block: 28

## (3) Input Data:

Function: buyPunk(uint256 punkIndex)

MethodID: 0x8264fe98
[0](000000000000000000000000000000000000000000000000000000000000000f): 000000000000000000000000000000000000000000000000000000000000143f

## (?) Private Note:

To access the Private Note feature, you must be Logged In
© $\because$ A transaction is a cryptographically signed instruction that changes the blockchain state. Block explorers track the details of all transactions in the network. Learn more about transactions in our Knowledge Base.

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

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



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

$$
4, K
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Commissioner of Oaths in and for Ontario




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


Commissioner of Oaths in and for Ontario



| Q noun | $\times$ | NounPunks \#5363 Mounfurksath 0 | 0.0179 ETH | 0.0136 WETH | * Not listed | 0.096 ETH | - |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Collection | Value | NounPunks \#4962 Noumpurwath 0 | 0.0179 ETH | 0.0136 WETH | - Not listed | 0.091 ETH | - |
| NounPunks.eth © tatac: 0/20 | $0.5367 \mathrm{ETH}$ <br> Poor 0.017 It [7 | NounPunks \#7165 HounPunks ath 0 | 0.0179 ETH | 0.0136 WETH | * Not listed | 0.0907 ETH | -- |
|  |  | NounPunks \#4391 NounPunktath 0 | 0.0179 ETH | 0.0136 WETH | * Not listed | 0.0877 ETH | - |
|  |  | NounPunks \#2924 <br> Mounfurissith 0 | 0.0179 ETH | 0.0136 WETH | - Not listed | 0.0833 ETH | - |
| Price | $\checkmark$ | NounPunks \#5197 Nounfurkseth 0 | 0.0179 ETH | 0.0136 WETH | * Not listed | 0.0834 ETH | $\cdots$ |
| Quantity | $\checkmark$ | NounPunks \#5455 Nounfuintert 0 | 0.0179 ETH | 0.0136 WETH | - Not listed | 0.0778 ETH | $\cdots$ |
| Currency | $\checkmark$ | NounPunks \#1782 Nounfuntath 0 | 0.0179 ETH | 0.0136 WETH | * Not listed | 0.0827 ETH | - |
|  |  | NounPunks \#7508 Nounfunksath © | 0.0779 ETH | 0.0136 WETH | * Not listed | 0.0789 ETH | - |
| Attributes | $3 \vee$ | NounPunks \#3401 Nounfunkwth 0 | 0.0179 ETH | 0.0136 WETH | - Not listed | 0.0825 ETH | - |

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

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


Commissioner of Oaths in and for Ontario


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


Commissioner of Oaths in and for Ontario


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

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Commissioner of Oaths in and for Ontario


Collections $\wedge$ GEVOLs $x \quad$ Clear all

| Q gevol | $\times$ | ITEM 12 |  | noor pace | anst offer | ustivo price | Cost | Diffrewiel © |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Collection | Value |  | EVOL \#5826 <br> BEVOLS | 0.0533 ETH | 0.0411 WETH | - Not listed | 0.5216 ETH | - |
| Gevots 0 <br> Inted ofl2 | 0.6396 ETH <br> fioar acoserent | $8$ | EVOL \#6001 otvour © | 0.0533 ETH | 0.0411 WETH | - Not listed | 0.5185 ETH | - |
| Chains | $\checkmark$ | $E$ | EVOL \#1149 <br> Getvois 0 | 0.0533 ETH | 0.0411 WETH | - Not listed | 0.4795 ETH | - |
| Status | $\checkmark$ |  | EVOL \#1214 <br> Otvols | 0.0533 ETH | 0.04II WETH | - Not listed | 0.4665 ETH | - |
| Price | $\checkmark$ | $E$ | EVOL \#7647 <br> Btvour 0 | 0.0533 ETH | 0.0411 WETH | - Not listed | 0.4665 ETH | - |
| Quantity | $\checkmark$ |  | EVOL \#3623 <br> Btvols 6 | 0.0533 ETH | 0.0411 WETH | - Not listed | 0.4665 ETH | - |
| Currency | $\checkmark$ |  | EVOL \#0878 bevols 0 | 0.0533 ETH | 0.0471 WETH | - Not listed | 0.4665 ETH | $\cdots$ |
| Attributes |  | $2$ | EVOL \#4846 Gevole 0 | 0.0533 ETH | 0.0411 WETH | * Not listed | 0.4645 ETH | - |
| Price | $\checkmark$ | $\dot{6}$ | EVOL \#4402 arvos 0 | 0.0533 ETH | 0.0411 WETH | * Not listed | 0.46 ETH | $\cdots$ |
| Quantity | $\checkmark$ | $x$ | EVOL \#3582 <br> Gevou 0 | 0.0533 ETH | 0.0411 WETH | - Not listed | 0.4612 ETH | - |
| Currency | $\checkmark$ | $\ddot{z}_{0}$ | EVOL \#7461 arvols 0 | 0.0533 ETH | 0.0411 WETH | - Not listed | 0.4612 ETH | $\cdots$ |
| Attributes |  |  | EVOL \#3680 <br> ocvouse | 0.0533 ETH | 0.0411 WETH | * Not listed | 0.4605 ETH | - |

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

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

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


Commissioner of Oaths in and for Ontario


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
Commissioner of Oaths in and for Ontario


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

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


Commissioner of Oaths in and for Ontario


| Q mev |  | $\begin{aligned} & \text { \#3358 } \\ & \text { mev army } 0 \end{aligned}$ | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.4156 ETH | - |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Q mev | $\times$ |  |  |  |  |  |  |
| Collection | Value | \#5032 <br> nev Army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.399 ETH | - |
| MEV Army © lifind D/80 | 1.992 ETH <br> Fbiar 00743 ith | \#1572 Mev army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.4008 ETH | - |
|  |  | \#1890 Miv Amy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3883 ETH | - |
| Chains | $\checkmark$ | \#4218 | 0.0249 ETH | 0.0151 WETH | , Not listed | 0.37 ETH | - |
| Status | $\checkmark$ |  |  |  |  |  |  |
| Price | $\checkmark$ | \#6469 <br> MeV Aurry 0 | 0.0249 ETH | 0.0151 WETH | - Not İsted | 0.3603 ETH | - |
| Quantity | $\checkmark$ | \#4320 <br> mevarnty 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3525 ETH | - |
| Currency | $\checkmark$ | \#8993 Met army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3516 ETH | - |
|  |  | \#910 mev Ainny 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3515 ETH | $\triangle$ |
| Attributes ana.e |  | \#2528 <br> mev army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3509 ETH | - |
| Q mev | $\times$ | \#4396 <br> MEV Ammy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3451 ETH | - |
| Collection | Value | \#4214 <br> mevartivo | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3453 EtH | - |
| MEV Army 0 inusad $0 / 10$ | $\begin{aligned} & 1.992 \mathrm{ETH} \\ & \text { Hloor: } 0.0245 \mathrm{ETH} \end{aligned}$ | \#2194 <br> mev Mmy 0 | 0.0249 EtH | 0.0151 WETH | - Not listed | 0.3462 ETH | - |
| Chains | $\checkmark$ | \#9145 <br> MEVAmTY 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3443 ETH | - |
| Status | $\checkmark$ | \#922 <br> mev Army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3397 ETH | - |
| Price | $\checkmark$ | \#7087 <br> MeV Ammy 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.3278 ETH | $\pi$ |
| Quantity | $\checkmark$ | \#1801 <br> mev Aumy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3304 ETH | - |
| Currency | $\checkmark$ | \#6804 <br> nev $\begin{aligned} & \text { ampoy } \\ & 0\end{aligned}$ | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3159 ETH | - |
| Attributes |  | \#9146 <br> Mev Aumy 0 | 0.0249 ETH | 0.0151 WEIH | * Not listod | 0.3055 EtH | - |
| eyes |  | \#331 mivy Aumy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.3017 ETH | - |
| Q mev | $\times$ | \#9350 Miva Amy 0 | 0.0249 E] | 0.0151 WETH | * Not listed | 0.2906 ETH | - |
| Collection | Value | \#9564 <br> mevartmy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2837 EtH | - |
| MeV Army o lutect ofen | 1.992 ETH nook 0.0249 Em | \#1416 <br> miv Army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2969 ETH | - |
| Chains | $\checkmark$ | \#1418 Mev $\Delta m$ my 0 | 0.0249 EIH | 0.0151 WETH | - Not listed | 0.2936 ETH | - |
| Status | $\checkmark$ | \#8578 <br> mev Aurny 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2833 ETH | - |
| Price | $\checkmark$ | \#24 <br> MIV Armp $\theta$ | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.289 EtH | - |
| Quantity | $\checkmark$ | \#6883 <br> nevamor o | 0.0249 ETH | 0.0151 WEIH | - Not listed | 0.286 EtH | - |
| Currency | $\checkmark$ | \# 422 <br> Miv ampy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.286 ETH | - |
| Attributes |  | \#6260 <br> mivarmy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2674 ETH | - |
| eyes | 16 レ | \#9820 <br> MEV Army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.282 ETH | - |


| Q mev | $\times$ | \#8589 mav Army 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2349 ETH | - |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Collection | Value | \#5833 <br> Mafy Amyy e | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2248 ETH | - |
| MEV Army 0 uthat U/E0 | 1.992 ETH <br> noor 1.0240 mth | \#2197 <br> mey Ampy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2187 ETH | - |
| Chains | $\checkmark$ | \#255 <br> MIV Amty 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2298 ETH | - |
| Status | $\checkmark$ | \#9687 <br> miv Artiny 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.218 ETH | - |
| Price | $\checkmark$ | \#8062 <br> mev amm 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2162 ETH | - |
| Quantity | $\checkmark$ | \#9747 <br> MFy Aimy © | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2145 ETH | - |
| Currency | $\checkmark$ | \#2592 <br> MEV Aumy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2098 ETH | - |
| Attributes |  | \#9964 <br> MEV Amwy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2134 ETH | 7 |
| eyes | $18 \sim$ | \#6467 <br> mey amto 0 | 0.0249 ETH | 0.0151 WETH | ( Not listed | 0.213 ETH | - |
| Q mev | $\times$ | \#4862 <br> MeV Army O | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2095 ETH | - |
| Collection | Value | \#9186 <br> mev Merny 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2093 ETH | - |
| MEV Army 0 latedr bisi | 1.992 ETH <br> Fher ouzastrM | \#9487 <br> MeV Amry 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2056 ETH | -- |
| Chains | $\checkmark$ | \#26 <br> mev Army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2049 ETH | - |
| Status | $\checkmark$ | \#161 <br> mev ammy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2042 ETH | - |
| Price | $\checkmark$ | \#3006 <br> MEV Attry O | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2056 ETH | -- |
| Quantity | $\checkmark$ | \#9615 <br> MEV Antry 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2095 ETH | - |
| Currency | $\checkmark$ | \#1397 <br> Mevarmy 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2313 ETH | - |
| Attributes |  | \#2978 <br> MEV Army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2037 ETH | - |
| eyes | $15 \sim$ | \#6038 mev Aumy | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.1988 ETH | -* |
| Q mev | $\times$ | \#186 <br> MfV Aumy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.2079 ETH | * |
| Collection | Value | \#9296 <br> meva amin 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.1967 ETH | - |
| MEV Ammy 0 theded 0/80 | 1992 ETH <br> Floor 00949 Em | \# $\$ 481$ <br> Mev Army 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.2048 ETH | - |
|  |  | \#3203 <br> Meva Amy 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.1969 ETH | -- |
| Chains Status | $\checkmark$ | \# 5332 <br> Mey amp 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.1831 ETH | - |
| Price | $\checkmark$ | \#5991 <br> MEV Atmy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.1821 ETH | - |
| Quantity | $\checkmark$ | \#2071 <br> MEV Aemy 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.1662 ETH | - |
| Currency | $\checkmark$ | \#3411 <br> Mev Army 0 | 0.0249 ETH | 0.0151 WETH | * Not listed | 0.1589 ETH | - |
|  |  | \#3412 <br> MEV Amim 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.6447 ETH | - |
| Attributes eyes | $10 \sim$ | \#3409 <br> Miv Army 0 | 0.0249 ETH | 0.0151 WETH | - Not listed | 0.1614 ETH | - |

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

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


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BNHDZVAULT
$<\quad$.
\& Oxa8c2..1317 Joined February 2022

Collected 32 BETA Created Favorited Activity More


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.t
Commissioner of Oaths in and for Ontario
ivybone.eth
$\$$ ivyboneeth~Joined October 202
Collected 14 beta Created Fovorited Activity More v


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


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```
Follow (Send \) ث) \overline{ ¢}
    boneheads.eth
    0x8c0f...de5f 回
    O Following 0 Followers
```


## Net Worth

\$149,009.08

```
NFTs 97.37% Wallet 2.63%
```

| Overview | Portfolio | NFTs | Activity |
| :--- | :--- | ---: | ---: | More |  |
| :--- |

NFTs


## CryptoPunks

| Floor Price | Est. Value |
| :--- | ---: |
| 52.95 ETH | $\$ 111.15 \mathrm{~K}$ |

\$145,093.65


Inhabitants: Generative Id...
$\begin{array}{lr}\text { Floor Price } & \text { Est. Value } \\ 0.5 \mathrm{ETH} & \$ 24.34 \mathrm{~K}\end{array}$


The Doggies
Floor Price
0.072 ETH

Est. Value \$4.62K

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


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```
Follow
                        Send }7 \uparrow \overline{=+
    0xa8c2...1317
    0xa8c2...1317 回
    O Following O Followers
```

    Net Worth
    \$37,225.36
    ```
NFTs 99.32% Wallet 0.68%
```



View all >

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

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


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```
Follow
Send \ ث =\mp
    ivybone.eth
    0xa1e4...df57 [
O Following 0 Followers
```

Net Worth
\$13,648.12
NFTs 100.00\%

Overview
Portfolio
NFTs
Activity
More $\boldsymbol{V}$

## No balances found

There are no balances to display.

Wallet

## No balances found

There are no balances to display.


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


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# 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 AntiFraud Centre will be sharing advice through our website, Facebook and Twitter pages. We encourage you to follow and visit our social media profiles often for fraud prevention information. Don't forget to use \#FPM2022 on all fraud prevention posts all month!

Investment scams were the highest reported scams based on dollar loss in 2021. Victims of investment scams reported a total loss of $\$ 163.9$ Million to CAFC. In most of these cases, the investment opportunities offer higher than normal, or true monetary, returns which often result in investors losing most, or all, of their money. The majority of the investment scam reports involve Canadians investing in crypto currency after seeing a deceptive advertisement. It typically involves victims downloading a trading platform and transferring crypto currency into their trading account. In most cases, victims are not able to withdraw their funds. It is very likely that many of the trading platforms are fraudulent or controlled by fraudsters. In addition to crypto trading scams, the CAFC also receives reports on suspected fraudulent Initial Coin Offerings.

## Variations of Crypto Investment Scams

- The victim is approached on a dating or social media website. In some cases, the scam starts as a romance scam and quickly turns into an "investment opportunity". Because suspects have gained the victim's trust, it can lead to a high dollar loss for the victim.
- In some reports, suspects have compromised victim's friend's social media accounts. Because the victim believes they are communicating with a friend or a trusted person, they are easily convinced to take advantage of the "investment opportunity".
- The suspect calls a victim directly and convinces them to invest into crypto currency. In many cases, the suspect asks for remote access to the victim's computer. The suspect shows the victim a fraudulent crypto investing website and convinces the victim to invest based on the potential exponential growth of the investment. In many cases, the victim will invest over a long period of time and, in the end, will realize that the funds can not be withdrawn.
- An email is received by the victim offering a crypto investment opportunity.
- The victim comes across an advertisement on social media. After the victim clicks on the ad and provides their contact information, suspects contact the victim by telephone and convince them to invest.


## Warning Signs

- Investment opportunities with higher than normal returns.
- Unsolicited telephone, email or social media investment offers.
- Displays of urgency so you don't miss out.
- An individual met on a dating or social media website who quickly attempts to convince you to invest into crypto currency.
- A friend tells you about a crypto currency investment opportunity via social media or email.
- Telephone calls from crypto investment companies.
- Fraudulent ads posted on the internet or social media.
- Request to transfer your crypto investment to an alternate crypto address.


## How to protect yourself

- Be careful when sending cryptocurrency. Once the transaction is completed, it is unlikely to be reversed.
- As proceeds of crime and anti-money laundering regimes around the world create regulatory frameworks that treat businesses dealing in crypto currencies as money service businesses, Canadians need do their research to ensure they are using reputable and compliant services.
- If you receive a suspicious message from a trusted friend, reach out to them through a different means of communication to confirm that it is them.
- Verify if the investment companies are registered with your Provincial Securities Agency or the National Registration Search Tool (www.aretheyregistered.ca).
- Prior to investing, ask for information on the investment. Research the team behind the offering and analyze the feasibility of the project.
- Be 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 online reporting system or by phone at 1-888-495-8501. If not a victim, report it to the CAFC anyway.

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

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


Commissioner of Oaths in and for Ontario


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

$$
4.2
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## Lexi stinson

| < 2 hrs | < $75 \%$ | 6 yrs |
| :---: | :---: | :---: |
| avg reply | reply rate | on Kijiji |

Listings
Reviews

## 3 listings



Townhouse for rent
\$2,800.00
1w Belleville


PS5 Console
\$1,000.00
$2 w$ Belleville


Men's Yeezy Slides
$\$ 100.00$
4w Belleville


## 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)

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


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## About

(f) Joined Facebook in 2010



Seller details

Follow

Joined Facebook in 2010

See 5 seller ratings

> Belleville

Belleville, ON
Location is approximate

## Details

Condition
New >

## Description

Basically brand new, used a few times, moving and don't need anymore. Comes with 4 controllers and all the games. Selling as a lot.

## Products related to this item

Sponsored


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

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


Commissioner of Oaths in and for Ontario







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


Commissioner of Oaths in and for Ontario


# ONTARIO SUPERIOR COURT OF JUSTICE 

Proceeding commenced at OTTAWA

Proceeding under the Class Proceedings Act, 1992

## AFFIDAVIT OF TAYLAN MCRAE-YU

## DELAWYER PROFESSIONAL

 CORPORATIONSuites 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

## TAB 2

## 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 ( $\$ 4,068.39 \mathrm{CAD}$ )) on August 29, 2021; and
ii. 30 ETH (approximately $\$ 96,759.00$ USD ( $\$ 122,051.80 \mathrm{CAD})$ ) 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.
8. 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.
9. 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".
10. 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:
i. 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:
i. 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


Taylan McRae-Yu
Sohaib Mohammad (LSO: 80696K)

This is Exhibit "CR" 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)


## RAUD 10/11/2021 5:42 PM

## 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 (0) er en


Twitter • 10/11/2021 5:41 PM
3
Q. groovybone tr24/2021a5s 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 V . A. y'all too @BONESTAR @nikkibone @lexibone
? 4 A A 4




This is Exhibit "CS" 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


[^8]coinbase
100 Pine Street Suite 1250
San Francisco, CA 94111
Phone: 1-888-908-7930

Account Information
Alexandra Stinson
lexistinson9@gmail.com

ON,
CA

| Account Statement Period | $01 / 16 / 2018-$ <br> $06 / 19 / 2023$ |
| :--- | :--- |

## 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 GNT |
| GNT Wallet | 0.0000 LOOM |
| LOOM Wallet | 0.0000 LTC |
| LTC Wallet | 0.0000 BTC |
| Loan Collateral | 0.0000 MANA |
| MANA Wallet | 0.0000 MKR |
| MKR Wallet | USDC Wallet |

Transaction History

| Date | Account | Transaction | Amount | Amount <br> (USD) | Balance |
| :--- | :--- | :--- | :--- | :--- | :--- |
| $08 / 30 / 2021$ | ETH Wallet | You sent Ethereum to <br> OxC59Ef925B947473b85b85f7583D29487Ee2e8620 | -30.68825271 <br> ETH | $-\$ 100,018.23$ <br> USD | 0.0000 ETH |
| $08 / 30 / 2021$ | ETH Wallet | You sent Ethereum to <br> OxC59Ef925B947473b85b85f7583D29487Ee2e8620 | -0.31443547 <br> ETH | $-\$ 1,017.51$ <br> USD | 30.68825271 <br> ETH |
| $08 / 29 / 2021$ | ETH Wallet | You received Ethereum from an external account | 30.0000 ETH | \$97,290.30 <br> USD | 31.00268818 <br> ETH |
| $08 / 29 / 2021$ | ETH Wallet | You received Ethereum from an external account | 1.0000 ETH | \$3,246.72 <br> USD | 1.00268818 <br> ETH |


| Date | Account | Transaction | Amount | Amount (USD) | Balance |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 08/19/2021 | ETH Wallet | You sent Ethereum to Ox8COfF426dFa77A87Be3729456D1D27fdC8F2DE5F | $\begin{aligned} & -0.08701201 \\ & \text { ETH } \end{aligned}$ | $\begin{aligned} & -\$ 352.94 \\ & \text { CAD } \end{aligned}$ | $\begin{aligned} & \text { O. } 00268818 \\ & \text { ETH } \end{aligned}$ |
| 06/21/2021 | ETH Wallet | You sent Ethereum to 0x04a0764d425843ae6Cca084758C151732439d9C8 | $\begin{aligned} & -0.12515701 \\ & \text { ETH } \end{aligned}$ | -\$301.52 CAD | $\begin{aligned} & 0.08970019 \\ & \text { ETH } \end{aligned}$ |
| 05/10/2021 | ETH Wallet | You purchased Ethereum | $\begin{aligned} & 0.09814782 \\ & \text { ETH } \end{aligned}$ | \$490.47 CAD | $\begin{aligned} & 0.2148572 \\ & \text { ETH } \end{aligned}$ |
| 05/10/2021 | BTC Wallet | You sold Bitcoin | $\begin{aligned} & -0.00710286 \\ & \text { BTC } \end{aligned}$ | $0.09814782$ | $\begin{aligned} & 0.00012715 \\ & \text { BTC } \end{aligned}$ |
| 05/07/2021 | ETH Wallet | You purchased Ethereum | $\begin{array}{\|l\|l} 0.11458034 \\ \text { ETH } \end{array}$ | \$489.94 CAD | $\begin{aligned} & 0.11670938 \\ & \text { ETH } \end{aligned}$ |
| 05/07/2021 | BTC Wallet | You sold Bitcoin | $\begin{aligned} & -0.00712802 \\ & \text { BTC } \end{aligned}$ | $0.11458034$ | $\begin{aligned} & 0.00723001 \\ & \text { BTC } \end{aligned}$ |
| 05/02/2021 | ETH Wallet | You sent Ethereum to Ox04a0764d425843ae6Cca084758C151732439d9C8 | $\begin{aligned} & -0.0513121 \\ & \text { FTH } \end{aligned}$ | -\$188.29 CAD | $\begin{aligned} & 0.00212904 \\ & \text { ETH } \end{aligned}$ |
| 05/02/2021 | BTC Wallet | You sold Bitcoin | $\begin{aligned} & -0.00284651 \\ & \text { BTC } \end{aligned}$ | $\begin{aligned} & 0.05344114 \\ & \text { ETH } \end{aligned}$ | $\begin{aligned} & 0.01435803 \\ & \text { BTC } \end{aligned}$ |
| 05/02/2021 | ETH Wallet | You purchased Ethereum | $\begin{aligned} & 0.05344114 \\ & \text { ETH } \end{aligned}$ | \$196.10 CAD | $\begin{aligned} & 0.05344114 \\ & \text { ETH } \end{aligned}$ |
| 03/03/2018 | BTC Wallet | You received Bitcoin from Coinbase | $\begin{aligned} & 0.000879 \\ & \text { BTC } \end{aligned}$ | \$10.00 USD | $\begin{aligned} & 0.01720454 \\ & \text { BTC } \end{aligned}$ |
| 03/03/2018 | BTC Wallet | You purchased Bitcoin | $\begin{aligned} & 0.01632554 \\ & \text { BTC } \end{aligned}$ | \$250.00 CAD | $\begin{aligned} & 0.01632554 \\ & \text { BTC } \end{aligned}$ |

ID Verification Attempts

| Status | First Name | $\begin{aligned} & \text { Last } \\ & \text { Name } \end{aligned}$ | Address 1 | Addresn2 | Address Components | City | State | 21P/Postcode | Country | D08 | SSN | CountrySpecific Information | Document | krc ueio | When | Informational Only? 0 | Vendor | Vendor <br> Relorence |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Succeso | Aleandra | Stinson | 1034 <br> County <br> Rood 3 |  | steet number: 1034 routa: County Rond 3 (Countly Rd 3) <br> tocaty, polticat: Belfovine adminibtrative arne Jeved.2. poitical: Prince Eidnard County adminatrative, ana level. 1 . political: Ortanio (ONO country, polticat: Canada (CN) postal Conde KSN 4Z1 street number 1034 mote: County Aoad 3 (County Rd 3) <br> locality, polticat: Bellevilie adruinatrative. ame_ ievi_ 2 . poltical: Prince Edmard Courty adminitrative arsa_level_1. poltica: Ontario (ON) country, polticat: Canadn (CA) poutal code. KBEN 421 atreet_number: 1034 route: Courty Rosd 3 (County Ad | Belerdle | ON | K8N 4221 | Canada | 「'yer'=1098. <br> "montr" $=36$. <br> "day (eot 10 ) |  | 1 <br> 'canactar states'] <br> 'CA. <br> "telan athes: <br> 'ON: <br> 'pontcode" <br> (KaN 4Z2') |  | $1814100 \%-$ <br> 1433-5e2a- <br> 8260- <br> b7tiontigacal | $2027-$ <br> 07-20 <br> 1:48 <br> PM <br> UTC | No | truico |  |


| 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: | $v$ |
| Raw vendor data |  |
| Retry with Jumio + address extraction |  |
| Supporting <br> Document | 60f6d4a415eccc197f05b99a |
|  |  |



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 O7/15/2022 447PM
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

This is Exhibit "CU" 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


[^9](7) Transaction Hash:

0xab71cd81b5ae51196c9b2484644b9b0991e0903dd2d8269cfd96a2a9b6271f62
(?) Status:
Success
(?) Block:
© 17465096
(?) Timestamp:
(1) 100 days 12 mins ago (Jun-12-2023 04:16:35 PM +UTC) | © Confirmed within 3 secs

## Sponsored:

## From:

0xa8c2bC23c4D51642C7c8767E1D2d6647f7281317 [】
(?) To:
回0xE66F9e497E1b83959F319b133EcF88FEAa8b82aC
ᄂ Transfer 8.5 ETH From 0xE66F9e...Aa8b82aC To Kraken 4
(?) Value:

- 8.5 ETH (1) \$14,812.27
(?) Transaction Fee:
0.001998146121115677 ETH © \$ $\$ .48$


## Gas Price:

40.120999159 Gwei (0.0000000040120999159 ETH)

## Private Note:

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

EQ: 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 "CV" 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)

## BONEHEADS

@BONEHEADS
so if this wasn't a rug then...what was it? best answer wins a BONEHEAD giveaway winner announced...like never? $\bullet \bullet++\boldsymbol{O}$

11:41 PM • Oct 2, 2021

This is Exhibit "CW" 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

Mos

[^10]
## 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 ••


This is Exhibit "CX" 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
Mos

[^11]


This is Exhibit "CY" 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


[^12]

TM means a trademark registration has been filed
© 2
we don't need permission from Netflix, if they have a problem they can suit us 1003


## TAB 3

## 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 " 2 D 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 " 2 D 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 3 K 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.
40. 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 1 yr 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:
i. 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:
i. 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".
51. 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".
53. 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".
54. 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.
55. 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.
58. 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


Dominic Simpson Sohaib Mohammad (LSO: 80696K)

## 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


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

| Boneheads NFT \# | Price | Purchase Price | Gas Price | Date of Purchase | Transaction ID |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 3570 | 0.1 | \$328.65 | \$40.95 | Aug-20-2021 | htips//ethessan io/Tx/0x7d6b88d75 9922614 e90a3a1113bbb 111029514670 ebba485b3d3318849178c9 |
| 1227 | 0.033 | \$106.81 | \$23.65 | Aug-21-2021 | https/letherscan io/tx/0x43b6b162ba4d017230d618783a68a479c4515458d04d1d28591b57/77e7833a5 |
| 9490 | 0.022 | \$75.59 | \$41.87 | Sep-18-2021 |  |
| 3866 | 0.06 | \$175.52 | \$35.76 | Sep-25-2021 | https://etherscan io/tx/0x89ce5704521160a1483e335029d2b1cc348c33e0ddo45d78dc9970db145d1de5 |
| 8716 | 0.032 | \$130.01 | \$56.86 | Oct-21-2021 | https://otherscan io/tx/0x712600ed29d8378e8b727b38b069897aa8d32ecc32298e19584e6438b2fet645 |
| 7229 | 0.029 | \$122.39 | \$52.72 | Oct-25-2021 | httos//etherscan io/ta/ $0 \times 36 \mathrm{co40620a1eff6d4866d02/3a5285514451567a21f64994e630459521e19ef3}$ |
| 732 | 0.05 | \$230.86 | \$68.18 | Nov-07-2021 | httpsiletherscan io/fx/0x3707add/55e9410e502315d1e4cda6e1ete7acte0a3ece8dd83034a4d7ab41a |
| 638 | 0 | \$0.00 | \$76.50 | Nov-26-2021 | https//etherscan.io/fx/0x85ab3504249877241daaecf17/51595ca1118054d65b091255c3cffoddc3531c |
| 7276 | 0.005 | \$22.57 | \$89.31 | Dec-02-2021 |  |
| 4167 | 0.00005 | \$1.84 | \$70.51 | Dec-31-2021 | https//etherscan io/bx0xde7844efflscaee/2b37ec519d9d537afd99483225a5etda 5bb119934c36ce86a |
| 4169 | 0.00005 | \$1.84 | \$73.64 | Dec-31-2021 |  |
| 9837 | 0.07 | \$257.31 | \$68.66 | Dec-31-2021 | https//etherscan io/tx/0xdc0044425a9f80cfde7a796cfo 1a5a31d5d7e665e4d0e0b074e9abd87ee6040b9 |
| 7960 | 0.017 | \$64.03 | \$63.76 | Jan-01-2022 |  |
| 9146 | 0.04 | \$133.98 | \$69.50 | Jan-15-2022 | https //etherscan io/txiOx9di2b3156eeefa98d109141a14c438070ctb8229744671c534fd15d4cad4f667 |
| 9216 | 0.037 | \$123.93 | \$69.50 | Jan-15-2022 | htips://etherscaniofx/0x9d12b3156eeefa98d109141a14c43807cofb $222974 / 571$ c534/d15d4cad4/667 |
| 1596 | 0.04 | \$133.98 | \$69.50 | Jan-15-2022 | https//etherscan ioftx/Ox9d/2b3156eeefa98d109141a14c43807cotb8229741671c5341d15d4cad4f667 |
| 8148 | 0.04 | \$133.98 | \$69.50 | Jan-15-2022 |  |
| 2741 | 1.1 | \$3,160 | \$2 | Feb-12-2022 |  |
| 8571 | 0.028 | \$89 | \$39 | Feb-15-2022 | https://etherscan io/w/0x85729d852152137cb4bd895a/731889c730377649e72c9e0de6add5flae6d5e9 |
| 1378 | 0.033 | \$86.12 | \$29.10 | Feb-23-2022 |  |
| 1380 | 0.033 | \$86.12 | \$25.23 | Feb-23-2022 | Htlps://etherscan io/lx/Oxtche 33 e53eef854c93e4b73a2ce55c8b785820548e30076396cdc18a3tc5d544 |
| 3793 | 0.0249 | \$64.27 | \$38.60 | Feb-23-2022 | htlps//etherscan.io/tx/0x96d8851f810t2c717577 cadec37b765a85e526bb95d699391decead38c95bccc |
| 4020 | 0.011 | \$17.86 | \$4.50 | Jun-17.2022 | https://etherscan io/fx/0x981105854850el2ca51c1fodae09315362ecd238ba68272b7/eee7107d11d8e6 |
| 2348 | 0.013 |  | \$4.50 | Jun-17-2022 |  |
| 5882 | 0.014 |  | \$4.50 | Jun-17-2022 |  |
| 9517 | 0.014 |  | \$4.50 | Jun-17-2022 | $\mathrm{https} / / \mathrm{l}$ therscan io/tx/0x981105854850el2ca51c1fodaep9315362ecd238ba68272b7leee7107d11d8ee6 |
| 4924 | 0.0149 | \$18 | \$2 | Nov-25-2022 |  |
| 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


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

8 BONESTAR 10/12/2021931 PM
Hey Prismo!! Do you wanna MOD? I didn't remember whether you mentioned you wanted to or not $\because=$
Prismo to/12/20219:32 PM
oh that would be sick Ivy, I'd really appreciate it. . .

BONESTAR to/12/2021993 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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Sohaib Mohammad (LSO: 80696K)

## This is Exhibit "D" to the Affidavit of Dominic Simpson

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

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Sohaib Mohammad (LSO: 80696K)

RAUD 11/01/20219:03 AM
Have not. I'll have to check it out
Also, found where team said Oct 31: https://twitter.com/boneheads/status/1447924261130285075?s=21
8 BONEHEADS (@BONEHEADS)
@TThirty__ @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
-i:
Y Twitter $\cdot 10 / 12 / 20218: 56$ AM

## This is Exhibit "F" to the Affidavit of Dominic Simpson

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Sohaib Mohammad (LSO: 80696K)


This is Exhibit "G" to the Affidavit of Dominic Simpson
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Notary Publiz in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)

JP 10/10/20217:45 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 $2 d$ jus sum sneak peeks $\bullet \bullet$
also saw ur text from earlier id love to $\bmod *$

BOSS 10/10/20217:59 PM
@JP would do the hammer justice

BONESTAR 10/10/20218:00 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 $\$+$ - 10
physicals, that's the core business, everything else is just fluff + marketing/relationships, easy money 0
$\bigcirc 9$
we're going to have a $\$ 100 \mathrm{~K}$ ETH giveaway contest, with a physical component, initiates shortly after 2 D reveal 9910
if anybody has seen please exit thru the giftshop, that's a good hint 90
1009

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

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


This is Exhibit "I" to the Affidavit of Dominic Simpson
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Notary Pubric in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)

This is Exhibit "J" to the Affidavit of Dominic Simpson
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Notary Pubfic in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)

## BONESTAR 10/12/2021 11:24 AM

so the 2D's are going to give you the ability to buy the kaws style limited edition collectible toys + the drip
v. 7

3D's are still up in the air, they legit just might not be necessary at this point
it really depends, it's almost two separate businesses and we're just trying to figure out the best way to blend them without cannibalizing the 2D's if 2D's = access to novelty art/limited collectibles, 3D's can have alternative utilities (edited)
(4) BONESTAR so the 2D's are going to give you the ability to buy the kaws style limited edition collectible toys + the drip

BOSS 10/12/2021 11:26 AM
LOVE THIS
log 3

JP 10/12/2021 11:26 AM
gm gang
© 2
time to peep uncle ivys messages
12
BOSS 10/12/2021 11:26 AM
Into the BearBrick and KAWS stuff
d. P. 10/12/202111:26 AM
one day closer to refresh

38 BOSS Into the BearBrick and KAWS stuff
BONESTAR 10/12/2021 1122 AM
same, thats museum shit, can't wait, no reason we can't make it to the top of that foodchain, especially when all the dope colours from the 2D refresh appear



## This is Exhibit "K" to the Affidavit of Dominic Simpson

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

BONESTAR 10/21/20219:48 PM
if you guys only knew what is in the works, and how big this is going to be
and by bigi i mean incredibly awesome, raw, and cool
헝 12
the only leak = there was an article that released yesterday on TechCrunch regarding a similar direction + investors that we've been speaking to 0913 © 8

```
(3) JP @BONESTAR this one?
BONESTAR 10/21/2021 10:36 PM
Imao this mf'r
BONEHEADS = BONEHEADS ORIGINS
JP 10/21/2021 10:37 PM
ivy in the flesh
BONESTAR 10/21/2021 10:37 PM
BONEHEADS ORIGINS 2D, BONEHEADS ORIGINS 3D
;
            7
JP 10/21/2021 10:37 PM
that's hard
0
    fw it
    8
    BONESTAR 10/21/2021 10:37 PM
    BONEHEADS = METAVERSE = BONEVERSE
        8.9
    IVYBONE = BONESTAR
        2 10
    JP 10/21/2021 10:37 PM
    yo bonestar anyway we can get a channel to send possible drip to add for meta refresh (edited)
    i love when ivy leaves for a day or two and comes back spittin sick new ideas
```




## This is Exhibit "L" to the Affidavit of Dominic Simpson

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

## 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 - 4
Bosco IIII 10/18/2021 6:53 PM
17 more for me to be top 10
4
4


[^13]

sbmitchellbone 10/27/20219:56 PM
so Im buying a 10 bundle from des
3
but gas is a bit high lol
Q sbmitchellbone so Im buying a 10 bundle from des RAUD 10/27/2021 9:58 PM
Swag. 10 Bones richer

This is Exhibit " $\mathbf{M}$ " to the Affidavit of Dominic Simpson
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Notary Publib in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)


This is Exhibit "N" to the Affidavit of Dominic Simpson
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Notary Publie in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)

sbmitchellbone w/war2021t2:22 PM

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

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Notary Public in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)
sbmitchellbone 11/09/2021 10:48 AM
lol glad I was like, let me randomly add this domain for my bones holdings

| sbmitchell.eth |  | - You were eligible for the airdrop! |
| :---: | :---: | :---: |
| Oxedc0f30d...fc3c3f3e75 |  |  |
| Rewards |  | Your tokens are claimed! |
| Historical activity | 1.96 (ㄱ) | You were eligible for the retroactive airdrop, and you successfully claimed your tokens. |
| Future registration | 112.41 (3) |  |
| Primary ENS Name set | 2x | Youreceived... $228.728886 \text { (1) }$ |
| Funfacts |  | You have received these tokens for being an early participant |
| Longest owned | sbmitchell.eth | of the ENS community. Use this power wisely! |
| Latest expiration | sbmitchell.eth | Tokens claimed successfully |

bones already making me monies
Q 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 11/09/202111:33 AM
1 K claimable tokens
$\downarrow$
10

## This is Exhibit "P" to the Affidavit of Dominic Simpson

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

## JP 11/25/2021 3:02 PM

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

## 991

(3) 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 9

## Smokeypot 11/25/2021 3:10 PM

I need a bone doll
9) 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

```
    -4
```

cant imagien thr ppl that have tons of bones


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

## This is Exhibit "Q" to the Affidavit of Dominic Simpson

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Notary Pubkc in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)
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?
(4) BONESTAR what's the problem?

JP 11/25/20218:30 PM
ser throw us a crumb
for thanksgiving

BONESTAR 11/25/2021 8:30 PM
happy thanksgiving

$$
\text { 9.) } 7
$$


(3) BONESTAR Click to see attachment

JP 11/25/2021 8:38 PM
and what's west coast nft?

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 11/25/20218:39 PM
they're not dead, we're stealthing the next steps, maximum impact until we're ready
© 2

# jOseph 11/25/2021 8:39 PM <br> 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 11/25/20218:40 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 11/25/20218:40 PM
Yeah you sound like a bitch
© jOseph 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 11/25/20218:40 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(40) 50) (%) (%)
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
n never happened so just been a bit hurt w sum stuff passing dawg
that's all
i get no dates bc dates in projevts never fucking work and just ruin things. but updates would be great @BONESTAR ^^
BONESTAR 11/25/20218:45 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
```


## This is Exhibit "R" to the Affidavit of Dominic Simpson

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


This is Exhibit " $\mathbf{S}$ " to the Affidavit of Dominic Simpson
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Notary Public in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)
ค Davee What's the thinking behind 3 k attributes? Will each bone have a high minimum amount of traits? 1 mean the combinations of 3 k attributes, mathematically runs into . BONESTAR 12/30/20211148 PM
extreme uniqueness, aesthetics, and pre-building utilities for the legacy physical collection

- 2
only 10 K bones, only 10 K boneheads physical pieces to ever exist
A 2
Supreme has...tens of millions? not including fakes?
Q BONESTAR extreme uniqueness, aesthetics, and pre-building utilities for the legacy physical collection
Davee $12 / 30 / 20211158$ PM
Cool, cant wait to see what you've been cooking!

8) EONESTAR extreme uniqueness, aesthetics, and pre-building utilities for the legacy physical collection
RAUD 12/31/202112.09 AM
Sweet deal
9) BONESTAR extreme uniqueness, aesthetics, and pre-building utilities for the legacy physical collection
© groovybone $12 / 31 / 2021$ 12:32 AM
I'm itching for a peek (ys


## This is Exhibit "T" to the Affidavit of Dominic Simpson

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Notary Pubhe in and for the Province of Ontario
Sohaib Mohammad (LSO: 80696K)
BONESTAR 01/05/2022 1:30 AM
@groovybone papers definitely still lurking, i should've stayed quiet...wanted $2 K$ bones before going into the reveal
not just to hoard but for utily-tities sake
095 앙
(3)
groovybone 01/05/2022 1:32 AM
Utily-tities $\Leftrightarrow$ But Imaoo yeah I was waiting for some eth to come in to pick up a few more and then that shit ran 아
(edited)
BONESTAR 01/05/2022 1:39 AM
p.S. official collection renamed to "BONEHEADS - Origins" now on OS
BONESTAR 01/05/2022 3:08 PMall $i$ know is were very grateful for the early riders, and we're going to make sure we provide value for ya'll legends
13 © 14
RAUD @BONESTAR you ever get your tat btw?

BONESTAR 01/05/2022 3:10 PM
hahaha not yet
waiting for the most impactful moment
? BONESTAR all i know is were very grateful for the early riders, and we're going to make sure we provide value for ya'll legends
BONEMEISTER 01/05/2022 3:10 PM
Any thoughts on doing the forging/minting on L2 like arbitrum?
(2) BONESTAR waiting for the most impactful moment
RAUD 01/05/2022 3:11 PM
Tsunami



BONESTAR 01/11/2022 8:38 PM
a pecentage of sales will be kicked back to the holders btw
© 12 - 10 \% 110
so when masses rent to forge, \% of bone tokens spent to forge = kicked back to holders
(2) BONESTAR 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
© 11
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
1006

BONESTAR 01/11/2022 8:39 PM
you will also need to use bone tokens to unlock items, so they can be forged10
if the masses don't want to wait to forge, they buy tokens of those willing to sell = time clash of clans, gems

BONESTAR 01/25/2022 7:30 PM

0911
i hope everyone likes it, $6+$ months of work
we did a major pivot
groovy and raud will be privy to it, but it's going to be insane cool vibes, not just streetwear, streetwear will be a component of it 0910 - 8
our vision is to build a community, with that, the art needs to be all encompassing, not just streetwear
荘 8 人 8
so we did just that 9
© 8


## (\%) BONESTAR 01/25/2022 7:51 PM

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

* 6

Bosco IIII 01/25/2022 7:51 PM
Bonetainment

BONESTAR 01/25/2022 7:51PM
positioning it in a very strategic way
hahaaha
hope everyone likes the art, gonna be a vibe!!!!!!!

BONESTAR 01/25/2022 8:07 PM
the vision will be clear once you see the reveal
造 6 * $405 \geqslant 4$
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 itll 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., itll be a franchise vs a company
念 1
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
(3)
groovybone 01/25/2022 840 PM
Moving away from rated R?
BONESTAR 01/25/20228:40 PM
and the attributes are insane, and fire
$10 \quad 8 \quad 9$.

BONESTAR 01/28/2022 10:32 AM
hahaha reveal will occur within Q1, that's a certainty
0911

BONEMEISTER 01/28/2022 10:33 AM
Now that's alpha
d 2
in
BONESTAR 01/28/2022 10:33 AM
art is gonna be wacky and cool and super fun!!!! streetwear will be present, but the overall theme will be...super cool and lots of attributes
but ya 100\% before Q1 over, and working to throw everything on-chain
© 11 - $11 \quad 11 \quad$ P $5 \quad$ P 3


## This is Exhibit "U" to the Affidavit of Dominic Simpson

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



```
BONESTAR O1/1/2022 10.52 PM
gang, i love the idea for the giveaway, another option is...hold your bones, cherish those bones, and instead we could replace Friday/Saturday with the 5ETH
giveback @0%)
9.9
the fact that you're all down to donate a bone (to the gang that matters) already shows that they're in the best hands they can possibly be IMO @0
for now just swing those hammers, discord is indeed locked, verification is faulty so they can't see the channel, don't want to lose vanity URL. so we can't
officially close it by revoking that link (as far as im aware)
p.s. and also nothing gets me more excited than the fact that youre all down to give away a bone and showing that you're closet papers, (5), jk jk, i kid i kid
*12 (2) 13 , 유 5
how many are on the google doc list currently?
BOSS 01/12/2022 10.58 PM
Looks like 20@?
BONESTAR 01/12/2022 10.59 PM
let's cap it at that, list closed, thank you awl for participating, quarter ETH to everyone that's on the list = win win, and you get to keep your bones
# 11 O 11 1589 % 8
```


## This is Exhibit "V" to the Affidavit of Dominic Simpson

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Sohaib Mohammad (LSO: 80696K)

BONESTAR 02/10/20222.02 PM
hey gang!! miss the squad, we're going to be gearing up for the reveal soon, and we want to do an honorary bunch for the OG squad!! if someone can make a google sheet with all of your fav attributes/personality traits/anything you want, we'll synthesize and make you an honorary BONE, the elite bones ©

groovybone 02 $10 / 20222.02 \mathrm{PM}$
OMGGG
© 11

3
BONESTAR 02/10/20222.02PM
we'Il drop a reveal sneak peek within the month only to this channel

- 16


## BONESTAR 02/17/2022 8:19 PM

0\% chance peak
아 5 장 5 의 6 웅 7
surprise reveal

- $14 \bigcirc 08$
you'll appreciate it that much more
13
but you'll have heads UP on wen reveal
- 13
half body, 650+ traits
full body will be downloadable via site UI for content + other utilitities
$9 \odot 14$

3) 13
© 3

This is Exhibit "W" to the Affidavit of Dominic Simpson
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Sohaib Mohammad (LSO: 80696K)





Sooo what boys? Rug confirmed? ©

## This is Exhibit "X" to the Affidavit of Dominic Simpson

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

## This is Exhibit "Y" to the Affidavit of Dominic Simpson

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

## BONEMEISTER 05/08/2022 11:45 AM

is close to time 00

## 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.

```
CAvatar SpaceMexManny 05/25/2022631PM
    HiGuys
    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!
```


## Bonegang Forever

$\${ }^{9}{ }^{\circ}$

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

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

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Sohaib Mohammad (LSO: 80696K)

BONESTAR 06/13/2022 8:56 AM
if you can find the face of the main BONEHEADS franchise character you'll get to see the next sneak peek first $\AA$


BONESTAR 06/13/2022 9:22 AM
p.s. 69 days until reveal

0914

RAUD The penny guy so relevant rn. My spirit Bone $\because$
moulanbator 06/13/2022 9:22 AM also low key a dummie ©〇
(3) BONESTAR p.s. 69 days until reveal
moulanbator 06/13/2022 9:22 AM
E
21st of august © $\odot$


BONESTAR 06/13/2022 9:32 AM
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: ©0

3 BONEMEISTER so one question I have - are the current bones refreshing? or we getting dropped new bones? I would just be sad to see the old sty. BONESTAR 06/13/2022 11:01 AM
all current are refreshing
© 4


BONEMEISTER 06/13/2022 11:02 AM
Two incredible vsad scoops gotta say
482 2
RAUD My 10 bone bdi from a few days ago? I set gas to 20 like a week ago and it took 3 days to transact
BONEMEISTER 06/13/2022 11:02 AM
Ya that was ledge
9 BONEMEISTER so one question I have - are the current bones refreshing? or we getting dropped new bones? I would just be sad to see the old sty. BONESTAR 06/13/2022 11:02 AM
OG's will forever be remembered - we have a neat capsule planned
99 10 © 7
(2) BONESTAR OG's will forever be remembered - we have a neat capsule planned

BONEMEISTER 06/13/2022 11:03 AM
Incredible -
moulanbator 06/13/2022 11:03 AM
lit
(9) BONEMEISTER Two incredible vsad scoops gotta say

BONESTAR 06/13/2022 11:03 AM
still preserving lots from OG's!! they'll look a tad bit different, but the characters are so awesome!!!!!
10 staple characters, based on expressions :D:D:D:D:D:D;D

BONESTAR 06/14/20222:35 PM
we're really glad that everyone loves the new look
11
does anyone like collectibles in the form of toys, figures/sculptures?
twio 11
Q. BONESTAR does anyone like collectibles in the form of toys, figures/sculptures?
moulanbator 06/14/20222:37 PM
an irl $\mathrm{BH}_{3}$ ?
$y e s \times \infty$


3 BONEMEISTER g fuckin m gang
BONESTAR 06/14/2022 2:37. PM
this is the closest to franchise boy, the main takeaway is the dummy like expression, rounded and depressed eye sockets: makes them a little less morbid and gives off the illusion of an actual eye = more relatable for storytelling + character development, hint hint the direction we're heading towards :+
9910

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

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Sohaib Mohammad (LSO: 80696K)






## 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

๑๑ 4
vc, very culture
bh is $v$ vc in all the ways


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Sohaib Mohammad (LSO: 80696K)


```
moulanbator 07/15/2022 1:22 AM
what do we think of this reply? being the OGs n all Oe
(am obvs here to stay @\bullet)
but we havent really been aware of the developments the whole time... .ov
23:58 - 14.07.22 - Twitter for iPhone
```



```
ryandcrypto＠＠ryandcrypto－7h
Replying to＠BONEHEADDDDDDD
＂oh shit we don＇t want to go to jail－let＇s
do some shit＂\(\%\)
Q 1
โ． 1
O22
ふ
さ
```



```
BONEHEAD＠BONEHEADDDD．．．• 7h
but what if we have a years worth of
receipts and a secret OG believers discord
chat that＇s been aware of our
developments and trolly tactics this entire
```



```
Q 6 七 ○ 5 ふ ث
```



```
ryandcrypto＠＠ryandcrypto－7h
3 yup makes sense
Q tl \(O=2\)
```

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 $\odot$

## RAUD @BONESTAR you willing to share what happened regarding that accusation that you didn't pay NFTLAB with us'

BONESTAR 07/15/2022 4:36 PM
pure BS - if you look in the original smart contract you can see a wallet splitter function dev'd right into the contract, $5 \%$ to whom I assume is NFTLAB (who was a huge pain near the end of the development process - he/they/it was relieved of their duties when WestCoastNFT took over, they were also very against them coming on board), $10 \%$ to WestCoastNFT - came out instantly upon mint, they've since distanced themselves for publicity reasons but we still keep in contact with one of their main dev's (edited)
Q 7 술


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
(3) 4 8 4
(5) BONEMEISTER The tsunami generator machine?
(3) BONESTAR 07/15/2022 4.56 PM
it'll take some time - web $2+$ web 3

## 902

(7) BONESTAR 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 w Dreuseff AKA BONE Brawler 07/16/2022 3:03 AM
Wait so you're saying you're not affiliated with lvy 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?
(2)

BONESTAR OT/16/2022 822 AM
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 - 5 K peoples opinions...noise

- 10

This is Exhibit "AD" to the Affidavit of Dominic Simpson
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Sohaib Mohammad (LSO: 80696K)

```
SONNEST/AR 07/18/2022 8.47 AM
^^^ 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
095
web 2 store (clothes + collectibles) + web 3 store (exclusives only), gated with $\mathrm{BH}+\$ \mathrm{BONE}$ ( $\$ B O N E$ will be generated through staking)
995
our plan is to eventually ( $5-10$ years from now, which means 20 by our standards -3 ) merge the web 2 to web 3 once critical mass adoption occurs
5 4
Q) BoNEsTAR web 2 store (clothes + collectibles) + web 3 store (exclusives only). gated with BH + \$BONE (\$BONE will be generated through staking)
BONEMEISTER $07 / 18 / 2022$ 8.51AM
any physicals going to be available during Boneiversary week? ©๑
BONESTAR O//18/2022 8.51AM
and then you'll only need \$BONE to unlock (not purchase) regular drops, for exclusives you'll still need BH + \$BONE
9.5
that'll be a way of generating value - through offloading \$BONE that gets generated while staked
(9) BONEMEISTER any physicals going to be available during Boneiversary week? $9 \boldsymbol{\circ}$
BONESTAR 07/18/20228.52 AM
$0 \%$ chance 웅
앙
we have over $1,600 \mathrm{BH}$ '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

30NEMEISTER 07/78/20228:59 AM
ayyy sounds dope, exciting times ahead for $\mathrm{BH} \because$
BONSSTAR 07/18/20228.59 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 4
covers most of the digital bases for creatives and everyone to build/create art/buff up their identities
$-2$
(4) 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 BONEMEISTER 07/43/2022 900 AM
Imao i have so many questions but im sure lots will be answered Boneiversary week so ill refrain - thx for the updates mr BONESTAR

BONESTAR 07/18/2022.9:00 AM
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

BONEMEISTER 07/18/20229:02 AM
so are you saying for UGC we will have access to 3d, 2d and voxel models of our bones?

## BONESTAR 07/18/20229:03 AM

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
© 3
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 183
one of the characters is BOOMBONE and he/she/it (it's he) says "boom" a lot very cute coming soon video coming soon
997
997

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 07/18/20229224AM
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
093

BONESTAR 07/18/20229:37 AM
yup, UGC is the only way to build community
and to do that you need assets
8909 1
honorary bone traits exist - maybe yesrs 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 (odited)
© 5

RAUD 07/18/20229:40 AM
Awesome
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 Origins (edited)
Im 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
4392
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
$\begin{array}{llllll}\text { D } 6 & 0 & 6 & \text { P } 6 & \text { E } 6\end{array}$
users will be able to show intent, which to us is data
102
09:48 brand + story + collectibles (with great content) + polarization, we'll see what happens
4. 1

BONESTAR O7/19/2022 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

3

BONEMEISTER 07/19/2022 11:30 AM
Oh damn so UGC not for another -90 days from now?
BONESTAR OT/T9/2022 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
3
UGC will start in August on a small scale, but your true BH won't be revealed until reveal

BONESTAR OT/19/2022 11:32 AM
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

43
that's before the reveal

BONEMEISTER 07/19/2022 11:34 AM
I'm excited to see some of this politically charged content $9 \times$
BONESTAR 07/19/2022 11:34 AM
we'll probably do 2-3 drops before the reveal to generate momentum
94
politically charged stuff will be able to be previewed in august for 3-5 of them $\Theta$ 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

BONEMEISTER O/IP/2022T137 AM
Lmao sounds hilarious I can't wait to hear what the Bones sound like (3)

EONESTAR OT/9/202211:37 AM
they just make sounds, they don't speak haha
$)^{3}$

BONESTAR 07/19/202211:37 AM
they just make sounds, they don't speak haha
$\cup 3$
but "boom" is a hallmark
BOOMBONE just loves to fuck shit up
© 9
but, blow it up to build it back up better, strategic destruction (3)아
these are all finalized, the only things that could change are dates, content and strategy is fixed, set in stone, keys thrown away / it took us a very long time t settle on all of this
Q) EONESTAR ai, the whole gamut

RAUD 07/19/2022 11:40 AM
I want the Al Bonehead pls
BONESTAR 07/19/2022 11:40 AM
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 believe it ©3) (edited)
© 6

RAUD I want the Al Bonehead pls
BONESTAR 07/19/2022 11:42 AM
we're like 20-30 years away from sentient ai, lots of FUD in the space (3)
the rogan and marc podcast was a good listen if you're into that realm


BONESTAR 07/19/2022 11:46 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 ©으
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!!!!

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
(2) BONESTAR OT/22/2022 1107 AM
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 12:43 PM
app store out the gate
the marketing component of simply having an app, huge, push notifs alone are insane conversion boosters
? 6
(1) BONESTAR the marketing component of simply having an app, huge, push notifs alone are insane conversion boosters
jOseph 07/22/2022 12:50 PM
lit
ngl im excited for the new placeholders even
RAUD So I'Il learn to bot for the web 2 shit and then enjoy tokengated/claimable the web 3
Prismo 07/22/2022 12:54 PM
time to build a script? ©9
sooo much to take it, love all the ideas
Q Prismo time to build a script? ©9
BONESTAR 07/22/2022 1:24 PM
we'll build one and it can be downloaded via our assets sectionall is fair in love and bots 5
holders won't need it for BH, web 3 drops will be rolling raffles, but you can use it for other brands every drop is character based so only 1 K eligible anyway per drop, unless you own all 10 characters which all you goons presumably will/already do7 준 4


## This is Exhibit "AE" 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


Sohaib Mohammad (LSO: 80696K)

```
MARSEILLE 08/14/20229:26 PM
```

@BONESTAR no updates?
(3) MARSEILLE @BONESTAR no updates?

BONESTAR 08/14/2022 10:19 PM
$\triangle \therefore \Delta^{\circ} \stackrel{\circ}{\circ} \stackrel{\circ}{ }{ }^{\circ}$ saving it for the completed


JJbone 08/44/2022 10:56 PM
Schedule still on progress? Any delay?

RAUD 08/15/2022 8:21AM
IWWIWIIW
© 3

3
BONESTAR 08/15/2022 5:38 PM
no delays , whitepaper on anny week, site update sept 1 , daily previews starting oct 1 , drop 1 november 1 , reveal jan 1 , app drops either anny week for forevers and public push will start oct 1 in tandem with the previews
A 10 © 10 ? 10

```
BONESTAR 08/20/2022 12:13 PM
happy 1yr presale anniversary @%, the real anniversary begins when we launch, when the reveal occurs, and the first collection drops *
@%
Q Bonestar happy yyr presale anniversary
```

```the real anniversary begins when we launch, when the reveal occurs, and the first collection drops \(\geqslant\)
BONEMEISTER 08/20/2022 12:14 PM
Timeline you gave earlier still in tact?
```

```
BONESTAR 08/20/2022 12:15 PM
yes
(a) bonestar yes
BONEMEISTER 08/20/2022 1216 PM
Does that mean WP sometime within next 7 days? 90
```

```
                    8ONEMEISTER Does that mean WP sometime within next 7 days?@@
8) BONEMEISTER This big brain knows.. u can't kill what is already dead
BONESTAR 08/21/2022 1:28 PM
we haven't even launched yet, people forget that at times (mostly all of them)
```

```
ᄋᄋᄋ 3 ⿻ᅡᄋ
```

```
ᄋᄋᄋ 3 ⿻ᅡᄋ
```



> BONESTAR 08/23/2022 $6: 36 \mathrm{PM}$
> we'll get him back $\odot \boldsymbol{\Theta}$
> $5 \quad 3$
> BONEMEISTER 08/23/2022 6:36 PM
> No doubt
> RAUD 08/23/2022 6:53 PM
> Yeah Smokey has no bad blood here. Loves everyone here; just waiting for action*

## This is Exhibit "AF" 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


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



This is Exhibit "AG" 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


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



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2
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X
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ES



## WHO THE F热CK IS CBONESTAR?

## WHO THE F\#@K ARE EOU...












This is Exhibit "AH" 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 Oj Reg 431/20, Administering Oath or Declaration


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

Q BONESTAR once we finalize NFT collection so many dope assets and emojis coming our way, we'll make our own SVG everything - putting hella emphasis o. BONEMEISTER 09/03/20222:53 PM
So would that be after refresh in jan1?


## This is Exhibit "AI" 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


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

BONESTAR 10/01/20229:06 PM
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 220 gsm fine jersey 100\% cotton, vintage white

2 8
all numbered to $1 / 100$, and I'll personally guarantee that anyone in here that wants one will have guaranteed access at cost
10
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
4 12 아 7

BONESTAR 10/27/2022 B:23 PM
we'll know in the next 48 hrs 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 8 x pieces of packaging

998
. MARSEILLE @BONESTAR Can I get two or just one per hand
BONESTAR 10/27/20228846 PM
there isn't a limit
4
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

- 8

This is Exhibit "AJ" 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


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

## 8ONESTAR 11/01/2022 7:35 AM

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
\$1 12
Q. 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 im BONEMEISTER 11/01/2022 7.41 AM
What's the plan forward?

BONESTAR 11/01/2022 7:52 AM
the plan is the same as mentioned before, the dates have been pushed up slightly
(3.) BONESTAR 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?

JJbone $11 / 01 / 20227.58$ AM
Whats the next target date?
@BONESTAR i am cold
© JJbone @BONESTAR iam cold
BONSSTAR 11/01/20228:02 AM
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 09 2 © 5
and that won't be pushed, $0 \%$ chance, I probably won't be happy with it, but it's what we all agreed on

6) 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 24 th 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

## 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


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



## 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 O. Reg 431/20, Administering Oath or Declaration


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


Bosco IIII 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

- 3


## 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


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

[^14]MARSEILLE 01/02/2023 9.53 AM
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


BONESTAR 11/09/2022 10:49 AM
everything happens all at once Jan 1


BONESTAR 11/09/2022 10:49 AM
10000000\% hahaha

I don't know why I constantly run into scammers in my life
94

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?
(3) 2

Bosco IIII 01/04/2023 3:44 PM
i'm confused by the radio silence @BONESTAR
(9)

BONEMEISTER 01/04/20233:44 PM
0
(8)

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?

안훙
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
B
adezeno.eth 01/05/20239.27 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


Sohaib Mohammad (LSO: 80696K)

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
903

Taylan McRae-Yu
Plaintiff

## TAB 4

## 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

7. On August 20, 2021, I minted 50 Boneheads NFTs at a total price of $\$ 16,432.50$ USD, and 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


Glen Wilde

Sohaib Mohammad (LSO: 80696K)

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)

## (?) Transaction Hash:

0x961e48987f7e4568c9a0222a67790869ca3f96e6560dcfb0d746c0ac1f8b1cde []
(?) Status:
Success

Block:
130641465099259 Block Confirmations
(?) Timestamp:
() 758 days 18 hrs ago (Aug-20-2021 08:00:22 PM +UTC)

## \& Transaction Action:

- Mint 50 of 8 BONEHEADS... (BONE...)

Sponsored:

## (3) From:

0x6B67623ff56c10d9dcFc2152425f90285fC74DDD []
(3) Interacted With (To):

⓪xf9C2874A88ED6C5a8115CB5693996C8fE22B3CE2 (BONEHEADS: BONE Token) [】
(?) ERC-721 Tokens Transferred:
50
ERC-721 Token ID [1944] 3) BONEHEADS... (BONE)
From Null: 0x000...000 To 0x6B6762...5fC74DDD
ERC-721 Token ID [1945] -3 BONEHEADS... (BONE)
From Null: 0x000...000 To 0x6B6762...5fC74DDD
ERC-721 Token ID [1946] 3. BONEHEADS... (BONE)
From Null: 0x000...000 To 0x6B6762...5fC74DDD
ERC-721 Token ID [1947] 3) BONEHEADS... (BONE)

From Null: 0x000...000 To 0x6B6762...5fC74DDD
ERC-721 Token ID [1948] 3 BONEHEADS... (BONE)
From Null: 0x000...000 To 0x6B6762...5fC74DDD
ERC-721 Token ID [1949] 3 BONEHEADS... (BONE)

$\approx$ Scroll for more
(?) Value:

- 5 ETH © \$16,432.50
(?) Transaction Fee:
0.48565082516241897 ETH © \$ $\$ 1,596.09$

Gas Price:
83.492930691 Gwei (0.000000083492930691 ETH)

More Details:

## (?) Private Note:

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

EO: 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.
Taylan McRae-Yu
Plaintiff

## TAB 5

# ONTARIO <br> SUPERIOR COURT OF JUSTICE 

BETWEEN:
TAYLAN MCRAE-YU
Plaintiff

- and -


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

Defendants

Proceeding under the Class Proceedings Act, 1992

## STATEMENT OF CLAIM

## TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, WITHIN TWENTY DAYS after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and $\$ 10,000$ for costs, within the time for serving and filing your statement of defence, you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and $\$ 400$ for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commences unless otherwise ordered by the court.

Date:
Issued by:
Local registrar
Address of
Court office: Ottawa Courthouse
161 Elgin St., 2nd Fl.
Ottawa, Ontario, K2P 2K1
TO: Profitly Incorporated
12 Amber Place
Belleville, ON, K8P 0B5
AND TO: DMCB HOLDINGS INC.
12 Amber Place
Belleville, ON, K8P 0B5
AND TO: Ivan Avramenko
12 Amber Place
Belleville, ON, K8P 0B5

AND TO: Alexandra Stinson
1034 County Road 3
Belleville, ON, K8N 4Z1

AND TO: John Doe (a.k.a. "@nikkibonee")

## CLAIM

1. In this Statement of Claim, in addition to the terms that are defined elsewhere herein, the below terms have the following meanings:
i. "Airdrop" means tokens that are sent to cryptocurrency wallets for free that meet certain pre-determined eligibility criteria;
ii. "Blockchain" means a ledger, usually viewable by the public, that is distributed among the nodes of a peer-to-peer network;
iii. "Cryptocurrency" means a digital or virtual currency that is secured by cryptography on a blockchain;
iv. "Cryptocurrency mixer" means a blockchain-based application which severs the link between a sending and receiving address, and functions to obfuscate or conceal the source of cryptocurrency funds;
v. "Decentralization" means lacking a central, trusted entity. Highly decentralized blockchains networks are those where nodes of the network are numerous and widely dispersed;
vi. "Discord" is a live chat application with voice, video, and text functionality. Projects launching on blockchains often have a Discord channel for members of the public to interact with founders, to receive updates regarding the project, and to connect with community members. Discord groups can generally be joined by any member of the public by using a publicly available invite link;
vii. "Ethereum" means a decentralized blockchain supporting smart contract functionality first launched in 2015;
viii. "ETH" or "ETHER" means the native cryptocurrency token for the Ethereum network;
ix. "Explorer" means a blockchain viewer where transactions associated with a particular cryptocurrency wallet may be viewed and traced;
x. "Floor price" means the cheapest token in a collection;
xi. "KYC" or "Know Your Client" means the entity behind a cryptocurrency wallet or address is known. Centralized exchanges, for example, are required to "KYC" users before allowing them to deposit and sell cryptocurrency in exchange for fiat;
xii. "Minting" means the interaction between a purchaser and a smart contract in the context of NFTs. In exchange for paying a requisite "minting" fee, the smart contract assigns ownership and manages transferability of an NFT to the purchaser. Minting is the initial point of sale of an NFT;
xiii. "NFT" or "Non-Fungible Token" means blockchain-based digital assets with unique metadata/identifiers making them distinguishable from one another. NFTs are often compared with fungible tokens (FTs), which are cryptocurrencies that are indistinguishable from one another. NFTs have become increasingly popular as a medium to showcase art;
xiv. "Roadmap" means a list of future considerations that are tied to a purchase of an NFT. Roadmaps describe an NFT project's future goals, towards which money generated from an NFT mint and royalties from secondary market sales will be used. A roadmap may be simple, such as a single future NFT collection that is airdropped to current NFT holders, or extensive, including building an entire ecosystem around an NFT purchase (physical merchandise, tokens, metaverse gaming, etc.);
xv. "Rug Pull" means blockchain fraud that is relatively quick following a mint. In these cases, an NFT project's founders/developers immediately "disappear" with funds from a mint without delivering on the roadmap or utility promised to holders. In some cases, not even an NFT is delivered;
xvi. "Slow Rug" means blockchain fraud that occurs slowly;
xvii. "Smart Contract" means a self-executing agreement between two or more parties on the blockchain, usually made possible through decentralized applications;
xviii. "Utility" means the benefit or future use of an NFT. Utility is based on promises of future considerations, deliverables, and roadmaps that a team has promised to purchasers of their NFT; and
xix. "Wallet" or "Wallet Address" means a cryptocurrency address that is in the control of a given entity, which is used to access tokens, such as cryptocurrencies and NFTs. Most blockchain explorers allow for all the activity of any given wallet to be seen by inputting the address into the explorer search bar.

## RELIEF SOUGHT

2. The Plaintiff claims on its own behalf and on behalf of the other Class Members:
i. an Order certifying this action as a class proceeding pursuant to the Class Proceedings Act, 1992, S.O. 1992, c. 6 and appointing the Plaintiff as the representative plaintiff for the Class (as defined below);
ii. an Order piercing the corporate veil for the Defendant corporations, Profitly Incorporated and DMCB Holdings Inc., and holding the Defendants, Ivan Avramenko and Alexandra Stinson personally liable for the Defendants’ actions as described herein;
iii. a declaration that the Defendants are liable to the Plaintiff and Class Members for breach of contract;
iv. a declaration that the Defendants are liable to the Plaintiff and Class Members for fraudulent misrepresentation, or, in the alternative, negligent misrepresentation;
v. a declaration that the Defendants are liable to the Plaintiff and Class Members for false, misleading, deceptive and/or unconscionable representations under the Consumer Protection Act, 2002, S.O. 2002, c. 30;
vi. a declaration that the Defendants engaged in deceptive marketing practices under the Competition Act, R.S.C., 1985, c. C-34;
vii. a declaration that the Defendants were unjustly enriched by the acts and omissions pleaded herein;
viii. a declaration that the Defendants misappropriated the funds of the Plaintiff and Class Members;
ix. special damages in the amount of $\$ 4,118,385.43$ CAD per the causes of action referenced herein;
x. punitive damages in the amount of $\$ 1,000,000.00$ CAD;
xi. injunctive relief prohibiting the Defendants from continuing the promotion of the Boneheads NFT;
xii. an Order for specific performance requiring the Defendants to modify the royalties on the Boneheads NFT to $0 \%$;
xiii. pre-judgment and post-judgment interest in accordance with the Courts of Justice Act, R.S.O., c. C.43, as amended;
xiv. the costs of this action, including GST;
xv . the costs of notice and of administering the plan of distribution of the recovery in this action, plus applicable taxes, pursuant to section 26 of the Class Proceedings Act; and
xvi. such further and other relief as this Honourable Court may deem just.

## OVERVIEW

## Non-Fungible Tokens (NFTs)

3. Non-Fungible Tokens (NFTs) are blockchain-based digital assets that have grown in popularity as a medium to showcase art. Artists and teams are able to launch NFT collections using smart contracts on blockchains that support smart contract functionality.
4. Ethereum is the largest smart contract blockchain for NFTs. Most of the NFT collections launched on Ethereum can be minted by paying a minting fee in Ether (ETH), the native cryptocurrency token for the Ethereum network. In exchange for paying the requisite fee, the purchaser is transferred an NFT, which displays art from the NFT collection tied to the smart contract.
5. Smart contracts generally house a limited number of NFTs. Once fully minted, the NFT collection is considered "sold out", with tokens being tradeable on NFT marketplaces.
6. Historically, purchasers of NFTs received only a digital token showcasing art from a particular collection and nothing more.
7. In 2021, the "Bored Ape Yacht Club" ("BAYC") NFT collection was launched on the Ethereum blockchain. BAYC is widely credited with being the first generative art collection on the Ethereum network to successfully execute on the idea of tying utility or a "membership benefit" with an NFT.
8. In the utility model, purchasers of an NFT not only receive a digital asset that displays art from the collection in question, they also receive some utility or benefit, usually outlined in a roadmap, for the duration of time they hold an NFT in their wallet. Once an NFT is sold or transferred to another cryptocurrency wallet, the new purchaser/holder of the NFT receives the associated membership benefit.
9. BAYC NFTs, some of which are depicted below, were available to the public to mint as of April 23, 2021 for a price of 0.08 ETH (approximately $\$ 210$ USD or $\$ 261.99$ CAD at the time) and limited to 10,000 NFTs.

10. Prior to its launch, the BAYC website stated the following:
i. "Your Bored Ape doubles as your Yacht Club membership card, and grants access to members-only benefits..."; and
ii. "When you buy a Bored Ape, you're not simply buying an avatar or provably-rare piece of art. You are gaining membership access to a club whose benefits and offerings will increase over time."
11. The BAYC website included a list of roadmap items which included: "MemberExclusive BAYC Merch Stores"; "The Bored Ape liquidity pool..."; and "Mutant Ape (NFT Breeding)...".
12. In addition to the initial funding that NFT projects receive by selling mints directly to consumers, NFT projects generally also charge a royalty on any secondary market sale of their NFT that takes place. Royalties in this context are seen by the development team as ongoing revenue and an implicit promise to continue to provide ongoing utility for a project.
13. In the case of BAYC, a royalty of $2.5 \%$ is charged on every secondary marketplace sale.
14. Since its launch, the BAYC team has delivered a number of membership benefits to BAYC NFT holders including:
i. In July 2021, NFT holders were told that for each BAYC NFT they held in their cryptocurrency wallet, they could mint a free NFT from a new collection called the "Bored Ape Kennel Club";
ii. In August 2021, NFT holders were airdropped a free "mutant serum" for each NFT they held in their cryptocurrency wallet. The mutant serum could be used to "mutate" a BAYC into a new NFT collection known as the "Mutant Ape Yacht Club"";
iii. In March 2022, the BAYC team released a cryptocurrency token, "ApeCoin" which was given for free to NFT holders;
iv. In April 2022, NFT holders were given free "land" in the form of NFT in a blockchain metaverse the BAYC is developing; and
v. The BAYC team has provided NFT holders with ongoing access to exclusive members-only events and limited-edition BAYC merchandise.
15. BAYC is one of the most successful NFT collections to date, with a brand that is worth in excess of one billion dollars. On any given day, a single BAYC NFT can trade for upwards of $\$ 100,000$ USD with certain more desirable pieces having been sold for millions of dollars.
16. In the summer of 2021, the NFT market experienced a large influx of consumer capital.
17. Given BAYC's tremendous success, hundreds of NFT collections launching on the Ethereum in the summer of 2021 touted an extensive roadmap, utility and/or membership benefit associated with the purchase of their NFT. Teams realized that in an extremely competitive environment, they had to offer consumers even more utility in order to ensure that their project "sold out" and garnered extensive secondary marketplace sales (and thus royalties).
18. Given that anyone could launch an NFT collection while remaining completely anonymous, as the BAYC team had, a number of individuals began to sell NFTs to defraud the public.
19. Within the NFT community, a rug pull became a popular term used to describe an NFT project which induced members of the public to purchase their NFT by promising extensive roadmaps, utility, and membership perks, only to disappear thereafter with the full proceeds of the mint and secondary market sales.
20. A slow rug became a popular term to describe a project where the development team dissipated of all funds from the sale of an NFT collection but continued to keep social media pages running with sporadic announcements. In these cases, little or no development work or utility is actually provided to NFT holders, but development team members maintain minimal communication in order to continue to collect royalties from secondary market sales and/or in an attempt to escape civil or criminal liability.
21. On March 24, 2022, the United States Department of Justice charged two individuals who launched the "Frosties" NFT collection with fraud and money laundering, specifically citing the rug pull perpetuated by the individuals on consumers. The individuals in question were stated to have defrauded $\$ 1$ million USD from the sale of the Frosties NFT.
22. The United States Department of the Treasury's Office of Foreign Assets Control (OFAC) subsequently sanctioned the virtual cryptocurrency mixers Tornado Cash and Blender in 2022, citing their role in assisting to launder billions of dollars in cryptocurrency. The individuals charged in the Frosties mint sent cryptocurrency funds through Tornado Cash in an attempt to obfuscate the source of funds they had received from the mint.
23. The Canadian Anti-Fraud Centre states that 2021 was a historic year for reported fraud, with losses totalling an over 2.5 -fold increase as compared 2020. Investment scams were the highest reported scams based on dollar loss.

## PARTIES

## The Defendants

24. The Defendant, Profitly Incorporated (Business Number: 731550711), is a Canadian corporation with an incorporation date of October 1, 2018. Profitly Incorporated has a registered business address at 12 Amber Place, Belleville, ON, K8P 0B5.
25. The Defendant, DMCB Holdings Inc. (Business Number: 780717302), is a Canadian corporation incorporated on August 26, 2021. DMCB Holdings Inc. has a registered business address at 12 Amber Place, Belleville, ON, K8P 0B5.
26. The Defendant, Ivan Avramenko, is a listed director of Profitly Incorporated and DMCB Holdings Inc. and has a listed personal address at 12 Amber Place, Belleville, ON, K8P 0B5. Ivan Avramenko operated the Twitter profile for "@ivybonee" where he listed himself as a co-founder of the Boneheads NFT project.
27. The Defendant, Alexandra Stinson, is a listed director of Profitly Incorporated and has a listed personal address of 1034 County Road 3, Belleville, ON, K8N 4Z1. Alexandra Stinson operates the Twitter profile for "@lexiibone" and lists herself as a co-founder of the Boneheads NFT project.
28. The Defendant, John Doe, operates the Twitter profile for "@nikkibonee" and is as a co-founder of the Boneheads NFT project.
29. The Defendants are collectively referred to as the "Boneheads team".

## The Plaintiff and Class

30. The Plaintiff, Taylan McRae-Yu ("Taylan"), resides in Ottawa, Ontario. He is a 29-year-old entrepreneur, most recently having worked as a Director of Strategy for the Canadian Federation of Students, Canada's largest student union.
31. In August 2021, Taylan became aware of the Boneheads NFT collection through promotions he came across on Twitter.
32. Boneheads featured 10,000 unique NFTs, an example of which is depicted below, which were available to mint on the Ethereum blockchain on August 20, 2021, at a mint price of 0.1 ETH (approximately $\$ 320$ USD or $\$ 410.27$ CAD at the time) per NFT.

33. Taylan minted the Boneheads NFT in response to the extensive promises of utility, roadmaps, and members-only benefits made by the Boneheads team, as detailed below.
34. The Boneheads team made these promises using an official Boneheads website ("Boneheads.io"), Twitter, and Discord.
35. In advance of the mint, Taylan reviewed the roadmap on the Boneheads website and followed social media announcements that the Boneheads team released. Taylan also joined the Boneheads Discord community.
36. Taylan understood that the act of minting a Boneheads NFT, purchasing a Boneheads NFT on the secondary market, and holding it, would provide him with both the NFT in question and extensive and innovative utility, as well as exclusive membership perks, as outlined in the roadmap prepared by the Boneheads team.
37. Taylan, relying on extensive representations made by the Boneheads team, purchased a total of 36 Boneheads NFTs at a combined price of 3.6 ETH (approximately $\$ 11,831.40$ USD or $\$ 15,169.03 \mathrm{CAD}$ ) during the minting stage on August 20, 2021.
38. Taylan continues to hold all 36 NFTs in his Ethereum wallet.
39. As of June 2023, not a single roadmap item, benefit, utility, NFT airdrop, token, event access, physical merchandise, voting right, or any of the dozens of roadmap items promised to Taylan, as detailed below, have been delivered by the Boneheads team.
40. The Plaintiff is seeking certification of the following class (collectively referred to as the "Class" or "Class Members"):

Every individual resident in or outside of Canada who minted a Boneheads
NFT or purchased a Boneheads NFT on any secondary NFT marketplace since August 20, 2021.

## FACTUAL BACKGROUND

## Extensive Roadmap Promises to Boneheads NFT Holders

41. The Boneheads team began marketing and promotional activity for the Boneheads NFT in or around the start of July 2021 through social media platforms including Twitter. Public "invite" links to the Boneheads community Discord were also provided. The Boneheads website was launched in or around August 2021 in advance of the mint.
42. In addition to receiving a Boneheads NFT featuring Boneheads art, prospective buyers were told that they would receive extensive and innovative utility, focused on their NFT specifically and around the Boneheads brand more broadly.
43. The Boneheads team promised the following giveaways:
i. On July 17, 2021, in advance of the mint, the Boneheads team told Discord members that everyone who purchased a Boneheads NFT would get the opportunity to win $\$ 1$ million; and
ii. On July 19, 2021, the Boneheads team tweeted that following the mint, one purchaser of the Boneheads NFT would receive a "monetary mystery box valued at a quarter million dollars, revealed instantly at the end of the mint" [emphasis added].
44. The Boneheads website included extensive roadmap descriptions comprising "code-based digitals", "NFT post-sale physicals", and "physical collectibles".
45. The Boneheads roadmap stated that purchasers of the Boneheads NFT would receive the following "code-based digitals":
i. " $5 \%$ Community Wallet" to signify that a portion that $5 \%$ of mint and secondary market proceeds would be put towards a community wallet;
ii. "3D Boneheads" to signify that "3D" versions of Boneheads NFTs would be provided to NFT holders;
iii. "Dynamic Landscapes";
iv. A form of gallery called "BoMA" (Bunker of Modern Art);
v. "Claimables";
vi. "Baby Bones" to refer to "baby" versions of Boneheads NFTs that would be provided to NFT holders;
vii. "Spaceheads (Alien Invasion)" referring to a blockchain game that the team would be launching;
viii. A form of NFT breeding similar to the Mutant Ape Yacht Club referred to as "Boning";
ix. A liquidity pool called "The Spa";
x. "Consumer-Facing Avatar Application" which Boneheads NFT holders would have first access to and which would allow users to create a personal avatar of themselves using "an expansive catalog of clothing and accessories to suit their unique style". The Boneheads website stated that purchasers would have access to this application "within the next 8-12 months"; and
xi. A partner "SDK" or software development kit.
46. The Boneheads roadmap stated that purchasers of the Boneheads NFT would receive the following "NFT post-sale physicals":
i. $\quad 50$ randomly selected members of the Boneheads community would receive a mouse pad matching the exact facial expression of their Boneheads NFT;
ii. $\quad 25$ randomly selected members of the Boneheads community would receive a free numbered hoodie;
iii. $\quad 10$ 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. $\quad 5$ randomly selected members of the Boneheads community would receive a free painting ( 40 " x 60 " ("gallery depth")) of their Boneheads NFT; and
v. Each item would be individually numbered, in a beautifully crafted and branded magnetic box, with a QR code or tag, to verify the authenticity of the product on the blockchain.
47. The Boneheads roadmap stated that Boneheads NFT purchasers would receive the following "physical collectibles":
i. 5 foot life size sculptures;
ii. 2.4 foot sculptures;
iii. 4 foot area rugs;
iv. playing cards;
v. boxing gloves;
vi. trucker hats;
vii. mini backpacks;
viii. puffer jackets;
ix. biker jackets;
x. bomber jackets;
xi. t-shirts hoodies;
xii. slides; and
xiii. socks.
48. The Boneheads team further promised that the team would develop "physical + digital products [...] like life-size 5 ft 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 $/ \mathrm{nfc}$ tag that will be verified on-chain. Every single item will be considered carefully and will be created in scarce supply in order to maximize secondary market sales potential.
50. The Boneheads team initially charged a $10 \%$ royalty on secondary market sales which would go "towards establishing a community-powered creator fund".
51. Ownership of the Boneheads NFT would grant "holders a lifetime membership (as long as they hold it in their wallet) to the cabana, the forging hq, where holders will be able to forge physical and digital collectibles".
52. This "exclusive forging" was described in considerable detail on both the Boneheads website and encouraged consumers to purchase more than a single NFT:

Only users holding a \#bonehead in their wallet will be able to mint/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.
61. On August 20, 2021, at 8:47:36 PM + UTC, less than 15 minutes after the entire Boneheads NFT collection had sold out, and within less than 1 hour of its release, the Boneheads NFT team removed 950.5 ETH (approximately $\$ 3,123,818.25$ USD or $\$ 4,005,047.38 \mathrm{CAD}$ ) from the smart contract in question.
62. Immediately thereafter, the Boneheads team stopped all promotion of the Boneheads project, put the Discord chat on "slow mode", and disappeared from their Discord server after posting an announcement stating that they would be returning on August 23, 2021.
63. Taylan and other consumers voiced their concern about this behaviour including the sudden change in communication from the Boneheads NFT team who had previously been very active on social media platforms and Discord. Taylan and other consumers were concerned that the project was about to "rug" and that the Boneheads founders were going to take off with the proceeds from the mint.
64. In response to these concerns, Taylan and others consumers were banned from the Discord server. Taylan and others were also eventually blocked on Twitter.

## Rug Pull Allegations

65. In the months following the public mint, the Boneheads team sporadically made appearances on social media platforms and Discord to continue to attract unsuspecting consumers to purchase the Boneheads NFT on the secondary market and in an attempt to avoid allegations that the project was a rug pull.
66. At the same time, the Boneheads team slowly dissipated the funds from the mint and secondary market sales, into and between various cryptocurrency addresses, and centralized exchanges. A significant portion of the funds were used by the Boneheads team to make extravagant purchases of NFT art.
67. In addition to mint proceedings, the Boneheads team received a total of 27.0958 ETH in royalties (approximately $\$ 87,811.97$ USD or $\$ 112,072.43$ CAD) from secondary marketplace sales of the Boneheads NFT.
68. On October 14, 2021, Jonathan Schmalfeld, known as "The NFTorney" referenced the Boneheads project in a blog post about class actions, rug pulls, and consumer protection in the NFT context.
69. In response to the blog post, which renewed allegations that the Boneheads projects was a rug pull, the Boneheads team stated that a flagship store for the Boneheads brand would be opening in Los Angeles in Early 2022. No such flagship store was opened.
70. In the first half of 2022, there were almost no updates regarding the Boneheads NFT project including social media posts through any official channel.
71. In the summer of 2022, Taylan contacted a Twitter user by the name of @zachxbt ("ZachXBT").
72. ZachXBT is an independent blockchain investigator who has amassed a significant social media following (over 375,000 Twitter followers) owing to the investigations he has conducted on exposing instances of blockchain fraud. ZachXBT's research and detective work has been cited by authorities in jurisdictions like France as having led to the prosecution of a group of NFT scammers.
73. On July 14, 2022, in collaboration with Taylan, ZachXBT released a series of Twitter posts on the Boneheads NFT project. These posts shared the result of investigative work done by ZachXBT on the Boneheads team and alleged that the Boneheads NFT project was a $\$ 3.1$ million USD rug pull.
74. Despite months of inactivity on social media, the Boneheads team immediately responded to ZachXBT's posts via Twitter, stating that Boneheads was not a scam but a "very deliberately slow creative process". They subsequently announced that
a "new" collection would be dropping on the anniversary of their project launch, in August 2022. No such collection was ever released.
75. On August 27, 2022, ZachXBT once again shared a Twitter post about the Boneheads NFT project, stating they had failed to deliver the collection they promised in August 2022. The post included screenshots of messages sent from the Boneheads team to ZachXBT stating "brand activations" would be launching on August 24, 2021 and ZachXBT should update his Twitter post at that time.
76. In response, the Boneheads team stated that as of November 1, 2022, "drops" would be releasing on the first of every month for Boneheads NFT holders to claim. No such drops have ever been released.
77. As of the date of filing of this claim, the Boneheads NFT team has not delivered on a single roadmap promise they had made to Boneheads NFT purchasers. Consumers have not received a single NFT airdrop, token, physical collectible, marketplace access, forging, avatar application, voting right, giveaway, or the dozens of other promises that were made to consumers in consideration for purchasing or minting a Boneheads NFT.

## CAUSES OF ACTION

## Breach of Contract

78. The Plaintiff and Class Members who minted or purchased a Boneheads NFT on the secondary market entered into a contract with the Boneheads team.
79. In consideration for the Plaintiff and Class Members purchasing the NFT, they were told they would receive: (1) a Boneheads NFT; (2) a host of benefits comprising utility that would be built around the Boneheads NFT brand generally and holders' individual NFT's specifically: and (3) those who purchased multiple NFTs would receive greater utility perks and benefits.
80. The Plaintiff and Class members abided by the terms of their obligations under this contract by paying the requisite fee to mint or purchase a Boneheads NFT on the secondary market.
81. The Boneheads NFT team breached the terms of the contract they entered into with the Plaintiff and Class Members by not fulfilling essential obligations under the contract, namely, to deliver the roadmap and utility promised to owners of the Boneheads NFT in a timely manner or at all.
82. The Plaintiff and Class Members are entitled to special damages for breach of contract.

## Fraudulent Misrepresentation

83. In the alternative, the contract is void ab initio as a result of fraudulent misrepresentations made by the Boneheads team, entitling the Plaintiff and Class members to special and punitive damages and/or 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;
iv. The Boneheads team was negligent in making representations about utility, including, but not limited, promises of giveaways and specific dates for deliverables;
v. The Plaintiff and Class Members reasonably relied on the representations made by the Boneheads team;
vi. The Plaintiff and Class Members, as outlined above, have suffered significant financial loss as a result of relying on the false representations made by the Boneheads team.

## Consumer Protection Act

86. The Plaintiff and Class Members are "consumers" under the Consumer Protection Act who were acting for personal and not business purposes.
87. The Plaintiff and Class Members entered into a "consumer transaction" under the Consumer Protection Act whereby the Boneheads team promised delivery of certain goods and services in exchange for payment/purchase of a Boneheads NFT.
88. The Boneheads team acted unfairly when transacting with the Plaintiff and Class Members by making the following false, misleading or deceptive and/or unconscionable representations under Part III of the Consumer Protection Act including:
i. Representations that the roadmap, benefits, and accompanying utilities were available or would be made available, delivered or performed following the purchase of a Boneheads NFT when the Boneheads team knew or ought to have known that they could not be delivered or performed;
ii. Representations of a roadmap, benefits, and accompanying utilities that used exaggeration, innuendo, or ambiguity as to a material fact or a failure to state a material fact that deceived or tended to deceive the Plaintiff and Class Members;
iii. Representations that misrepresented the purpose or intent of any solicitation or communication with the Plaintiff and Class Members; and
iv. Representations that the purpose of charges, namely the minting or secondary market royalties, were to develop and deliver on the roadmap, benefits, and accompanying utilities that had been promised to Boneheads NFT holders.
89. At all material times, the Boneheads team were located in Ontario where the contract was formed, when transacting online with the Plaintiff and Class Members.

## Competition Act

90. The Boneheads team engaged in deceptive marketing practices under Part VII. 1 of the Competition Act.
91. The Boneheads team directly promoted the Boneheads NFT project for the purpose of promoting their own business interests.
92. The Boneheads team made representations to the public that were both false and misleading. The Boneheads team represented to the public that minting or purchasing a Boneheads NFT on the secondary market guaranteed or promised performance of a roadmap, providing holders of the Boneheads NFT with extensive utility that was clearly laid out on the Boneheads websites and on social media platforms including Twitter and community platforms including Discord.
93. The Boneheads team guaranteed or promised this extensive utility to minters and purchasers of the Boneheads NFT in a manner that was materially misleading or had no reasonable prospect that it would be carried out, such as the promises of entry into a $\$ 250,000$ and $\$ 1$ million giveaway. It was known to the Boneheads Team that members of the public, namely the Plaintiff and Class Members, would and did indeed rely on this guaranteed or promised roadmap in making a decision to purchase or mint a Boneheads NFT.
94. After the Plaintiff and Class Members minted and/or purchased the Boneheads NFT, the Boneheads team failed to fulfil the guarantees or promises of the roadmap/utility associated with holding a Boneheads NFT.
95. To date, the Boneheads team continues to deceive unsuspecting members of the public into purchasing their NFT with false promises of a roadmap.
96. Plaintiff and Class Members are everyday consumers with limited financial means and time. By purchasing the Boneheads NFT as a result of inducements of the extensive roadmap and utility that would be provided to them, holders of the

Boneheads NFT decided to forego the purchase of other legitimate NFT projects in an extremely competitive environment.

## Unjust Enrichment

97. Furthermore, or in the alternative, the Boneheads team was unjustly enriched at the expense of the Plaintiff and Class Members.
98. The Plaintiff and Class Members were deprived of approximately $\$ 4,118,385.43$ CAD in value which was unjustly and unfairly passed to the Boneheads team.
99. Given that Plaintiff and Class Members did not receive the benefits that were promised to them by the Boneheads team, there has been a failure of consideration, resulting in significant corresponding deprivation to the Plaintiff and Class Members.
100. There is no juristic reason for the Boneheads team to retain the $\$ 4,006,313$ CAD in mint proceeds or $\$ 112,072.43 \mathrm{CAD}$ 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:
ใ7 BONEHEADS Retweeted
BONESTAR @OxBONESTAR • Jul 14
for the 2736463266474 th time, itz not rug 气. just a very deliberately slow
creative process, lots of pivots, assumptive fake news, incorrect founder
profiles, marketing agency = not founders, bonniversary week will be
$2 \mathrm{~K}+$ attributes...

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

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## TAB 6

# ONTARIO <br> 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
-8-
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 $\$ 3.1 \mathrm{~m}$ 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 20 th 2021 with a supply of 10 k 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 $\$ 3.1 \mathrm{~m} . .$.

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**
56. 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.

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## ONTARIO SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT OTTAWA

## STATEMENT OF DEFENCE AND COUNTERCLAIM

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## TAB 7

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 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.
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:
 left behind by the team into how the money has actually been spent.

10:30 AM • Jul 14, 2022

ZachXBT @zachxbt • Jul 14, 2022
2/The project was launched by an anon team on August 20th 2021 with a supply of 10 k 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 @zachxbt • Jul 14, 2022
5/ The rest was used to purchase NFTs such as BAYC, Crypto Punks, MAYC, Clone X, and more.

0x8COfF426dFa77A87Be3729456D1D27fdC8F2DE5F
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.

## BONEHEADS

## About BONEHEADS

## Unsubscribe

## Update Profile

You were subscribed to this list because:

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

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

ZachXBT @ @zachxbt • Jul 14, 2022
7/ The address on the site was linked to two entities in Canada with the same address 'Profitly' \& 'DMCB Holdings' which had been registered just days (08-26-2021) after Boneheads minted out.

Profitly:
ic.gc.ca/app/scr/cc/Cor...
DMCB Holdings:
ic.gc.ca/app/scr/cc/Cor...

## Corporate History

## Corporate Name History

2021-08-26 to Present DMCB HOLD

## Certificates and Filings

Certificate of Incorporation
2021-08-26

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 $\$ 3.1 \mathrm{~m}$.


ZachXBT @zachxbt•Jul 14, 2022
10/ Earlier this week @0xTAY_ 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? $\because$ ? ${ }^{\text {? }}$ +

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**
Join us in making the cryptoverse a safer place

Q | Search crypto address
www.chainabuse.com

## chainabuse

chainabuse.com
ZachXBT's report on Chainabuse: Rug Pull Scam
Boneheads Rug Pull - NFT project launched August 2021 with a supply of 10,000 NFTs and a mint price of 0.1 ETH . The project minted out ...
25. On July 7, 2023, following the filing of this action, ZachXBT released another Tweet ("Second Post") as follows:

ZachXBT *)
@zachxbt
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 roadmap

Yet another case where my research has been cited


ZachXBT @zachxbt • Jul 14, 2022
1/ Investigating the $\$ 3.1 \mathrm{~m}$ rug pull @BONEHEADS and the breadcrumbs left behind by the team into how the money has actually been spent.

## 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:

BONEHEADS
@BONEHEADS
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
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:
wen biggest NFT rug account tweets and provides free publicity . . . . . . . cats outttttaaa the bag BH's, BONNIVERSARY week it all officially begins 8 10 Characters - 10 Seasons, if you were in our secret BONEHEAD FOREVERS over this past year you would have known this all along **

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:

BONESTAR @0xBONESTAR • Jul 15, 2022
FACT CHECK: $\sim 85$ BH's under mint price $=0.0085 \%$, itz not rug, but we will be releasing some insaneeeee rugs, aren't they sweet?

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.
$\underline{\text { ZachXBT's Posts Constitute Responsible Communication on Matters of Public Interest }}$
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 halfheartedly 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.

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Taylan McRae-Yu
Plaintiff

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## TAB 8

## ONTARIO <br> SUPERIOR COURT OF JUSTICE

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 <br> (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.


Issued on June 262023

## 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 (ETH) | 1 | 0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F |
|  | 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

NFT Marketplaces:
Opensea

## SCHEDULE "C"

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

## ONTARIO

## SUPERIOR COURT OF JUSTICE

## 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


#### Abstract

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;
- 0xale43fcb51656354931d47458eceadbc6545df57;
- 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.


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 (ETH) | 1 | 0x8C0fF426dFa77A87Be3729456D1D27fdC8F2DE5F |
|  | 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
y Incorporated et. al. ONTARIO
Defendant
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
PROCEEDING COMMENCED AT OTTAWA
Proceeding under the Class Proceedings Act, 1992 DELAWYER PROFESSIONAL CORPORATION Suites of Somerset 52 Bayswater Ave., Suite 1505 Ottawa, ON K1Y 4K3 Sohaib Mohammad
LSO\#: 80696 K
Tel: (647)-535-8706 Sohaib Mohammad
LSO\#: 80696 K
Tel: $\quad(647)-535-8706$ Email: sohaib@delawyer.io
Lawyer for the Plaintiff

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

Proceeding under the Class Proceedings Act, 1992

## ORDER

## DELAWYER PROFESSIONAL

## CORPORATION

Suites of Somerset
52 Bayswater Ave., Suite 1505
Ottawa, ON K1Y 4K3
Sohaib Mohammad
LSO\#: 80696K
Tel: (647)-535-8706
Email: sohaib@delawyer.io
Lawyer for the Plaintiff



[^0]:    : 8 : 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

[^1]:    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 $5000 \$$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

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

    Vous fournissez des renseignements exigés par la LCSA. Il est à noter que la LCSA et la Loi sur les renseignements personnels permettent que de tels renseignements soient divulgués au public. Ils seront stockés dans la banque de renseignements personnels numéro IC/PPU-049.

[^2]:    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 $5000 \$$ et d'un emprisonnement maximal de six mois, ou l'une de ces peines (paragraphe 250(1) de la LCSA).

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[^3]:    CAUTION TO If this Defence contains a proposal of terms of payment, you are deemed to have accepted the PLAINTIFF(S): 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)].

[^4]:    

[^5]:    

[^6]:    

[^7]:    

[^8]:    Notary Public in and for the Province of Ontario
    Sohaib Mohammad (LSO: 80696K)

[^9]:    Notary Public in and for the Province of Ontario
    Sohaib Mohammad (LSO: 80696K)

[^10]:    Notary Public in and for the Province of Ontario
    Sohaib Mohammad (LSO: 80696K)

[^11]:    Notary Public in and for the Province of Ontario
    Sohaib Mohammad (LSO: 80696K)

[^12]:    Notary Public in and for the Province of Ontario
    Sohaib Mohammad (LSO: 80696K)

[^13]:    Dreuseff AKA BONE Brawler 10/21/2024743 PK
    $\mathrm{Y}_{\mathrm{O}}$ - with metadata refresh on 2Ds then we don't have to 'mint' anything - so no fees for current holders right?
    sbmitchelibone 10/21/ro217A8 PM
    wait someone. was selling a 19 bundle of bones
    Id take that off his hands lol
    who was it
    Q sbmitcheillbone who was it
    RAUD 50r2/2021751PM
    I messaged you. Itsdes
    $\rightarrow$
    Bosco Imin tory/roe21754 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 ithought buying a bundle counts as a single transaction.

[^14]:    BONESTAR 12/31/2022 7:03 PM
    Happy New Year GANG $\oplus$
    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 6 th noun is automatically allocated to the team); since they ${ }^{\prime \prime}$ 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 $\because \because$ 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 $3 x$ 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 future releases.

    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.
    © $12 \times 9$ - 9

