

L. Cooper Overstreet, #7-4996  
OVERSTREET HOMAR & KUKER  
Attorneys-at-Law  
2922 Central Avenue  
Cheyenne, Wyoming 82001  
307.274-4444 telephone  
307.274-4443 facsimile  
[www.ohklegal.com](http://www.ohklegal.com)  
*Attorneys for Respondent*

**IN THE DISTRICT COURT, FIRST JUDICIAL DISTRICT  
COUNTY OF LARAMIE, STATE OF WYOMING**

**Docket No. 2024-CV-0202917**

CHUCK GRAY, Wyoming Secretary of State	)
	)
Petitioner,	)
	)
vs.	)
	)
AMERICAN CRYPTO FED DAO, LLC	)
	)
Respondent.	)

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**RESPONDENT’S RULE 26 INITIAL DISCLOSURES**

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**COMES NOW**, Respondent, American CryptoFed DAO, LLC (“Respondent”), by and through its undersigned attorney, L. Cooper Overstreet with OVERSTREET HOMAR & KUKER, and hereby provides the following required initial disclosures pursuant to Wyoming Rule of Civil Procedure Rule 26(a)(1) as follows:

*DISCLAIMER:* The following initial disclosures are provided in compliance with Wyoming Rule of Civil Procedure, Rule 26. Compliance with the rules requires the disclosure of the potential witnesses likely to have discoverable information that Respondent may use to support its claims or defenses, and the disclosure of documents that Respondent may use to support its claims or defenses. While Respondent has discovered the names and documents set forth below, this is not a list of witnesses or exhibits. Respondent is simply complying with the requirements

of the rule in a good faith disclosure of potential witnesses and documents, which may be used to support Respondent's claims or defenses. Respondent specifically reserve the right to contest the relevance and/or admissibility of the following witnesses and documents based upon further discovery in this case.

A. Wyoming Rule of Civil Procedure, Rule 26(a)(1)(A) -- the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

By listing and providing the following names and information, Respondent is not agreeing that the witnesses have discoverable information or that their testimony is credible or admissible. Respondent is simply attempting to comply in good faith with the required discovery rule and are listing all presently known potential witnesses who may have discoverable information that Respondent may use to support its claims:

1. **Xiaomeng Zhou**  
**C/o Overstreet Homar & Kuker**

**Mr. Zhou may have information pertaining to all of the facts and circumstances of this case as outlined in the Complaint.**

2. **Scott Moeller**  
**C/o Overstreet Homar & Kuker**

**Mr. Moeller may have information pertaining to all of the facts and circumstances of this case as outlined in the Complaint.**

3. **Chuck Gray**  
**Wyoming Secretary of State's Office**  
**C/o Counsel**

**Chuck Gray, as Wyoming Secretary of State, is the Petitioner in this matter and may have information pertaining to all of the facts and circumstances of this case as outlined in the Complaint.**

**4. Colin Crossman  
C/o Counsel**

**Mr. Crossman is the Wyoming Secretary of State Business Division Director and has testified before the Select Committee regarding Respondent. Mr. Crossman may have information regarding Petitioner's action and/or inaction regarding Respondent's requests.**

**5. Jesse Naiman  
C/o Counsel**

**Mr. Naiman is the Wyoming Secretary of State Deputy Secretary and has previously corresponded with Respondent, declining to answer emails and questions from Respondent. Mr. Naiman may have information regarding Petitioner's action and/or inaction regarding Respondent's requests.**

**6. Joe Rubino  
C/o Counsel**

**Mr. Rubino is the Wyoming Secretary of State Chief Policy Officer/General Counsel and has previously testified before the Select Committee regarding Respondent. Mr. Rubino may have information regarding Petitioner's action and/or inaction regarding Respondent's requests.**

B. Wyoming Rule of Civil Procedure, 26(a)(1)(A)(ii) – a copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

By providing and or describing the following items, Respondent is not agreeing that the items identified are relevant or admissible. Respondent is simply attempting to comply in good faith with the required discovery rule and listing items presently in its possession, custody, or control or that it may use to support its claims or defenses.

	<b>Document Categories</b>	<b>Bates No.</b>
1.	December 8, 2023, Email from Mr. Naiman to Respondent	OHK000001
2.	August 1, 2024, Email from Mr. Naiman to Respondent	OHK000002

3.	October 17, 2024, Letter from Mr. Naiman to Respondent	OHK000003- OHK000007
4.	October 28, 2024, Letter from Respondent to Petitioner, Re: Request for Clarity on Intrastate Token Issuance within Wyoming	OHK000008- OHK000035
5.	November 17, 2024, Letter from Respondent to Petitioner, Re: Request for Clarity on Intrastate Token Issuance within Wyoming	OHK000036- OHK000065
6.	November 28, 2024, Letter from Respondent to Petitioner, Re: Request for Clarity on Intrastate Token Issuance within Wyoming	OHK000066- OHK000095
7.	December 6, 2024, Letter from Respondent to Petitioner, Re: Request for Clarity on Intrastate Token Issuance within Wyoming	OHK000096- OHK000125
8.	December 15, 2024, Letter from Respondent to Petitioner, Re: Request for Clarity on Intrastate Token Issuance within Wyoming	OHK000126- OHK000155
9.	Articles of Organization filed with the Petitioner	OHK000156- OHK000160
10.	Operating Agreement (CryptoFed Constitution) filed with the U.S. Securities and Exchange Commission	OHK000161- OHK000177
11.	September 16, 2024, Mr. Crossman's testimony regarding Respondent before the Wyoming Legislative Select Committee on Blockchain, Financial Technology, and Digital Innovation Technology: <a href="https://www.youtube.com/live/hlnJDwInl6c">https://www.youtube.com/live/hlnJDwInl6c</a>	
12.	May 14, 2025, testimonies regarding Respondent by Secretary Gray, Mr. Rubino and Mr. Crossman before the Wyoming Legislative Select Committee on Blockchain, Financial Technology, and Digital Innovation Technology: <a href="https://www.youtube.com/live/3R2FA6u_qC4">https://www.youtube.com/live/3R2FA6u_qC4</a>	
13.	January 21, 2022, written testimony regarding Sales and Use Tax Amendments Bill by Merchant Advisory Group before the Wyoming Legislative Select Committee on Blockchain, Financial Technology, and Digital Innovation Technology	OHK000178
14.	July 31, 2024, Letter from Respondent to Petitioner, Re: Request for Clarity on Intrastate Token Issuance within Wyoming	OHK000179- OHK000188
15.	April 16, 2025, written testimony regarding Regulatory Clarity for Wyoming DAOs' Intrastate Token Issuance by Respondent before the Wyoming Legislative Select Committee on Blockchain, Financial Technology, and Digital Innovation Technology	OHK000189- OHK000391

C. A computation of each category of damages claimed by the disclosing party- who must also make available for inspection and copying under Rule 34 the documents or other evidentiary material unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered: and

***Respondent is unable to calculate damages accurately at this time. Respondent will supplement its disclosures to include a calculation of damages when Respondent can reasonably do so following information which becomes known or available via discovery.***

D. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy a judgment.

**Respondent is neither aware of, nor in possession of, any such agreement.**

***Respondent reserves the right to supplement its disclosures as information becomes known or available.***

**DATED** this 11<sup>th</sup> day of July 2025.

**AMERICAN CRYPTO FED DAO, LLC,  
Respondent**

By: /s/ L. Cooper Overstreet  
L. Cooper Overstreet, #7-4996  
John M. Kuker, #6-3452  
OVERSTREET HOMAR & KUKER  
Attorneys-at-Law  
2922 Central Avenue  
Cheyenne, Wyoming 82001  
307.274-4444 telephone  
307.274-4443 facsimile  
[www.OHKlegal.com](http://www.OHKlegal.com)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11<sup>th</sup> day of July 2025, a copy of the foregoing *Respondent's Rule 26 Disclosures* was served via email and hand delivery on the following:

Mackenzie Williams  
Senior Assistant Attorney General  
109 State Capitol  
Cheyenne, WY 82002  
307-777-7886  
[Mackenzie.williams@wyo.gov](mailto:Mackenzie.williams@wyo.gov)  
*Attorney for Petitioner*

/s/ L. Cooper Overstreet  
OVERSTREET HOMAR & KUKER