

copies bearing any marks (such as initials, comments, notations, notes or stamped indices) not found on the original, and includes, without limitation, all memoranda, reports, notes, transcripts, letters, envelopes, telegrams, cables, telexes, telephone bills, messages, intra or inter office memoranda, work papers, diaries, desk calendars, appointment books, drafts, minutes or transcriptions of meetings and other documents of every type, and all mechanical or electrical sound recordings, magnetic tapes, or other material.

3. "Communication" means all oral, written, electronic, and mechanical modes of conveying meaning or information, such as, but not limited to, telephone, email, text messages, or written or spoken language between two or more people.

4. "Meeting" means any coincidence or presence of persons, whether by chance or prearranged, including, but not limited to, a formal or informal gathering, luncheon, dinner, social or business occasion, or any other group situation of two or more persons.

5. "Person" or "persons" means any individual, firm, partnership, association, organization, corporation, government (or agencies thereof), quasi-public entity or other legal or commercial entity.

6. "Identify" means with respect to an individual person to set forth that individual's full name and, on the first occasion that such individual is identified, the following information:

- a. Present home address;
- b. Present business address;
- c. Telephone number.

7. "Identify" means with respect to oral communications to set forth the following information:

- a. The substance of the communication; and,

b. The date and time of the communication.

8. “Identify” means with respect to a document or documents:

a. Furnish the name and date of the document (and if not dated, the approximate date), the date the document was prepared, the date the document was sent, the number of pages comprising the document, the subject matter of the document, the name, address and title (if any) of the person authoring the document, the name, address and title (if any) of the person to whom the document was addressed, the names and addresses of all persons to whom copies of the document were or have been sent, and the firm or firms with which all such persons were connected at the date of the document.

b. State whether you are in possession of the original, master, or a copy of the document, and if not in possession of the original, master, or copy, furnish the name and last known address of the custodian of the original, master or copy.

9. “You” and “your” means Chuck Gray in his capacity as Wyoming Secretary of State.

10. “Petition” shall mean the Petition for Permanent Injunction filed by the Wyoming Secretary of State, Chuck Gray, on December 17, 2024.

11. “Petitioner” shall mean the Wyoming Secretary of State and all staff of the Secretary of State’s Office, including but not limited to, Chuck Gray (Secretary of State), Jesse Naiman (Deputy Secretary of State), Colin Crossman (Business Division Director) and Joe Rubino (Chief Policy Officer/General Counsel).

12. “Select Committee” shall mean the Wyoming Legislature Select Committee on Blockchain, Financial Technology and Digital Innovation Technology.

13. “Securities Act” shall mean the Wyoming Uniform Securities Act.

14. “DAO Supplement” shall mean the Wyoming Decentralized Autonomous Organization Supplement.

15. “Regulatory Criteria within the Secretary of State Office” shall mean the specific standards, rules, and guidelines that the Wyoming Secretary of State’s Office uses to implement and enforce laws passed by the Wyoming legislature.

16. The term “and” includes the term “or,” and the term “or” includes the term “and.” The singular includes the plural and the plural includes the singular. The masculine includes the feminine, and the feminine includes the masculine.

INTERROGATORIES

INTERROGATORY NO. 1: Please state the full and complete name, address, employer, and job title of the person(s) answering these interrogatories.

ANSWER:

INTERROGATORY NO. 2: Please state the regulatory criteria within the Secretary of State’s Office, if any, which guided Petitioner in its application of the Securities Act to CryptoFed in its October 17, 2024, notice letter (OHK000003-000007).

ANSWER:

Background for Interrogatory No. 3: Regarding providing CryptoFed with the Petitioner’s decision in writing, in his testimony before the Select Committee on September 16, 2024, Mr. Crossman said, "We have asked them numerous times to retain a counsel. We can’t tell them that things would be. I mean, while I personally am a member of the bar. I am not their attorney...In this position, if somebody weren’t a member of the bar, they would be potentially engaging in unlicensed practice, if they were to render this decision directly to them without them having a counsel. They refused to get a counsel. ... At a higher level, they do need to get a counsel." (available at 12:16 - 13:30, <https://www.youtube.com/live/hlnJDwInl6c>).

INTERROGATORY NO. 3: Please state the regulatory criteria within the Secretary of State Office, if any, which required CryptoFed to retain counsel, in order that the Secretary of State's Office could render its written decision to CryptoFed through its counsel.

ANSWER:

INTERROGATORY NO. 4: Please state the reason(s) Petitioner's notice letter sent to CryptoFed on October 17, 2024, only mentioned the Petitioner's authority to enforce the Wyoming Uniform Securities Act under W.S. 17-4-604, and not its enforcement authority under W.S. 17-4-603.

ANSWER:

INTERROGATORY NO. 5: Please state factual basis for waiting until December 17, 2024, to bring this legal action for permanent injunction given that CryptoFed has made its intention clear in issuing the Locke token since November 25, 2023 (OHK000001-000002).

ANSWER:

INTERROGATORY NO. 6: Please provide factual basis for Petitioner's refusal to answer CryptoFed's question, "can American CryptoFed DAO legally distribute Locke tokens to its contributors within the State of Wyoming, free of charge?" (OHK000001 and OHK000002), for over ten months.

ANSWER:

INTERROGATORY NO. 7: Please state the facts which support Petitioner's allegation, "By providing owners with governance rights, Locke tokens will constitute interests in a limited liability company, specifically, CryptoFed" (Petition, Allegation 19, p.4).

ANSWER:

INTERROGATORY NO. 8: Please state the facts which support Petitioners application of Wyo. Stat. Ann. § 17-4-102(a)(xxviii)(E) to CryptoFed by alleging, “Interests in limited liability companies constitute investment contracts, and therefore securities” (Petition, Allegation 19, p.4).

ANSWER:

INTERROGATORY NO. 9: Please state the facts that support Petitioner’s statement that CryptoFed’s plan to issue Locke tokens satisfies all the elements of “the somewhat stricter *Howey* test” and “the Wyoming statutory instantiation of the *Howey* test in W.S. 17-4-102(a)(xxviii)(D)” (SOS-000004).

ANSWER:

Background for Interrogatory No. 10: In response to Senator Chris Rothfuss’ question during his testimony before the Select Committee on May 14, 2025, the Secretary said, “I feel the need to correct the record and enforce the laws of state [of law], when you push back with fraud, potential fraud...” (available at 3:21:30-3:23:00), https://www.youtube.com/live/3R2FA6u_qC4).

INTERROGATORY NO. 10: Please state the factual basis for Petitioner’s allegation of fraud or potential fraud against CryptoFed, If Petitioner is alleging that CryptoFed has or will commit fraud, please identify the victims, or potential victims, and the losses suffered.

ANSWER:

Dated this 31st day of July 2025

AMERICAN CRYPTO FED DAO, LLC,
Respondent

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CERTIFICATE OF SERVICE

This is to certify that on the 31st day of July 2025 a true and correct copy of the foregoing was served via Email on the following:

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