

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’s Office and its representatives, attorneys, agents, employees, or any person acting on its behalf.

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.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1: Admit that, after Mr. Crossman said in his testimony before the Select Committee on September 16, 2024,

“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.” (emphasis added, <https://www.youtube.com/live/hlnJDwInl6c> ,12:16 - 13:30), Senator Chris Rothfuss responded,

“We write things down. If somebody is in violation of a statute, it isn’t an advisory opinion. It isn’t engaging attorneys in a darkroom someplace. It is [a] we deem this to be in compliance or out of compliance, and there is a fair due process thereafter, and **you have denied them due process.**” (emphasis added, *Ibid*, available at 18:10 – 19:10).

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that one month after the Select Committee’s meeting held on September 16, 2024, Petitioner sent a notice letter to CryptoFed dated October 17, 2024 (“SoS October 17, 2024 Letter”, OHK000003-000007, SOS-000001-000005).

RESPONSE:

REQUEST FOR ADMISSION NO. 3: Admit that prior to the Select Committee’s meeting held on September 16, 2024, through two emails dated December 8, 2023 and August 1, 2024, respectively (OHK000001 and OHK000002), Petitioner declined to answer CryptoFed’s question asked on November 25, 2023, “can American CryptoFed DAO legally distribute Locke tokens to its contributors within the State of Wyoming, free of charge?”.

RESPONSE:

REQUEST FOR ADMISSION NO. 4: Admit that Petitioner’s notice letter to CryptoFed dated October 17, 2024 (OHK000003-000007, SOS-000001-000005) has a legally binding force between the Petitioner and CryptoFed.

RESPONSE:

REQUEST FOR ADMISSION NO. 5: Admit that, at the time when the SoS October 17, 2024 Letter was sent, the inclusion of W.S. 17-4-604 and the exclusion of W.S. 17-4-603 in the SoS October 17, 2024 Letter below was to notify CryptoFed that the Petitioner had intention to take enforcement action against CryptoFed under W.S. 17-4-604, not W.S. 17-4-603.

We are currently engaging with the Wyoming Attorney General's Office about this issue, and our authority to enforce the Wyoming Uniform Securities Act under W.S. 17-4-604 (OHK000007, SOS-000005).

RESPONSE:

REQUEST FOR ADMISSION NO. 6: Admit that Petitioner did not respond to CryptoFed’s five letters dated October 28, 2024, November 17, 2024, November 28, 2024, December 6, 2024 and December 15, 2024 respectively, which repeatedly requested Petitioner to follow through W.S. 17-4-604,

RESPONSE:

REQUEST FOR ADMISSION NO. 7: Admit that Petitioner did not notify CryptoFed in advance that Petitioner would take enforcement action against CryptoFed under W.S. 17-4-603.

RESPONSE:

REQUEST FOR ADMISSION NO. 8: Admit that, at the time when the SoS October 17, 2024 Letter was sent to CryptoFed, the only provision of the DAO Supplement cited in the SoS October 17, 2024 Letter, was W.S. 17-31-102(a)(ii) ("Decentralized autonomous organization" means a limited liability company organized under this chapter).

RESPONSE:

REQUEST FOR ADMISSION NO. 9: Admit that, at the time either when the SoS October 17, 2024 Letter was sent to CryptoFed, or when the Petition was filed on December 17, 2024, the Petitioner did not apply W. S. § 17-31-102 (a) (vi), Wyo. Stat. § 17-31-103(a) and W. S. § 17-31-104 (c) of the DAO Supplement, to CryptoFed, by considering the following clauses of the CryptoFed Constitution (operating agreement):

- a) Locke token “does not represent a financial interest in a company, partnership, or fund, including an **ownership** or debt interest, revenue share, entitlement to any interest or dividend payment” (Section 3.3, CryptoFed Constitution e.g. operating agreement, SOS-000008).
- b) “Under no circumstances, should any individuals, entities, natural persons or legal persons claim **ownership** of CryptoFed.” (Section 4.6, CryptoFed Constitution, SOS-000009).

RESPONSE:

REQUEST FOR ADMISSION NO. 10: Admit that, at the time when the SoS October 17, 2024 Letter was sent to CryptoFed, Petitioner did not apply W.S. § 17-31-110 of the DAO Supplement (“...no member of a decentralized autonomous organization shall have any fiduciary duty to the organization or any member...”) to CryptoFed, by considering the following statutorily required notice (W. S. § 17-31-104 (c)) of the CryptoFed’s Articles of Organization filed with the Secretary’s Office on July 1, 2021 (OHK000156):

“The Wyoming Decentralized Autonomous Organization Supplement, underlying smart contracts, articles of organization and operating agreement, may ... eliminate fiduciary duties...”

RESPONSE:

REQUEST FOR ADMISSION NO. 11: Admit that in the Petition filed with the Court on December 17, 2024, Petitioner did not cite any provision of the DAO Supplement, and did not explicitly apply any provision of the DAO Supplement as the controlling authority, to CryptoFed.

RESPONSE:

REQUEST FOR ADMISSION NO. 12: Admit that, at the time when Petitioner stated, “therefore registration would be required” in the SoS October 17, 2024 Letter to CryptoFed (SOS- 000004), Petitioner not only knew that W.S. 17-4-304 (b) (ii) required a registration statement to include information related to “...each director and officer of the issuer, and other person having a similar status or performing similar functions...”, but also knew that CryptoFed Constitution (operating agreement) had a clause stating,

“There is no hierarchy, such as an executive branch, a board of directors, or an advisory board, at CryptoFed. CryptoFed will be decentralized to the extent that a CEO is no longer needed within three years. For the time being, the current CEO is a symbolic

position to communicate with regulators together with MShift because regulators, such as the SEC, or other agencies, may require contact people and the founding company to be responsible for document filing.” (Section 4.6, CryptoFed Constitution, SOS- 000009).

RESPONSE:

REQUEST FOR ADMISSION NO. 13: Admit that, at the time when Petitioner stated, “therefore registration would be required” in the SoS October 17, 2024 Letter to CryptoFed (SOS- 000004), Petitioner not only knew that W.S. 17-4-304 (b) (ix) required a registration statement to include information related to “[the] estimated monetary proceeds to be received by the issuer from the offering; the purposes for which the proceeds are to be used by the issuer...”, but also knew that “CryptoFed distributes certain Locke tokens, free of charge, to Wyoming individual residents and Wyoming legal entities (intrastate distribution) who have made, are making and will make non-monetary contributions to CryptoFed ("Contributors") in one way or another.” (SOS- 000001).

RESPONSE:

REQUEST FOR ADMISSION NO. 14: Admit that in his testimony before the Select Committee on September 16, 2024, Mr. Crossman stated, “the Locke token is a per se security” (available at 7:30 -7:60, <https://www.youtube.com/live/hlnJDwInl6c>), while also stating “Well, yes, Mr. Chairman, to be fair, they haven’t done anything yet. We still don’t know what they are doing.” (*Ibid*, available at 18:50- 19:17).

RESPONSE:

REQUEST FOR ADMISSION NO. 15: Admit that Petitioner’s statement, “...the ‘investment of money’ is any exchange of value...”, in the SoS October 17, 2024 Letter to CryptoFed (SOS- 000003), is wrong.

RESPONSE:

REQUEST FOR ADMISSION NO. 16: Admit that Petitioner knew through SOS- 000024 that in *Fourco Glass Co. v. Transmirra Products Corp.*, 353 US 222 (1957) at 229, the US Supreme Court held (emphasis added):

We think it is clear that § 1391 (c) is a general corporation venue statute, whereas § 1400 (b) is a special venue statute applicable, specifically, to all defendants in a particular type of actions, i. e., patent infringement actions. In these circumstances the law is settled that **"However inclusive may be the general language of a statute, it `will not be held to apply to a matter specifically dealt with in another part of the same enactment. . . . Specific terms prevail over the general in the same or another statute which otherwise might be controlling.'** Ginsberg & Sons v. Popkin, 285 U. S. 204, 208."

MacEvoy Co. v. United States, 322 U. S. 102, 107.

We hold that 28 U. S. C. § 1400 (b) is **the sole and exclusive provision controlling** venue in patent infringement actions, and that it is not to be supplemented by the provisions of 28 U. S. C. § 1391 (c).

RESPONSE:

REQUEST FOR ADMISSION NO. 17: Admit that in his testimony before the Select Committee on May 14, 2025, regarding the ruling in *SEC v. Ripple Labs* by the U.S. District Court for the Southern District of New York, the Secretary Gray said, "I want to note that we are administering the laws of the State of Wyoming here. That is different from the federal side, which is what they just cited, even though that case [that we are really not] is not in our district." (available at 3:17:38-3:18:15, (https://www.youtube.com/live/3R2FA6u_qC4), although in the SoS October 17, 2024 Letter (SOS-000003, SOS-000004, and footnote at SOS-000004), many

federal court cases outside Wyoming’s district were cited, such as, *Hector v. Wiens*, 53 F.2d 429, 432 (9th Cir. 1976); *SEC .v Sierra Brokerage Servs., Inc.*, 608 F. Supp. 2d 923, 940-943 (S.D. Ohio 2009); *Hocking .v Dubois*, 85 F2.d 149, 145 (9th Cri 1989); *Securities & Exchange Commission v. Glenn W. Turner Enterprises Inc.*, 474 F.2d 476, 482 (9th Cir. 1973).

RESPONSE:

REQUEST FOR ADMISSION NO. 18: Admit that, the Secretary did not have factual evidence to prove his fraud allegation against CryptoFed under W.S. 17-4-501, when, 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).

RESPONSE:

REQUEST FOR ADMISSION NO. 19: Admit that Petitioner summarized the characteristics of CryptoFed’s plan to issue Locke tokens in its October 17, 2024, notice letter (SOS-000001 - SOS-000002), and in response CryptoFed stated in the CryptoFed’s October 28, 2024 Letter, “there is no factual dispute over the characteristics of the Locke token distribution and relevant elements which were summarized in the SoS Legal Analysis” (SOS- 000163).

RESPONSE:

Dated this 11th day of August 2025.

**AMERICAN CRYPTOED DAO, LLC,
*Respondent***

/s/ L. Cooper Overstreet

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CERTIFICATE OF SERVICE

This is to certify that on the 11th day of August 2025 a true and correct copy of the foregoing was served via email on the following:

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