

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

CHUCK GRAY, Wyoming Secretary of
State,

Petitioner,

v.

AMERICAN CRYPTO FED DAO, LLC,

Respondent.

Civil Action No: 2024-CV-0202917

**PLAINTIFF’S FIRST INTERROGATORIES AND REQUESTS FOR
PRODUCTION**

The Secretary of State, through the Wyoming Attorney General’s Office, propounds the following discovery requests.

INSTRUCTIONS

I. Requests for Production

A. “Documents” and “things” are defined as those terms are used in Wyoming Rule of Civil Procedure 34 and include all types of recorded information, including but not limited to writings, notices, pamphlets, work papers, surveys, accounting statements, financial summaries, statements of assets and liabilities, expense reports, prospectuses, affidavits, lien claims, bonds, statistics, drawings, graphs, charts, photographs, any and all

computerized records, storage media, phone records, other data compilations from which information can be obtained, translated, if necessary, through detection devices into reasonably usable form and all drafts, alterations, modifications, changes, and amendments of any kind. Further, the term “document” or “documents” means every document as defined here that is known to you and every responsive document that you can locate or discover by reasonably diligent efforts.

B. As used here, the term “communication” means inquiry, discussion, conversation, negotiation, agreement, undertaking, meeting, telephone conversation, letter, notes, telegram, telex, advertisement, or other forms of verbal intercourse, whether oral or written.

C. With respect to all documents requested, you must furnish all documents within your custody or control even if those documents are not in your direct possession. This means that if a third party has responsive documents and you have the right to obtain copies of those documents from that third party, you must produce them in response to this request. Third parties may include, but are not limited to, your agents, financial institutions, credit card companies, phone companies, employees, attorneys, accountants, representatives, investigators, consultants, or any corporation, subsidiary, partnership, association, or other entity with which you have an ownership interest or are employed or affiliated.

D. All documents must be produced as they are kept in the usual course of business or organized and labeled to correspond with the categories in this Request.

E. If any document cannot be produced in full, the document must be produced to the fullest extent possible. You must specify the reasons that you are unable to produce the remaining portion.

F. If any document existed at one time but has been discarded, lost, or otherwise destroyed, please specify the: (1) document type, (2) document subject, (3) date upon which the document ceased to exist, (4) circumstances under which the document ceased to exist, and (5) identity of all persons having knowledge of the contents of the document.

G. To the extent that you object to these Requests or any part on the basis of any privilege or the work product doctrine, state your objection, produce a privilege log, and provide those documents that you are willing to provide without further court order. The privilege log should include the following information: (1) document type; (2) basis of privilege; (3) document author(s); (4) document date; (5) document recipient(s); (6) general subject matter of the document or communication; and (7) present whereabouts of the document and the name and address of the custodian of the document.

H. These requests are continuing in nature. To the extent that you obtain additional responsive documents at any time after the production called for by these Requests, you should promptly supplement your responses by providing these documents.

I. As to all computerized documents, please provide these documents either 1) on a portable USB drive, or 2) via a file sharing system such as Google Drive or Microsoft SharePoint. The documents should be in the software format normally used or, if the software required to read it is proprietary, in ASCII format.

II. Interrogatories

A. Whenever in the following Interrogatories any writing must be described or identified, all writings in the possession or control of yourself and your representatives are included, and all responsive writings shall be identified by date, author, addresses, title, subject, title of document (contract, invoice, work order, letter or other identifying designation), number, and physical description. As to each responsive writing, the plaintiff also requests the address of the present location of the writing and the name and address of its custodian. The term “writing” is used here in its broadest sense, and includes any original reproduction or copy of any kind of writing or any documentary material, including, without limitations, correspondence, memoranda, interoffice communications, notes, diaries, contract documents, drawings, plans, specifications, estimates, vouchers, permits, written ordinances, minutes of meetings, invoices, billings, checks, reports, studies, telegrams, notes of telephone conversations, and notes of any oral communications.

B. Whenever in the course of answering these interrogatories information is called for that is other than within the personal knowledge of the person answering, you are requested, in addition to providing that information, to provide the name, address, telephone number, official capacity, and job title of each person providing information to you, or if the information is obtained from a writing, to identify each writing as described above.

C. Plaintiff requests that you supplement responses to all interrogatories that seek or the answer contains the following information: A) The identity and location of persons having knowledge of discoverable facts, and B) the identity and location of persons

expected to be called at trial and the subject matter of their testimony. Plaintiff also requests that you supplement responses if you receive new information that shows an original response to an interrogatory was incorrect when made or, although correct when made, is no longer true in light of new information. The duty to supplement shall be continuing as to the above-described types of information, and Plaintiff requests supplementary responses whenever new or changed information is discovered or determined.

D. In the event an interrogatory cannot be answered in full after the exercise of due diligence to secure the information requested, the responding party shall state that and answer to the fullest extent possible. If this is the case, specify that portion of the interrogatory that you claim you are unable to answer fully and completely and state what knowledge, information, or belief you have concerning the unanswered portion of each incomplete interrogatory and explain all efforts made to obtain the requested information.

INTERROGATORIES

Interrogatory 1: Please identify the individual natural person responsible for answering these interrogatories, including that person's title or titles and contact information. If different people are responsible for various answers, please identify each of them here, then indicate the author of each answer provided in that answer.

Interrogatory 2: CryptoFed stated in various letters, including its letter dated September 30, 2024, at SOS-000155, and in its "constitution" at section 4.6, that "Locke tokens represent citizenship, not ownership." Please explain the basis for CryptoFed's claim, and define "ownership" and "citizenship" as used in this "constitution."

Interrogatory 3: CryptoFed’s “constitution” states that its publicly available identifier for smart contracts is “blockexplorer.americancryptofed.org.” The following is the html of the page that is delivered when navigating to that uniform resource locator as of the date of this discovery request:

```
<html>
  <head>
    <meta http-equiv="Content-Type"
    content="text/html; charset=windows-1252">
    <title>ACF Block Explorer</title>
    <link type="text/css" rel="stylesheet" id="dark-
    mode-custom-link">
    <link type="text/css" rel="stylesheet" id="dark-
    mode-general-link">
    <style lang="en" type="text/css" id="dark-mode-
    custom-style"></style>
    <style lang="en" type="text/css" id="dark-mode-
    native-style"></style>
    <style lang="en" type="text/css" id="dark-mode-
    native-sheet"></style>
  </head>
  <body>
    <h1>Welcome to AmericanCryptoFed!</h1>
  </body>
</html>
```

Please explain how this page satisfies the requirement to provide a publicly available identifier under Wyo. Stat. Ann. § 17-31-106(b).

Interrogatory 4: The CryptoFed “constitution” provides that MShift, Inc. is CryptoFed’s sole member. Please describe MShift’s governance structure and which natural persons are authorized to make decisions concerning CryptoFed’s operation.

Interrogatory 5: The CryptoFed “constitution” provides that MShift’s powers and rights are delegated to Locke token owners effective when the Securities and Exchange

Commission approves CryptoFed's S-1 filing. It also provides that MShift will reserve 25%, or 2,500,000,000,000 Locke tokens for itself.

Interrogatory 5(a): Which natural persons will exercise MShift's rights to vote Locke token shares and how will MShift's votes be decided? If more than one person will exercise MShift's rights to vote Locke token shares, please describe each person participating in that decision and how disputes between those persons will be resolved.

Interrogatory 5(b): When will MShift's allocation of 2,500,000,000,000 Locke tokens be distributed to MShift, that is, what event or combination of events will trigger this distribution?

Interrogatory 6: Please explain each and every reason that MShift—as CryptoFed's sole member—chose to domesticate in Wyoming on or about November 20, 2024.

Interrogatory 7: For each and every reason provided in Interrogatory 6, please explain why that justification did not apply before November 20, 2024.

Interrogatory 8: What facts currently known or inferred by CryptoFed support its claim of arbitrary enforcement, as articulated on page 5 of its answer and counterclaims? Specifically, please include any known or inferred circumstances in which the Secretary has issued a no-action letter under circumstances similar to CryptoFed's. Also, please include any circumstance in which the Secretary initiated either civil or administrative enforcement proceedings under Wyo. Stat. Ann. §§ 17-4-603 or 17-4-604. For those circumstances in which CryptoFed has inferred an event, please provide the factual basis for that inference.

Interrogatory 9: What facts justify or support CryptoFed's claim that the Secretary's requested relief is barred by estoppel?

Interrogatory 10: What facts justify or support CryptoFed's claim that the Secretary's requested relief is barred by laches?

REQUESTS FOR PRODUCTION


Request 1: Plaintiffs provided a copy of CryptoFed's "constitution" in its initial disclosures at pages SOS-000007 through 21. Please provide any updates, addenda, new versions, or other documents that amend, replace, or interpret that document.

Request 2: Please provide any and all smart contracts used to manage, facilitate, or operate CryptoFed, as describe in Wyo. Stat. Ann. § 17-31-106(b). Provide the smart contracts in human-readable programming language such as Solidity or whatever similar language was used when the smart contract was drafted.

Dated this 28th day of August, 2025.

/s/ Mackenzie Williams
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307-777-8781
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 28th day of August,  25, the foregoing was served on the following using the indicated methods:

FileAndServeXpress:

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/s/ Mackenzie Williams
Office of the Attorney General