



Summary of professional experience from Eugene Dvekutsky regarding to "WEB 3 BUSINESS & **CRYPTO-ASSETS TRANSACTIONS"**

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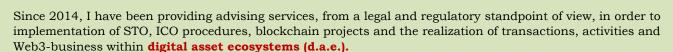
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Skype: Eugene Dvekutsky

Location: Ukraine:

Education: University degree, Yuriy Fedkovych Chernivtsi National University, Law Faculty, 1993-1998; My Professional portfolios concerning to WEB 3 BUSINESS & CRYPTO-ASSETS TRANSACTIONS as well as "WEB 3 BUSINESS & CRYPTO-ASSETS TRANSACTIONS LEGAL CONSULTING & PARTNERSHIP PROPOSAL" (WEB 3.B.C.A.T.L.C.P.P.), can be provided, with a brief content, but can be provided with a detailed content - for those who are really interested in such consultations and in legal documentation of cases and Web3 projects), to the address (email, Viber, Telegram, WhatsApp Skype), specified by the interested person (the volume is about 120 A4 pages);

Also I can provide my professional portfolios concerning to legal advice and documentation in the field of "Securities Law of Switzerland (Schweiz), European Union, Malta, Singapore, United Kingdom, legal framework tokenization of equity securities, debt instruments, Assets and DLT legal regulation regarding to DLT-securities";



Ensure an array of professional legal advice & support consulting services and full legal documentation, related to STO, ICO, crypto-assets transactions, and activities of blockchain-focused Web3 company, involving security tokens, asset-based tokens and utility tokens, pursuant legislations of jurisdictions: Singapore, Malta, Panama, UK, EU;

TARGET GROUP OF HEREBY PROFESSIONAL SUMMARY AND MY LEGAL CONSULTING PROPOSAL (WEB 3.B.C.A.T.L.C.P.P.)

I provided and provide legal advice, support, legal opinions and documentation to individuals, investors and related parties, affiliated companies and associated persons, etc.

I have summarized the needs of clients based on the legal advice & support, which was provided.

I have identified, determined and know demanded (required) by clients directions of advisory as well as demand and needs, tasks and challenges and know what the following clients and investors need:

- crypto-asset service providers;
- issuers of crypto-assets;
- companies implementing blockchain and Web3 technology and to company which creating and deploying digital assets by **procedures ICO & STO**;
- ♦ companies whose activities, range across and are carried out within entire spectrum functioning of digital assets ecosystem;
- foreign blockchain / crypto companies & **Web3 businesses**, which entering to the market of southeast Asia, Europe and the Mediterranean by using tax planning strategies of S'por (Singapore) and Malta as low tax jurisdiction;
- startups, investors, exchanges, technology founders and startups founders;
- established crypto companies launching blockchain & Web3 projects;



I suggest considering the possibilities indicated in my "WEB 3 BUSINESS & CRYPTO-ASSETS TRANSACTIONS LEGAL CONSULTING & PARTNERSHIP PROPOSAL"

Allow to introduce You the overview of our legal advising services, **DUE DILIGENCE** and **AUDIT PROCEDURES** as well as skills, which You can harness for Your own aims and needs, and which may be enclosed to You in stages:

- in brief content of my "WEB 3 BUSINESS & CRYPTO-ASSETS TRANSACTIONS LEGAL CONSULTING & PARTNERSHIP PROPOSAL", - "Summary of demanded (required) by clients directions of advisory as well as legal focus key directions of our consulting";
- part of my "WEB 3.B.C.A.T.L.C.P.P.", "Conditions and events: "What Can Go Wrong" in transactions with crypto-assets";
- part of my "WEB 3.B.C.A.T.L.C.P.P.", "What the clients and investors need in activities and Web3 business related to crypto-assets;
- part of my "WEB 3.B.C.A.T.L.C.P.P.", "AUDIT PROCEDURES & DUE DILIGENCE PROCEDURES INVOLVING TRANSACTIONS OF CRYPTOASSETS":
- and in Detailed contents of my "WEB 3.B.C.A.T.L.C.P.P.";

Provided legal advice & support as:

- crypto-assets transactions Legal adviser;
- ₩ Web3 blockchain business Legal Regulatory Counsel;
- ₩ Web3 Product legal counsel;
- ★ Legal Consultant IP Law and Blockchain Regulations;

Ensure an array of professional legal advice & support, in the fields of:

- K Legal & regulatory compliance (LCJ) of Acts (Legislation) and legal and enforcement frameworks which enacted a statutory framework and regulated Web3 & blockchain based businesses as well as cryptoassets transactions involving security tokens, asset-referenced tokens or asset-based tokens, utility tokens, pursuant of Singapore's, Panama's, Maltese's, EU's, and United Kingdom's jurisdictions;
- tokenization (digitized) assets or securities in the digital asset ecosystem (d.a.e.) (blockchain);
- documentation and confirmation title ownership and transfer of title ownership on crypto assets;
- Development, drafting and documentation to the client of a legal extract from the blockchain ledger (LEBL), i.e. from the digital asset ecosystem, (or from digital transaction ledger) (LEDAE or LEDTL) which reflects and discloses two information blocks:

«detailed in a separate document»

- ₹ Full legal documentation of ICO and STO, including White Papers;
- Providing audit procedures & due diligence procedures involving transactions of crypto-assets, issuers of crypto assets, service providers of crypto assets;

I have identified, determined and know:

- what are the challenges | tasks | pain points of client, company or investor, according to which, legal solutions are provided;
 - «Detailed in a separate document»
- k demanded (required) directions of advisory, which interested of clients and investors;
- what the clients and investors need in activities involving of crypto-assets;
- what are the goals and objectives for consulting, which interested of clients and investors;
- approaches for conducting due diligence and audit procedures involving transactions of crypto-assets;
- conditions and events: "What Can Go Wrong" in transactions with crypto-assets; «Detailed in a separate document»



RELEVANT SKILLS ALSO APPROACHES, METHODS, IMPACT MEASURES AND MEASURES TO ACHIEVE SUCCESS REGARDING TO CLIENT'S TASKS:

- w understanding the Web3 space;
- understanding of client's pain points in Web3 business & crypto-assets transactions; X
- 🕅 knowledge and understanding of the client's business;
- knowledge and understanding, what the clients and investors need in activities related to Web3 business & crypto assets;
- know and be able to ensure conducting, advice, drafting & documentation of regulatory treatments, accounting treatments, legal clarifications, legal opinions relating to:
 - due diligence procedures involving transactions of crypto-assets;
 - audit procedures involving transactions of crypto-assets;
 - approaches of accounting of crypto-assets according to the applicable IAS & IFRSs standards;
- **X** I differentiate and distinguish between:
 - digital and digitized assets from a legal and technological point of view;
- K I understand and know how to apply of UK Legislation, Acts, Subsidiary Legislation as well as **Precedent Cases of Common Law**, regulating the activities, transactions and transfer of crypto assets, including the transfer of title ownership on crypto assets;
- 🖔 I understand and know how to apply of Singapore legislation & Subsidiary Legislation and Precedent Cases, of Common Law, in a field of activities & transaction of crypto assets;
- K understanding and know how to apply Maltese Acts and Subsidiary Legislation in a field of transaction of crypto assets;
- be able and know how to development and drafting legal opinions, legal treatments and legal clarifications of the jurisdictional issues of the digital asset ecosystem;
- & Communication with clients, related to their Web3 business, as well as transactions and activities involving crypto assets, with understanding of their challenges | tasks | pain points;
- be able and know how to development and drafting:
 - all Legal documents for ICO & STO;
 - legal documents, that confirms of the transfer of title ownership (C.T.T.O.) (right of ownership) on digital crypto assets;
 - for clients' needs of the legal opinions, legal assessments, legal justifications, legal reasoning and precedential legal reasoning;
- know how to provide of real-time & historical crypto-assets transactions data extraction from digital asset ecosystem (d.a.e.) (or distributed transaction ledger (d.t.l.)), for tokens Standards - ERC20, ENS, ERC223, ERC-721, ERC-777, ERC-1155, ERC-3643, ERC-6960;
- be able and know how to development and draft to the client of a legal extract from the blockchain ledger (LEBL) or legal extract from distributed transaction ledger (LEDTL);
- know how to develop legal documents for STO, such as "White paper", "TERMS OF USE", Terms of sale for security tokens; legal extract from the blockchain ledger (LEBL); (i.e. from the digital asset ecosystem, (or from digital transaction ledger) (LEDAE or LEDTL)) or legal certificate of confirmation of title ownership on crypto assets from the digital asset ecosystem (L.C.C.T.O.C.A.), which include the necessary legal clauses, provisions and procedures, in order to identity management to confirmation the transfer of title ownership on securities tokens in the digital asset ecosystem, pursuant Singapore's, Maltese's, Panama's, EU's and UK's governing law;
- be able and know how to providing of audit procedures of tracking or traceability relating to transactions details of crypto assets;
- **be able and know how to provide** associated person audit procedures;
- be able and know how to provide of development and drafting of documents, or in fact account source documents (A.C.D.), accounting records — The records of initial accounting entries and supporting records, regarding to transactions of crypto assets, for clients;







APPROACHES, METHODS, SKILLS PURSUANT TO «COMMON LAW» IN CASES OF CLIENTS CONCERNING TO WEB3 BUSINESS:

differentiate and understanding of distinguish between following categories of legal terms, which extract from judgments or precedents cases:

1st category of legal terms which extract from judgments or precedents cases:

- the factual background and particular factual context as Web3 business, transactions and blockchain commercial activity involving crypto-assets;
- The sources of law that the Courts must apply are applicable law or governing law, as a practical activity done under Acts and Subsidiary legislation by crypto-asset service providers, issuers of cryptoassets and companies implementing blockchain and Web3 technology as well as by companies which creating and deploying digital assets by procedures ICO & STO;
- **↓** legal practice, as a Crypto Cases, cases in Securities Law, Civil Law, Corporate Law, which hearing by courts and which was required to consider by designated authorities to oversee Web3 business;
- **↓** law enforcement practice as a cases in Criminal Law, which hearing by courts and was required to consider designated authorities to oversee Web3 business;

2st category of legal terms which extract from judgments or precedents cases:

- substantive rules;
- legal rules;
- default legal rules;
- legal principles;
- arguments based on precedent;
- legal reasoning and precedential legal reasoning;

«Detailed in a separate document»

PROVIDED LEGAL ADVICE & SUPPORT AS WELL AS DRAFTING OF LEGAL OPINIONS PURSUANT TO «COMMON LAW OR CASE LAW»;

Provided extraction, analyses and application, for clients, Legal Data and Elements, from judgments, Precedents or Precedent Cases, which were made regarding to cases in the field of Web3 business, as well as transactions and activities involving of crypto-assets;

SOME RELEVANT SKILLS PURSUANT OF "COMMON LAW OR CASE LAW" IN CASES OF CLIENTS **CONCERNING TO WEB3 BUSINESS:**

SKILL PURSUANT OF CASE LAW 1. Know and be able to use Legal Judgment Elements Extraction Approaches

SKILL PURSUANT OF CASE LAW 1.1. Know and be able to extract (extract-to-draw), to-draw, analyses, define, formulate, to use and provide for clients of:

- necessary legal principles and facts;
- legal reasoning and precedential legal reasoning;
- legal arguments and provisions;
- Substantive Rules;
- Rules:
- default rules. -

extracted from judgments or precedents, which were made regarding to cases in the field of Web3 business, as well as transactions and activities involving of crypto assets;

SKILL PURSUANT OF CASE LAW 2. Be able and know how to develop and draft, in areas of clients' needs, the legal opinions, legal assessment, legal reasoning and precedential legal reasoning, regarding to:

- the merits and circumstances of the situation;
- governing law or applicable law;
- the factual background or particular factual context;
- the salient facts and detailed facts which are relevant to understanding the arguments, -



which have been extracted from the was made judgments or from precedents, regarding cases related to the Web3 business, as well as transactions and activities with crypto assets;

SKILL PURSUANT OF CASE LAW 3. Be able and know how to identify relevant precedents, in the fields of Web3 business and activity involving of crypto-assets as well as how to weigh them, and how to interpret them;

SKILL PURSUANT OF CASE LAW 4. Be able and know how to dealt with the internal aspect of the common law and precedent in laying down a set of default rules as a matter of substantive law;

SKILL PURSUANT OF CASE LAW 5. Know how to develop and drafting of legal reasoning from decision (judgments) in order to provide legal solutions for the client, in his activities and Web3-business related to transactions with crypto assets;

SKILL PURSUANT OF CASE LAW 6. Know how to extract, identify, recognize, apply and provide for the clients, Arguments based on precedent, necessary in activities of clients, related to transactions with crypto assets;

SKILL PURSUANT OF CASE LAW 7. Use in the legal opinion-writing process following approaches:

- refining the question presented,
- identifying the governing law;
- and describing the material facts;

SKILL PURSUANT OF CASE LAW 8. Know how to provide a roadmap of the types of problems;

k know how to evaluate to evidence relevant to the determination of a case;

SOME RELEVANT SKILLS PURSUANT TO AUDIT PROCEDURES & DUE DILIGENCE PROCEDURES **INVOLVING TRANSACTIONS OF CRYPTOASSETS:**

- know and be able to ensure conducting audit procedures & due diligence procedures involving transactions of cryptoassets;
- K In the fields of audit procedures & due diligence procedures involving transactions of cryptoassets, know and be able to IDENTIFIED, DETRMINED AND KNOW:
 - A. Key areas of legal due diligence on businesses that deal with crypto assets;
 - B. Has been compiled and framed-up a crypto issues matrix;
 - C. Know-How to Identify and Assessing Risks of material misstatement in cryptoassets transactions and balances:
- know and be able to identified conditions and events "What can go wrong" in transactions with crypto assets regarding of Assertions to Which a Possible Misstatement May Relate;

SOME APPROACHES, METHODS AND SKILLS PURSUANT TO AUDIT PROCEDURES & DUE DILIGENCE PROCEDURES INVOLVING TRANSACTIONS OF CRYPTOASSETS:

Designing and performing about 14 types of audit procedures involving crypto-assets;

«Detailed in a separate document»

Skills pursuant to audit procedures & due diligence procedures 1.

Providing audit procedures & due diligence procedures involving transactions of crypto-assets, issuers of crypto assets, service providers of crypto assets;

Skill pursuant to audit procedures & due diligence procedures 2.

Know how to provide audit procedures and methods of associated (associated entity procedures) a crypto asset located at a specific address in the ecosystem with a wallet and with the legal data of an entity or individual person, such that:

associated entity procedures;

- associated address procedures;
- associated crypto assets procedures;

«Detailed in a separate document»

Skills pursuant to audit procedures & due diligence procedures 2.1.

Know how to provide reciprocal audit procedures

- Lensure procedures of associated (associated procedures) of the entity (or individual) according to the address in the blockchain;
- Ensure associated procedures of address according to the entity (or individual);

Skill pursuant to audit procedures & due diligence procedures 3.

Development (designing) and performing of audit procedures in order to make (to form) existence assertion regarding to crypto assets;

Skill pursuant to audit procedures & due diligence procedures regarding to the private key 4.

Skill pursuant to audit procedures & due diligence procedures regarding to the private key 4.1.

Ensuring auditing procedures to verify an persons of 'management body' and others persons to access to the **private key** and control over the related crypto assets.

Skill pursuant to audit procedures & due diligence procedures regarding to the private key 4.2.

Provide legal and regulatory treatment relating to the «private key»;

Designing and performing audit procedures related on aim to protect the entity's private key from unauthorized access through the Internet;

«Detailed in a separate document»

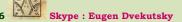
PROFESSIONAL SUMMARY

I draft and provide all legal documents, specified below, in English, Bulgarian, Ukrainian and Russian;

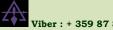
BRIEF CONTENT OF MY PROFESSIONAL SUMMARY REGARDING TO WHICH
LEGAL ADVICE, SUPPORT AND DOCUMENTATION WERE PROVIDED IN THE
FIELD OF WEB3 BUSINESS & CRYPTO-ASSETS TRANSACTIONS:

FIELD OF	FIELD OF WEB3 BUSINESS & CRYPTO-ASSETS TRANSACTIONS:	
1. Chapter TARGET GROUP &	individuals, investors and related parties, affiliated companies and associated persons, etc.	
demanded (required) by clients directions of advisory	I <u>Identified</u> , <u>determined and knowledgeable in those demanded (required) by clients directions of advisory as well as demand and needs, tasks and challenges of clients and know what the following clients and investors need; «Detailed in a separate document»</u>	
2 <u>Chapter</u> .	MY SKILLS, APPROACHES, METHODS, IMPACT MEASURES AND MEASURES TO ACHIEVE SUCCESS CONCERNING TO TASKS AND CASES OF CLIENTS;	





3 <u>Chapter</u> .	RELEVANT SKILLS ALSO APPROACHES, METHODS, IMPACT MEASURES AND MEASURES TO ACHIEVE SUCCESS REGARDING TO CLIENT'S TASKS AND TO WEB3 BUSINESS OF CLIENTS;
4 <u>Chapter</u> .	APPROACHES, METHODS, SKILLS PURSUANT TO «COMMON LAW» IN CASES OF CLIENTS CONCERNING TO WEB3 BUSINESS; «Detailed in a separate document»
5 <u>Chapter</u> .	PROVIDED LEGAL ADVICE & SUPPORT AS WELL AS DRAFTING OF LEGAL OPINIONS PURSUANT TO "COMMON LAW OR CASE LAW";
6 <u>Chapter</u> .	SOME RELEVANT SKILLS PURSUANT OF "COMMON LAW OR CASE LAW" IN CASES OF CLIENTS CONCERNING TO WEB3 BUSINESS;
7 <u>Chapter</u> .	SOME APPROACHES, METHODS AND SKILLS PURSUANT TO AUDIT PROCEDURES & DUE DILIGENCE PROCEDURES INVOLVING TRANSACTIONS OF CRYPTOASSETS:
	Designing and performing about 14 types of audit procedures involving crypto-assets; «Detailed in a separate document»
8 <u>Chapter</u> .	PROFESSIONAL EXPERIENCE AND ACCOMPLISHMENTS;
8.1.	Chapter A. COMPLETED LEGAL ADVICE, SUPPORT AND DOCUMENTATION ACCORDING TO SOME CUSTOMERS CASES CONCERNING TO THE CLIENT'S TASKS AND REGARDING TO THE TARGET CRYPTO-ASSETS, THE TARGET FINANCIAL INSTRUMENTS, THE TARGET SECURITY TOKENS REGARDING WHICH LEGAL ADVICE, SUPPORT AND DOCUMENTATION WERE PROVIDED IN LINE WITH THE DIRECTIONS:
8.1.1.	Provided Legal advice, documentation & support of STO procedures pursuant with the legislation and laws of Malta;
8.1.2.	Ensured legal advices & support to Client-User regarding to conducting (undergoing) the Financial Instrument Test (FIT);
8.1.3.	SOME <u>CUSTOMERS CASE STUDIES</u> OF MY CRYPTO LEGAL CONSULTING AND PROVIDED LEGAL ADVICE & SUPPORT AS WELL AS MY DRAFTED & DESIGNED LEGAL DOCUMENTS (DOCUMENTATION) CONCERNING TO <u>ISSUING</u> AND <u>ISSUED</u> FINANCIAL INSTRUMENTS, SECURITIES and <u>SECURITY TOKENS</u> :
8.1.4.	Developed, drafted and provided:
	Prospectus for issue and public offer of SECURITY TOKENS; (excerption from my drafted Prospectus;)
8.1.5.	Provided legal advice, Documentation & support in the field of Decentralised Finance or "DeFi".
	«Detailed in a separate document»





Ensured Legal advice, development & draft of legal documentation for two crypto lending platforms, as a tax residents in Singapore jurisdiction;
CHAPTER B. PROVIDED AND COMPLETED LEGAL ADVICE & SUPPORT REGARDING TO DEMANDED (REQUIRED) BY CLIENTS DIRECTIONS OF ADVISORY AS WELL AS ACCORDING TO LEGAL FOCUS KEY DIRECTIONS OF OUR CONSULTING;
Provided Legal advice & support pursuant Maltese legislation and enforcement Framework in the field of issue, transactions and transfer of title ownership on SECURITY TOKENS and Virtual Financial Assets (crypto-assets) as well as which regulated Distributed Ledger Technology Platforms and which provide a regulatory framework for crypto-assets service providers;
Ensured legal advices & support to Client-User regarding to conducting (undergoing) the Financial Instrument Test (FIT) ;
Provided Legal advice & support as well as drafting of legal opinions pursuant legislation of European Union in the field of issue, transactions and transfer of title ownership on Securities, as well as relating to financial instruments, on SECURITY TOKENS (in a field of Securities Law) and crypto-assets
Provided legal advice & support pursuant UK Legal and enforcement Framework, regulating the turnover, transactions and transfer of crypto-assets, including the transfer of title ownership on crypto-assets;
Provided legal advice & support pursuant Singapore legislation & legal framework in a field of turnover & transaction of crypto assets;
Provided real-time & historical crypto-assets transactions data extraction (or DATA RETRIEVAL which are recorded in (d.a.e.) or (d.t.l.)) from digital asset ecosystem (d.a.e.) (or distributed transaction ledger (d.t.l.)), for tokens Standards - ERC20, ENS, ERC223, ERC-721, ERC-777, ERC-1155, ERC-3643, ERC-6960; «Detailed in a separate document»
Provided Extracting of Unique Transaction Identifier (UTI), transaction identifier (txid), TXs, transaction ID by specific address of crypto assets (wallet) or smart contract and file formation CSV or to text file (doc or PDF);
Developmented, Designed and provided to the clients of a legal extract from the blockchain ledger (my legal term or wording - LEBL); (i.e. from the digital asset ecosystem, (or from digital transaction ledger) (LEDAE or LEDTL)) or legal certificate of confirmation from the digital asset ecosystem; provided Legal extract from the blockchain ledger (LEBL), reflects and discloses two information blocks: ↓ Digital and technology blockchain information regarding the crypto asset and transaction details; ↓ legal information about crypto assets, issuer, owner of crypto assets, "custodian wallet provider", transaction details; «Detailed in a separate document»
Provided tracking (or traceability) procedures relating to transactions details of crypto assets; «Detailed in a separate document»



13 <u>Chapter</u> .	Provided associated person audit procedures; «Detailed in a separate document»
	Enshured Documentation.C.T.O. (confirms of the title ownership)
14 <u>Chapter</u> .	Provided legal documents, that:
	 confirms of the title ownership (C.T.O.) on digital crypto assets and transfer of title of ownership on digital crypto assets;
15 Chapter.	Developed and provided legal documents, that confirms of the transfer of title ownership (C.T.T.O.) (title ownership or right of ownership) on digital crypto assets;
	Provided Legal documents for ICO & STO;
16	Developed and provided the following documents in English, Bulgarian, Ukrainian, Russian:
<u>Chapter</u> .	Provided comprehensive services for the design and preparation of the full package of legal documents necessary for registration and issuing ICO and STO and ensuring further successful operation of the Web3 company;
17 Chapter.	Ensured advising regarding to accounting approaches of crypto-assets, according to the applicable IAS & IFRSs standards;
18 Chapter.	Developed and provided of Legal opinions, legal clarifications, legal treatments:
	Developed and Drafted of legal opinions regarding to particular crypto assets - security
18.1.	tokens and Asset-based tokens;
19	Provided legal support for the documentation procedure or developing legal documents that confirmation or provide legal evidence (as well as validation) (legal proof) regarding to:
Chapter.	 title ownership of a cryptoasset; transfer of title ownership (right of ownership) on a cryptoasset; within:
	- "digital asset ecosystem";- distribution ledger transactions (registry or ledger) d.l.t.
	Provided legal support, advising and legal opinions pursuant Common Law or Case Law;
20 <u>Chapter</u> .	this section corresponds to Chapters 4,5,6.

PROFESSIONAL EXPERIENCE AND ACCOMPLISHMENTS

Detailed content of my Professional Summary

Blockchain technology ensures that once you purchase tokens representing an asset, no one authority can remove or change your ownership, rendering it completely immutable.

I provide legal advice, support and documentation to individuals, investors and related parties, affiliated companies and associated persons, etc.

In consequence of the fact that I signed a "Non-disclosure agreement", I can't disclose confidential information relating to the Company Name and location of clients - individual persons and companies.

But I will point out:

DIRECTIONS:
► LEGAL ASSESS OR LEGAL TAXONOMIZATION OF CLIENT'S DLT ASSETS;
MY DRAFTED & DESIGNED LEGAL DOCUMENTS (DOCUMENTATION) CONCERNING TO ISSUING AND ISSUED FINANCIAL INSTRUMENTS, SECURITIES and SECURITY TOKENS;
THE DIRECTIONS OF COMMERCIAL USE OF BLOCKCHAIN (C.C.DCUB.CA.) such as TOKENISATION OF ASSETS AND CRYPTO- LANDING PLATFORMS;
TRANSACTION OF FINANCIAL INSTRUMENTS, SECURITIES, SECURITY TOKENS AND CRYPTO-ASSETS;
CONFIRMATION OF TITLE OWNERSHIP ON FINANCIAL INSTRUMENTS, SECURITIES, SECURITY TOKENS AND CRYPTO-ASSETS;
TRANSFER OF TITLE OWNERSHIP ON SECURITIES, SECURITY TOKENS AND CRYPTO-ASSETS;



so, - Detailed content of my Professional Summary:

Chapter A. COMPLETED LEGAL ADVICE, SUPPORT AND DOCUMENTATION ACCORDING TO SOME CUSTOMERS CASES CONCERNING TO THE CLIENT'S TASKS AND REGARDING TO

THE TARGET CRYPTO-ASSETS,

THE TARGET FINANCIAL INSTRUMENTS,

THE TARGET SECURITY TOKENS

REGARDING WHICH LEGAL ADVICE, SUPPORT AND DOCUMENTATION WERE PROVIDED

A.1. Provided Legal advice, documentation & support of STO procedures pursuant with the legislation and laws of Malta;

IN LINE WITH THE FOLLOWING DIRECTION:

ℵ LEGAL ASSESS OR LEGAL TAXONOMIZATION OF CLIENT'S DLT ASSETS;

Provided:

legal assess or legal taxonomization of client's DLT assets in order to classifies as in accordance with Maltese legislation for Client - Issuer who want to launch his STO from Malta and register their Whitepaper with the Maltese competent authority (MFSA- Malta Financial Services Authority);

the target crypto-assets, regarding which was provided legal advice and legal documentation – security tokens or Digital Financial Instruments in the form of DLT assets which fall under the definition of "financial instruments", as defined in Section C of Annex I of MiFID.

A.2. Ensured legal advices & support to Client-User regarding to conducting (undergoing) the Financial Instrument Test (FIT) in order to determine whether a particular client's DLT asset classifies as a financial instrument or otherwise;

A.3. SOME <u>CUSTOMERS CASE STUDIES</u> OF MY CRYPTO LEGAL CONSULTING AND PROVIDED LEGAL ADVICE & SUPPORT

AS WELL AS IN LINE WITH THE FOLLOWING DIRECTION:

MY DRAFTED & DESIGNED LEGAL DOCUMENTS (DOCUMENTATION) CONCERNING TO ISSUING AND ISSUED FINANCIAL INSTRUMENTS, SECURITIES and SECURITY TOKENS:

A.3.1. Developed, drafted and provided:

Prospectus for issue and public offer of up 8 000 000 tokens which issuing by entity incorporated as a joint stock company under the laws of Malta; ISIN MT1111111111;

<u>the target crypto asset:</u> which was determined by associated clients, as a structured financial product – as securities created for securitization and transfer the credit risk associated with a pool of financial assets.

This entitles the holder to receive regular payments that depend on the cash flow from the underlying assets;

the target crypto asset - is a structured notes, instrument with partial capital protection

The ZZZ Tokens are digital tokens which each represent an interest in a structured Note. The ZZZ Tokens are issued in the form of book-entry securities.

(excerption from my drafted Prospectus;)

A.3.2. Developed, drafted and provided:

"Prospectus" - "by XXX p.l.c., which was incorporated as a public limited liability company registered under the laws of Malta with company registration number Z XXXXX and having its registered office at Tower Business Centre, ZZZZ, Malta"

Intermediaries Offer of 6,850,000 XXX Tokens.

the target crypto asset:

The **XXX** Tokens are digital token which represent as ordinary shares having a nominal value of EUR1,50.

(excerption from my drafted Prospectus;)

A.4. Provided legal advice, Documentation & support in the field of Decentralised Finance or "DeFi".

IN LINE WITH THE FOLLOWING DIRECTION:

K THE DIRECTIONS OF COMMERCIAL USE OF BLOCKCHAIN (C.C.DCUB.CA.) such as TOKENISATION **OF ASSETS AND CRYPTO-LANDING PLATFORMS;**

Provided legal advice, support and Documentation & for crypto lending platforms:

- **A.4.1. Ensured** compliance with Singapore's regulatory requirements in relation to rights and obligations:
 - lenders:
 - crypto lending platform as a legal entity;
 - borrowers;
- A.4.2. Ensured compliance with regulatory regime of Singapore, which governs if and how it is able to make crypto loans;
- **A.4.3. Ensured** legal compliance with interests Lenders and borrowers with the legislation of Singapore;
- **A.4.4.** Ensured compliance of rights and obligations between lenders and borrowers;
- A.4.5. Ensured legal support & advice for Borrowers persons who borrow fiat currencies (against own crypto assets) using own crypto assets as collateral to secure a loan of money, regarding to:
 - legal nature a crypto lending (a crypto backed loan) as secured loans using cryptocurrency as collateral;
 - customizing (the adjustment) of the loan in accordance (to fit) with his financial needs of borrower;

A.4.6. Provided legal advice to the borrowers **regarding to**:

- loan approval (How fast will loan be approved for borrower?);
- supported crypto assets and crypto currencies;
- Payment schedule;

A.4.7. Provided legal advice to lenders regarding:

♣ Considering the liquidity of collateral in crypto assets for lenders;

A.4.8. Ensured Legal advice, development & draft of legal documentation for two crypto lending platforms;

I have provided a full package of legal documents for the incorporation of the crypto lending as a Private Company Limited by Shares as a tax resident in Singapore jurisdiction;

Developed and drafted:

- USER TERMS AND CONDITIONS;
- RISK DISCLOSURE POLICY;
- ANTI MONEY LAUNDERING & KNOW YOUR CUSTOMER POLICY;
- Using Platform and Protocol App Agreement (for clients);
- PRIVACY POLICY;



♣ TERMS OF USE:

A.4.8.1. For two crypto lending platforms - as a tax residents in Singapore jurisdiction - Private Company Limited by Shares, (XXXXX Pte. Ltd.), -

provided a full package of legal documents was made with a LEGAL NOTICE OR LEGAL DISCLAIMERS THAT **GOVERN THE RULES OF CONDUCT**, pursuant Singapore's legislation:

"the DPT borrowing and lending services provided by the Company are not regulated by the MAS under the Payment Services Act 2019."

Legal clause concerning to

my Ensured Legal advising & documentation for crypto lending platform in Singapore's jurisdiction:

As of June 2023, in Singapore's jurisdiction, so far, there are no regulations specifically regulating **DeFi platforms** that match borrowers and lenders of digital assets.

However, to crypto-lending platforms (C.L.P.) general laws on the conduct of lending as a business will apply (such as the Moneylenders Act and the Banking Act).

Besides, should be prepared for new legal provisions, within the law of Singapore's jurisdiction, relating to crypto assets

and have proper legal advisory support, respectively, regarding to these new legal provisions for the financial sector, were set by the Singapore's "FINANCIAL SERVICES AND MARKETS ACT of 2022", which, as part of the first phase, had come into force on April 28, 2023, and which regulate digital token services.

In this connection:

Provide Legal advice & support pursuant "FINANCIAL SERVICES AND MARKETS ACT of 2022", which had come into force on April 28, 2023 as part of the first phase, what is a necessity for this legal field;

and further, - CHAPTER B. PROVIDED AND COMPLETED LEGAL ADVICE & SUPPORT ACCORDING TO DEMANDED (REQUIRED) BY CLIENTS DIRECTIONS OF ADVISORY AS WELL AS REGARDING TO LEGAL FOCUS KEY DIRECTIONS OF MY ADVICE & CONSULTING;

B.1. L.A.S.L.J.Malta. (Legal advice & support pursuant legislation Malta)

Provided legal advice & support pursuant Maltese legal and enforcement framework for:

Virtual Token:

Financial Instruments in the form of DLT assets, which are - SECURITY TOKENS;

Virtual Financial Asset (VFA);

Distributed Ledger Technology Platforms;

activity of crypto-assets service providers;

Provided legal advice & support pursuant:

- 1. MALTA FINANCIAL SERVICES AUTHORITY ACT (Chapter 330 of the Laws of Malta);
- 2. SUBSIDIARY LEGISLATION 330.11 MALTA FINANCIAL SERVICES AUTHORITY ACT (TRANSPARENCY OF SECURITIES FINANCING TRANSACTIONS AND OF REUSE) REGULATIONS;
- 3. SUBSIDIARY LEGISLATION 345.13 CENTRAL SECURITIES DEPOSITORY (CONTROL OF ASSETS) REGULATIONS;
- **4.** The Virtual Financial Assets Act; (chapter 590 of the laws of Malta);
- 5. The Malta Digital Innovation Authority Act (chapter 591 of the laws of Malta);
- 6. The Innovative Technology Arrangements and Services Act (chapter 592 of the laws of Malta;
- 7. VIRTUAL FINANCIAL ASSETS RULEBOOK; CHAPTER 1 VIRTUAL FINANCIAL ASSETS RULES FOR VFA AGENTS REVISIONS LOG 1.03 13 AUGUST 2020 ADDITION OF R1-3.2.9.1-3;
- B.1.1. LAS.C.FIT. Ensured legal advices & support to Client-User regarding to conducting (undergoing) the Financial Instrument Test (FIT);
- B.2. L.A.S.L.J.European Union. (Legal advice & support pursuant legislation of European Union)

Provided legal advice & support pursuant:

- 1. REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Markets in Crypto-assets (MiCA);
- 2. Regulation (EU) 2017/1129 (the "Prospectus Regulation") which of the 21st of July 2019, entered fully into effect and is directly applicable in all EU member states.
- 3. MiFIR Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments;
- 4. MiFID II Directive 2014/65/EU of the European Parliament and of the Council of 15th May 2014 on markets in financial instruments;

Provide legal advice & legal opinion regarding to definition "financial instrument" pursuant Article 4(1), point (15), of Directive 2014/65/EU;

B.3. L.A.S.L.J.United Kingdom.

- **B.3.1. Provided legal advice & support pursuant UK Legal and enforcement Framework**, regulating the turnover, transactions and transfer of crypto-assets, including the transfer of title ownership on crypto-assets:
- 1. HMRC internal manual;
- 1.1. "Crypto-assets Manual";
- 1.2. CRYPTO10400 Introduction to crypto-assets:
- 1.3. HMRC manual «Record keeping of crypto-assets»;
- 1.4. CRYPTO10375 Introduction to crypto-assets: wallets;
- 2. Provide legal advice & legal opinions pursuant to "DIGITAL ASSETS CONSULTATION PAPER" OF THE LAW COMMISSION UK FROM 28 JULY 2022;
- B.3.2. Provided legal advice regarding to a new third category of personal property called "data objects" (D.O.) that would cover digital assets including cryptocurrencies which establish crypto as capable of constituting property.

B.4. L.A.S.L.J.Singapore.

<u>Provided</u> legal advice & support pursuant Singapore legislation & legal framework in a field of turnover & transaction of crypto assets:

- 1. Payment Services (PSA) Act Singapore;
- 2. Securities and Futures Act 2001;
- 3. Goods and Services Tax Act 1993;
- 4. PSN07 "NOTICE ON CONDUCT";
- 5. IRAS e-Tax Guide GST: Digital Payment Tokens;
- **B.5. L.A.S.S.T.O.** Provided legal support, advice and legal opinions regarding to procedures to launch an Security Token Offering ("STO") as the process of issuing of Security Tokens on a blockchain, in digital asset ecosystem or on the platforms Ethereum, Hyperledger Fabric, Hedera Hashgraph, Neo, Stellar by a Company-Issuer;
- <u>B.6.</u> Provided real-time & historical crypto-assets transactions data extraction (or DATA RETRIEVAL which are recorded in (d.a.e.) or (d.t.l.)) from digital asset ecosystem (d.a.e.) (or distributed transaction ledger (d.t.l.)), for tokens Standards ERC20, ENS, ERC223, ERC-721, ERC-777, ERC-1155, ERC-3643, ERC-6960;

through use:

Dapp Web3; Web3 Data APIs from Moralis;

Visual Code Studio; Python;

QuickNode's QuickAlert Expressions;

EthQL: as a server that exposes a GraphQL endpoint to the public Ethereum ledger.

GraphQL: is a query language (QL) for APIs and a runtime for fulfilling those queries;

QuickBlocks: collection of tools to retrieve Ethereum data.

EthSlurp: Extracting TXs for specific address or smart contract to CSV or text file.



B.6.1. Provided Extracting of Unique Transaction Identifier (UTI), transaction identifier (txid), TXs, transaction ID by specific address of crypto assets (wallet) or smart contract and file formation CSV or to text file (doc or PDF):

- 1. Extracting transaction labelling;
- 2. Extracting Internal Transactions;
- 3. Extracting verbose transactions of an address;
- 4. Extracting internal transactions by hash;
- 5. Extracting all transactions of an address;
- 6. Extracting a data transaction by transaction hash;

B.6.2. Data Access and Retrieval in respect of key modules:

Account: Retrieve balance, transactions, and other details for Ethereum addresses;

Contract: Access information about smart contracts, including source code verification;

Transaction: Obtain details about individual transactions on the Ethereum network;

Token: Retrieve information about ERC20, ENS, ERC223, ERC-721, ERC-777, ERC-1155, ERC-3643, ERC-6960.

B.7. Developmented, Designed and provided to the client of a legal extract from the blockchain ledger [LEBL]; (i.e. from the digital asset ecosystem, (or from digital transaction ledger) (LEDAE or LEDTL)) or legal certificate of confirmation from the digital asset ecosystem;

provided Legal extract from the blockchain ledger (LEBL), reflects and discloses two information blocks:

- Digital and technology blockchain information regarding the crypto asset and transaction details;
- legal information about crypto assets, issuer, owner of crypto assets, "custodian wallet provider", transaction details, according to and in order to:
 - due diligence procedures;
 - "know your client" procedures;
 - procedures of associated;

B.8. Provided tracking (or traceability) procedures relating to transactions details of crypto assets;

<u>B.8.1. Provided</u> tracking (or traceability) procedures for locating cryptographic tokens or crypto asset within Ethereum protocol, or other digital system ecosystem;

B.8.2. Provided Traceability procedures to a dedicated blockchain address (not all transactions can be individually traced to a dedicated blockchain address).

B.8.3. Provided a procedures of legal clarification and identification of factors which are **indicators of segregation**;

B.9. Provided associated person audit procedures

<u>B.9.1. Provided</u> traceability & associated person or Entity by juxtaposition address\wallets procedures to legal documents of individual person or entity;

B.9.2. Provide associated individual person or Entity by juxtaposition address\wallets procedures with legal documents of holders or issuers of crypto-assets;

B.10. Enshured Documentation.C.T.O. (confirms of the title ownership)

Provided legal documents, that:

- transfer of title of ownership on digital crypto assets;

<u>B.10.1. Developed and provided</u> legal documents, that confirms of the transfer of title ownership (C.T.T.O.) (title ownership or right of ownership) on digital crypto assets:

- 1. Token Purchase Agreement (for utility tokens);
- 2. Share Sale and Purchase Agreement for securities tokens as documentary securities tokens;
- 3. The terms and conditions of issue, and the Prospectus for securities tokens as book-entry securities;
- 4. Purchase private key (ledger) agreement;
- 5. Transfer private key (ledger) agreement;

- 6. LEDGER LIVE TERMS OF USE:
- 7. Confirmation note, for book entry securities tokens, pursuant Part 3AA «CENTRAL DEPOSITORY SYSTEM» of Singapore's SECURITIES AND FUTURES ACT and in accordance with the CDP Depository Rules;
- 8. Smart contract (with IT Support Specialist);

LEGAL CLOUSE

In the EU, there is a plan for full dematerialization of securities by 2025 (CSD Regulation). The objective is to reduce the time for settlement of securities trades to two days (T+2). Securities should be recorded electronically, in book entries managed by a CSD.

B.10.2. Provided Legal documents for ICO & STO;

Developed and provided the following documents in English, Bulgarian, Ukrainian, Russian:

Provided comprehensive services for the design and preparation of the full package of **legal documents** necessary for registration and issuing ICO and STO and ensuring further successful operation of the Web3 company;

- White Paper for ICO, STO;
- ♣ White Paper for offerings of asset-referenced Token (IEO, IDO);
- ♣ Terms and Conditions (T&C);
- Terms of sale for utility tokens;
- Terms of sale for security tokens;
- Terms of Token Purchase;
- "Public Offering" or "Prospectus";
- ♣ Prospectus for issue and public offer of up tokens which issuing by entity incorporated as a joint stock company under the laws of Malta;
- Prospectus of the Tokens which represent as ordinary shares;
- **↓** Token Purchase Agreement, which determine conditions in order to
 - "to purchase from the Company (the number) of security Tokens";
- ♣ Token Sale Agreement, which determine conditions in order to "to purchase Tokens which are not intended to be commodity or any other kind of financial instrument, do not represent any share, stake, equity interest or security or equivalent rights»;
- ♣ Token sale agreement (for utility tokens) in which:

The Tokens are not intended to be any form of:

- 1. security; or
- 2. commodity; or
- 3. any form of financial instrument; or
- 4. investment; or
- 5. speculative or financial purpose.
- ♣ White Paper;
- Privacy Policy;
- AML Policy;
- policies on the processing and transfer of personal data of users;
- documents in accordance with the requirements of AML and KYC regulation in the jurisdiction of the established company;
- user agreements;
- documentation defining the conditions for the provision of services within the ICO and the use of the online platform in addition to the offer agreements;
- offer agreements concluded in connection with the token sale;

B.11. Ensured advising regarding to accounting approaches of crypto-assets, according to the applicable IAS & IFRSs standards;

In addition, it should be pointed out that regarding to cryptocurrencies and crypto assets there are different accounting approaches according to the applicable IAS & IFRSs standards;



And also, there are different accounting treatments, regarding to how, a reporting entity that is a Holder, or crypto-asset issuer or crypto-asset service provider or third-party custodial services for crypto-assets to apply recognition, measurement, and presentation of crypto assets in the balance sheet, in the Statement of financial position or Financial Statements, and in **Profit and Loss Statement**;

With reference to the above, I want to point out some of the skills I have regarding to accounting for crypto assets:

- know how to Ensure advising as well as development, drafting & documentation of accounting treatments, legal clarifications regarding to accounting approaches of crypto-assets, according to the applicable IAS &
- know how a reporting entity (that is a Holder, or crypto-asset issuer or crypto-asset service provider or third-party custodial services for crypto-assets) to apply recognition, measurement, and presentation of crypto assets in the balance sheet, in the Statement of financial position or Financial Statements, and in **Profit and Loss Statement:**

Developed and provided the following documents in English, Bulgarian, Ukrainian, Russian:

C. Developed and provided of Legal opinions, legal clarifications, legal treatments:

- C.1. Legal opinions and legal clarifications regarding the legal status (nature) of the crypto asset and the digital asset ecosystem (d.a.e.);
- C.2. Legal opinions which to confirm or deny the classification of a token as **securities**;
- C.3. Provision of legal opinions and audit assertions regarding the on what is in fact tantamount to practical control or practical and physical ownership over crypto assets;

Drafted of legal opinions regarding to crypto-assets as a category of property and the ability to be objects of ownership and objects of transfer of title;

C.4. Developed and Drafted of legal opinions regarding to particular crypto assets - security tokens and **Asset-based tokens:**

1 category of legal opinions which had been provided, pursuant to governing law of Malta, Singapore, UK, as well as pursuant to "DIGITAL ASSETS CONSULTATION PAPER" OF THE LAW COMMISSION UK FROM 28 JULY 2022:

- as a category of legal things or "thingness" or property;
- as the object of property rights;
- as a objects of property;
- as a objects which can ability of right to ownership;
- as objects of transfer of title ownership;

C.5. Provided legal documents, that confirms of the transfer of title ownership (C.T.T.O.) (right of ownership) on digital crypto assets;

- **C.6. Provided** legal support for the **documentation procedure** or developing legal documents that confirmation or provide legal evidence (as well as validation) (legal proof) regarding to:
 - title ownership of a cryptoasset;
 - transfer of title ownership (right of ownership) on a cryptoasset; within:
- "digital asset ecosystem";
- distribution ledger transactions (registry or ledger) d.l.t.





D. Provided legal support, advising and legal opinions pursuant Common Law or Case Law;

2 Category of legal opinions which had been provided pursuant to governing law of Malta, Singapore, UK:

D.1. Common Law or Case Law;

<u>Provided</u> legal advice as well as legal opinions pursuant judgments and precedents related to Web3 business, as well as transactions and activities involving crypto assets, in order to **extracting of <u>Legal Data and Elements</u>**, **from judgments**, **Precedents or Precedent Cases**, and which can be used by clients in their activities involving crypto assets as well as with the aim of Resolving of various conflict situations and disputes with opponents;

3th category of legal opinions which had been provided pursuant to governing law of Malta, Singapore, UK:

D.2. Common Law or Case Law;

Provided legal advice & support as well as development and drafting of legal opinions pursuant to Legal Data and Elements extracted from judgments and Precedent Cases, regarding to crypto assets:

- ♣ as a category of legal things or "thingness" or property;
- as a form of property;
- as the object of property rights;
- as a objects of property;
- ↓ as a objects, which can ability of title ownership (right of ownership);
- as objects of transfer of title ownership;

4th category of legal opinions which had been provided pursuant to governing law of Malta, Singapore, UK:

D.3. Common Law or Case Law;

<u>Provided</u> for clients' needs of the legal opinions, legal assessments, legal justifications, legal reasoning and precedential legal reasoning, regarding to:

- ★ the merits and circumstances of the situation;
- governing law or applicable law of Malta, Singapore, UK;
- **the factual background** or particular factual context;
- the salient facts and detailed facts which are relevant to understanding the arguments, -

which have been extracted from the was made judgments or precedents, regarding cases related to the Web3 business, as well as transactions and activities with crypto assets;

D.4. Common Law or Case Law;

<u>Provided</u> legal advice as well as develop and drafting of legal opinions regarding to <u>legal reasoning</u> extracting from judgments in order to provide legal solutions for the client, in his activities and Web3-business related to transactions with crypto assets;

here are a few judgments and precedents, concerning which, the legal opinions were provided:

- **1. Case «Lord Wilberforce in National Provincial Bank** v **Ainsworth**» [1965] 1 AC 1175 at 1247-8 where the characteristics of property were described;
- 2. Case Armstrong DLW GmbH v Winnington Networks Ltd [2012] EWHC 10, [2013] Ch 156 at [50], where specifically identifies property rights which might be described as intangible property, other than choses in action "documentary intangibles";
- **3. Case of Quoine Pte Ltd v B2C2 Ltd [2020]** SGCA (I) 02 (the Quoine Case) where the Singapore Court of Appeal applied existing laws on contract to cryptocurrencies.
- **4. Case of PP v Lange Vivian [2021] SGMC 11**, in which has been hearing regarding a prosecution against a person for providing a DPT service without the necessary licence under the PS Act;



5. Case of Janesh s/o Rajkumar v Unknown Person ("CHEFPIERRE") [2022] SGHC 264 The claimant in this case, Janesh Rajkumar (Rajkumar), had used the BAYC NFT as collateral for a loan on a

peer-to-peer lending platform known as NFTfi which functioned as a digital assets lending marketplace that permitted its users to use NFTs as collateral for their loans.

- 6. Case of Tulip Trading Limited v Van Der Laan & Others [2023] EWCA Civ (Appeal) in which The Court of Appeal recognised and founded for the first time, that developers of bitcoin networks might owe fiduciary duties to bitcoin owners;
- 7. Case of ByBit Fintech Ltd v Ho Kai Xin and others [2023] SGHC 199, in which, the Singapore High Court has confirmed that Singapore law had recognized crypto-assets as a form of property capable of being held on trust;

used:

www.elitigation.sg https://www.judiciary.uk/judgments caselaw.nationalarchives.gov.uk