

## Exhibit A

## Cornerstone Report - SEC Cryptocurrency Enforcement Actions

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
1. <i>SEC v. Shavers</i> , Case No. 4:13-CV-416 (E.D. Tex. Aug. 6, 2013)	Defendant operated a Ponzi scheme that defrauded investors out of more than 700,000 bitcoins. <a href="https://www.justsecurity.org/wp-content/uploads/2014/04/SEC.Complaint.SEC-v-Shavers.2013.pdf">https://www.justsecurity.org/wp-content/uploads/2014/04/SEC.Complaint.SEC-v-Shavers.2013.pdf</a>	Yes	No	Yes
2. <i>In the Matter of Eric T. Vorhees</i> , File No. 3-15902 (June 3, 2014)	Defendant offered unregistered securities in two entities, and received payment in bitcoins. <a href="https://www.sec.gov/litigation/admin/2014/33-9592.pdf">https://www.sec.gov/litigation/admin/2014/33-9592.pdf</a>	Yes	No	Yes
3. <i>In the Matter of BTC Trading, Corp. and Ethan Burnside</i> , File No. 3-16307 (Dec. 8, 2014)	Defendant failed to register two online venues that offered shares in unregistered securities in exchange for digital assets. <a href="https://www.sec.gov/litigation/admin/2014/33-9685.pdf">https://www.sec.gov/litigation/admin/2014/33-9685.pdf</a>	Yes	No	Yes
4. <i>In the Matter of Sand Hill Exchange</i> , File No. 3-16598 (June 17, 2015)	Defendant offered unregistered securities-based swaps that allowed customers to bet on the value of public companies in transactions denominated in digital assets. <a href="https://www.sec.gov/litigation/admin/2015/33-9809.pdf">https://www.sec.gov/litigation/admin/2015/33-9809.pdf</a>	No	No	Yes

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
5. <i>SEC v. Steve Chen, et al.</i> , Case No. CV 15-07425 (C.D. Cal. September 22, 2015)	Defendant operated a pyramid scheme that falsely promised investors they would profit from amber mines, and provided payment in a virtual currency secured by the company's nonexistent amber assets.  <a href="https://www.sec.gov/litigation/complaints/2015/comp-pr2015-227.pdf">https://www.sec.gov/litigation/complaints/2015/comp-pr2015-227.pdf</a>	Yes	No	Yes
6. <i>SEC v. Homero Joshua Garza</i> , Case No. 3:15-cv-01760 (D. Conn. Dec. 1, 2015)	Defendant operated a Ponzi scheme that offered shares in a cryptocurrency mining venture, and made false statements about the computer power that would be available for mining.  <a href="https://www.sec.gov/litigation/complaints/2015/comp23415.pdf">https://www.sec.gov/litigation/complaints/2015/comp23415.pdf</a>	Yes	No	Yes
7. <i>In The Matter of Bitcoin Investment Trust and Secondmarket</i> , File No. 3-17335 (July 11, 2016)	Defendant violated Rule 101 restricting distribution participants from purchasing securities that were subject to a distribution; the securities were in entities that invested in cryptocurrencies.  <a href="https://www.sec.gov/litigation/admin/2016/34-78282.pdf">https://www.sec.gov/litigation/admin/2016/34-78282.pdf</a>	No	No	Yes
8. <i>SEC v. Renwick Haddow, et al.</i> , Case No. 17-cv-4950 (S.D.N.Y. June 30, 2017)	Defendant made false claims to investors in "Bitcoin Store Inc.," which the defendant claimed provided cryptocurrency services but did not have any operations or revenue.  <a href="https://www.sec.gov/litigation/complaints/2017/comp-pr2017-123.pdf">https://www.sec.gov/litigation/complaints/2017/comp-pr2017-123.pdf</a>	No	No	Yes

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9. <i>SEC v. ReCoin and DRC World Inc.</i> , Case No. 17-cv-05725 (E.D.N.Y. Sep. 29, 2017)	Defendants defrauded investors in a pair of ICOs purportedly backed by investments in real estate and diamonds. <a href="https://www.sec.gov/litigation/litreleases/2018/lr24081.htm">https://www.sec.gov/litigation/litreleases/2018/lr24081.htm</a>	Yes	Yes	No
10. <i>SEC v. PlexCorps, et al.</i> , Case No. 17-cv-07007 (E.D.N.Y. Dec. 1, 2017)	Defendant attempted to defraud investors in an ICO by claiming investments would yield a 1,354 percent profit in less than a month. <a href="https://www.sec.gov/litigation/complaints/2018/comp24079.pdf">https://www.sec.gov/litigation/complaints/2018/comp24079.pdf</a>	Yes	Yes	No
11. <i>In the Matter of Munchee Inc.</i> , File No. 3-18304 (Dec. 11, 2017)	Defendant created an app for restaurant reviews, and sold digital tokens to raise capital that would support its restaurant review platform and claimed the tokens would increase in value. <a href="https://www.sec.gov/litigation/admin/2017/33-10445.pdf">https://www.sec.gov/litigation/admin/2017/33-10445.pdf</a>	Yes	Yes	No
12. <i>SEC v. AriseBank et al.</i> , Case No. 3:18-cv-00186-M (N.D. Tex. Dec. 11, 2018)	Defendants falsely claimed to have created an FDIC-insured bank for cryptocurrency transactions, and funded their efforts with a fraudulent ICO. <a href="https://www.sec.gov/litigation/complaints/2018/finaljudgment-pr2018-280.pdf">https://www.sec.gov/litigation/complaints/2018/finaljudgment-pr2018-280.pdf</a>	Yes	Yes	No

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
13. <i>SEC v. Jon E. Montroll and Bitfunder</i> , Case No. 18-cv-1582 (S.D.N.Y. Feb. 21, 2018)	Defendants operated an unregistered online securities exchange and defrauded exchange users by misappropriating their bitcoins and failing to disclose a cyberattack on the exchange's system that resulted in the theft of more than 6,000 bitcoins.  <a href="https://www.sec.gov/litigation/complaints/2018/comp24078.pdf">https://www.sec.gov/litigation/complaints/2018/comp24078.pdf</a>	No	No	Yes
14. <i>SEC v. Sohrab Sharma, et al.</i> Case No. 18-cv-02909 (S.D.N.Y. Apr. 2, 2018)	Defendants orchestrated a fraudulent ICO that falsely claimed to offer a cryptocurrency debit card backed by Visa and Mastercard.  <a href="https://www.sec.gov/litigation/litreleases/2018/lr24090.htm">https://www.sec.gov/litigation/litreleases/2018/lr24090.htm</a>	Yes	Yes	No
15. <i>SEC v. Longfin Corp. et al.</i> , Case No. 18-cv-2977 (S.D.N.Y. April 4, 2018)	Defendants conducted unregistered distributions of Longfin Corp. securities, which had also been inflated by purchase of a purported cryptocurrency company.  <a href="https://www.sec.gov/litigation/complaints/2019/comp-pr2019-90-1.pdf">https://www.sec.gov/litigation/complaints/2019/comp-pr2019-90-1.pdf</a>	No	No	Yes
16. <i>SEC v. Titanium Blockchain Infrastructure Services, Inc., et al.</i> , Case No. 2:18-CV-04315-DSF (JPRx) (C.D. Cal. May 22, 2018)	Defendants orchestrated a fraudulent ICO that solicited investors by comparing purchase of the tokens to an investment in "Intel or Google," and falsely claimed relationships with the Federal Reserve and dozens of well-known firms as partners.  <a href="https://www.sec.gov/litigation/litreleases/2018/lr24160.htm">https://www.sec.gov/litigation/litreleases/2018/lr24160.htm</a>	Yes	Yes	No

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17. <i>SEC v. T.J. Jesky, Esq. and Mark F. DeStefano</i> , Case No. 18-CV-05980 (S.D.N.Y. Filed July 2, 2018)	Defendants unlawfully sold restricted shares of a blockchain-related business during an unusual price spike. <a href="https://www.sec.gov/litigation/litreleases/2018/lr24190.htm">https://www.sec.gov/litigation/litreleases/2018/lr24190.htm</a>	Yes	No	Yes
18. <i>In the Matter of Tomahawk Exploration</i> , File No. 3-18641 (Aug. 14, 2018)	Defendants conducted a fraudulent ICO to fund purported oil drilling, and distributed tokens in exchange for online promotional activity. <a href="https://www.sec.gov/news/press-release/2018-152">https://www.sec.gov/news/press-release/2018-152</a>	Yes	Yes	No
19. <i>SEC v. James Bernard Moore et al</i> , Case No. 18-cv-07803 (S.D.N.Y. Aug. 27, 2018)	Defendant, a co-conspirator of Ponzi scheme perpetrator Renwick Haddow, aided and abetted fraud. This case does not directly involve cryptocurrency at all, although co-conspirator Haddow's schemes involved a fraudulent cryptocurrency business. <a href="https://www.morrisoncohen.com/siteFiles/files/2018_08_27%20-%20SEC%20v_%20Moore,%20et%20al.pdf">https://www.morrisoncohen.com/siteFiles/files/2018_08_27%20-%20SEC%20v_%20Moore,%20et%20al.pdf</a>	No	No	Yes
20. <i>In The Matter of Crypto Asset Management, et al</i> , File No. 3-18740 (Sept. 11, 2018)	Defendant operated an unregistered investment company that falsely marketed itself as the "first regulated crypto asset fund in the United States." <a href="https://www.sec.gov/news/press-release/2018-186">https://www.sec.gov/news/press-release/2018-186</a>	Yes	No	Yes

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
21. <i>In The Matter of TokenLot LLC, et al</i> , File No. 3-18739 (Sept. 11, 2018)	Defendant acted as unregistered broker-dealer by operating a self-described “ICO Superstore” and promoting digital tokens on behalf of issuers. <a href="https://www.sec.gov/news/press-release/2018-185">https://www.sec.gov/news/press-release/2018-185</a>	Yes	No	Yes
22. <i>SEC v. IPool Ltd. et al.</i> , Case No. 18-cv-02244 (D.D.C. Sept. 27, 2018)	Defendants unlawfully offered and sold unregistered swap contracts to investors, which allowed investors to buy swaps tracking the value of stocks, commodities, foreign-exchange pairs, and cryptocurrencies. <a href="https://www.sec.gov/litigation/complaints/2018/comp24330.pdf">https://www.sec.gov/litigation/complaints/2018/comp24330.pdf</a>	No	No	Yes
23. <i>SEC v. Blockvest</i> , Case No. 18-CV-2287-GPB (MSB) (S.D. Cal. Oct. 3, 2018)	Defendants planned to raise funds through an ICO for several financial products that would generate passive income and double-digit returns based on misrepresentations about the firm's regulatory status. <a href="https://www.sec.gov/litigation/litreleases/2019/lr24400.htm">https://www.sec.gov/litigation/litreleases/2019/lr24400.htm</a>	Yes	Yes	No
24. <i>In The Matter of Zachary Coburn</i> , File No. 3-18888 (Nov. 8, 2018)	Defendant operated an unregistered securities exchange using the Ethereum blockchain. <a href="https://www.sec.gov/news/press-release/2018-258">https://www.sec.gov/news/press-release/2018-258</a>	No	No	Yes

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25. <i>In The Matter of CarrierEQ (AirFox)</i> , File No. 3-18898 (Nov. 16, 2018)	Defendant offered an ICO to fund a prepaid mobile phone business, and made statements that the tokens would increase in value as a result of the defendant's efforts. <a href="https://www.sec.gov/litigation/admin/2018/33-10575.pdf">https://www.sec.gov/litigation/admin/2018/33-10575.pdf</a>	Yes	Yes	No
26. <i>In The Matter of Paragon Coin</i> , File No. 3-18897 (Nov. 16, 2018)	Defendant offered an ICO to fund blockchain technology and legalization advocacy in the cannabis industry. <a href="https://www.sec.gov/divisions/enforce/claims/paragon-coin.htm">https://www.sec.gov/divisions/enforce/claims/paragon-coin.htm</a>	Yes	Yes	No
27. <i>In The Matter of Floyd Mayweather Jr.</i> , File No. 3-18906 (Nov. 29, 2018)	Defendant used celebrity status to promote an ICO and tokens (Centra Tech) without disclosing personal compensation. <a href="https://www.sec.gov/news/press-release/2018-268">https://www.sec.gov/news/press-release/2018-268</a>	No	No	Yes
28. <i>In The Matter of Khaled</i> , File No. 3-18907 (Nov. 29, 2018)	Defendant used celebrity status to promote an ICO and tokens (Centra Tech) without disclosing personal compensation. <a href="https://www.sec.gov/news/press-release/2018-268">https://www.sec.gov/news/press-release/2018-268</a>	No	No	Yes
29. <i>In The Matter of CoinAlpha Advisors</i> , File No. 3-18913 (Dec. 7, 2018)	Defendant failed to file register securities offering for entity formed to invest in digital assets. <a href="https://www.sec.gov/litigation/admin/2018/33-10582.pdf">https://www.sec.gov/litigation/admin/2018/33-10582.pdf</a>	Yes	No	Yes

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30. <i>In The Matter of Gladius Network</i> , File No. 3-19004 (Feb. 20, 2019)	Defendant conducted an ICO to finance a cybersecurity business. <a href="https://www.sec.gov/news/press-release/2019-15">https://www.sec.gov/news/press-release/2019-15</a>	Yes	Yes	No
31. <i>SEC v. Natural Diamonds Investment Co, et al</i> , Case No. 9:19-cv-80633-RLR (S. D. Fla. May 13, 2019)	Defendants operated a \$30 million Ponzi scheme promising investments backed by diamonds and cryptocurrency. <a href="https://www.sec.gov/litigation/litreleases/2019/lr24473.htm">https://www.sec.gov/litigation/litreleases/2019/lr24473.htm</a>	Yes	Yes	No
32. <i>In The Matter of NextBlock Global</i> , File No. 3-19164 (May 14, 2019)	Defendant made false statements in connection with fundraising for a blockchain company. <a href="https://www.sec.gov/litigation/admin/2019/33-10638.pdf">https://www.sec.gov/litigation/admin/2019/33-10638.pdf</a>	No	No	Yes
33. <i>SEC v. Daniel Pacheco, et al.</i> , Case No. 5:19-CV-00958 (C.D. Cal. May 22, 2019)	Defendant operated a pyramid scheme where participants could opt to receive rewards in the form of cryptocurrency tokens. <a href="https://www.sec.gov/litigation/litreleases/2019/lr24478.htm">https://www.sec.gov/litigation/litreleases/2019/lr24478.htm</a>	Yes	No	Yes
34. <i>SEC v. Savraj Gata-Aura et al.</i> , Case No. 19-cv-04780 (S.D.N.Y. May 23, 2019)	Defendant, a co-conspirator of Ponzi scheme perpetrator Renwick Haddow, aided and abetted fraud. This case does not directly involve cryptocurrency; co-conspirator Haddow's schemes involved a fraudulent cryptocurrency business. <a href="https://www.sec.gov/litigation/complaints/2019/comp24479.pdf">https://www.sec.gov/litigation/complaints/2019/comp24479.pdf</a>	No	No	Yes



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35. <i>SEC v. Kik</i> , Case No. 19-cv-05244 (S.D.N.Y. June 4, 2019)	Defendant offered and sold digital tokens and Simple Agreements for Future Tokens (“SAFTs”) through an unregistered ICO.  <a href="https://www.sec.gov/news/press-release/2020-262">https://www.sec.gov/news/press-release/2020-262</a>	Yes	Yes	No
36. <i>SEC v. Longfin Corp., et al.</i> , Case No. 19-cv-05296 (S.D.N.Y. June 5, 2019)	Defendants engaged in fraudulent public offering in a scheme to obtain a listing on the Nasdaq Stock Market, LLC (“NASDAQ”). After misrepresenting its status as a company based in the United States to use SEC Regulation A to proceed with an offering, defendants distributed over 400,000 shares to insiders and affiliates of the company to create the false appearance of a public float of bona fide investors to satisfy the NASDAQ listing requirements.  <a href="https://www.sec.gov/divisions/enforce/claims/docs/complaint-longfin-060519.pdf">https://www.sec.gov/divisions/enforce/claims/docs/complaint-longfin-060519.pdf</a>	No	No	Yes
37. <i>In the Matter of SimplyVital Health, Inc.</i> , File No. 3-19332 (Aug. 12, 2019)	Defendant offered and sold unregistered digital tokens and SAFTs through ICO pools.  <a href="https://www.sec.gov/litigation/admin/2019/33-10671.pdf">https://www.sec.gov/litigation/admin/2019/33-10671.pdf</a>	Yes	Yes	No
38. <i>SEC v. Regional Middleton</i> , Case No. 19-cv-4625 (E.D.N.Y. Aug. 12, 2019)	Defendants defrauded investors in ICO offering of virtual currency by making misrepresentations about the potential profitability and viability of the company’s operations, as well as its use and amount of funds, and by manipulating the price and volume of the virtual currency on secondary markets.  <a href="https://www.sec.gov/litigation/litreleases/2019/lr24665.htm">https://www.sec.gov/litigation/litreleases/2019/lr24665.htm</a>	Yes	Yes	No

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39. <i>In the Matter of ICO Rating</i> , File No. 3-19366 (Aug. 20, 2019)	Defendant violated Section 17(b) of the Securities Act by assigning ratings to various ICOs without disclosing that it charged fees of the ICOs to provide such ratings.  <a href="https://www.sec.gov/litigation/admin/2019/33-10673.pdf">https://www.sec.gov/litigation/admin/2019/33-10673.pdf</a>	No	No	Yes
40. <i>SEC v. Bitqyck, Inc., et al.</i> , Case No. 19-cv-2059 (N.D. TX. Aug. 29, 2019)	Defendant defrauded investors by offering digital tokens it falsely claimed provided fractional shares of the company's stock or an interest in a cryptocurrency mining facility that did not exist. Defendants also illegally operated an unregistered exchange that offered one of its digital tokens.  <a href="https://www.sec.gov/litigation/litreleases/2019/lr24582.htm">https://www.sec.gov/litigation/litreleases/2019/lr24582.htm</a>	Yes	Yes	No
41. <i>In the Matter of Blockchain Solutions, et al.</i> , File No. 3-19437 (Oct. 7, 2019)	Defendant failed to file periodic reports as required by Exchange Act Section 13(a) and Rules 13a-1 and 13a-13 thereunder.  <a href="https://www.sec.gov/litigation/admin/2019/34-87242.pdf">https://www.sec.gov/litigation/admin/2019/34-87242.pdf</a>	No	No	Yes
42. <i>SEC v. ICOBox, et al.</i> , Case No. 19-cv-08066 (C.D. Cal. Sept. 18, 2019)	Defendant offered and sold its digital tokens through an unregistered ICO and engaged in unregistered broker activities by facilitating ICOs for dozens of clients.  <a href="https://www.sec.gov/litigation/litreleases/2020/lr24763.htm">https://www.sec.gov/litigation/litreleases/2020/lr24763.htm</a>	Yes	Yes	No

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43. <i>SEC v. Jonathan Lucas</i> , Case No. 24607 (S.D.N.Y. Sept. 20, 2019)	Defendant defrauded investors in an unregistered ICO of digital tokens he falsely claimed would value through trading on a purported online adult entertainment marketplace that did not exist. Defendant's misrepresentations included a false claim that a "working beta" of the site existed, a presentation of a fictitious management team, and false claims about his own experience.  <a href="https://www.sec.gov/litigation/litreleases/2019/lr24607.htm">https://www.sec.gov/litigation/litreleases/2019/lr24607.htm</a>	Yes	Yes	No
44. <i>In the Matter of Block.one</i> , File No. 3-19568 (Sept. 30, 2019)	Defendant offered and sold unregistered digital tokens through an ICO.  <a href="https://www.sec.gov/litigation/admin/2019/33-10714.pdf">https://www.sec.gov/litigation/admin/2019/33-10714.pdf</a>	Yes	Yes	No
45. <i>In the Matter of Nebulus, Inc.</i> , File No. 3-19569 (Sept. 30, 2019)	Defendant engaged in unregistered offering and sale of securities.  <a href="https://www.sec.gov/litigation/admin/2019/33-10715.pdf">https://www.sec.gov/litigation/admin/2019/33-10715.pdf</a>	Yes	No	Yes
46. <i>SEC v. Telegram</i> , Case No. 19-cv-9439 (Oct. 11, 2019)	Defendant offered and sold unregistered digital tokens and Simple Agreements for Future Tokens ("SAFTs") through an ICO.  <a href="https://www.sec.gov/litigation/complaints/2019/comp-pr2019-212.pdf">https://www.sec.gov/litigation/complaints/2019/comp-pr2019-212.pdf</a>	Yes	Yes	No

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
47. <i>In the Matter of XBT Corp. Sarl d/b/a First Global Credit</i> , File No. 3-19592 (Oct. 31, 2019)	Defendant that advertised itself as “the world’s first professional investment service that bridges the gap between cryptocurrencies and global stock markets” offered and sold security-based swaps online without registering the securities or registering as an exchange.  <a href="https://www.sec.gov/litigation/admin/2019/33-10723.pdf">https://www.sec.gov/litigation/admin/2019/33-10723.pdf</a>	Yes	No	Yes
48. <i>SEC v. Eran Eyal, et al.</i> , Case No. 19-cv-11325 (S.D.N.Y. Dec. 11, 2019)	Defendants fraudulently raised \$42.5 million worth of virtual currency through an unregistered ICO of digital tokens based on a series of false and misleading statements to potential and actual investors, including misrepresentations about the purported successful pilots of the token’s application.  <a href="https://www.sec.gov/litigation/litreleases/2020/lr24842.htm">https://www.sec.gov/litigation/litreleases/2020/lr24842.htm</a>	Yes	Yes	No
49. <i>In the Matter of Blockchain of Things</i> , File No. 3-19621 (Dec. 18, 2019)	Defendant offered and sold unregistered digital tokens through an ICO.  <a href="https://www.sec.gov/litigation/admin/2019/33-10736.pdf">https://www.sec.gov/litigation/admin/2019/33-10736.pdf</a>	Yes	Yes	No
50. <i>SEC v. Donald Blackstad, et al.</i> , Case No. 20-cv-163 (Jan. 8, 2020)	Defendant raised approximately \$3.544 million through the fraudulent offer and sale of securities in three companies he owned and controlled, including a purported cryptocurrency mining operation. Defendant made materially false and misleading statements to induce investment and misappropriated	No	No	Yes

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	<p>the funds raised through the fraudulent offering and sale of these securities.</p> <p><a href="https://www.sec.gov/litigation/litreleases/2020/lr24711.htm">https://www.sec.gov/litigation/litreleases/2020/lr24711.htm</a></p>			
51. <i>SEC v. Boaz Manor</i> , Case No. 20-cv-00597 (D.N.J. Jan. 17, 2020)	<p>Defendant charged with conducting fraudulent ICO of digital token using a false identity.</p> <p><a href="https://www.sec.gov/news/press-release/2020-12">https://www.sec.gov/news/press-release/2020-12</a></p>	Yes	Yes	No
52. <i>SEC v. Grybniak, et al.</i> , 20-cv-327 (E.D.N.Y. Jan. 21, 2020)	<p>Defendants charged with fraudulently claiming ICO of unregistered digital tokens was “SEC regulated,” “SEC compliant,” and “SEC registered,” among other deceptive acts.</p> <p><a href="https://www.sec.gov/litigation/litreleases/2020/lr24723.htm">https://www.sec.gov/litigation/litreleases/2020/lr24723.htm</a></p>	Yes	Yes	No
53. <i>SEC v. Ackerman</i> , Case No. 20-cv-1181 (S.D.N.Y. Feb. 11, 2020)	<p>Defendant charged with defrauding investors by making material false and misleading claims about returns they could expect by investing in his business he claimed used a proprietary algorithm to trade cryptocurrencies.</p> <p><a href="https://www.sec.gov/litigation/litreleases/2020/lr24737.htm">https://www.sec.gov/litigation/litreleases/2020/lr24737.htm</a></p>	No	No	Yes

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54. <i>In the Matter of Enigma MPC</i> , File No. 3-19702 (Feb. 19, 2020)	Defendant offered and sold unregistered digital tokens through an ICO. <a href="https://www.sec.gov/litigation/admin/2020/33-10755.pdf">https://www.sec.gov/litigation/admin/2020/33-10755.pdf</a>	Yes	Yes	No
55. <i>In the Matter of Steven Seagal</i> , File No. 3-19712 (Feb. 27, 2020)	Defendant promoted an ICO without disclosing consideration offered in exchange for promotion, in violation of Section 17(b) of the Securities Act. <a href="https://www.sec.gov/news/press-release/2020-42">https://www.sec.gov/news/press-release/2020-42</a>	No	No	Yes
56. <i>SEC v. Meta 1 Coin Trust, et al.</i> , Case No. 20-cv-273 (W.D. Tex. Mar. 16, 2020)	Defendants offered and sold an unregistered digital token through an ICO. Defendants falsely claimed the digital token was backed by a \$1 billion art collection or \$2 billion of gold, and that an accounting firm was auditing the gold assets. The defendants also made material misrepresentations about the risk and return on the digital token, never distributed the actual token, and used the investor funds for personal expenses. <a href="https://www.sec.gov/litigation/litreleases/2020/lr24775.htm">https://www.sec.gov/litigation/litreleases/2020/lr24775.htm</a>	Yes	Yes	No
57. <i>SEC v. Teshuater LLC, et al.</i> , Case No. 20-cv-01187 (S.D. Tex. Apr. 2, 2020)	Defendants charged with three separate fraudulent and unregistered offerings and sales of securities, including the offer and sale of a digital token defendants falsely claimed was backed by bottled alkaline water. <a href="https://www.sec.gov/litigation/litreleases/2020/lr24787.htm">https://www.sec.gov/litigation/litreleases/2020/lr24787.htm</a>	Yes	Yes	No

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58. <i>SEC v. Dropil, Inc., et al.</i> , Case No. 20-cv-00793 (C.D. Cal. Apr. 23, 2020)	Defendants charged with offering and selling unregistered digital tokens through a fraudulent ICO. Defendant diverted investor funds to other projects and personal bank accounts then manufactured fake profitability reports and misrepresented the volume and dollar amount of digital tokens sold during and after the ICO, ultimately claiming it had raised \$54 million from 34,000 investors when it had raised less than \$1.9 million from fewer than 2,500 investors. <a href="https://www.sec.gov/litigation/litreleases/2020/lr24804.htm">https://www.sec.gov/litigation/litreleases/2020/lr24804.htm</a>	Yes	Yes	No
59. <i>SEC v. Putnam, et al.</i> , Case No. 20-cv-0030, (D. Utah May 7, 2020)	Defendant fraudulently offered and sold securities relating to digital assets, including purported shares of cryptocurrency mining machines and digital token trading packages. Defendants made a series of materially false and misleading representations to induce these investments. <a href="https://www.sec.gov/litigation/complaints/2020/comp24829.pdf">https://www.sec.gov/litigation/complaints/2020/comp24829.pdf</a>	Yes	No	Yes
60. <i>In the Matter of BitClave PTE Ltd.</i> , File No 3-19816 (May 28, 2020)	Defendants offered and sold an unregistered digital token through an ICO. <a href="https://www.sec.gov/litigation/admin/2020/33-10788.pdf">https://www.sec.gov/litigation/admin/2020/33-10788.pdf</a>	Yes	Yes	No

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
61. <i>SEC v. Hvizdzak Capital Mgmt., et al.</i> , Case No. 20-cv-00154 (W.D. Penn. June 16, 2020)	Defendants fraudulently raised and subsequently misappropriated millions of dollars from the sale of limited partnership interests in a fund they claimed would invest in digital assets.  <a href="https://www.sec.gov/litigation/complaints/2020/comp-pr2020-137.pdf">https://www.sec.gov/litigation/complaints/2020/comp-pr2020-137.pdf</a>	No	No	Yes
62. <i>SEC v. Abramoff</i> , Case No. 20-cv-04190 (N.D. Cal. June 25, 2020)	Defendant offered and sold unregistered digital tokens through an ICO and made materially false or misleading representations, including falsely claiming that the technology was complete when it was not and that they were on the verge of purchasing an advertising slot during the Super Bowl.  <a href="https://www.sec.gov/litigation/complaints/2020/comp-pr2020-145-abramoff.pdf">https://www.sec.gov/litigation/complaints/2020/comp-pr2020-145-abramoff.pdf</a>	Yes	Yes	No
63. <i>SEC v. NAC Foundation LLC, et al.</i> , Case No. 20-cv-04188 (N.D. Cal. June 25, 2020)	Stems from the same facts as <i>Abramoff</i> .  <a href="https://www.sec.gov/litigation/complaints/2020/comp-pr2020-145-nac-andrade.pdf">https://www.sec.gov/litigation/complaints/2020/comp-pr2020-145-nac-andrade.pdf</a>	Yes	Yes	No
64. <i>In the Matter of Plutus Financial Inc. d/b/a Abra, et al.</i> , File No. 3-19873 (July 13, 2020)	Defendants, a private company offering financial transactions through contracts memorialized on the Bitcoin blockchain, sold security-based swaps in violation of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.  <a href="https://www.sec.gov/litigation/admin/2020/33-10801.pdf">https://www.sec.gov/litigation/admin/2020/33-10801.pdf</a>	No	No	Yes



Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
65. <i>In the Matter of Kevin Boon, LLC, et al.</i> , File No. 3-19913 (Aug. 13, 2020)	Defendants offered and sold unregistered digital tokens through an ICO and made material misrepresentations about its platform's technological capabilities.  <a href="https://www.sec.gov/litigation/admin/2020/33-10817.pdf">https://www.sec.gov/litigation/admin/2020/33-10817.pdf</a>	Yes	Yes	No
66. <i>SEC v. Millan, et al.</i> , Case No. 20-cv-06575 (S.D.N.Y. Aug. 18, 2020)	Defendants acted as unregistered broker-dealers by promoting investment in an MLM scheme, taking investment orders and receiving investor cash.  <a href="https://www.sec.gov/litigation/litreleases/2020/lr24870.htm">https://www.sec.gov/litigation/litreleases/2020/lr24870.htm</a>	No	No	Yes
67. <i>SEC v. Jali, et al.</i> , Case No. 20-cv-02491 (D.Md August 28, 2020)	Defendants operated a Ponzi scheme promising investors high rates of returns based on purported expertise in investing in foreign currency exchanges and cryptocurrencies. Defendants fraudulently raised \$27 million from approximately 1,200 investors.  <a href="https://www.sec.gov/litigation/complaints/2020/comp-pr2020-198.pdf">https://www.sec.gov/litigation/complaints/2020/comp-pr2020-198.pdf</a>	No	No	Yes
68. <i>SEC v. FLiK, et al.</i> , Case No. 20-cv-03739 (N.D. Ga. Sept. 10, 2020)	Defendants offered and sold unregistered digital tokens through ICOs and made materially false or misleading representations during the course of these offerings.  <a href="https://www.sec.gov/litigation/complaints/2020/comp-pr2020-207.pdf">https://www.sec.gov/litigation/complaints/2020/comp-pr2020-207.pdf</a>	Yes	Yes	No

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
69. <i>In the Matter of Clifford Harris, Jr.</i> , File No. 3-19990 (Sept. 11, 2020)	Arising from the same set of facts as <i>FLiK</i> , defendant offered and sold digital tokens through an ICO. <a href="https://www.sec.gov/litigation/admin/2020/33-10836.pdf">https://www.sec.gov/litigation/admin/2020/33-10836.pdf</a>	Yes	Yes	No
70. <i>In the Matter of Unikrn, Inc.</i> , File No. 3-20003 (Sept. 15, 2020)	Defendant offered and sold unregistered digital tokens through an ICO. <a href="https://www.sec.gov/litigation/admin/2020/33-10841.pdf">https://www.sec.gov/litigation/admin/2020/33-10841.pdf</a>	Yes	Yes	No
71. <i>In the Matter of Salt Blockchain Inc.</i> , File No. 3-20106 (Sept. 30, 2020)	Defendant offered and sold unregistered digital tokens through an ICO. <a href="https://www.sec.gov/litigation/admin/2020/33-10865.pdf">https://www.sec.gov/litigation/admin/2020/33-10865.pdf</a>	Yes	Yes	No
72. <i>SEC v. John McAfee, et al.</i> , Case No. 20-cv-08281 (S.D.N.Y. Oct. 5, 2020)	Defendant promoted an ICO without disclosing consideration offered in exchange for promotion, in violation of Section 17(b) of the Securities Act. <a href="https://www.sec.gov/litigation/complaints/2020/comp-pr2020-246.pdf">https://www.sec.gov/litigation/complaints/2020/comp-pr2020-246.pdf</a>	No	No	Yes
73. <i>SEC v. Ripple Labs Inc., Bradley Garlinghouse, and Christian A. Larsen</i> , Case No. 1:20-cv-10832-AT-SN (S.D.N.Y. Dec. 22, 2020)	Alleging that Ripple's distributions of XRP constitute investment contracts and thus securities subject to registration under Section 5 of the Securities Act.	Yes	Yes	Yes

Case	Allegations	Alleged Unregistered Sale of Securities?	Based on Sale of Digital Assets?	Outside the ICO Context?
74. <i>SEC v. Stefan Qin et al.</i> , Case No. 20-cv-10849 (S.D.N.Y. Dec. 22, 2020)	Defendant made false claims to raise capital for two hedge funds, which he claimed were involved in algorithmic trading of cryptocurrencies. <a href="https://www.sec.gov/news/press-release/2020-341">https://www.sec.gov/news/press-release/2020-341</a>	No	No	Yes
75. <i>In the Matter of Tieron, Inc.</i> , File No. 3-20188 (Dec. 23, 2020)	Defendant offered and sold unregistered digital tokens through an ICO. <a href="https://www.sec.gov/litigation/admin/2020/33-10914.pdf">https://www.sec.gov/litigation/admin/2020/33-10914.pdf</a>	Yes	Yes	No