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Singapore
CrossAngle Pte. Ltd.

Disclosure Level **A**

Xangle disclosure level policy

A+ 57 or more

A 50 ~ 56

B 42 ~ 49

C 41 or less

(Out of total 63 questionnaires)

EN

Due Diligence Report



FLETA Pte.Ltd.

Singapore

(Country or jurisdiction of incorporation)

201902947G

(Entity Registration Number)

Singapore

(Address, including zip code, including area code, of principal executive offices)

Company Representative (Report Data Submitter)

Name	Position	Office Phone Number	Telegram ID
Paul Seungho Park	CEO	+82-(0)2-3288-9900	@fletapaul

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WHERE YOU CAN FIND MORE INFORMATION

Readers and others should note that the company announces material information to the public using the company website, press releases, public conference calls, and webcasts. They may also use the following social media channels as a means of disclosing information about the company, products, planned financial and other announcements and attendance at upcoming investor and industry conferences, and other matters.

Channels	Address
Company Website	https://fleta.io/
Main communication channel	
Twitter	https://twitter.com/fletachain
Company Blog	https://medium.com/fleta-first-chain
Facebook	
Linkedin	https://www.linkedin.com/company/fleta/
Github	https://github.com/fletaio
Reddit	https://www.reddit.com/r/fletachain
Telegram	https://t.me/FLETAofficialGroup
WeChat	
KaKaoTalk	https://open.kakao.com/o/gDDjvgN
Custom Link	YouTube - https://www.youtube.com/channel/UC9HFP_upl0jPuK7UWSWZsAg Naver Post - https://m.post.naver.com/my.nhn?memberNo=46139699

The information posted through these social media channels may be deemed valid. Accordingly, the public should monitor these accounts and the blog, in addition to following company press releases, conference calls, and webcasts. This list may be updated from time to time and these channels may be updated without notice.

PART I. Corporate Profile

ITEM 1. Basic Corporate Profile

Official Company Name	FLETA Pte.Ltd.
Establishment Date	01 Jul 2018
Jurisdiction of Incorporation	Singapore
Principal Office Location	Singapore
Address of Official Company Registration	16, COLLYER QUAY, #17, INCOME AT RAFFLES, SINGAPORE 049318
Company Name for Website Display	FLETA
Description of Company	FLETA is a blockchain platform that aims to offer infrastructure that can be applied to real-world business models.
Company Website	https://fleta.io/
Whitepaper Link	https://fleta.io/download/190604_Buisness_Whitepaper_EN_web.pdf
Mission and Vision	FLETA aims to solve problems that existing platforms have such as slow speeds, scalability limitation, and excessive fees and provide a flexible development environment. By doing so, FLETA is aiming to drive the commercialization of blockchain technology.

ITEM 2. Team

2.1 Executives & Founders

The following sets forth certain information regarding the company's executive officers and founders, their details and positions as of 2019-11-25

Paul Seungho Park

Position Title	CEO
Short Bio	Paul Seungho Park is a serial entrepreneur and technology strategist with in-depth experiences in IT.
Experience	
Education	
Company e-mail	
Social	 @fletaceo

Henry Jongho Hong

Position Title	CEO
Short Bio	Henry Hong is a finance and tax management expert as well as a cryptocurrency investor.
Experience	
Education	
Company e-mail	jongho@firstchain.co
Social	 @henry-jongho-hong-007

Parker Park

Position Title	CTO
Short Bio	Parker Park is a Korean independent game developer famous for indie games including Donquixote Online and Nekopocha.
Experience	
Education	
Company e-mail	horus@firstchain.co

Social

[in](#) @fletaparker

Jason Joonsoo Kim

Position Title Head of Business Support

Short Bio Jason Kim is a sales expert and an early cryptocurrency investor.

Experience

Education

Company e-mail joonsoo@firstchain.co

Social [in](#) @joonsoo-kim-1b065b158

Peter Manjae Park

Position Title Head of Finance

Short Bio Peter J is a financial specialist with expertise in the fintech sector. Through his previous work experience, he became interested in blockchain and cryptocurrency businesses.

Experience

Education

Company e-mail manjae@firstchain.co

Social [in](#) @peter-j-b8b0a9166

Scott Sol Park

Position Title Certified Tax Accountant

Short Bio As a tax specialist, Scott Park worked in as a tax accountant in Samdo Tax Consulting Firm, which is one of the leading tax firms in Korea.

Experience

Education

Company e-mail cta1123@firstchain.co

Social [in](#) @scott-park-189745164

Gerrard Hyungchul Kim

Position Title CBO

Short Bio Gerrard Kim is a finance and tax management expert and is currently in charge of business planning at FLETA.

Experience

Education

Company e-mail hangfe2@firstchain.co

Social [in](#) @https://www.linkedin.com/in/gerrard-hyung-chul-kim-0604a1169

2.2 Engineering Team Leaders

The following sets forth certain information regarding the company's development and engineering leaders, their details and positions as of 2019-11-25

Sam Jeong

Position Title Director of Technology Development

Short Bio Sam Jeong is a Full Stack Developer and a member of Mensa International. In his late teens, he began computer programming and became interested in how blockchain and the IT industry could change society. He has experience in many IT startups as a programmer working with Android, iOS, Web Framework, MSTR Customizing, and Data Visualization. During this time, because of the explosion in popularity of cryptocurrency, he decided to begin blockchain development. Currently he is the core of the development of the blockchain project FLETA, which will be the most efficient and flexible platform on which DApp developers will be able to develop. Sam graduated from Chung-Ang University with a bachelor's degree in computer engineering.

Experience

Education

Social

Parker Park

Position Title	CTO
Short Bio	Parker Park is a Korean independent game developer famous for indie games including Donquixote Online and Nekopocha. As he joined the FLETA as a new CTO on 9 July, he will lead all game planning and development projects and drive the development of use cases in the game industry.
Experience	
Education	
Social	

2.3 Advisory

The following sets forth certain information regarding the company's advisories, their details and positions as of 2019-11-25

Unenburen Ulziiburen

Company	Bitmonex
Role of Advisor	Support FLETA's business expansion in Mongolia; advise on a FLETA's exchange listing strategy

Sven Moeller

Company	Swisscom Blockchain
Role of Advisor	Support FLETA's business expansion through Swisscom Blockchain networks in various industry including governments and global enterprise

Akihisa Ishida

Company	Avex Technologies Inc.
Role of Advisor	Support FLETA's business expansion in Japan; introduce FLETA to his professional network for FLETA's technology adoptions

Daniel Eom

Company	Forestring
Role of Advisor	Advise on a FLETA's global business strategy and investor relations

Mickey Kim

Company	Google APAC
Role of Advisor	Advise on a FLETA's global business strategy; introduce FLETA to his professional network for FLETA's technology adoptions

Du Hee Lee

Company	LIKE LION
Role of Advisor	Advise on a FLETA's technology development; introduce FLETA to his professional network for FLETA's technology adoptions

2.4 Organization Structure

The following sets forth certain information regarding the structure of the company as of 2019-11-25

Name of Department/Group/Office/etc.	Number of Full-Time Staff	Number of Part-Time Staff	Head of Department (Maybe left blank)
Executives	5	0	
Marketing & Business Development	6	0	
Branding	3	0	
Finance & Accounting	3	0	
Development	6	0	
Total	23	0	

PART II. Business Information

ITEM 1. Industry Classification

Sector	Information Technology
Industry	IT/Blockchain Services
Category	Interoperability
Sub-category	1. Business Services & Consulting 2. Cryptocurrency 3. Enterprise & BaaS

ITEM 2. Industry Description

2.1 Industry Overview

Ethereum, which emerged in 2014, adopted turing-complete languages for smart contract, actualizing the various potentials of blockchain. Subsequently, blockchain app platform emerged, giving way to the idea of the blockchain ecosystem. The utilization of blockchain went beyond cryptocurrency and started to be utilized in various industries including finance and public organizations. Despite this fact, blockchain-based DApps are still hard to find. The reality is that the DApps, which actually provide services are in their initial stages.

2.2 Recent Trends

(1) Attack of the 51%

Global giants who are investing the most and the Big 3 Bitcoin Mining Pool comprises 60%, as the mining of cryptocurrency already became another field for corporations. In theory, the attack of 51% became feasible.

(2) ICO

For the first 8 months in 2018, a total of 18.7 billion dollars was made from ICOs, which is three times that of the same period from last year. In 2016, there were 43 ICO cases and that number surged to 770 in the first 8 months of 2018. By the end of 2018, there was over 20 times the growth compared to two years earlier.

2.3 Target Market Size

The transaction volume of \$3.2 billion

2.4 Target Customers

Dapps developers

2.5 Competitors

2.5.1 Existing Industry Competitors

The following sets forth certain information regarding the company's conventional competitors already established within the industry as of 2019-11-25:

No data available

2.5.2 Token Project Competitors

The following sets forth certain information regarding the company's competitors that have implemented Token economics as of 2019-11-25:

Ethereum

Token Symbol	ETH
Network Type	
Description	Ethereum is an open source, public, blockchain-based distributed computing platform and operating system featuring smart contract functionality.

TRON

Token Symbol	TRX
Network Type	
Description	TRON is a project dedicated to the establishment of a truly decentralized Internet and its infrastructure

EOSIO

Token Symbol	EOS
Network Type	
Description	OS.IO is a blockchain protocol powered by the native cryptocurrency EOS. The protocol emulates most of the attributes of a real computer including hardware with the computing resources distributed equally among EOS cryptocurrency holders.

ITEM 3. Project's Business Model

3.1 Business Description

3.1.1 Business Model

FLETA designed the mining node to be operated on the cloud network and charge the monthly maintenance fee of the mining node to miners.

3.1.2 Platform or Application Overview

General platform description

No Input

Functions of the solution

FLETA, as a blockchain platform, provides a service model to DApp developers to include FLETA's chain technology, token generation, and an environment for developing smart-contracts and developer portals.

Pain Points to solve

No Input

3.1.3 Product/Service Line Description

· Maximization of the function of blockchain technology

FLETA developed a new consensus model call PoF which allows block's dissemination range to be reduced, resulting in faster block generation and dissemination.

3.1.4 Competitive Advantage

FLETA developed a new consensus model called Proof-of-Formulation in which consensus is made on block mining procedure and blocks are generated in a designated order. This allows block's dissemination range to be reduced, resulting in faster block generation and dissemination.

3.1.5 Intellectual Property

No Input

3.2 Partnerships

▸ CertiK

Counterparty Website	https://certik.org/
Counterparty Description	CertiK is one of the premier blockchain and smart contract verification platforms in the world.
Applicable Dates	2019-04-17 ~
Does this partnership has an expiration date?	No
Revenue Generation	No
Expected Revenue (USD)	N/A
Partnership Description	
Expected Benefits to Project Team	
Expected Benefits to Counterparty	

▸ BitMonEx

Counterparty Website	https://www.bitmonex.mn/
Counterparty Description	Digital asset exchange platform
Applicable Dates	2019-02-11 ~
Does this partnership has an expiration date?	No
Revenue Generation	No
Expected Revenue (USD)	N/A
Partnership Description	The blockchain platform FLETA and the digital asset exchange platform BitMonEx signed a MOU on February 11th in the Mongolian capital of Ulaanbaatar.
Expected Benefits to Project Team	
Expected Benefits to Counterparty	

▸ C Block Capital

Counterparty Website	https://cblockcapital.com/
Counterparty Description	Blockchain investment and consultation company
Applicable Dates	2019-02-08 ~
Does this partnership has an expiration date?	No
Revenue Generation	No
Expected Revenue (USD)	N/A
Partnership Description	On February 8th, the blockchain platform FLETA and blockchain investment and consultation company C Block Capital signed an MOU and agreed to cooperate together in order to advance the industry.
Expected Benefits to Project Team	
Expected Benefits to Counterparty	

▸ Entersoft

Counterparty Website	https://entersoftsecurity.com/
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Counterparty Description	
Applicable Dates	2018-11-25 ~
Does this partnership has an expiration date?	No
Revenue Generation	No
Expected Revenue (USD)	N/A
Partnership Description	On November 25th, FLETA and Entersoft signed a MOU at the Beyond Blocks Summit in Bangkok. Through the agreement, the security of the FLETA platform is greatly enhanced, establishing a safe and optimal environment for blockchain developers.
Expected Benefits to Project Team	
Expected Benefits to Counterparty	

► CRYPTONINZA

Counterparty Website	https://cryptoninjagame.com/
Counterparty Description	Strategic game based on IOST blockchain
Applicable Dates	2018-08-27 ~
Does this partnership has an expiration date?	No
Revenue Generation	No
Expected Revenue (USD)	N/A
Partnership Description	CRYPTONINJA agreed to be part of FLETA's DApp ecosystem through which it can solve price issues that arise during the gaming process and activate flexible smart-contract.
Expected Benefits to Project Team	
Expected Benefits to Counterparty	

► Swisscom Blockchain

Counterparty Website	https://blockchain.swisscom.com/
Counterparty Description	Swisscom Blockchain is a blockchain-specialised technology company; the company is a subsidiary of Swisscom -- a Swiss state-owned telecommunication and ICT firm -- and led by experienced consultants and technology experts.
Applicable Dates	2019-02-15 ~
Does this partnership has an expiration date?	No
Revenue Generation	No
Expected Revenue (USD)	N/A
Partnership Description	Along with the FLETA mainnet launch in August, FLETA has geared up for presenting technology-based use case in health care & life science industry and game industry. By entering into the partnership with Swisscom Blockchain, FLETA can improve access to company and government clients of Swisscom Blockchain while developing FLETA's technology solutions accommodating the needs of clients in real-world business.
Expected Benefits to Project Team	
Expected Benefits to Counterparty	

► Oasis City

Counterparty Website	https://oasiscity.io/en/
Counterparty Description	Oasis City is a blockchain-based project that realizes a virtual city with full-body motion tracking technology.
Applicable Dates	2019-01-22 ~
Does this partnership has an expiration date?	No
Revenue Generation	No
Expected Revenue (USD)	N/A

Partnership Description

Both companies will cooperate in diverse aspects including sharing the networks and information for project development. They will focus on developing an innovative blockchain-based VR platform.

Expected Benefits to Project Team**Expected Benefits to Counterparty****► Ledger****Counterparty Website**

<https://www.ledger.com/>

Counterparty Description

Industry: Bitcoin, Blockchain, Cryptocurrency, Cyber Security, SaaS

Country of incorporation: Ledger is headquartered in Paris, has a production facility in Vierzon (France) and offices in San Francisco.

Number of employees: 101-250

Executive Info: Eric Larchevêque, Joel Pobeda, Nicolas Bacca, Pascal Gauthier

Description of main products or services: Ledger develops security and infrastructure solutions for cryptocurrencies as well as blockchain applications for individuals and companies, by leveraging a distinctive, proprietary technology.

Applicable Dates

2019-10-28 ~

Does this partnership has an expiration date?

No

Revenue Generation

No

Expected Revenue (USD)

N/A

Partnership Description

Detailed description of cooperation details: Co-marketing, Technical cooperation

Expected Benefits to Project Team

Enhancing security and credibility. Global marketing with co-marketing activities with Ledger

Expected Benefits to Counterparty

Providing service to not only FLETA but also to DApps in FLETA ecosystem. Marketing in Korea through co-marketing activities with FLETA

3.3 Project Progress

History

Founded by Seungho Park on July 2018, FLETA aims to provide a service platform like Google Android or Apple iOS in blockchain. FLETA launched its beta test on December 2018 and plans to officially launch FLETA protocol in 2019.

Project Status

Development Stage

Development of the platform and business operations have been or will be funded through the following sources

Initial token sale(Public and Private)

Sale of tokens from team's pre-mined or pre-allocated reserves post initial sale

Plan or Strategy to expand platform or token

FLETA will expand its business to clinical research and health care industry using its clinical data management system.

3.4 Milestones

Title	Target Date	Status	Description
Open Mainnet(Open Test)	2019-07-22	Completed	Beginning of mining

Title	Target Date	Status	Description
Open Testnet	2019-03-06	Completed	
Launch Alpha Testnet	2018-10-31	Completed	

3.5 Key Progress

(1) eCRF system

Applicable Dates	
Category	Business: Adoption and commercialization
Status	Ongoing
Name of main counter-party	
Involved companies or organizations	The Catholic University of Korea
Target Industry	Software
Type of Project	
Main Participant	
List of others involved	1. The Catholic University of Korea Company Website: https://www.catholic.ac.kr/
Description of blockchain application	FLETA will develop a blockchain-based ePRO system for clinical data management, featuring enhanced credibility and accuracy of the data.

3.6 Legal Concerns

No data available

PART III. Financial Information

ITEM 1. Equity Shareholders

The following sets forth company cap table of equity shareholders of the organization with more than 5% stake as of 2019-11-25
Number of Shares Outstanding:

Shareholder Name	Title or Relations with Company	Percentage of Total Outstanding Shares	Number of Shares
No data available			

ITEM 2. Equity Funding History

2.1 Equity Funding Rounds

Transaction Name	Announced Date	Number of Investors	Money Raised (In USD)	Lead Investors
No data available				

2.2 Extraordinary Relations with Company

The following sets forth companies and organizations with extra-ordinary relations with company as of 2019-11-25

Company Name	Country of Incorporation	Start Date	End Date	Relationship Details
No data available				

ITEM 3. Financial Disclosures

The following are simplified and condensed financial statements submitted by the company for disclosure last updated on 2019-11-25:

3.1 Simplified Income Statement

(USD)
Revenue
Cost of Goods Sold (COGS)
Gross Profit
Operating Expenses (SG&A)
Other Revenue & Expenses
Operating Income

3.2 Simplified Balance Sheet

(USD)
Fiat
Cash Equivalent

(USD)

Total Fiat & Cash

Digital Asset

Book Value of All Assets

3.3 Key Ratios

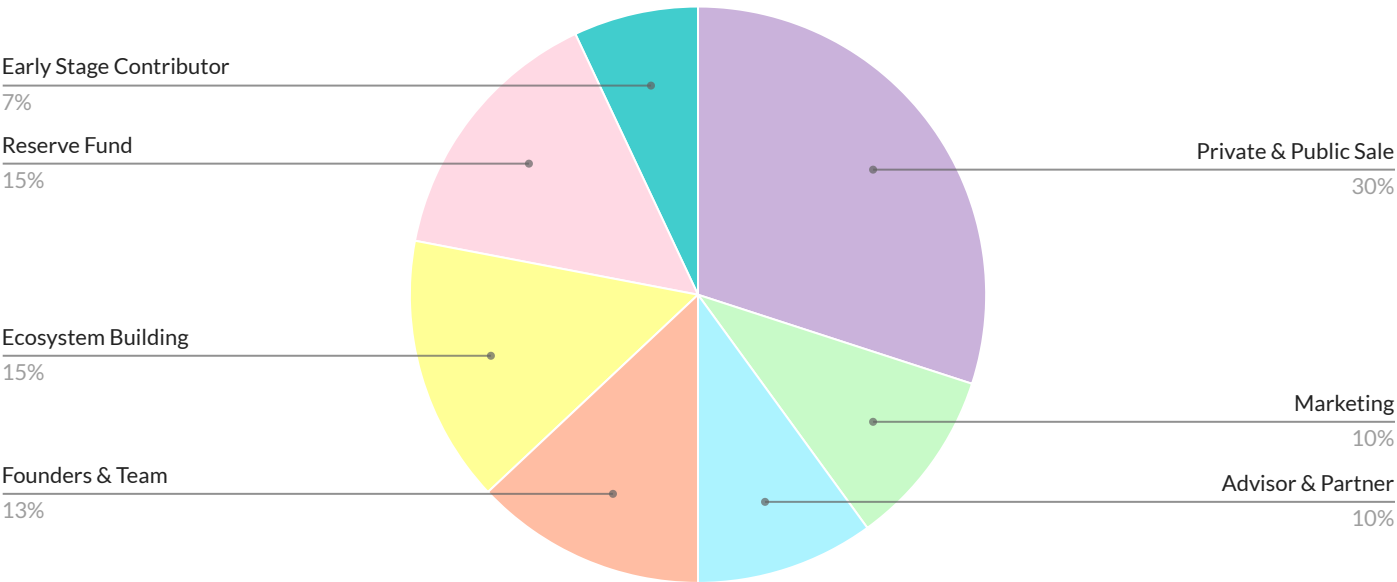
No data available

PART IV. Token Information

ITEM 1. Token Profile

Token Name	FLETA
Symbol	FLETA
Token Economy	
Token Usage	DApp tokens in FLETA are mined under certain token economy system of DApps depending on their own parameter value. Additionally, the mining reward and execution fee can be customized based on the preference of each DApp.
Short Token Description	Tokens independently mined and used in Dapps
Token Contract Address	0x7788d759f21f53533051a9ae657fa05a1e068fc6
Base Platform	Ethereum
Mainnet Explorer Url	
Network	No Input
Project Type	Utility Token
Tokens were initially available and currently obtainable in the following method(s)	1. Private offering 2. Payouts to compensate employees, reward users, fund projects, and other direct use from reserve funds 3. Mining 4. Public offering
Additional Token issuance or minting conditions, including implemented natural inflation.	Inflation of FLETA tokens may occur as the activated Formulators(mining nodes) generates new blocks(tokens) every year. The total number of generated tokens will not exceed 420,000,000(21% of the total amount issued tokens in the beginning of FLETA); the generated tokens would be used as rewards to holders of activated Formulators who have participated in the PoF process.
Trading practices after the Token Sale by Company	1. Company founders and promoters have purchased or sold Tokens after the Token Sale
Method of allocating tokens during Token Sale	First come, First served

Token allocation percentage based on Total Supply immediately after Token Generation Event



Token Holder Rights

- a) Receive payments or other consideration under the following circumstances
No Input
- b) Tokens give holders ownership or contractual interest or rights in the following circumstances

No Input

c) Token holders may vote on the following matters

No Input

d) Other information that may be relevant to the Tokens or their sale

No Input

ITEM 2. Token Sales

2.1 Token Sales details

Projected Total Supply	2,000,000,000
Genesis Supply	1
Initial Offering Status	No
Initial Offering Price (USD)	0.05
Initial Offering Price (ETH)	4884.9
Initial Offering Price (BTC)	0

Funding achieved in relation to the target hard cap (%)

Percentage of individual investors at initial offering

Terms and conditions for top backers

No Input

2.2 Initial Offering Rounds

No data available

*: Proposed calculation, but not necessarily mandatory, is based on USD equivalent of cryptocurrency received between the start and end date of the Token sale duration calculated by $((\text{High} + \text{Low}) / 2)$ of market price

ITEM 3. Token Supply History

The following is a manual record Token supply history as of 2019-11-25. Corresponding transactions hashes have not been provided within this report.

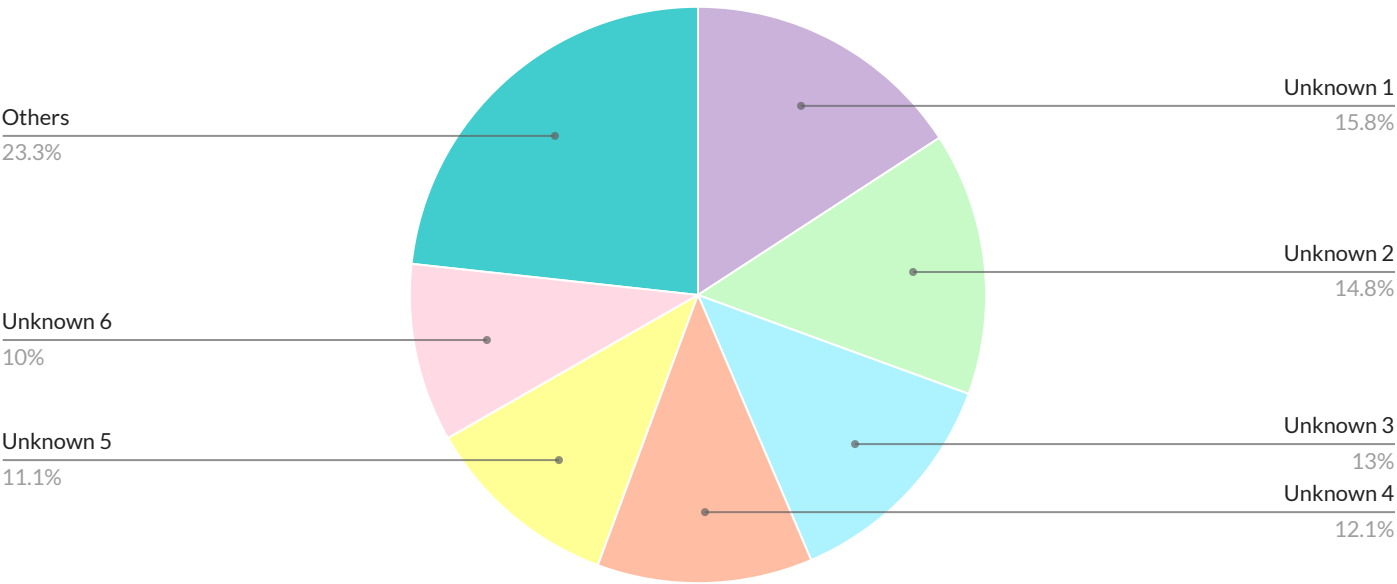
Purpose	Date	Amount	Value (USD)	Post Total Supply	Post Circulating Supply
Token distribution	2019-05-27	513,778,087	6,784,480	N/A	N/A
Token generation	2019-04-16	2,000,000,000	N/A	N/A	N/A

ITEM 4. Listed Exchanges

	Exchange	Pair	Price	Volume	Percentage
	GDAC	FLETA/KRW	\$0.012500	\$8,382	99.30%
	DigiFinex	FLETA/BTC	\$0.012000	\$41	0.50%
	DigiFinex	FLETA/ETH	\$0.006100	\$18	0.20%
	Bitsonic	FLETA/KRW	\$0.011400	-	0.00%

ITEM 5. Token Ownership

The following is an automatic query result of wallet addresses based on balance holdings with meta data application as of 2019-11-25.



Rank	Address	Balance	Percentage
1	0x58f3b0FB9e332eD6fD68b16B947531187d08BD31 (Unknown 1)	316,303,174	15.82%
2	0x55c5DF9a656a825e47DB4Bf8276635Fa22a07dA7 (Unknown 2)	295,202,292	14.76%
3	0x3A5B967E64315B2481E5761FB800031fdac7b7c1 (Unknown 3)	260,000,000	13%
4	0x25613F40D8F28400b77add51f906FE600A8ad46B (Unknown 4)	241,504,474	12.08%
5	0xd54dD9041C7081588a673E3B07689Faf3D2a09b9 (Unknown 5)	221,473,674	11.07%
6	0xC5B30272025fEe4AEFAB1D53E47fAd7d284821dF (Unknown 6)	200,000,000	10%
7	0xFBb1b73C4f0BDa4f67dcA266ce6Ef42f520fBB98 (Bittrex)	87,179,937	4.36%
8	0xDB08620017C2d95111e5F00868450a96B8b3C36c (Unknown 7)	72,017,791	3.60%
9	0xBb947D45fe8ea963940C46Cf938Ce20471627A8F (Unknown 8)	60,069,865	3.00%
10	0x5735fBAC26BB21CA3C5228022cc382136038087c (Unknown 9)	16,858,944	0.84%
11	0x7a6BF8dA0e46b01119A6aBEdBf1eEbBed6C3E412 (Unknown 10)	11,167,543	0.56%
12	0x008c7ff2282D94d049d142E0C113Ebd56AFA341E (Unknown 11)	9,000,000	0.45%
13	0xee80C1547393A1AC57D6C85f5028eEe4224468E4 (Unknown 12)	7,668,474	0.38%
14	0x933F0B17A43f8c8a24C19215003e4C6923F5A6AB (Unknown 13)	6,885,214	0.34%
15	0xF9eAD5192D2B0F6243fcca9fa53e1Bf5d400797e (Unknown 14)	6,098,072	0.30%
16	0xf3773B38781Fa021d35B8825dBf7727CDB684478 (Unknown 15)	4,971,164	0.25%
17	0xf6D89cB8f7eab63EF13274A807F828f90b1CE31f (Unknown 16)	4,642,830	0.23%
18	0x2d07E511Af7D823A99D6A245a7004212E487465F (Unknown 17)	4,446,610	0.22%

Rank	Address	Balance	Percentage
19	0x19aa53af023ce36393B7dD14c4c579C3A7D36876 (Unknown 18)	4,328,348	0.22%
20	0xD20d70Ede0DdE18030e34A3b0515fb622dD67636 (Unknown 19)	4,301,000	0.22%

ITEM 6. Token Price and Market Cap

The following are market data present as of 2019-11-25.

Market Cap Rank **460**

Price Performance



► USD

Current Price : \$0.012319

Change (7d/24h/1h) : -23.7% | -7.2% | -1.3%

Market Cap : 3,685,373.45

Initial Offering Price : \$0.050000

Return since Initial Offering : 0.25 X

► ETH

Current Price : 0.000091 ETH

Change (7d/24h/1h) : 4.7% | 4.1% | -1.2%

Market Cap : 27,351.72

Initial Offering Price : 4,884.9 ETH

Return since Initial Offering :

► BTC

Current Price : 0.000002 BTC

Change (7d/24h/1h) : -1.6% | 1.7% | -0.8%

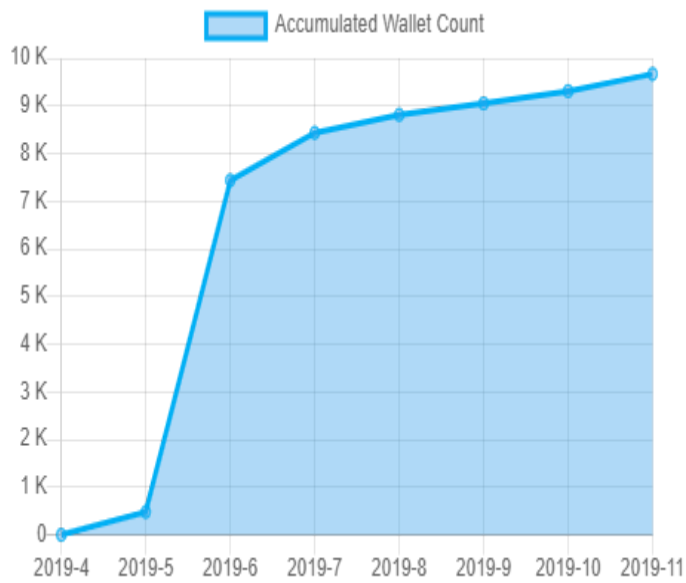
Market Cap : 555.31

Initial Offering Price : - BTC

Return since Initial Offering :

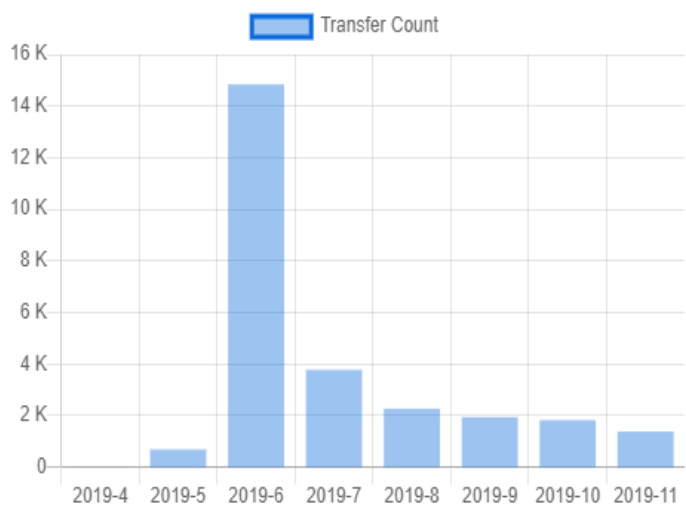
ITEM 7. On-chain Performance

Accumulated Wallet Count



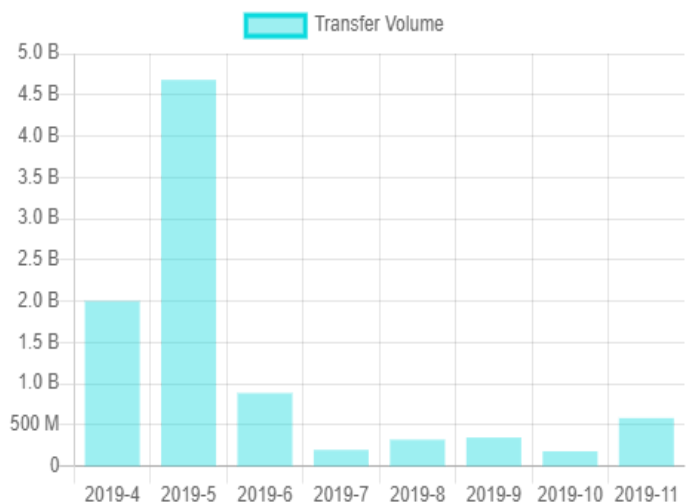
Date	Accumulated Wallet Count	New Wallet Count
2019-11	9,669	360
2019-10	9,309	257
2019-9	9,052	240
2019-8	8,812	377
2019-7	8,435	998
2019-6	7,437	6,953
2019-5	484	481
2019-4	3	3

Transfer Count



Date	Token Transfer Count
2019-11	1,382
2019-10	1,826
2019-9	1,942
2019-8	2,269
2019-7	3,776
2019-6	14,842
2019-5	688
2019-4	4

Transfer Volume



Date	Token Transfer Volume
2019-11	583,628,367.166
2019-10	180,482,368.578
2019-9	347,272,769.408
2019-8	321,715,390.211
2019-7	197,290,140.132
2019-6	885,705,221.484
2019-5	4,680,786,024.908
2019-4	2,000,000,006

PART V. Compliance

ITEM 1. Legal

Legal Memorandums and Opinions

Date	Target Jurisdiction	Sender / Written by	File
2019-06-03	Singapore	Duane Morris & SELVAM LLP	

Legal Compliance

Q: Can you ensure that your project is in compliance with all laws in the countries that you conduct business and the jurisdiction of where your company is incorporated? Please use the input field to describe your circumstances in case you cannot ensure compliance.

A: Yes

Q: Can you ensure that there are no elements or features that potentially involve damaging public interests in certain countries due to the activities promoted by the project? (Gambling/drugs, etc.) Please use the input field to describe your circumstances in case you cannot ensure compliance.

A: Yes

Q: Can you ensure that your token/coin project is not categorized as a security under any existing global capital market regulations? Please use the input field to describe your circumstances in case you cannot ensure compliance.

A: Yes

ITEM 2. Technical

Technical audit results and other equivalents

File	Date	Document Title	Audited by / Reported by
No data available			

Technical Compliance

Q: Can you ensure that your company has the technical capability to cooperate with exchanges? (Daemon/Wallet/Mainnet support/etc.) If your answer is yes, please use the input field to describe what necessary steps are required for the exchanges to engage in listing your project.

A: No