

## Constitution of Class (I) Personal Beneficial Unit Series.

THIS CONSTITUTION OF CLASS, is made this TWENTY-THIRD DAY OF APRIL, in the year TWO THOUSAND EIGHTEEN, and arises from the DECLARATION OF TRUST of the COLLECTIVE DATA TRUST.

WHEREAS:

The Creation of this Class, under the Article 2, Section 2.B and 2.B.1 of the Declaration of Trust,

HEREBY:

This Constitution of Class (I) a Individual Digital Assets Trust, which shall be known as Personal Beneficial Unit Series, and shall be governed by the following articles and sections.

Section C-1-A: Class (I) Beneficial Unit Series, and dependent accounts, and the deposited property including related assets shall be governed by the dispositions of the Declaration of Trust in general, and by this Constitution of Class in particular.

Section C-1-A.1: Each Beneficial Unit of this series shall belong to a specific Beneficiary. No Beneficiary can have more than one Beneficial Unit of this Class, nor can have less than one Beneficial Unit, nor can own fractions of other Beneficial Units.

Section C-1-A.2: Each Beneficial Unit of this series shall entitle the beneficiary to a parallel beneficial unit of Class (II) Collective Beneficial Unit Series, but each class shall be submitted to its own regulation, and the rights allowed in one class can not be enforced in a different class.

Section C-1-A.3: Each Beneficial Unit on this Class (I) Individual Beneficial Unit Series shall have equals rights but different valuations. Being the value of each beneficial Unit proportional to the value of monetizable assets of each Unit, and such value should be expressed in the format of the Internal Value Metric Unit (CDC), and translated to the reference currency.

Section C-1-A.4: Under Class (I) Individual Beneficial Unit Series, each beneficiary, has the right to individually agree or disagree, customize and review the settlement agreement, and all Beneficial Units of this Class shall be entitled to the same rights, independently of each other, but the units under Class (I) Individual Beneficial Unit Series shall have no voting rights at the general assembly of beneficiaries of the Trust.

Section C-1-A.5: For this Class (I) Individual Beneficial Unit Series, each beneficial unit is meant to be settled with digital assets, data and information, to be considered the "deposited property", and such assets shall be valued by the Trust according to Article 4 of the Declaration of Trust, and should be managed and submitted under trustee's or adviser's best criteria to different monetization processes aligned with the trust's objectives, in order to obtain benefits for the Beneficiary owner of such Beneficial Unit, under the terms and conditions that the beneficiary has established in the settlement agreement or the placement memorandum, or the subscription agreement.

Section C-1-A.6: Class (I) Individual Beneficial Units' account(s) can be self managed by the beneficiary, who will assume all liabilities that would otherwise remain over the Trustee or the advisers; And the trust, through its companies will provide the tools and elements it considers necessary for the Beneficiary to generate, collect and monetize its own digital assets.

Section C-1-A.7: The assets that will be admitted to settle the beneficial units are digital assets, data and information, provided by the Beneficiary, to be considered the deposited property, and to be treated as exchangeable commodity on current spot or future markets.

Section C-1-A.8: Each beneficiary herein represents that he is the sole owner of his Beneficial Unit and related account(s) and that no other person, except as disclosed herein, has any interest therein.

Section C-1-A.9: Each beneficiary represents that the property deposited into his Beneficial Unit and related account(s) are of its own and that no property from any other person or entity will be deposited into his Individual Beneficial Unit related account(s).

Section C-1-A.10: The Collective Data Trust is relying on the representations contained herein with regard to the manner in which the Trust will carry the account of each beneficiary, and therefore, each beneficiary agrees to notify immediately in writing to the trustee, in the event that the declared circumstances of any supplemental deed has changed, and the lack of veracity from the beneficiary, will remove him from any right over the beneficial unit

Section C-1-B: Class (I) Personal Beneficial Unit Series, Assets Management.

Each Unit of Class (I) Personal Beneficial Unit, shall be settled, managed, accounted and booked according to provisions of the Declaration of Trust, with the following accounts and management rules.

Section C-1-B.1: The title of the Class (I) Personal Beneficial Unit is not transferable, yet the rights to receive benefits and to withdraw from allowed accounts can be assigned to third parties by the beneficiary, with the acceptance of the Trustee.

Section C-1-B.2: The assets to integrate a Beneficial Unit of this class, shall be of the following nature, but not limited to, valuable digital property according to the criteria of the trustee, such as data and information, actively provided by the user, or passively generated by him and captured by the trust, and each beneficiary's individual data about beneficiary's interaction with internet-connected products and services. The Integration of assets shall occur under the terms established by the Beneficiary for himself, established under the subsequent Settlement Agreement, Placement Memorandum, or Subscription Agreement.

Section C-1-B.3: Valuation of the assets used to settle Class (I) Personal Beneficial Units shall be given according to Article 4 of the Master Declaration of Trust, and by measuring the digital assets, over size or quantity and/or quality, according to assets' valuation, generally accepted practices. Corrections and improvements to the formulas and methods used to assign value to digital assets might arise as a consequence of data and experience obtained from execution of the trust's missions.

Section C-1-B.4: Assets on this Class (I) Individual Beneficial Unit's Account(s) shall be considered as commodities (digital commodities), belonging to each beneficiary, taken into deposit account by the trust, to be managed, monetized, traded, invested or reinvested, in order to generate exchange value and profit, which shall be later distributed in favor of the beneficiary, according to regulation of such class.

Section C-1-B.5: Collective Data Trust (CDT) has the sole and absolute discretion and the right to limit placements and positions in Beneficiary's account(s), to decline to accept any orders and to require that the account(s) be liquidated according to law.

Section C-1-B.6: The Trustee will establish the specific account needs for assets management processes, in order to better manage the assets and isolate liabilities. These accounts will be executed according to the declaration of trust, this constitution of class and the supplemental deeds, by the trustee on behalf of each beneficiary, and cannot be used for different processes than assets management under the Trust. These accounts shall be separated of any services account on any platform of the trust.

Section C-1-B.7: The trust will perform research and analytics from existing data as a basis for using data to reduce risk, enhance product development or performance, or improve Beneficiary's experience or business outcomes.

Section C-1-B.8: Beneficiaries shall be the central point of control for their data and information. The user's data attributes being managed by the Trust may be stored locally at Beneficiary's own facilities, in a co-located repository, or they may be stored in multiple external distributed repositories, or a combinations of such. Attributes from a partitioned data set may be accessed via an application programming interface according to permissions established by the Beneficiary at the settlement agreement of its Beneficial Unit.

Section C-1-B.9: Beneficial Unit's instance may be allowed to selectively share sets of attributes with other Units according to Trustee's criteria, as they represent a change in Assets Values and metrics and imply transferences of data among accounts.

Section C-1-B.10: The trust will pursue the increase of value and utility of the data and its sources, by analyzing its own data and the data deposited into the Beneficial Units against traditional databases exploring the potential to mine data for social good, research, discovery and development, and achievement of the trust's objectives.

Section C-1-B.11: The trust will engage the Beneficiary in transactions that submits the assets to data monetization models, which can be self-directed or set for automatic implementation.

Section C-1-B.12: Unless specific reasons for which an individual could actually create data for someone else as being someone else the owner of such data, including contracts reasons and the law. The Owner of a Individual Beneficial Unit is a data creator who generates assets through his own efforts or owns a device such as a sensor or computing unit with a proper license that generates data, and therefore he has credits on the data creation.

Section C-1-B.13: The business entity that generates data out of individuals, capturing data through their systems and platforms, has the right to benefit from such data, but not in disregard of the rights of such individuals.

Section C-1-B.14: Collective Data Trusts will develop the tools for the Beneficiary to implement vendor relationship management concepts regarding the data he provides to different platforms, challenging corporate cooptation of data without compensation.

Section C-1-B.15: Collective Data Trust will generate income for the Beneficial Unit, through applying the digital assets to data monetization or trading processes under Beneficiary's approved conditions, established on the settlement agreement, and through the development, deployment and execution of data centric products, ideas, or services.

Section C-1-B.16: Any deposited property under this class, belonging to a Beneficiary, held by the Trust or any of its subsidiaries or affiliates or carried in any of Beneficiary's account(s) shall be subject to a general lien and security interest for the discharge of Beneficiary's obligations with the Trust, wherever or however arising and without regard to whether or not CDT has made advances with respect to such property, and the Trust is hereby authorized to sell and/or purchase any and all such property without notice to satisfy such general lien and security interest. The Beneficiary irrevocably appoints The Trustee as the attorney-in-fact with power of substitution to execute any documents for the perfection or registration of such general lien and security interest.

Section C-1-C: Class (I) Personal Beneficial Unit's Digital Assets' Integration.

The trust will provide to its Beneficiaries with a specialized storage architecture, designed to hold data extracted from Beneficiary's interactions with internet-connected products and services or transaction systems, and external sources; To then combine that data in an aggregate summary form, with suitable data analysis and reporting services, for monetization purposes.

Section C-1-C.1: The trust will provide to the Beneficiary the tools needed to start sourcing out data, setting up the mechanism for automating data sources, enabling data extraction and conversion, and set-up by itself or third party, the data storage management system and administration, and the business intelligence tools, to help

maximize benefits out of the monetization system. Such tools will allow the Beneficiary to integrate his digital assets into Beneficial Units, in such ways including but without limitation to:

Section C-1-C.2: Identity and access management (IAM) for the unit, to control and monitor information about users and devices associated with such unit. Such information includes information that authenticates the identity of a Beneficiary, and data that describes information and actions they are authorized to access and/or perform on the platform. It shall also include the management of descriptive information about the user and how and by whom that information can be accessed and modified.

Section C-1-C.3: Whenever the trustee considers, at its sole discretion, that is on the best interest of the Trust and the Beneficiaries, the platform shall allow each Beneficiary to individually store, manage and deploy his digital assets and other data in a highly secure and structured way following Organization for Economic Co-operation and Development (OECD) and National Institute of Standards and Technology (NIST) guidelines on protecting personal identifying information (PII), and until such conditions are met, the Trustee can determine that the beneficial units will be stored locally at the beneficiaries storage device, or in a third party provider storage facility. The Beneficiary will set up the conditions to access the data on the Settlement Agreement. The Storage Policies shall be approved by the Data Compliance Officer.

Section C-1-C.4: Collective Data Trust will establish the codification of identity names and attributes of a Beneficial Unit's instance in a way that facilitates processing and monetization.

Section C-1-C.5: The Trust will facilitate the identification of available data sources that could be provided by the Beneficiary, this includes data currently available for monetization as well as other external data sources that may enhance the value of the assets currently available for such beneficial unit.

Section C-1-C.6: The Trust will connect, aggregate, attribute, validate, authenticate, and exchange data, and automate the previously described process to allow data to be converted directly into actionable or revenue generating services, or exchangeable data to be generated and traded passively on behalf of the beneficiary.

Section C-1-C.7: The Trust will set the terms and prices to facilitate data trading, and development of exchangeable value through products based on methods for data vetting, storage, and access. CDT's strategy recognizes data as an evolving asset, living and growing within a living environment, and NOT as a static asset that depreciates in value.

Section C-1-C.8: The platform may provide mechanisms in order to help the Beneficiary to monetize his digital assets under self-managed, supervised, or automated accounts.

Section C-1-C.9: The trust will enable Data Processing Platforms for the digital assets to be integrated into a beneficial unit.

Section C-1-C.10: The Beneficial Unit will pull in data from a wide array of sources, and will integrate the data into a unified stream, and make it accessible through an application programming interface (API) regulated as the Beneficiary's own terms established in the Settlement Agreement, Placement Memorandum or Subscription agreement.

Section C-1-C.11: The trust will enable Data Creation Platforms, that will allow the Beneficiaries to increase the value of their Beneficial Units, and create data on demand in order to be monetized.

Section C-1-C.12: The trust will apply to the assets of the Beneficial Units, such business intelligence technologies including but not limited to reporting, on-line analytical processing, analytics, data mining, process mining, complex event processing, activity performance management, benchmarking, text mining, predictive analytics and prescriptive analytics, to help identify, develop and otherwise create new strategic opportunities for assets monetization. Identifying new opportunities and

implementing an effective strategy based on insights can provide the Trust with a competitive market advantage and long-term stability.

Section C-1-C.13: The Trustee, and the trust, through itself or through third party shall procure the development and execution of architectures, policies, practices and procedures that properly manage the full data life-cycle needs of a Beneficial Unit.

Section C-1-C.14 The Trust will work to increase Beneficiary's Beneficial Unit's value, by collecting directly or indirectly, or by third party, any information about Beneficiaries from public records and private sources including but not limited to census and change of address records, motor vehicle and driving records, user-contributed material to social networking sites, media and court reports, voter registration lists, consumer purchase histories, bank card transaction records, health care authorities, and web browsing histories, and the beneficiary authorizes the trust to do so, since the results of such monetization, once applied if such, shall be distributed to his Beneficial Unit.

Section C-1-4.D: Class (I) Personal Beneficial Unit's Digital Assets' Valuation.

The assets integrated into the Beneficial Unit's Capital Asset Account shall be valued, according to the Assets Valuation Formula (AVF), established on "Appendix: CDT/MD/CC/C1/A1", and according to the following rules.

Section C-1-D.1: The Assets Valuation Formula is a specific set of calculations applied to a specific set of data, with the intention to establish a quantification of the value of the assets, into a specific value metric unit, at any given time. The formula for such calculations shall be established by the trustee, and shall be from time to time amended, adapted and modified by the trustee at its sole discretion, to better suit the system development in the best interest of the trust. Modifications on the Assets Valuation Formula can also be proposed to the trustee by the assembly of of beneficiaries, or by the board of advisers.

Section C-1-D.2: Changes in valuation Formula shall affect all units of a Class, in a given way that the proportions of interest in the total assets of a class shall not be unfairly modified by the sole action of the new formula implementation.

Section C-1-D.3: Data and other digital assets to be valued will be measured in the abstract quality conditions of the data entered, collected or submitted, requiring the data to pass a set of quality criteria, including but not limited to Validity, Accuracy, Completeness, Consistency, Uniformity, as described on the Settlement Agreement or Placement Memorandum, and after the quality of data have being qualified under the previously mentioned criteria, it will be submitted for measurement and translated into Internal Value Metric Unit (GDC), and then, expressed in the reference currency.

Section C-1-D.4: Minimum Monetizable Data Unit refers to the minimum set of attributes of specific type of data, in order to be usable in an average monetization process, and such value and/or its requirements shall be established by the Trustee, and updated from time to time, according to the evolution of operations. The values and formulas to establish Min.Dat shall be published by the Trust, and annexed as an appendix, forming part of this declaration, together with any amendments. Current version of Min.Dat is published always as evolution of "Appendix: CDT/MD/CC/C1/A2"

Section C-1-D.5: Internal Value Metric Unit (CDC). CDC is a reference value, that represents the liquidation of the average money value of a Minimum Monetizable Data Unit after monetization with deducted cost. The formula to establish CDC, shall be published by the Trust, and updated from time to time by the trustee, according to the evolution of operations and annexed as an appendix, forming part of this declaration, together with any amendments. Current version is published always as evolution of "Appendix: CDT/MD/CC/C1/A3"

Section C-1-D.6: The Trustee can request or invite the community of beneficiaries to participate in the development of the formulas for valuation. Such request will not be binding to the Beneficiary to participate, and such development proposals from Beneficiaries shall not be binding to the trustees to implement.

Section C-1-D.7: Class (I) Personal Beneficial Units Series shall have on the Trust books the following accounts, without obstacle for the trustee to start new accounts for this class. These Accounts are for the sole purpose of Assets Management Accounts and are not related to any service account on the platforms. These accounts shall be known as (Account C-1-E.1) Capital Asset Account; (Account C-1-E.2) Income Account, and (Account C-1-E.3) Loss Carry forward Account. Each of the mentioned accounts shall be considered together with its own sub-accounts if any as a whole.

Section C-1-E.1: Class (I) Personal Beneficial Unit's Capital Assets Account.

This Capital Assets Account is made to be the depository account of the digital assets to be integrated into a Class (I) Personal Beneficial Unit, and such Digital Assets will be considered as the deposited property and shall be treated as a commodity available to be submitted to different processes not limited to collateral support, commercial analysis, trading and monetization.

Capital Asset Account is an inventory management account with especial management rules to handle the deposited property, considering the nature and characteristics of the assets of a Class (I) Personal Beneficial unit.

There shall be established in respect of each Beneficiary of each Personal Beneficial Unit a separate Capital Assets Account in the books and records of the Trust in respect of such Class (each a "Capital Assets Account"), to which the following provisions shall apply:

Section C-1-E.1.A: Assets on this Class, when referred to as being traded, it shall not mean the purchase and sale of it, but rather the assets are licensed for particular, specific or limited uses in exchange of a fee.

Section C-1-E.1.B: Monetization of digital assets integrated into the Units of Class (I) Individual Beneficial Unit Series refer to the use of such assets to submit them to such processes as determined by the trustee, with the intention of converting the Assets of the Beneficial Unit into legal tender or other exploitable or exchangeable benefit, on behalf of the beneficiary.

Section C-1-E.1.C: Such processes of monetization are referred but not limited to, monetizing data services, generating measurable economic benefits from available data, generate business opportunities, commercial relationships and direct monetizing, under the conditions established by each Beneficiary for himself at the Settlement Agreement, Placement Memorandum, or Subscription Agreement.

Section C-1-E.1.D: Direct Monetization. Digital Assets Monetization can occur directly, meaning that the asset is directly engaged in a process that shall generate income as a result, for such Beneficial Unit.

Section C-1-E.1.E: Indirect Monetization. Digital Assets Monetization can occur indirectly, meaning that the asset is engaged in processes that will not generate income, but it will generate products with exchange value that can be afterwards converted into income.

Section C-1-E.1.F: Active Monetization: Digital Assets Monetization can occur actively, when the Beneficiary is engaged in taking actions on the process that will produce value out of the asset.

Section C-1-E.1.G: Passive Monetization. Digital Assets Monetization can occur passively, when the Beneficiary does not need to engage in other actions than authorizing once, so the unit's processes can produce value out of the asset without need for Beneficiary's intervention.

Section C-1-E.1.H: The assets deposited into the Beneficial Units Capital Assets Account(s) are submitted to trading as understood in section C-1-E.1.A for placement of licenses or particular, specific or limited uses; And monetization as the process of conceiving, defining, delivering, monitoring and refining data derivative products in, and withdrawing data derivative products from, a market in order to maximize business results, using Data to obtain quantifiable economic benefit, and without excluding compatible definitions set out herein.

Section C-1-E.1.I: Admissibility of assets into a Beneficial Unit's Account(s) are at the sole discretion of the Trustee, and the Beneficiary agrees to provide all necessary assistance to the trust in the processes of data cleansing, understood as the process of detecting and correcting (or removing) corrupt or inaccurate records from a record set, table, or database and refers to identifying incomplete, incorrect, inaccurate or irrelevant parts of the data and then replacing, modifying, or deleting such data.

Section C-1-E.1.J: Assets Admission and treatment of dark data. Assets not meeting the admission requirements, at the sole discretion of the Trustee, and according to the rules for data quality and other asset management regulation of the class, assets integrated into a beneficial unit can be rejected or requested to be removed from the unit, by the beneficiary, the Trustee, or the adviser in any case, under considerations of identifying any data stored during regular business activities, that will fail or have failed to be usable for monetization purposes, unless such data is required to be kept for business compliance reasons.

Section C-1-E.1.K: The Beneficiary can appoint a third party provider to act as depository, and move the data not meeting the admission criteria to such storage service providers, at its own cost.

Section C-1-E.1.L: Trading Limitations. The Trustee may, in its sole and absolute discretion, refuse to accept or execute any order from any Beneficiary, including, but not limited to, in the event that CDT believes that the acceptance or execution of Beneficiary's order would be in contravention of any rule or law. In addition, CDT may at any time, in its sole and absolute discretion, limit the number or types of positions which the Beneficiary may maintain or negotiate through CDT, and the Beneficiary agrees not to exceed such limits. CDT is under no obligation to effect any transaction for Beneficiary's Account that would create positions in those accounts in excess of the limit CDT has set.

Section C-1-E.1.M: Cost of Integrating and Holding Assets into Capital Account.

The Trust will finance by itself or by third party, the cost of managing the data and digital assets that will integrate the account. This cost will have a non-divisible part of cost for the infrastructure designed to store and maintain the data, and a possible divisible and individually assignable cost for the process of integrating and holding data. The cost of data for each Class (I) Personal Beneficial Unit shall result from the sum of a pro-rata division of the indivisible part of cost, plus any individually generated cost on the acquisition, integration, maintenance and holding of data and information.

Section C-1-E.1.N: Cost Deductions. No Cost generated by the acquisition, integration, or monetization of assets can be deducted from the Capital Asset Account, and can not be collected from the Beneficiary directly. The cost Deduction shall be applied and deducted from the Income Account, under conditions described herein. The Beneficiary can not be liable to pay for any data acquisition or monetization cost, with funds other than those generated by the Beneficial Unit itself on the platform.

Section C-1-E.1.O: Capital Account Perpetual inventory system. Under this system the Inventory of monetizable data account is continuously updated after each transaction, including integration, valuation, placement, trading and other monetization related process' transaction. Update is made to the valuation of the beneficial unit, as well as to the valuation of the series.

Section C-1-E.1.P: The Capital Assets Account of each Beneficiary of each Class (I) Personal Beneficial Unit Series shall initially be equal to the cash and fair market value of the digital assets or any property contributed (each, a "Capital Asset Contribution") by such Beneficiary as a subscription for the Beneficial Unit of such Class.

Section C-1-E.1.Q: Capital Account Assets Inventory is increased with the value and/or quantity of data integrated by, or otherwise captured from a Beneficiary, when using CDCs as the unit to measure the value, and Min.Dat as the unit to measure the volume of Digital Assets deposited into the Beneficial Unit.

Otherwise, the account is increased by (A) an amount equal to any Capital Contribution by such Beneficiary in respect of such Class during such Fiscal Period (net of liabilities assumed by such Class in connection with such contribution or to which any such property is subject); (B) such Beneficiary's assets having been submitted to monetization processes have returned aggregated data and other digital assets which are integrated back to the Beneficial Unit.

Section C-1-E.1.R: Capital Account Assets Inventory is decreased with the value and/or quantity of the assets in inventory that has been deemed to be dark data or other kind of non-monetizable digital assets. The previously assigned average value to such assets shall be decreased from the total value of the inventory when performed the disintegration of such assets from the Beneficial Unit.

Otherwise, the account is decreased by (A) any withdrawal, restriction or elimination of data or information that the Beneficiary has previously integrated but later decided not to submit to monetization, or to withdraw such asset from monetization processes in respect of such Class during such Fiscal Period; (B) the fair market value of any data that has been deemed to be depreciated or resulted in any kind of devaluation or invalidation (net of any liabilities assumed by the Beneficiary in connection therewith or to which such asset is subject); (C) any asset pre-sold with exclusive licenses during such Fiscal Period in respect of any advance made by the Trustee in respect of such Class to such Beneficiary from time to time in accordance with the provisions of this Declaration and not repaid upon demand or converted into a redemption or distribution.

Section C-1-E.1.T: Capital Assets Account Inventory of Class (I) Personal Beneficial Unit Series shall not decrease in quantity or value with monetization or trading of the assets, due to the fact that the assets can be monetized and traded more than once without losing value. The account only decreases when as caused by law or contracts, certain assets will not be longer monetizable, or they have loose the ability to be monetized due to whatever market or information phenomena, including the removal of dark data.

Section C-1-E.1.U: Under Class (I) Capital Assets Account Inventory, the MONETIZATION of data will result in three journal entries: one to record the monetization process and the cash or accounts receivable at CDC value; One to increase the monetization cost of such Assets adding it to the cost of Assets' Integration and Holding at CDC value; One to reevaluate the inventory and to establish the new valuation of such beneficial unit capital asset account.

Section C-1-E.1.V: Under Class (I) Capital Account Assets Inventory, the CLEANSING of data will result in three journal entries: one to record the process of removal of data from the Beneficial Unit and any resulting liability; One to increase the cost of cleansing on such Assets and adding it to the accumulated integration and Holding Costs at CDC Value; and One to decrease the inventory and to establish the new valuation of such beneficial unit capital asset account.

Section C-1-E.1.W: Capital Account Assets Inventory of Class (I) shall have the following sub-accounts: (A) Monetizable Data on Stock at CDC value; (B) Integration and Holding of Assets Cost; ( C ) Monetization of Assets Cost; (D) Cleansed Data from Stock at CDC value; (E) Cleansing of Assets Cost.

Section C-1-E.1.W.1: At any given time, deducting the value of account (D) from account (A) shall give the new value of Capital Account's Inventory at CDC value, until new valuation applies.

Section C-1-E.1.W.2: At any given time, the sum of totals values in accounts (B) + ( C ) + (E) can be deducted from the CDC value of the Income account established in Section C-1-E.2, and such operation shall give the CDC value of the Net Accumulated Income of the Beneficial Unit

Section C-1-E.1.W.3: At any given time, the sum of totals values in accounts (B) + ( C ) + (E) can be combined to obtain the CDC value of the Loss Carry-Forward Account established in Section C-1-E.2 if calculation applied prior to any Distribution, and Deducting from it any advances made by the Trustee to the Beneficiary.

Section C-1-E.2: Class (I) Personal Beneficial Units' Income Account.



Income Account is a designated account to receive all income generated by assets' monetization on a net basis of a Class (I) Personal Beneficial unit.

Each Beneficial Unit of this Class (I) Personal Beneficial Unit shall have a separate Income Account in the books and records of the Trust in respect of such Class (each a "Income Account"), to which the following provisions shall apply:

Section C-1-E.2.A: Income account of this Class (I) Personal Beneficial Unit, can not receive deposits other than the resulting income generated through the assets monetization, and due to specific events not limited to monetization and trading on the platform, transfers among accounts of beneficial units authorized by the trustee, advances and distributions general to the series, or particular to such beneficial unit.

Section C-1-E.2.B: Income account will increase with the CDC value of the deposits made by the trustee as any advance or distribution of income resulting from monetization processes corresponding to such beneficial unit's assets held in the Capital Assets Account. No other kind of deposit can be made into this account.

Section C-1-E.2.C: Income account will decrease with the CDC value of each deduction made by the trustee as a result of applied cost, taxes retention, and withdrawals made by the beneficiary, and with the transfer of total or part of the values to another account belonging to such or to other beneficial unit.

Section C-1-E.2.D: The amount value of CDC to increase the Income Account when distribution is made, is obtained from applying the formula described in Section C-1-E.1.V.2. and depositing the results into this Income Account.

Section C-1-E.2.E: All deductions corresponding to the Beneficial Unit shall be made from income account, including but not limited to cost, liabilities, withdrawals from beneficiaries, advances, fees, allocations, taxes retention, and others. If deductions where to be made, and the CDC value of the Income Account is inferior to the CDC value of the deductions, the trustee shall deduct from the income account such value as available in the account but not below zero, and the remaining value shall be booked to the Loss Carry Forward Account set out in Section C-1-E.3

Section C-1-E.3: Class (I) Personal Beneficial Unit Losses Carry-Forward Account

Each Beneficial Unit of this Class (I) Personal Beneficial Unit shall have a separate Loss Carry-Forward Account in the books and records of the Trust in respect of such Class (each a "Loss Carry-Forward Account"), to which the following provisions shall apply:

Section C-1-E.3.A: All expenses assigned to the acquisition, integration, holding, cleansing, and monetization of digital assets, as well as any fee, liability, taxes retention, and payments in representation of a Beneficial Unit, shall be deducted from the Income Account, and when such account of such beneficial unit has non-sufficient value to compensate such mentioned expenses, then such expenses value shall be booked on the Losses Carry-Forward Account until such expenses can be deducted from the Income Account.

Section C-1-E.3.B: All expenses assigned to the acquisition and development of technology and infrastructure for integration, holding, cleansing, and monetization of digital assets, as well as any fee, liability, taxes retention, and payments in representation of the Trust, which are not assignable to one single Beneficial Unit shall be considered a collective expense, and by each class, a pro-rata value of the collective expenses shall be allocated to the Loss Carry-Forward account of each Beneficial Unit of a class.

Section C-1-E.3.C: Loss Carry-Forward Account of a Beneficial Unit, increases with the cost of deductions not possible to collect from the income account of such beneficial unit.

Section C-1-E.3.D: Loss Carry-Forward Account of a Beneficial Unit, decreases with the CDC value of debits made from the Income account of such beneficial unit.

#### Section C-1-E.4: Class (I) Personal Beneficial Unit - Allocations

Subject to the Regulatory Allocations set forth in this declaration according to the regulations, Net Profit, Net Loss and items thereof of a Partnership Class shall be provisionally allocated as of the end of each Fiscal Period as follows:

Section C-1-E.4.1: Except as otherwise provided in this declaration or any supplemental deed, shall be allocated to each Beneficiary in such Class, an amount equal to the product of such Beneficiary's Proportionate Interest in such Class as of the beginning of such Fiscal Period multiplied by the Net Profit or Net Loss (in each case), reduced by the amount of Net Profit, Net Loss or items of income, gain, deduction expense or loss allocated pursuant to such Class for such Fiscal Period.

Section C-1-E.4.2: To each Beneficiary to whom should be allocated the Net Profit or Net Loss associated with an operation or transaction:

Section C-1-E.4.2.A: which is properly allocable pursuant to the Placement Memorandum of such Class to one or more, but not all, Beneficiaries of such Class;

Section C-1-E.4.2.B: which is a "new issue" (a "New Issue") for purposes of Rule 2790 of the Conduct Rules of the National Association of Securities Dealers, Inc. of the United States of America (the "New Issue Rule") but only for the Fiscal Period during which such investment is treated as a New Issue; and

Section C-1-E.4.2.C: in which one or more other Beneficiary of such Class is not to participate for tax, regulatory or any other reason (the criteria for such other reason shall be agreed upon by the Adviser, on behalf of the Trustee, and any such Beneficiary), the amount of Net Profit or Net Loss (in each case, reduced by the items of income or gain allocated pursuant this declaration or a supplemental deed that the Adviser, on behalf of the Trustee, determines in the Adviser's sole discretion is associated with such investment or transaction multiplied by a fraction, the numerator of which is such Beneficiary's Proportionate Interest in such Class and the denominator of which is the sum of the Proportionate Interests of all Beneficiaries in such Class with respect to such investment or transaction for such Fiscal Period. Beneficiaries on this regime are known as Unrestricted Personal Beneficial Owners

Section C-1-E.4.2.D: In the sole discretion of the Adviser on behalf of the Trustee, with respect to each investment or transaction described for this class, to each Beneficiary that is NOT an Unrestricted Beneficiary for such Fiscal Period, items of income or gain in an amount equal to such Beneficiary's Proportionate Interest in such Class divided by the sum of the Proportionate Interests of all Beneficiaries in such Class who are not Unrestricted Beneficiaries with respect to such investment or transaction for such Fiscal Period multiplied by (A) the interest that would have accrued during the Fiscal Period on the amount of Class assets used to purchase such investment (the "Purchase Price") such Beneficiary was not permitted to participate in had such Purchase Price earned interest for such Fiscal Period at the interest rate (per annum) being paid by such Class during such Fiscal Period or (B) if the Class has not borrowed any amounts during such Fiscal Period, at the interest rate (per annum) that the Adviser on behalf of the Trustee determines, in the Adviser's sole discretion, would have been paid if the Purchase Price had been borrowed by the Class during such Fiscal Period.

Section C-1-E.4.2.E: Immediately after the allocations with respect to any Beneficiary, unless otherwise provided in the Placement Memorandum for such Partnership Class, as of (i) the last Business Day of a fiscal quarter, (ii) the date of any interim full or partial redemption of Units by a Beneficiary (in which case only with respect to the redeemed Units) or (iii) the date of the termination and final liquidation of such Class, there shall be reallocated to the Capital Account of the Special Beneficiary and debited from the Capital Account of such Beneficiary (other than certain employees and/or affiliates of the Special Beneficiary) an aggregate amount equal to the Performance Allocation, if any, applicable to such Beneficiary.

Section C-1-E.4.2.F: The "Performance Allocation" for a Personal Beneficial Unit shall be calculated separately for each Beneficial Unit of such Class (other than Special Units) and shall equal the percentage(s), as defined in the Placement Memorandum for such Class, of the amount, if any, by which (i) the Net Profit or items

thereof, if any, allocable to a Beneficiary's Capital Account maintained in respect of the Unit of such Beneficiary (other than a Special Beneficial Unit) during the Fiscal Period or portion thereof described in Clause Section C-1-E.4.2.E (after payment of fees but before the reallocation of Performance Allocation) exceeds (ii) the positive balance, if any, in such Beneficial Unit's Loss Carryforward Account (other than a Special Beneficial Unit) as of the beginning of such time period.

Section C-1-E.4.2.G: For purposes of calculating the Performance Allocation for the Units of each Beneficiary, there shall be established for each Beneficiary (other than a Special Beneficial Unit) as of the date of the acceptance of the subscription for Beneficial Units to the Class (I) Personal Beneficial Unit, a memorandum account which shall be designated a "Loss Carryforward Account." The Loss Carryforward Account of each Beneficial Unit shall have an initial balance of zero and shall be adjusted as follows: as of each date described in Section C-1-E.4.2.E for such Beneficial Unit, the balance, if any, of such Beneficiary's Loss Carryforward Account shall be increased by the Net Loss and items thereof, if any, allocated to such Beneficiary's Capital Account pursuant to Section 4.E.4 with respect to the portion of the Fiscal Periods ending on or before such date and shall be decreased (but not below zero) by the Net Profit and items thereof, if any, allocated to such Beneficiary's Capital Account pursuant to Section C-1-E.4 with respect to the portion of the Fiscal Periods ending on or before such date.

Section C-1-E.4.2.H: The Loss Carryforward Account of any Beneficiary making a partial redemption of Units will be further adjusted as of the date such redemption is effective by decreasing any positive balance of such Loss Carryforward Account (but not below zero) by an amount determined by multiplying (A) such positive balance by (B) a fraction, of which the numerator is equal to the amount redeemed and the denominator is equal to the balance of such Beneficiary's Capital Account immediately before giving effect to such redemption.

Section C-1-E.4.2.I: Before any distribution of property (other than cash) from a Class (I) Personal Beneficial Unit Series to a Beneficiary of such Class (including without limitation, any non-cash asset which shall be deemed distributed immediately prior to the dissolution and winding up of such Class or a complete redemption of a Series of such Class), the Capital Accounts of all Beneficiaries of such Class shall be adjusted to reflect the manner in which any unrealized income, gain, loss or deduction inherent in such property (that has not been previously reflected in the Beneficiary's Capital Accounts) would be allocated among the Beneficiaries if there were a taxable disposition of such property by such Class on the date of distribution.

Section C-1-E.4.2.J: In determining the amount of any liability for purposes of Capital Accounts hereof, there shall be taken into account Section 752 of the Code and any other applicable provisions of the Code and any Regulations promulgated thereunder, understanding the assets on the Capital Account as "Assets other than cash and financial assets".

Section C-1-E.4.2.k: For each Class (I) Personal Beneficial Unit, the Beneficiary's Capital Accounts may, as determined by the Adviser on behalf of the Trustee, in the Adviser's sole discretion, be adjusted in accordance with, and upon the occurrence of one or more events not limited to the described in, Section 1.704-1(b)(2)(iv)(f) of the Regulations, including but not limited to the addition of new Beneficiaries or additional investments pursuant to the Issuance of Beneficial Units hereof, to reflect a revaluation of the Deposited Property of the Class. Such adjustments to the Beneficiary's Capital Accounts, if made, shall be made in accordance with Section 1.704-1(b)(2)(iv)(g) of the Regulations for allocations of depreciation, depletion, amortization and gain or loss with respect to such revalued property, adjusted to the nature of the non-liquid assets taken into account.

Section C-1-E.4.2.L: This Section, and subsequent items are intended to comply with Section 1.704-1(b)(2)(iv) of the Regulations and shall be interpreted and applied in a manner consistent with such Regulations, but considering the nature of the assets taken into account for the settlement of Class I - Personal Beneficial Units Series.-

Section C-1-E.4.3: Distributions.

Section C-1-E.4.3.A: Subject to Section C-1-E.4.3.D, on any Distribution Payment Date the Trustee may distribute, in cash or in kind, at the discretion of the Trustee

in consultation with the Adviser, to each Beneficiary of a Class (I) Personal Beneficial Unit Series in respect of each Unit of such Class for which a relevant Placement Memorandum provides for distributions to be made and which Unit is registered in such Beneficiary's name at the opening of business on the applicable Distribution Record Date, an amount equal to all or a portion of the Net Asset Value per Unit for the relevant Distribution Period or such other amount as described in the Placement Memorandum as may be declared by the Trustee from time to time, which distribution will be distributed, in cash or in kind, At the discretion of the Trustee after consultation with the Adviser, to the Beneficiary or, upon distribution and at the discretion of the Trustee after consultation with the Adviser, be automatically reinvested in a suitable Class on the same Business Day at the same Net Asset Value or as soon as possible thereafter on a fair market value.

Section C-1-E.4.3.B: The amounts so distributed to Beneficiaries of a Class (I) Personal Beneficial Unit Series will be deemed to have been paid first from the cumulative Net Profit of the relevant Class (after provision for the expenses of such Class to be charged thereto) and, if and to the extent that the amounts so distributed exceed the Net Profit of such Class, the balance thereof will be deemed to be booked into the Loss Carry-Forward account to be collected from future monetization of the Deposited Property of such Class, or from deposits made into the Income Account by any reason as approved by the trustee, including without limitation to the transference and/or conversion of assets.

Section C-1-E.4.3.C: Any distributions to Beneficiaries of a Class (I) Personal Beneficial Units made pursuant to the provisions of this Clause shall be made to those Beneficiaries of such Class whose names appear on the Register as the holders of Units of such Class at the opening of business on the relevant Distribution Record Date and shall be made ratably in accordance with the Capital Accounts of such Class then held by them.

Section C-1-E.4.3.D: Notwithstanding Section C-1-E.4.3.A, the Trustee after consultation with the Adviser may, if it determines that it would be in the best interests of the Beneficiaries of any Class, vary the amount, timing and frequency of distributions to Beneficiaries.

Section C-1-E.4.4: Tax Allocations.

As of the end of each Fiscal Year, income, expense, deduction, gain or loss of each Class (I) Personal Beneficial Unit, all as determined for U.S. federal income tax purposes, shall be allocated, solely for tax purposes, among the Beneficiaries of such Class as provided below, except to the extent that the supplemental deed or Placement Memorandum of such Class provides for a different method, and giving effect to Sections 704(b) and (c) of the Code and the Regulations thereunder and Section 706(c)(1) of the Code, all as determined in the sole discretion of the Adviser on behalf of the Trustee.

Section C-1-E.4.4.A: Items of ordinary income (such as interest income) and expense (such as advisory fees and brokerage fees) shall be allocated in a manner consistent with the economic allocations described in Section C-1-E.1.

Section C-1-E.4.4.B: Items of recognized gain or loss from, shall be allocated as follows:

Section C-1-E.4.4.B.1: There shall be established a tax basis account with respect to each Beneficiary's interest in such Personal Beneficial Unit Series. The initial balance of each tax basis account shall be the amount at CDC value of contributed capital for such assets. As of the end of each Fiscal Year:

Section C-1-E.4.4.B.1.A: Each tax basis account shall be increased by the amount of (A) any additional Capital Contributions at CDC value made with respect to such Beneficiary's Beneficial Unit of such Class and (B) any taxable income or gain allocated to such Beneficial Unit pursuant to this Section C-1-E.4.4;

Section C-1-E.4.4.B.1.B: Each tax basis account shall be decreased by the amount of (A) taxable expense, deduction or loss allocated to such Beneficiary pursuant to this Section C-1-E.4.4 and (B) any distribution received by such Beneficiary with respect to its Units of such Class other than a redemption;

Section C-1-E.4.4.B.1.C: When any Units are redeemed, the tax basis account attributable to such redeemed Units shall be eliminated; and

Section C-1-E.4.4.B.1.D: To the extent a valid election pursuant to Section 754 of the Code has been made, each tax basis account shall be increased or decreased, where appropriate, to reflect any adjustments to the tax basis of the Deposited Property pursuant to Sections 734 or 743 of the Code.

Section C-1-E.4.4.B.2: Immediately prior to any redemption, items of gain shall be allocated first to each Beneficiary who has redeemed all or any part of its Units during the Fiscal Year up to any excess of (x) the amount received over (y) an amount equal to the product of (A) the Beneficiary's tax basis account and (B) the Redemption Percentage. If the aggregate amount of gain to be so allocated to all Beneficiaries who have redeemed Units of the Class during a Fiscal Year is less than the excess of all such amounts received upon redemption over all such tax basis accounts, the entire amount of gain for such Fiscal Year shall be allocated among all such Beneficiaries in the ratio that each such Beneficiary's allocable share of such excess bears to the aggregate excess of all such Beneficiaries who redeemed Units of the Class during such Fiscal Year. Notwithstanding anything to the contrary herein, in no event shall any Beneficiary be allocated items of gain in excess of the maximum amount permitted under Section 706(d) of the Code.

Section C-1-E.4.4.B.3: Items of gain of such Class remaining after the allocation in Section 4.E.4.4.B.2 above shall be allocated among all Beneficiaries of such Class whose Capital Accounts are in excess of their tax basis accounts (after the adjustments in Section C-1-E.4.4.B.2) in accordance with allocations made pursuant to Section C-1-E.4.2 in the ratio that each such Beneficiary's allocable share of such excess bears to all such Beneficiary's excesses. If the aggregate amount of gain to be so allocated is greater than the excess of all such Beneficiary's Capital Accounts over all such tax basis accounts, the excess amount of gain shall be allocated among all Beneficiaries in the ratio that each Beneficiary's Capital Account bears to all Beneficiaries' Capital Accounts.

Section C-1-E.4.4.B.4: Immediately prior to any redemption, items of loss shall be allocated first to each Beneficiary who has redeemed all or any part of its interest during the Fiscal Year up to any excess of (x) an amount equal to the product of (A) the Beneficiary's tax basis account and (B) the Redemption Percentage over (y) the amount received upon such redemption. If the aggregate amount of loss to be so allocated to all Beneficiaries who have redeemed Units of the Class during a Fiscal Year is less than the excess of all such tax basis accounts over all such amounts received upon redemption, the entire amount of loss for such Fiscal Year shall be allocated among all such Beneficiaries in the ratio that each such Beneficiary's excess bears to the aggregate excess of all such Beneficiaries who redeemed Units of the Class during such Fiscal Year. Notwithstanding anything to the contrary herein, in no event shall any Beneficiary be allocated items of loss in excess of the maximum amount permitted under section 706(d) of the Code.

Section C-1-E.4.4.B.5: Items of loss remaining after the allocation in Section C-1-E.4.4.B.4 above shall be allocated among the Beneficiaries whose tax basis accounts are in excess of their Capital Accounts (after the adjustments) in the ratio that each such Beneficiary's allocable share of such excess bears to all such Beneficiaries' excesses. If the aggregate amount of loss to be so allocated is greater than the excess of all such tax basis accounts over all such Beneficiaries' Capital Accounts, the excess amount of loss shall be allocated among all Beneficiaries in the ratio that each Beneficiary's Capital Account bears to all Beneficiaries' Capital Accounts of such Partnership Class.

Section C-1-E.4.4.B.6: Any gain or loss required to be taken into account in accordance with Sections 475, 1256 or 1259 of the Code shall be considered gain or loss for purposes of Section C-1-E.4.4.B.

Section C-1-E.4.4.C: The allocation of profit and loss for U.S. federal income tax purposes set forth herein is intended for each Class (I) to allocate taxable profit and loss so as to eliminate, to the extent possible, any disparity between a Beneficiary's Capital Account and its tax basis account, consistent with principles set forth in Section 704(c) of the Code. In addition, for purposes of this Clause 3,

to the extent a Beneficiary contributes to the Deposited Property, property with a fair market value that differs from the adjusted tax basis of such property, income, gain, loss and deduction with respect to such property shall be allocated among the tax basis accounts of Beneficiaries so as to take account of the variation between the adjusted tax basis and fair market value of such property, consistent with Section 704(c) of the Code and applicable Regulations.

Section C-1-E.4.5:           Transfer of or Change in Interests. The Adviser on behalf of the Trustee may use any convention or combination of conventions that it believes is reasonable for U.S. federal income tax purposes regarding the allocation of items of income, gain, loss, deduction and expense with respect to transferred Units and redeemed Units in a such Class. A transferee who takes all or part of a Beneficiary's Units in a Partnership Class shall succeed to the Capital Account maintained in respect of the transferor Beneficiary to the extent of such transfer.

Section C-1-E.4.6: Regulatory Allocations.

Section C-1-E.4.6.A:           The allocations of profit and loss to the tax basis accounts of Beneficiaries in respect of the Beneficial Units in a Class (I) Personal Beneficial Unit shall not exceed the allocations permitted under Subchapter K of the Code as determined by the Adviser on behalf of the Trustee, in the Adviser's sole discretion, whose determination shall be binding on the Beneficiary.

Section C-1-E.4.6.B:           Notwithstanding any other provision in this Section (C-1-E) to the contrary, the following special allocations shall be made to the Capital Accounts of the Beneficiaries of each Class (I) Personal Beneficial Unit, in the following order:

Section C-1-E.4.6.B.1:   Class' Minimum Gain Chargeback. Notwithstanding any other provision of this Section (C-1-E) and except as otherwise provided in Section 1.704 2(f) of the Regulations, if there is a net decrease in Class (I)'s Minimum Gain during any Fiscal Year, each Beneficiary's Capital Account shall be specially allocated items of Class income and gain for such Fiscal Year (and, if necessary, subsequent Fiscal Years) in an amount equal to such Beneficiary's share of the net decrease in the Class Minimum Gain, determined in accordance with Section 1.704 2(g) of the Regulations. Allocations pursuant to the previous sentence shall be made in proportion to the respective amounts required to be allocated to the Accounts of the Beneficiaries pursuant thereto. The items to be so allocated shall be determined in accordance with Sections 1.704 2(f) and 1.704 2(j)(2)(i) of the Regulations. This Section C-1-E.4.6.B.1 is intended to comply with the minimum gain chargeback requirement in Section 1.704 2(f) of the Regulations and shall be interpreted consistently therewith.

Section C-1-E.4.6.B.2:   Class (I) Partner's Minimum Gain Chargeback. Notwithstanding any other provision of this Section 4.E and except as otherwise provided in Section 1.704 2(i)(4) of the Regulations, if there is a net decrease in Partner Nonrecourse Debt Minimum Gain attributable to a Partner Nonrecourse Debt during any Fiscal Year, each Beneficiary who has a share of the Partner Nonrecourse Debt Minimum Gain attributable to such Partner Nonrecourse Debt, determined in accordance with Section 1.704 2(i)(5) of the Regulations, shall be specially allocated items of Class income and gain for such Fiscal Year (and, if necessary, subsequent Fiscal Years) in an amount equal to such Beneficiary's share of the net decrease in Partner Nonrecourse Debt Minimum Gain attributable to such Partner Nonrecourse Debt, determined in accordance with Section 1.704 2(i)(4) of the Regulations. Allocations pursuant to the previous sentence shall be made in proportion to the respective amounts required to be allocated to each Beneficiary's Capital Account pursuant thereto. The items to be so allocated shall be determined in accordance with Sections 1.704 2(i)(4) and 1.704-2(j)(2) of the Regulations. This Section C-1-E.4.6.B.2: is intended to comply with the minimum gain chargeback requirement in Section 1.704 2(i)(4) of the Regulations and shall be interpreted consistently therewith.

Section C-1-E.4.6.B.3:   Qualified Income Offset. In the event any Beneficiary unexpectedly receives any adjustments, allocations or distributions described in Section 1.704-1(b)(2)(ii)(d)(4), (5) or (6) of the Regulations with respect to such Beneficiary's Capital Account, items of Class income and gain shall be specifically allocated to the Income Account maintained in respect of each such Beneficiary in an amount and manner sufficient to eliminate, to the extent required by the Regulations, the Adjusted Account Deficit of such Beneficiary as quickly as possible provided that

an allocation pursuant to this Section C-1-E.4.6.B.3 shall be made only if and to the extent that such Beneficiary would have an Adjusted Capital Account Deficit after all other allocations provided for in this Section (C-1-E) have been tentatively made as if this Section C-1-E.4.6.B.3 were not in this Declaration. This Section C-1-E.4.6.B.3 is intended to constitute a "qualified income offset" within the meaning of Section 1.704-1(b)(2)(ii)(d) of the Regulations and should be interpreted consistently therewith.

Section C-1-E.4.6.B.4: Nonrecourse Deductions. Any Nonrecourse Deductions for any Fiscal Year or other period shall be allocated to the Income Accounts of the Beneficiaries in accordance with their respective Capital Accounts.

Section C-1-E.4.6.B.5: Class (I) Partner Nonrecourse Deductions. Any Partner Nonrecourse Deductions for any Fiscal Year shall be specially allocated to the Capital Account of the Beneficiary who bears the economic risk of loss with respect to the Partner Nonrecourse Debt to which such Partner Nonrecourse Deductions are attributable in accordance with Section 1.704-2(i)(1) of the Regulations.

Section C-1-E.4.6.B.6: Gross Income Allocation. In the event any Beneficiary has an Adjusted Account Deficit, items of Class income and gain shall be specially allocated to the Capital Account of such Beneficiary in an amount and manner sufficient to eliminate such Beneficiary's Adjusted Capital Account Deficit as quickly as possible; provided that an allocation pursuant to this Section C-1-E.4.6.B.6: shall be made only if and to the extent that such Beneficiary's Capital Account would have an Adjusted Capital Account Deficit after all other allocations provided for in this Section C-1-E (other than Section C-1-E.4.6.B.3) have been tentatively made as if this Section C-1-E.4.6.B.6 were not in this Declaration.

Section C-1-E.4.6.B.7: Limitation of Net Losses. If any allocation of Net Loss for any Fiscal Period would create an Adjusted Capital Account Deficit with respect to a Beneficiary (or would increase the amount of any such deficit), then the relevant amount shall be allocated to the Capital Accounts of those Beneficiaries that have positive Capital Account balances in proportion to the respective amounts of such positive balances until all such positive balances have been reduced to zero.

Section C-1-E.4.6.B.8: Curative Allocations. The allocations set forth in Section C-1-E.4.6 (the "Regulatory Allocations") are intended to comply with certain requirements of Section 704 of the Code and applicable Regulations, or even when not applicable due to lack of regulation, this declaration attempts to use them as a standard. Notwithstanding any other provisions of this Clause (other than the Regulatory Allocations), the Regulatory Allocations shall be taken into account in allocating other Class items of income, gain, loss, deduction and expenses among the Capital Accounts of Beneficiaries in such Classes so that, to the extent possible, the net amount of such allocations of other profits, losses and other Class items and the Regulatory Allocations to each Beneficiary's Capital Account shall be equal to the net amount that would have been allocated to each such Beneficiary's Capital Account if the Regulatory Allocations had not been made.

Section C-1-E.4.7: U.S. Partnership Tax Treatment. It is the intent of the Trustee that each Class that the Trustee elects to be a Class (I) Personal Beneficial Unit will be governed by the applicable provisions of Subchapter K, of Chapter 1, of the Code. So to each beneficial unit be treated as a partnership where the beneficiary provides the assets that will be monetized by the trust, and the trust provides the means for monetization as understood under the terms of this declaration. The Trustee may file such forms and make elections as the Trustee deems appropriate to effect such intent.

Section C-1-E.4.8: Dissolution and Liquidation. In the event of the dissolution and winding-up of a Class (I) Personal Beneficial Unit for any reason or a termination of the Trust pursuant to what is set out in the Master Declaration of Trust, after the payment of or provision for creditors and other applicable law, the respective Partnership Class's Deposited Property shall be distributed among its Beneficiaries in accordance with their respective positive Capital Account balances, in accordance with Section 1.704-1(b)(2)(ii)(b)(2) of the Regulations. Digital Assets shall be returned in full, and no copy or other record except for public information shall be kept.

Section C-1-E.4.9: Adjustment of Basis of Units. Pursuant to Section 1.704 1(b)(2)(iv)(m) of the Regulations, to the extent an adjustment to the adjusted tax basis of any Class (I) asset under Sections 734(b) or 743(b) of the Code is required to be taken into account in determining Capital Accounts, the amount of such adjustment to the Capital Accounts shall be treated as an item of gain (if the adjustment increases the basis of the asset) or loss (if the adjustment decreases such basis) and such gain or loss shall be specially allocated to the Capital Accounts of the Beneficiaries in such Class in a manner consistent with the manner in which their Capital Accounts are required to be adjusted pursuant to such section of the Regulations.

Section C-1-E.4.10: No Deficit Makeup. Notwithstanding anything herein to the contrary, upon the liquidation of a Class (I), no Beneficiary shall be required to make any contribution to such Class in respect of any deficit in such Beneficiary's Capital Account.

Section C-1-E.4.10: Determination of Certain Matters. Notwithstanding dispositions herein or in the Master Declaration of Trust, or the relevant subdeeds, for each Partnership Class all matters concerning the computation of Capital Accounts and tax basis accounts, the allocation of Net Profit (and items thereof) and Net Loss (and items thereof), the allocation of items of income, gain, loss, deduction and expense for tax purposes, the adoption or modification of any accounting procedures, including reserves for expenses and contingencies, any adjustments to the books and records of a Partnership Class and all matters related to liquidation and dissolution of a Partnership Class or a Series of such Class shall be determined by the Adviser on behalf of the Trustee, in Adviser's sole discretion. Such determination shall be final and conclusive as to all Beneficiaries and be in accordance with the Code and Regulations. Notwithstanding anything expressed or implied to the contrary in this Declaration, in the event the Adviser on behalf of the Trustee shall determine, in the Adviser's sole discretion, that it is prudent to modify the manner in which the Capital Accounts and tax basis accounts, or any debits or credits thereto, are computed in order to effectuate the intended economic sharing arrangement of the Beneficiaries of a Class (I) partnership, the Adviser on behalf of the Trustee may make such modification, in accordance with the Code and Regulations. Allocations of Net Profit and Net Loss to a Beneficiary's Capital Account shall be made for each Fiscal Period as soon as practicable thereafter.

Section C-1-E.4.11: Tax Returns; Tax Matters Partner.

Section C-1-E.4.11.A: Filing of Tax Returns. For each Partnership Class, the Adviser on behalf of the Trustee shall prepare and file, or cause the accountants of the Class to prepare and file, as the Adviser on behalf of the Trustee determines to be appropriate, in the Adviser's sole discretion, a U.S. federal information tax return in compliance with Section 6031 of the Code and any required U.S. state, local and non-U.S. income tax and information returns for each tax year.

Section C-1-E.4.11.B: Tax Matters Partner. The Special Beneficiary or such other qualified person, as the Special Beneficiary may designate, shall be designated as the tax matters partner of each Partnership Class (the "Tax Matters Partner") as provided in Section 6231(a)(7) of the Code. Each Person (for purposes of this Section C-1-E.4.11.B, called a "Pass Thru Partner") that holds or controls a Unit on behalf of, or for the benefit of another person or persons, or which Pass Thru Partner is beneficially owned (directly or indirectly) by another person or persons shall, within 30 days following receipt from the Tax Matters Partner of a notice or document, convey such notice or other document in writing to all holders of Units of the Class holding such interest through such Pass Thru Partner. In the event a Partnership Class shall be the subject of an income tax audit by any U.S. federal, state or local authority, to the extent such Class is treated as an entity for purposes of such audit, including administrative settlement and judicial review, the Tax Matters Partner is authorized to act for, and its decision shall be final and binding upon, such Class and each Beneficiary thereof. All expenses incurred in connection with any such audit, investigation, settlement or review shall be borne by the Beneficiaries of such Class.