

# SUPERIOR COURT OF QUÉBEC

(Business Chamber)

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY

No.: 200-11-025040-182

DATE: ●

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**PRESIDED OVER BY JUSTICE DANIEL DUMAIS, J.C.S.**

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IN THE MATTER OF THE *ACT RESPECTING THE REGULATION OF THE FINANCIAL SECTOR*, RLRQ, c E-6.1 between:

**AUTORITÉ DES MARCHÉS FINANCIERS (QUÉBEC  
FINANCIAL MARKETS AUTHORITY)**

Plaintiff

c.  
**DOMINIC LACROIX**

Defendant

and  
**RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.**

Temporary Administrator

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## CLAIMS PROCEDURE ORDER

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- [1] CONSIDERING the Order of July 5, 2018 ordering the appointment of the Temporary Administrator;
- [2] CONSIDERING the Judgment of October 29, 2020 ordering the implementation of a simple and effective claims procedure to be submitted to the Court;
- [3] CONSIDERING that the Temporary Administrator plans to submit, to the Court, one or multiple distribution plans for the assets that it administers, including the assets frozen in Québec, which must be the subject of distribution among all of the creditors of Dominic Lacroix, as well as the assets frozen in the United States, which, if they are transferred to the Temporary Administrator by the Court in the United States for distribution purposes, must be the subject of distribution among the investor creditors defined in clause 1.1.13 of the Distribution Plan of November 4, 2019;
- [4] Considering the Application Concerning the Claims Procedure of March 4, 2021 submitted by the Temporary Administrator (hereinafter the "**Application**");

- [5] CONSIDERING the observations of the attorneys of the Temporary Administrator as well as of the *Autorité des marchés financiers*;
- [6] CONSIDERING the *Act Respecting the Regulation of the Financial Sector*, RLRQ, ce-6.1 and the inherent powers of the court;

**FOR THESE REASONS, THE COURT:**

- [7] **ALLOWS** the Application.

**Definitions**

- [8] **DECLARES** that except in the event of an indication to the contrary, the following terms in this Order have the meaning granted to them below:
- (a) “**AMF**” refers to the *Autorité des marchés financiers* (Québec Financial Markets Authority), a legal entity established by the *Act Respecting the Regulation of the Financial Sector* (Québec).
  - (b) “**Notice of Revision or Rejection**” refers to the notice mentioned in subparagraph [16](a) of the present Order advising the Creditor that the Temporary Administrator has revised or rejected, whether in entirety or in part, its Claim, as established in its Proof of Claim, stating the reasons for this revision or rejection, in accordance with a document essentially compliant with **Annex A** attached.
  - (c) “**Notice of Claims Procedure**” refers to a notice in accordance with a document essentially compliant with **Annex D** attached.
  - (d) “**Creditor**” refers to any Person that is the owner of a Claim and can, if the context so requires, include the assignee of a Claim, a trustee, an insolvency trustee, an interim receiver, a receiver, or any other Person acting on behalf of this Person.
  - (e) “**Known Creditor**” refers to a Creditor whose Claim is known to the Temporary Administrator as of the date of the present Order, including persons who demonstrated an interest in the PlexCoin undertaking in the context of the IPO, in accordance with the information collected by the Temporary Administrator from the AMF or the SEC.
  - (f) “**AMF Press Release**” refers to the press release to be published on the AMF’s website regarding the procedure to submit Proof of Claim attached to the present document as **Annex B**.
  - (g) “**Claim Submission Deadline**” refers to the [Note: insert the date corresponding to 90 days following the Order].
  - (h) “**Legal File Fees**” refers to all of the fees, Professional fees, and the disbursements of Professionals related to the execution of the Temporary Administrator’s file and approved by the Court.
  - (i) “**IPO**” refers to the fundraising that led to the issuance of PlexCoins, as described in the White Paper.

- (j) “**Working Day**” refers to any day except for a Saturday or a holiday, in accordance with article 61 of the *Interpretation Act* (Québec).
- (k) “**Lacroix**” refers to Dominic Lacroix.
- (l) “**White Paper**” refers to version 2.71 dated August 2017 of the PlexCoin White Paper.
- (m) “**Person**” refers to an individual, a company, a corporation, a limited liability or unlimited liability corporation, a partnership, a limited partnership, an association, a trust, a trustee, an organization that does not have legal personality, a joint venture, a government body, an administrative authority, or any other entity.
- (n) “**Related Person**” refers to a related person in the sense of article 4 of the *Bankruptcy and Insolvency Act* (Canada).
- (o) “**PlexCoin**” refers to the cryptocurrency named PlexCoin, as described in the White Paper.
- (p) “**PlexCorps**” refers to the undertaking or group of individuals that contributed to the creation, marketing, and issuance of PlexCoins, as described in the White Paper.
- (q) “**Proof of Claim**” refers to the proof of claim form essentially compliant with **Annex C** attached.
- (r) “**Professionals**” collectively refers to the attorneys of the Temporary Administrator, the Temporary Administrator, and any other professional whose services have been retained by the Temporary Administrator.
- (s) “**Claim**” refers to all claims or debt claims, of any nature whatsoever, whether current or future, certain or potential, liquidated or non-liquidated, regardless of whether they are payable or not as of the Claim Submission Deadline, resulting from any obligation taken on by Lacroix, including but not limited to claims related to the acquisition of PlexCoin in the context of the IPO as well as the loans requested by either Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc., or FinaOne inc. in the context of the operations of the aforementioned companies, excluding Professional Fees and Legal File Fees.
- (t) “**SEC**” refers to the United States Securities and Exchange Commission.
- (u) “**Court**” refers to the Superior Court of Québec presiding over the present file.

### Notice procedure

[9] **ORDERS** the Temporary Administrator to publish, on its website at the address [www.raymondchabot.com/fr/entreprises/dossiers-publics/dominic-lacroix-2/](http://www.raymondchabot.com/fr/entreprises/dossiers-publics/dominic-lacroix-2/), within two Working Days of the present Order, the present Order and the Notice of Claims Procedure.

[10] **ORDERS** the Temporary Administrator to publish the Notice of Claims Procedure within two Working Days of the present Order in *Le Journal de Québec*, on the websites [www.coinmarketcap.com](http://www.coinmarketcap.com) and [www.coindesk.com](http://www.coindesk.com), and on the PlexCoin subreddit at [www.reddit.com/r/plexcoin/](http://www.reddit.com/r/plexcoin/).

- [11] **ORDERS** the Temporary Administrator to send, within two Working Days of the present Order, the Notice of Claims Procedure to Known Creditors, via the following means:
- (a) for Persons that demonstrated an interest in the PlexCoin undertaking during the IPO in accordance with the information collected by the Temporary Administrator from the AMF or SEC, by email using the email addresses provided by these Persons as recovered by the AMF or SEC; and
  - (b) for other Persons, by email or regular post.
- [12] **ORDERS** the publishing, on the AMF's website, within two Working Days of the present Order, the AMF's Press Release, and **ACKNOWLEDGES** the SEC's commitment to publish the present Order and Notice of Claims Procedure on its website in their English versions.
- [13] **DECLARES** that the notice procedures established in the present Order are sufficient and are the only procedures that must be completed by the Temporary Administrator, the AMF, and via their engagement, the SEC, with regards to the Notice of Claims Procedure, the AMF Press Release, and the present Order.

#### **Submission of Claims**

- [14] **DECLARES** and **ORDERS** that any Creditor that has not submitted its Proof of Claim to the Temporary Administrator by the Claim Submission Deadline or which, with respect to a Claim, has received a notice of rejection that has not been the subject of an appeal: i) does not have the right to any additional notice; ii) shall be permanently excluded from asserting its claims against the Temporary Administrator; and iii) shall not be permitted to receive distributed funds in virtue of any distribution plan initiated by the Court in the context of the present proceedings; and iv) all Claims received in this way shall be inadmissible permanently;
- [15] **DECLARES** and **ORDERS** that any Proof of Claim can only be submitted to the Temporary Administrator by filling out and submitting the online claim form at the address • and by uploading all supporting evidence. Any Proof of Claim received by regular mail, courier, fax, or email shall not be considered to have been validly submitted to the Temporary Administrator, except in the event of a specific agreement between a Creditor and the Temporary Administrator.

#### **Proof of Claim Processing Procedure**

- [16] **ORDERS** that the following procedure apply when a Creditor submits Proof of Claim prior to the Claim Submission Deadline:
- (a) The Temporary Administrator will examine the Proof of Claim to determine the validity of the Claim that the Creditor is making. When applicable, the Temporary Administrator will send the Creditor a Notice of Revision or Rejection by regular mail, fax, courier, email, or any other electronic communication means.
  - (b) Prior to sending a Notice of Revision or Rejection to a Creditor revising or rejecting its Claim due to missing or inappropriate information or evidence, the Temporary Administrator must:
    - i. send the Creditor a notice requesting this information or evidence, advising that its Claim will be revised or rejected if this information or evidence is not provided to the Temporary Administrator within 30 Working Days; and

- ii. examine any additional information or evidence provided by the Creditor by the aforementioned deadline in response to the aforementioned notice.
- (c) Any Creditor that receives a Notice of Revision or Rejection and which wishes to challenge it must, within 30 Working Days of the date of the Notice of Revision or Rejection, lodge an appeal with the Court and serve a copy of it to the Temporary Administrator.
- (d) If the Creditor does not lodge an appeal application by the deadline indicated above, this Creditor shall be deemed to have accepted the value assigned to its Claim in the Notice of Revision or Rejection.
- (e) Any appeal against a Notice of Revision or Rejection proceeds as an appeal on a stated case and not an appeal *de novo*, unless the Court determines that this is unfair for the Creditor in the circumstances.

[17] **DECLARES** that Proof of Claim documents are confidential but **AUTHORIZES** the Temporary Administrator to send these documents to any tax or regulatory authority or any person specifically authorized by the Court.

#### **Notices and communications**

[18] **ORDERS** that any notice or other communication to be issued in virtue of this Order, by a Creditor to the Temporary Administrator, must be in writing, and when applicable, essentially similar to the form established in the present document, and shall only be deemed to have been validly made if sent by regular mail, fax, courier, or any other electronic communication means addressed to:

Temporary Administrator: **Raymond Chabot Administrateur Provisoire inc.**  
Attention: Mr. Emmanuel Phaneuf  
Fax: 514-878-2100  
Email: phaneuf.emmanuel@rcgt.com

CC: **McCarthy Tétrault s.e.n.c.r.l., s.r.l.**  
Attention: Attorney Hugo Babos-Marchand  
Attorney Gabriel Faure  
Fax: 514-875-6246

Email: hbmarchand@mccarthy.ca  
gfaure@mccarthy.canotif  
ication@mccarthy.ca

### General provisions

- [19] **ORDERS** that the Temporary Administrator use its reasonable discretion with regards to the conformity of any document written and signed subsequent to the present Order, and that it is permitted, if it is satisfied that any matter which must be proved following the present Order is proved adequately, to waive the requirements established in the present document with respect to the writing and execution of documents.
- [20] **APPROVES** the content of the annexes to the present Order and **DECLARES** that they are a comprehensive part of it.
- [21] **DECLARES** that the Temporary Administrator can submit an application to the Court in order to obtain instructions regarding any concerns with respect to the execution or modification of its authority and obligations in virtue of the present Order.
- [22] **DECLARES** that the present Order is issued in a French and an English version, and that these two versions are in force and have equal value.
- [23] **SOLICITS** the assistance and acknowledgment of any court and of any government or entity exercising judiciary, regulatory, or administrative duties of a province or a territory of Canada; of any judiciary, regulatory, or administrative court or any other court established by the Parliament of Canada or a provincial legislature; or any court or government or entity exercising judiciary, regulatory, or administrative duties in the United States, any nation, or any state, to assist and provide its support to this Court in order to implement and apply this Order.
- [24] **ORDERS** the provisional execution of the present Order notwithstanding appeal, without the need to establish a bond.
- [25] **ALL WITHOUT JUDICIAL COSTS.**

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**DANIEL DUMAIS, J.C.S.**

**Annex A**  
**Notice of Revision or Rejection**

SUPERIOR COURT OF QUÉBEC  
(Business Chamber)

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY  
No: 200-11-025040-182  
Office No.: 358421-001

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In the matter of the *Act Respecting the Regulation of the Financial Sector*, RLRQ, c E-6.1  
between:

**Autorité des marchés financiers (Québec Financial Markets Authority)**  
Plaintiff

c.

**Dominic Lacroix**  
Defendant

and

**Raymond Chabot Administrateur Provisoire Inc.**  
Temporary Administrator

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**NOTICE OF REVISION OR REJECTION OF PROOF  
OF CLAIM OR OF A GUARANTEE**

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To: [Creditor name]

We have examined your Proof of Claim [and all subsequent documents that you have provided relative to this Proof of Claim].

We hereby inform you that we have rejected your Claim against Dominic Lacroix (or your guarantee against his assets) in its entirety [or have revised your Claim against Dominic Lacroix (or your guarantee against his assets) to an amount of \$●] in accordance with the Claims Procedure Order dated ● (the “**Order**”), for the following reason:

●

If you wish to challenge this decision, you must submit an application for appeal to the Superior Court of Québec (the “**Court**”) with respect to the aforementioned matter and serve a copy of it to the Temporary Administrator in accordance with the Order, within 30 Working Days of the date of the present notice. If you do not submit an application for appeal by the aforementioned deadline, you shall be deemed to have accepted the value assigned to your Claim in the present notice. In the event that you challenge it, the Temporary Administrator shall be able to invoke any other reason. To lodge an appeal with the Court, you may be required to be counseled and represented by a lawyer authorized to practice law in Québec (Canada) or may desire to be counseled and represented by such a lawyer.

Except if indicated to the contrary in the present document, all terms that start with a capital letter shall have the meaning assigned to them in the Order.

In Montréal, on ●.

**RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.**

Temporary Administrator

600, rue de La Gauchetière Ouest, bureau 2000

Montréal (Québec) H3B 4L8

**Annex B**  
**AMF Press Release**

**PlexCoin File: The Superior court of Québec is requesting that Creditors submit Proof of Claim in order to participate in a potential distribution**

Québec – the Superior Court of Québec is requesting that any person that has a Claim against Dominic Lacroix provide Proof of Claim to the firm Raymond Chabot Administrateur Provisoire inc., appointed Temporary Administrator of Dominic Lacroix, at the latest by • [insert Claim Submission Deadline].

On • 2021, Justice Daniel Dumais, judge of the Superior Court of Québec, issued a Claims Processing Order. In accordance with this Order, any person that has a Claim against Dominic Lacroix must submit Proof of Claim to the Temporary Administrator by filling out and submitting the online claim form available at the address •, at the latest by • [insert Claim Submission Deadline]. Any person that is not capable of filling out the online claim form can contact the Temporary Administrator by telephone at • in order to take other measures for the submission of Proof of Claim, which must nonetheless be submitted to the Temporary Administrator at the latest by • [insert Claim Submission Deadline]. Any person with a Claim against Dominic Lacroix that has not submitted Proof of Claim to the Temporary Administrator by this deadline shall not be permitted to receive distributed funds by virtue of any distribution plan issued by the Superior Court.

This decision is a part of the procedures undertaken in view of proceeding to distribute assets to the Creditors of Dominic Lacroix. It must be recalled that on October 29, 2020, the Superior Court declared that the amounts seized or frozen in Québec had to be the subject of distribution among all of the Creditors of Dominic Lacroix, whereas the amounts seized or frozen in the United States by the United States Securities and Exchange Commission, if they are transferred to the Temporary Administrator for distribution, must be the subject of distribution exclusively among PlexCoin investors.

Interested parties can contact the Temporary Administrator by email at [plexcoin@rcgt.com](mailto:plexcoin@rcgt.com) or via its website at the address <https://www.raymondchabot.com/fr/entreprises/dossiers-publics/dominic-lacroix-2/>.

The *Autorité des marchés financiers* [Québec Financial Markets Authority] is the body that regulates and oversees the financial sector in Québec.

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Information:

Journalists only:

Sylvain Théberge: 514 940-2176

Information center:

Québec: 418 525-0337

Montréal: 514 395-0337

Other regions: 1 877 525-0337

Twitter: @lautorite

LinkedIn: Autorité des marchés financiers (Québec)

## **Annex C Proof of Claim**

Welcome to the online claim system for the temporary administration of the assets of Dominic Lacroix.

Except if indicated to the contrary in the present document, all terms that start with a capital letter have the meaning granted to them in the Claims Processing Order issued on ●.

The present Proof of Claim form must be filled out and submitted by ● at the latest. Any Creditor that has not submitted its Proof of Claim to the Temporary Administrator by this date shall not have the right to any additional notice; shall be permanently excluded from asserting a Claim against the Temporary Administrator; shall not be permitted to receive distributed funds in virtue of any distribution plan initiated by the Court in the context of the present proceedings; and all Claims received in this way shall be inadmissible permanently.

Any person that is not capable of filling out the online claim form can contact the Temporary Administrator by telephone at ● in order to take other measures to submit Proof of Claim, which must nonetheless be submitted to the Temporary Administrator at the latest by ●.

To continue, click the "Next" button.

### **CREDITOR DETAILS**

Are you submitting this Claim on behalf of another person, such as a company, a corporation, another entity, a minor, or a person subject to legal protective measures? [Answers: "Yes, I am submitting this Claim on behalf of another person" or "No, I am submitting this Claim for myself"].

Full legal name of the Creditor: ●

[If applicable] Name of the Creditor's representative: ●

[If applicable] Title of the Creditor's representative: ●

[If applicable]  By checking this box, I confirm that I am authorized to submit a Claim on behalf of the Creditor.

Complete mailing address of the Creditor: ●

Residency status for tax purposes: [Answers: "Resident of Canada" or "Resident of a jurisdiction other than Canada"].

Creditor's telephone number: ●

Creditor's fax number: ●

Email address: ●

By checking this box, I authorize the Temporary Administrator to communicate with me at the above email address regarding any matters relative to my Proof of Claim or the present file. Please make sure that you add the email address of the Temporary Administrator to your safe senders list. This will ensure that important emails from the Temporary Administrator are not sent directly to your spam folders.

### **AMOUNT AND NATURE OF THE CLAIM**

Check and fill out the applicable category.

CLAIM NOT SUBJECT TO A GUARANTEE FOR AN AMOUNT OF ● \$CA

With regards to this debt claim, the Creditor does not have any guarantee over the assets of Dominic Lacroix.

CLAIM SUBJECT TO A GUARANTEE FOR AN AMOUNT OF ● \$CA

With regards to this debt claim, the Creditor has a guarantee over the assets of Dominic Lacroix, the estimated value of which is ● \$CA.

### **TYPE OF CLAIM**

Check the applicable type of claim.

Claim against Dominic Lacroix related to PlexCoin

Claim against Dominic Lacroix related to a loan solicited by Dominic Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc., or FinaOne inc.

Another Claim against Dominic Lacroix

### **[If applicable] PLEXCOIN CLAIM DETAILS**

#### ***Purchase of PlexCoins in the context of the IPO***

Date of purchase: ●

Number of PlexCoins purchased: ●

Type of compensation paid by the Creditor: [Answer: "currency" or "cryptocurrency"].

[If applicable] Currency paid for the PlexCoins: ●

[If applicable] Cryptocurrency exchanged for the PlexCoins: ●

Amount of the currency paid or of the cryptocurrency exchanged for the PlexCoins: ●

[If applicable] Conversion to Canadian dollars: ●

Rate of conversion to Canadian dollars: ●

Portfolio address where the PlexCoins were received: ●

[If applicable] Portfolio address to which the Creditor paid cryptocurrency in exchange for PlexCoins: ●

Please upload any supporting evidence.

Any transfer, assignment, sale, or other alienation of PlexCoins must be declared below.

Click the “Add” button to add another purchase of PlexCoins in the context of the IPO to your Claim.

***Purchase of PlexCoins other than in the context of the IPO***

Date of purchase: ●

Number of PlexCoins purchased: ●

Type of compensation paid by the Creditor: [Answer: “currency”, “cryptocurrency”, or “other”].

[If applicable, if the compensation is not a currency or cryptocurrency] specify the compensation paid: ●

[If applicable] Currency paid for the PlexCoins: ●

[If applicable] Cryptocurrency exchanged for the PlexCoins: ●

Amount of the currency paid or of the cryptocurrency exchanged for the PlexCoins: ●

[If applicable] Conversion to Canadian dollars: ●

Rate of conversion to Canadian dollars: ●

Portfolio address where the PlexCoins were received: ●

[If applicable] Portfolio address to which the Creditor paid cryptocurrency in exchange for PlexCoins: ●

Please upload any supporting evidence.

Any transfer, assignment, sale, or other alienation of PlexCoins must be declared below.

Click the “Add” button to add another purchase of PlexCoins other than in the context of the IPO to your Claim.

***Bonus in the form of PlexCoins***

Number of PlexCoins obtained as a bonus: ●.

Date obtained: ●.

Portfolio address where the PlexCoins were received: ●.

Click the “Add” button to add another bonus in the form of PlexCoins to your Claim.

***Transfer, assignment, sale, or other alienation of PlexCoins***

Date of the transfer, assignment, sale, or other alienation of PlexCoins: ●

Number of PlexCoins transferred, assigned, sold, or alienated: ●

Type of compensation received by the Creditor: [Answer: “currency”, “cryptocurrency”, or “other”].

[If applicable, if the compensation is not a currency or cryptocurrency] Specify the compensation received: ●

[If applicable] Currency received in exchange for the PlexCoins: ●

[If applicable] Cryptocurrency exchanged for the PlexCoins: ●

Amount of the currency received or of the cryptocurrency exchanged for the PlexCoins: ●

[If applicable] Conversion to Canadian dollars: ●

Rate of conversion to Canadian dollars: ●

Portfolio address to which the Creditor transferred the PlexCoins: ●

[If applicable] Portfolio address where the Creditor received cryptocurrency in exchange for PlexCoins: ●

Please upload any supporting evidence.

Any transfer, assignment, sale, or other alienation of PlexCoins must be declared.

Click the “Add” button to add another transfer, assignment, sale, or other alienation of PlexCoins to your Claim.

**[If applicable] LOAN CLAIM DETAILS**

Borrower: [Answer: “Dominic Lacroix”, “Sabrina Paradis-Royer”, “PlexCorps”, “DL Innov inc.”, “Micro-Prêts inc.”, or “FinaOne inc.”.]

Loan date: ●

Loan amount: ●

Interest rate: ●

[If applicable, if the borrower is Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc., or FinaOne inc.]:did Dominic Lacroix act as guarantor for the borrower’s obligations?  
[Answer: “yes” or “no”]

[If the answer to the previous question is yes] Please provide a copy of Dominic Lacroix's guarantee.

Only a loan to Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc., or FinaOne inc. that has been the subject to a guarantee issued by Dominic Lacroix constitutes a Claim.

Total interest received: ●

Total principal reimbursement received: ●

Total principal owed: ●

Interest owed: ●

Please upload an up-to-date statement of account and any other supporting documents.

**[If applicable] OTHER CLAIM DETAILS**

Claim against Dominic Lacroix that is not a claim related to PlexCoin or to a loan solicited by either Dominic Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc., or FinaOne inc.

Principal amount: ●

Interest amount: ●

Currency: ●

[If applicable] Conversion into Canadian dollars: ●

[If applicable] Rate of conversion to Canadian dollars: ●

Details: ●

Please upload an up-to-date statement of account and any other supporting documents.

**[If applicable] GUARANTEE DETAILS**

Please describe the guarantee: ●.

Please upload a copy of the guarantee: ●.

**SIGNATURE AND DECLARATION**

[If the Proof of Claim is filled out by the Creditor itself/himself/herself]  By checking this box, I, [Creditor name], hereby certify that I possess a Claim, that the information that I am providing is accurate and truthful, and that I am informed of all of the circumstances surrounding the Claim that is the subject of the present document.

[If the Proof of Claim is filled out by a representative of the Creditor]  By checking this box, I, [name of the Creditor's representative], [title of the Creditor's representative], hereby certify that [Creditor's name] possesses a Claim, that the information that I am providing is accurate and truthful, and that I am informed of all of the circumstances surrounding the Claim that is the subject of the present document.

Click the "Submit" button to submit your Proof of Claim.

Once your Proof of Claim has been submitted, you will receive a copy of your Proof of Claim and a confirmation number by email. Please keep this number, as it is the number of your Claim with the Temporary Administrator.

**Annex D**  
**Notice of Claims Procedure**

SUPERIOR COURT OF QUÉBEC  
(Business Chamber)

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY  
No: 200-11-025040-182  
Office No.: 358421-001

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In the matter of the *Act Respecting the Regulation of the Financial Sector*, RLRQ, c E-6.1  
between:

**Autorité des marchés financiers (Québec Financial Markets Authority)**

Plaintiff

c.

**Dominic Lacroix**

Defendant

and

**Raymond Chabot Administrateur Provisoire inc.**

Temporary Administrator

**Notice of Claims Procedure**

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The present document hereby gives notice that the Superior Court of Québec issued a Claims Procedure Order on ●, in virtue of which the Court ordered the Temporary Administrator to inform potential Creditors in the aforementioned matter and to implement a claims procedure.

Any person that believes that it has a Claim or debt Claim, of any nature whatsoever, whether current or future, certain or potential, liquidated or non-liquidated, regardless of whether it is payable immediately or subsequently, resulting from any obligation taken on by Dominic Lacroix, including but not limited to Claims related to the acquisition of PlexCoin in the context of the IPO leading to the issuance of PlexCoins as well as the loans solicited by either Dominic Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innovinc., Micro-Prêts inc., or FinaOne inc. must submit Proof of Claim to the Temporary Administrator by filling out and submitting the online claim form at the address ●, at the latest by ● [insert Claim Submission Deadline] (hereinafter the “**Claim Submission Deadline**”). Any person that is not capable of filling out the online claim form can contact the Temporary Administrator by telephone at ● in order to take other measures to submit Proof of Claim, which must nonetheless be submitted to the Temporary Administrator at the latest by the Claim Submission Deadline.

Any Creditor that has not submitted Proof of Claim to the Temporary Administrator prior to the Claim Submission Deadline shall not have the right to any additional notice; shall be permanently excluded from asserting its Claim against the Temporary Administrator; shall not be permitted to receive distributed funds in virtue of any distribution plan initiated by the Court in the context of the present proceedings; and all such Claims shall be permanently inadmissible.

Except if indicated to the contrary in the present document, all terms that start with a capital letter shall have the meaning assigned to them in the Claims Procedure Order of ●.

If you would like more detailed information on the subject, please contact the Temporary

Administrator by email atplexcoin@rcgt.com.

In Montréal, on ●.

**RAYMOND CHABOT ADMINISTRATEUR PROVISoire INC.**

Temporary Administrator

600, rue de La Gauchetière Ouest, bureau 2000

Montréal (Québec) H3B 4L8

**SUPERIOR COURT OF QUÉBEC  
(Business Chamber)**

**CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY**

**No.: 200-11-025040-182**

**IN THE MATTER OF THE ACT RESPECTING THE REGULATION OF THE FINANCIAL SECTOR  
BETWEEN:**

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**AUTORITÉ DES MARCHÉS FINANCIERS (QUÉBEC FINANCIAL MARKETS AUTHORITY)**

Plaintiff

c.

**DOMINIC LACROIX**

Defendant

and

**RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.**

Temporary Administrator

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**APPLICATION REGARDING THE CLAIMS PROCEDURE**

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**TO SUPPORT ITS APPLICATION, RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC. STATES:**

1. Raymond Chabot Administrateur Provisoire Inc. (hereinafter the “Temporary Administrator”) is requesting that the court order a claims procedure against Dominic Lacroix.

**The actions of the defendant Dominic Lacroix**

2. In 2009, the defendant Dominic Lacroix founded Mini-Prêts inc., a business offering instant loans of \$500 at very high interest rates and with very high accessory fees.
3. In 2011, the *Tribunal administratif des marchés financiers* (Québec Financial Markets Administrative Court, hereinafter the “**TAMF**”) issued orders against the defendant Dominic Lacroix relative to illegal placements, as the defendant did not have a permit and was not registered with the *Autorité des marchés financiers* (Québec Financial Markets Authority, hereinafter the “**AMF**”).

4. In December 2012, the defendant Dominic Lacroix founded DL Innov inc., a holding company of which he is the administrator and main shareholder.
5. The defendant Dominic Lacroix also subsequently founded FinaOne inc., a company offering loans of small amounts to customers outside Québec, as well as other companies offering services complementary to those offered by his companies, including, among others, Gestio inc., Interaxe inc., and Gap Transit inc. These companies are all under the control of the defendant Dominic Lacroix.
6. In 2013, the defendant Dominic Lacroix pleaded guilty to six counts of illegal placements, illegal practices, and the transmission of false or deceiving information in securities.
7. In 2017, the companies of the defendant Dominic Lacroix expanded, and the latter subsequently employed approximately forty people.
8. In the spring of 2017, simultaneously, the defendant Dominic Lacroix launched a new cryptocurrency, the “PlexCoin”, with his business partner Yan Ouellet.
9. The defendant Dominic Lacroix and Yan Ouellet wrote a white paper describing their cryptocurrency. This white paper predicted an increase of up to 1354% and mentioned that the company was based in Singapore and had 53 employees working at its corporate headquarters, which is false.
10. PlexCoin transactions took place anonymously through “blockchain”.
11. The official launch of the PlexCoin was planned for the spring or summer of 2017. Transactions started in April or May of 2017.
12. PlexCoin advertising took place on Facebook. PlexCoin investors came from across the globe.
13. More than 50 million PlexCoins were exchanged from 14,325 known portfolio addresses, according to the counts of the Temporary Administrator. Out of these, approximately 100 persons invested more than \$10,000 each, meanwhile approximately 10,000 persons likely invested less than \$250.

#### **The steps of the AMF and the SEC**

14. The AMF and the United States Securities and Exchange Commission (hereinafter the “**SEC**”) received numerous complaints about the defendant, Dominic Lacroix. After an inquiry, they deemed the activities of the defendant Dominic Lacroix to be illegal and not authorized.
15. On June 13, 2017, following a request from the AMF, the TAMF issued a freeze order and an order to stop the illegal operations of DL Innov inc. and its subsidiaries.
16. On July 20, 2017, the TAMF issued new orders aiming at putting an end to the transactions related to the PlexCoin.
17. On September 21, 2017, given the lack of the collaboration of the defendant Dominic Lacroix and his continuation of activities, the TAMF issued new freeze orders against the defendant Dominic Lacroix, his spouse Sabrina Paradis-Royer, and DL Innov Inc.

18. On October 17, 2017, Justice Marc Lesage, J.C.S., found the defendant Dominic Lacroix guilty of contempt of court due to failure to comply with the orders issued by the TAMF. On December 8, 2017, the defendant Dominic Lacroix was therefore sentenced to two years in prison. On December 11, 2017, the defendant Dominic Lacroix lodged an appeal, and the serving of his sentence was suspended.
19. In December 2017, the SEC issued orders aiming at freezing the assets of the defendant Dominic Lacroix and injunctions targeting his assets on American soil, approved by a court of the State of New York.

### **The bankruptcy of the companies of the defendant Dominic Lacroix**

20. Because the defendant Dominic Lacroix's bank accounts were seized and his activities were stopped, the defendant is no longer capable of reimbursing the loans he took out to finance his activities.
21. The defendant Dominic Lacroix has sent out three notifications of intent to make a proposal to his creditors for three of his companies, Micro-Prêts inc., DL Innov inc., and FinaOne inc.
22. Mr. Jean Lelièvre, the bankruptcy trustee of the three companies, negotiated with the AMF to obtain a lifting of the blockage of certain accounts frozen by the TAMF rulings in order to resume the companies' activities and collect the loans owed by small borrowers.
23. On April 24, 2018, the TAMF refused to approve the agreement.
24. On June 21, 2018, the companies' creditors refused the proposal made to them. The three companies went bankrupt.

### **Appointment of the Temporary Administrator**

25. Despite the renewal of the freeze orders demanded respectively by the AMF and the SEC on May 24 and June 15, 2018, these authorities were not yet able to take possession of the cryptocurrency possessed by the defendant Dominic Lacroix.
26. On July 5, 2018, the AMF requested that the Superior Court appoint a temporary administrator to help it retrace the cryptocurrency in the possession of, controlled by, held by, or that has been entrusted to Dominic Lacroix.
27. On July 5, 2018, Justice Raymond W. Pronovost, J.C.S., appointed the Temporary Administrator in accordance with articles 19.1 and the following articles of the *Act Respecting the Regulation of the Financial Sector*.
28. At that time, Justice Raymond W. Pronovost, J.C.S., granted the Temporary Administrator the authority to take possession of the assets of the defendant Dominic Lacroix, his cryptocurrencies, to convert them, and to ensure their conservation, excluding any other persons.
29. On July 5 and 12, 2018, the TMF ordered a partial lifting of the freeze orders for the Temporary Administrator in order to allow it to exercise the authority that it had been granted to it by the Superior Court without restrictions.

30. On that same day, July 5, 2018, the Temporary Administrator seized various of the assets of the defendant Dominic Lacroix at his residence, and in particular computer equipment.
31. On July 6, 2018, the defendant Dominic Lacroix transferred to the Temporary Administrator a total of 425 bitcoins held by a portfolio address under his control, under the threat of being held in contempt of court once again.
32. Subsequently, the Superior Court issued numerous rulings and granted a variety of authorizations aiming at properly managing the file.
33. Justice Daniel Dumais, J.C.S., specifically authorized the conversion of the bitcoins tracked into cash and the seizure and sale of the other assets of the defendant Dominic Lacroix by the Temporary Administrator, as well as the granting of additional powers to the Temporary Administrator.
34. On January 18 and February 22, 2019, Justice Daniel Dumais, J.C.S., ordered the defendant Dominic Lacroix to draw up a list of his assets, to provide a statement of his accounting and his administration, as well as to provide information allowing to access his computer equipment seized by the Temporary Administrator.
35. On July 12, 2019, Judge Daniel Dumais, J.C.S., found the defendant Dominic Lacroix guilty of contempt of court, as the defendant continued to refuse to comply with these rulings. The defendant Dominic Lacroix was therefore sentenced to jail time.

#### **Proceedings against the defendant Dominic Lacroix in the United States**

36. In parallel, in June 2019, as a part of proceedings taking place in the United States, the defendant Dominic Lacroix came to an agreement with the SEC at the initiative of the United States District Court of New York. The defendant Dominic Lacroix and Sabrina Paradis-Royer committed to pay 4,900,000 USD in addition to a penalty of 1,000,000 USD, in order to reimburse PlexCoin investors.

#### **The plan to distribute the assets of the defendant Dominic Lacroix**

37. On August 30, 2019, the Superior Court accepted the AMF's request to grant additional powers to the Temporary Administration or in order for it to prepare a distribution plan to reimburse the PlexCoin investors who had not been reimbursed otherwise.
38. The assets to distribute were in the account of the Temporary Administrator, the account of Sabrina Paradis-Royer at Royal Bank, which was frozen, as well as in the United States, in the accounts of the financial institutions targeted by the SEC's rulings.
39. These assets came from PlexCoin investors, with the exception of the amount of \$2247, the origin of which is unknown.
40. The defendant Dominic Lacroix does not possess any other significant assets, and the receivables accounts of his companies have very little chance of collecting sums.
41. The Temporary Administrator therefore prepared a distribution plan dated November 4, 2019. This distribution plan proposed the sharing of the assets of the defendant Dominic Lacroix among initial PlexCoin investors, excluding the defendant's other creditors.

### **The other creditors of the defendant Dominic Lacroix and his companies**

42. Starting in 2013, the defendant Dominic Lacroix solicited private lenders to finance his companies, offering yields that could be as high as 42% annually, depending on the value of the loan.
43. A variety of lenders financed the companies of the defendant Dominic Lacroix, with loan amounts that generally varied between \$25,000 and \$100,000. Some of these were reimbursed in their entirety over time, receiving interest on a monthly basis, while others would never be reimbursed.
44. The number of lender creditors is approximately 50. The total balance owed to these lender creditors was between \$4,000,000 and \$5,000,000 as of March 25, 2020.

### **The declaratory judgment of the Superior Court of October 29, 2020**

45. After having been informed of the existence of the distribution plan dated November 4, 2019, hundreds of PlexCoin investors (grouped as the PlexCoin Committee); approximately thirty lender creditors (grouped as the Committee of Lenders); the SEC; the bankruptcy trustee of Micro-Prêts inc., DL Innov inc., and FinaOne inc.; and the provincial and federal tax authorities emerged to make claims.
46. Faced with these divergent claims, the Superior Court seized upon an application for a declaratory judgment by the Temporary Administrator to end the debate regarding who would benefit from this distribution.
47. In its judgment of October 29, 2020, the court declared that the assets frozen in the United States had to be distributed among the investor lenders defined in clause 1.1.13 of the distribution plan of November 4, 2019, including those whose debt claim is less than \$250, whereas the assets frozen in Québec had to be the subject of distribution among all of Dominic Lacroix's creditors, including those whose debt claim is less than \$250.
48. Furthermore, in the same judgment, the court ordered that a simple and effective claim mechanism be submitted to it.

### **The claims procedure requested by the Temporary Administrator**

49. The Temporary Administrator is requesting that the court issue a claims procedure order, the main elements of which are the following:
  - (a) The publication of a Notice of Claims Procedure on the website of the Temporary Administrator, in *Le Journal de Québec*, on the websites [www.coinmarketcap.com](http://www.coinmarketcap.com) and [www.coindesk.com](http://www.coindesk.com), as well as on the PlexCoin subreddit;
  - (b) Sending of a Notice of Claims Procedure to Known Creditors by email or regular post;
  - (c) Publication of a press release by the AMF and the SEC;

- (d) Any person that believes that it has a Claim resulting from any obligation taken on by Dominic Lacroix, including a Claim related to the acquisition of PlexCoin in the context of the fundraising that led to the issuance of PlexCoin as well as related to the loans requested by either Dominic Lacroix, Sabrina Paradis-Royer, PlexCorps, DL Innov inc., Micro-Prêts inc., or FinaOne inc. must submit Proof of Claim to the Temporary Administrator by filling out the online claim form on the Temporary Administrator's website at the latest by the 90th day following the date on which the Order was issued (hereinafter the "**Claim Submission Deadline**"), if applicable;
- (e) Any Creditors that have not provided Proof of Claim to the Temporary Administrator prior to the Claim Submission Deadline will not have the right to another notice, shall be permanently excluded from asserting their claims against the Temporary Administrator, shall not be permitted to receive distributed funds in virtue of any distribution plan initiated by the Court in the context of the present proceedings, and all Claims received in this way shall be ineligible with regards to any distribution plan;
- (f) The Temporary Administrator shall examine Proof of Claim documents in order to determine the validity of the Claim being made. When applicable, the Temporary Administrator shall send a Notice of Revision or Rejection to the Creditor;
- (g) Any Creditor that receives a Notice of Revision or Rejection and which wishes to challenge it must submit an appeal to the Court within the following 30 working days; and
- (h) The proceedings will take place in French and in English;

all as per the Draft Claims Procedure Order, Document P-1.

50. It is in the best interests of justice for a simple and effective claims procedure to be implemented by the court in which to proceed to distribute the funds to Creditors by means of a distribution plan that will be submitted to the Court once the results of the claims procedure are known.

**FOR THESE REASONS, MAY IT PLEASE THE COURT:**

**TO ISSUE** an "*Ordonnance relative au traitement des réclamations*" (the claims procedure order in French) that is substantially similar to the draft of such an order, Document P-1;

**TO ISSUE** a Claims Procedure Order similar to the draft of such an order, Document P-2;

**ALL WITHOUT JUDICIAL COSTS**, except in the case of appeals.

MONTRÉAL, on March 4, 2021

*McCarthy Tétrault sencrl srl*

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**McCARTHY TÉTRAULT s.e.n.c.r.l., s.r.l.**

Attorneys of the Temporary Administrator

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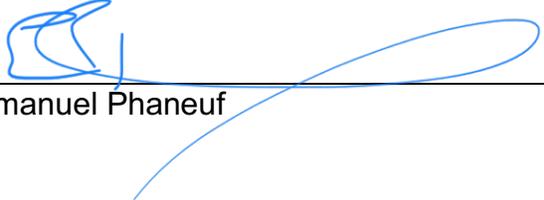
Fax: 514 875-6246

**SWORN OATH**

I, the undersigned, Emmanuel Phaneuf, exercising my profession at 600, De La Gauchetière Ouest, Bureau 2000, Montréal, Québec, H3B 4L8, swear the following under oath:

1. I am a duly authorized representative of the Temporary Administrator in the present proceedings;
2. I read the present Application Regarding the Claims Procedure and all of the facts related in it are true.

AND I SIGNED, in Montreal, on March 4, 2021

  
Emmanuel Phaneuf

Declared under oath before me in Montreal, on March 4, 2021

  
Commissioner of Oaths of Québec



[Stamp: Commissioner of Oaths  
Pascale Bédard  
220 091  
For Québec]

**SUPERIOR COURT OF QUÉBEC  
(Business Chamber)**

**CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY**

**No: 200-11-025040-182**

**IN THE MATTER OF THE *ACT RESPECTING THE REGULATION OF THE FINANCIAL SECTOR*  
BETWEEN:**

---

**AUTORITÉ DES MARCHÉS FINANCIERS (QUÉBEC FINANCIAL MARKETS AUTHORITY)**

Plaintiff

c.

**DOMINIC LACROIX**

Defendant

and

**RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.**

Temporary Administrator

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**NOTICE OF SUBMISSION BEFORE THE BUSINESS PRACTICES  
DIVISION (CHAMBER 3.14)**

**(ART. 101 C.P.C.)**

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**i. Notification list**

**1. PROVISIONAL ROLL CALL VIA TELEPHONE CONFERENCE**

**TAKE NOTE** that the provisional roll call by telephone conference will take place on a date to be determined by the Hon. Daniel Dumais, J.C.S.

During this roll call, if your file is in order, you can reserve your preliminary hearing date, and must inform the special court clerk of the time required to present claims that must be heard by a judge the following day, in accordance with the directives of the Senior Associate Chief Justice.

To submit any requests that should be heard by a judge the following day, the schedule for the precise time and methods (in the chamber, via WebRTC, or telephone conference) will be made available on the website of the Superior Court starting at 16:30 on the date of the provisional roll call.

To attend the provisional roll call, you must dial the telephone number **1-855-453-6954** and join the telephone conference by dialing **6264872** five (5) minutes before the time set for the

telephone conference. It will be presided over by the special court clerk on Tuesdays and Wednesdays and by a Justice of the Superior Court on Thursdays.

2. **SUBMITTING YOUR CLAIM**

**TAKE NOTE** that following the provisional roll call, the application shall be presented before the business practices division of the Superior Court, in a chamber (to be determined) of the Palace of Justice of Québec (300, boulevard Jean-Lesage in Québec City), at a date to be determined by Justice Daniel Dumais, J.C.S., unless other methods are applicable following the prior day's provisional rollcall (WebRTC or telephone conference) or as soon as counsel can be heard.

3. **NON-ATTENDANCE OF THE PROVISIONAL ROLLCALL VIA TELEPHONE CONFERENCE**

**TAKE NOTE** that if you wish to oppose the application, you must participate in the provisional rollcall via telephone conference. Otherwise, a ruling will be issued against you during the presentation of the application the following day, with no additional notice and immediately.

4. **OPPOSING THE APPLICATION**

**TAKE NOTE** that any file the hearing for which exceeds thirty (30) minutes shall only be scheduled after the special clerk or the judge has been informed of the duration of the hearing.

5. **NON-ATTENDANCE OF THE PRELIMINARY HEARING DATE SCHEDULED DURING THE TELEPHONE CONFERENCE**

**TAKE NOTE** that if you do not appear before the Court on the date of the preliminary hearing scheduled during the telephone conference, a ruling will be issued against you with no additional notice and immediately.

6. **OBLIGATIONS**

**TAKE NOTE** that you are required to cooperate with the other party, in particular by mutually informing one another, at all times, of the facts and elements liable to promote amicable debate, and by ensuring that you preserve the pertinent supporting evidence (article 20 of the Québec C.P.C).

**PLEASE ACT ACCORDINGLY.**

MONTRÉAL, on March 4, 2021

*McCarthy Tétrault sencrl srl*

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**McCARTHY TÉTRAULT s.e.n.c.r.l., s.r.l.**  
Attorneys of the Temporary Administrator

**SUPERIOR COURT OF QUÉBEC  
(Business Chamber)**

**CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY**

**No.: 200-11-025040-182**

**IN THE MATTER OF THE ACT RESPECTING THE REGULATION OF THE FINANCIAL SECTOR  
BETWEEN:**

---

**AUTORITÉ DES MARCHÉS FINANCIERS (QUÉBEC FINANCIAL MARKETS AUTHORITY)**

Plaintiff

c.

**DOMINIC LACROIX**

Defendant

and

**RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.**

Temporary Administrator

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**LIST OF DOCUMENTS**

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Document P-1     *Projet d'Ordonnance relative au traitement des réclamations* (draft claims procedure order in French)

Document P-2     Draft Claims Procedure Order (in English)

MONTRÉAL, on March 4, 2021

*McCarthy Tétrault sencrl srl*

**McCARTHY TÉTRAULT s.e.n.c.r.l., s.r.l.**  
Attorneys of the Temporary Administrator

**N°200-11-025040-182**  
SUPERIOR COURT OF QUÉBEC  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY

---

IN THE MATTER OF THE *ACT RESPECTING  
THE REGULATION OF THE FINANCIAL  
SECTOR* BETWEEN:

**AUTORITÉ DES MARCHÉS FINANCIERS**  
Plaintiff

c.

**DOMINIC LACROIX**  
Defendant

and

**RAYMOND CHABOT ADMINISTRATEUR  
PROVISoire INC.**

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**Application Regarding the Claims  
Procedure**

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**ORIGINAL**

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BC0847

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SUPERIOR COURT OF QUÉBEC / Business Chamber

CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF QUÉBEC CITY  
No:200-11-025040-182

IN THE MATTER OF THE ACT RESPECTING THE REGULATION OF THE FINANCIAL SECTOR  
BETWEEN:

AUTORITÉ DES MARCHÉS FINANCIERS (QUÉBEC FINANCIAL MARKETS AUTHORITY)

Plaintiff

c.

DOMINIC LACROIX

Defendant

and

RAYMOND CHABOT ADMINISTRATEUR PROVISOIRE INC.

Temporary Administrator

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EMAIL NOTIFICATION SLIP

(Art. 133 and 134 of the C.P.C.)

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MONTRÉAL, on March 4, 2021

TIME: {indicated on the present slip}

SENDER:

Attorney Gabriel Faure (0272)  
**McCarthy Tétrault S.E.N.C.R.L., s.r.l.**  
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Reference No.: 777457-535751

DOCUMENT TYPE:

**APPLICATION REGARDING THE CLAIMS PROCEDURE (13pages),  
AS WELL AS DOCUMENT P-1 (18 pages) AND DOCUMENT P-2 (16 pages)  
A TOTAL OF 47 PAGES**

NUMBER OF PAGES SENT  
(notification slip not included):

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RECIPIENT(S)

704367/521969  
DOCS 20211298

MONTRÉAL - Central Fax Department: Tel.: 514-397-4191 Fax: 514-875-6246

Any notifications via email must be exclusively addressed to [notification@mccarthy.ca](mailto:notification@mccarthy.ca)

N.B. If you have received this email or this fax by mistake, please advise the sender and destroy any copy of it in your possession. Our confidentiality policy is available on the website [www.mccarthy.ca](http://www.mccarthy.ca).

## SEE THE NOTIFICATION LIST

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