FORMAL COMPLAINT

Filed with the Virtual Assets Regulatory Authority (VARA)

Emirate of Dubai, United Arab Emirates

COMPLAINANT	RESPONDENT
Codex Arcanum LLC	STON.fi Development LLC
1021 E Lincolnway, Suite 8312	(also "STON.fi" / "STON.fi DEX")
Cheyenne, Wyoming 82001, USA	Claimed HQ: Dubai, UAE
EIN: 38-4357792	Skyview Tower, Apt 2806, Dubai Marina
Contact: Ali ALGhamdi	CEO: Slavik Baranov (Viacheslav Baranov)
Tel: +966 507 000 900	COO: Stanislav Bazylevich
Email: legal@codex.claims	CFO: Dmitriy Malinovskiy
Website: https://codex.claims	Website: https://ston.fi
	DEX Volume: >$6 Billion cumulative

Date of Filing: March 28, 2026

Reference: VARA-STONFI-2026-0328

Updates: VARA-STONFI-2026-0215 (February 15, 2026 - original filing, updated herein)

Subject:

(1) Unauthorized retention of 20,000,000 tokens from a transaction that was NOT authorized by the user (NO GAS, NO PAYLOAD, COMPUTE SKIPPED); (2) Selective Asset Recovery Policy causing user harm; (3) Potential operation of unlicensed Virtual Asset Exchange in/from Dubai; (4) Misleading statements contradicted by on-chain evidence; (5) Complicity of TON Foundation in suppressing legitimate token verification

Amount in Dispute: 1,000,000 TON (~$3,000,000 USD at current market rate) + return of 19,999,999.99998 TLE tokens + consequential damages for 22 months of asset deprivation, project destruction, and harm to 922 token holders

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1. EXECUTIVE SUMMARY

This complaint concerns STON.fi, the largest decentralized exchange (DEX) operating on The Open Network (TON) blockchain, which has processed in excess of six billion US dollars ($6,000,000,000) in cumulative trading volume. STON.fi claims Dubai, United Arab Emirates, as its principal place of business, yet does not appear in the VARA Public Register of licensed Virtual Asset Service Providers.

On May 4, 2024, a wallet software malfunction generated a duplicate transaction (hereinafter 'TX2') that sent 19,999,999.99998 TLE tokens to the STON.fi Router v1 contract. **This transaction was NOT authorized by the user.** Forensic blockchain analysis -- detailed in Section 3 -- proves:

Parameter	TX2 Value	Significance
Gas	0.000000001 TON (1 nanoTON)	Insufficient for ANY operation
Payload	EMPTY { is_right: false, value: {} }	No instruction of any kind
Compute Phase	SKIPPED (cskip_no_gas)	Smart contract NEVER executed
query_id	0 (null reference)	No operation binding
Aborted	TRUE	Router itself refused to process
Bounced	FALSE	Tokens NOT returned to sender
All Fees	0.000000000 TON	Zero blockchain activity occurred

The Router received 20,000,000 tokens without executing any operation, without rendering any service, and without returning the tokens to their owner. This constitutes **Unjust Enrichment** -- assets received without authorization, without consideration, and without legal basis for retention.

Despite possessing the proven technical capability to recover tokens -- the **pay_to** mechanism executed 56 times on May 12, 2024 (the day recovery was first called 'impossible'), 64 times on October 11, 2024, and for approximately 50 million DOGS token users in August 2024 -- STON.fi has refused recovery for 22 consecutive months.

A formal settlement demand was delivered on March 9, 2026 through four verified channels. STON.fi responded with template messages only. On March 22, 2026, STON.fi support engaged substantively but made admissions that further strengthen the Complainant's position (detailed in Section 10), including confirming that *'this transaction is not associated with any interaction with the STON.fi protocol'* (no service rendered) and *'at least until the full migration of liquidity from v1 to v2 pools is completed'* (recovery IS technically possible).

The Complainant respectfully requests VARA's intervention to: (a) investigate STON.fi's licensing status and compliance with Dubai Law No. 4 of 2022; (b) investigate the unauthorized retention of user assets; (c) compel disclosure of the responsible legal entity; and (d) facilitate equitable resolution of this dispute.

2. UPDATE: NEW EVIDENCE SINCE FEBRUARY 2026 FILING

This complaint supersedes and updates the complaint filed February 15, 2026 (Ref: VARA-STONFI-2026-0215). The following material developments have occurred since that filing:

Date	Event	Significance
Feb 17, 2026	Case S344 formally reopened	6 grounds with new forensic evidence
Mar 9, 2026	Settlement demand (200,000 TON)	4 channels: bot, Twitter, Telegram, LinkedIn to CEO
Mar 9, 2026	STON.fi acknowledges receipt	"Forwarded to technical team"
Mar 16, 2026	72-hour reminder sent	STON.fi: identical template reply
Mar 18, 2026	Deadline expires	9 days, zero substantive response
Mar 19, 2026	Demand escalated: 1,000,000 TON	NO_GAS evidence presented first time
Mar 22, 2026	STON.fi engages substantively	4 key admissions (see Section 10)
Mar 22, 2026	Escalated to "senior colleagues"	Decision-makers now reviewing
Mar 27, 2026	5-day senior review expires	No response received
Mar 28, 2026	THIS COMPLAINT FILED	After exhaustion of all direct attempts

3. THE UNAUTHORIZED TRANSACTION -- NO_GAS EVIDENCE

This section presents the central new evidence that fundamentally changes the nature of this dispute from a 'user error resulting in stuck assets' to an 'unauthorized transaction resulting in unjust enrichment by the platform operator.'

3.1 The Two Transactions -- Side by Side

On May 4, 2024, two transactions were sent from wallet tleton.ton (0:a619...6354) to the STON.fi Router v1 contract (0:779d...384e):

Parameter	TX1 -- AUTHORIZED	TX2 -- UNAUTHORIZED
Time (UTC)	May 4, 2024 06:01:19	May 4, 2024 06:17:32
Gap		16 minutes after TX1
Tokens	20,000,000 TLE + 500 TON	19,999,999.99998 TLE (NO TON pair)
Gas	~0.27 TON (sufficient)	0.000000001 TON (1 nanoTON)
Payload	StonfiProvideLiquidity	EMPTY { is_right: false, value: {} }
OpCode	Jetton Transfer + DEX ops	Jetton Notify (0x7362d09c) only
query_id	Valid (bound to LP flow)	0 (null -- bound to nothing)
Compute Phase	EXECUTED (8 operations)	SKIPPED (cskip_no_gas)
Aborted	No	TRUE
Bounced	N/A	FALSE -- tokens NOT returned
Gas Fee	~0.07 TON	0.000000000 TON
Storage Fee	Normal	0.000000000 TON
Action Fee	Normal	0.000000000 TON
Result	SUCCESS: LP tokens minted	TRAPPED: 20M TLE absorbed

TX1 Verification: https://tonviewer.com/transaction/8df890f334a32207deb3ee7d6485fbe7848ae7e345328bfcf5a300fca3a9db1e

TX2 Verification: https://tonviewer.com/transaction/48cf27299cfd70a24751c1f64b26b4c3d1a251bc1948d9ed413d08c1495cdf15

3.2 Why TX2 Was Not Authorized

On the TON blockchain, a valid authorized DeFi operation requires three elements:

1. Sufficient Gas: TX2 carried 0.000000001 TON. The Router requires approximately 0.27 TON to execute any operation. The compute phase was skipped entirely (cskip_no_gas). The smart contract code never ran. Not a single instruction was executed.

2. Valid Payload: TX1 carried StonfiProvideLiquidity -- a clear DEX instruction with all required parameters. TX2 carried { is_right: false, value: {} } -- an empty structure. No instruction. No operation type. No intent.

3. Operation Binding: TX1 had a valid query_id linking it to the liquidity provision flow. TX2 had query_id: 0 -- a null reference, bound to no operation in the Router's execution context.

TX2 possesses none of these authorization elements. The wallet software (Tonkeeper/MyTonWallet) generated a mechanical duplicate that stripped away every parameter constituting authorization. The user never initiated, approved, or signed TX2 as a DEX operation.

3.3 The Router's Failed Safety Mechanism

STON.fi's own source code (router.func, publicly available at github.com/ston-fi/dex-core) contains a refund condition at approximately line 91:

```
if (forward_payload is empty) -> refund tokens to sender
```

This safety mechanism exists precisely for this scenario -- tokens arriving without valid instructions should be automatically returned to the sender. However, executing even this refund path requires gas. TX2 carried

0.000000001 TON -- insufficient to trigger even the safety net.

Critical finding: The tokens are trapped not because of user action, not because of protocol design, but because insufficient gas prevented the Router's own built-in safety mechanism from functioning. The Router's code anticipated this scenario and included a protective refund -- but the refund could not fire.

3.4 Unjust Enrichment -- Legal Framework

The on-chain data establishes all elements of unjust enrichment recognized under UAE civil law and international legal principles:

Element	Evidence	On-Chain Proof
1. Asset received	19,999,999.99998 TLE	TX2 hash + Router balance
2. Without authorization	No gas, no payload, compute skipped	cskip_no_gas, aborted: true
3. Without service rendered	No liquidity, no swap, no operation	Zero internal messages executed
4. Without return to owner	Bounced: false	Tokens remain in Router wallet
5. Continued retention	Router balance: 33,970,912.82 TLE	Active -- processing pay_to daily
6. Enrichment of holder	Router retains value-bearing assets	While denying recovery for 22 months

4. JURISDICTION AND RESPONDENT'S DUBAI NEXUS

VARA has jurisdiction over all virtual asset activities conducted within or from the Emirate of Dubai, excluding the DIFC, pursuant to Dubai Law No. 4 of 2022. The following evidence establishes that STON.fi conducts operations from Dubai:

4.1 Domain Registration (WHOIS/RDAP)

Field	Value
Domain	ston.fi (registered May 19, 2022)
Registrant Organization	101domain GRS Limited (Privacy Proxy)
Registrant Address	Skyview Tower, Apt 2806
City / Country	Dubai, United Arab Emirates
Location Context	Dubai Marina / DMCC Free Zone area
Email Infrastructure	Google Workspace (@ston.fi)

4.2 Corporate Databases

Source	Location	Details
PitchBook	Dubai, UAE	Legal entity: STON.fi Development LLC
LinkedIn	Dubai, UAE	11-50 employees; 106 associated profiles
CrunchBase	Dubai, UAE	$9.5M Series A (July 2025)
Gate.io Research	Dubai, UAE	Operating headquarters
Tracxn	Yerevan, Armenia	Conflicting (possible subsidiary)

4.3 Leadership Team

Name	Title	Relevance
Slavik Baranov	CEO / Founder	LinkedIn InMail sent Mar 9, 2026; Leiden, NL
Stanislav Bazylevich	COO	Dubai operations
Dmitriy Malinovskiy	CFO	Finance and compliance
Alexey Papirovskiy	CPO	Product decisions
Andrey Fedorov	CMO/CBDO	Public representation

4.4 VARA Public Register: NOT FOUND. A search for 'STON.fi,' 'STONFI,' 'STON.fi Development,' and 'Baranov' returned no results. STON.fi is not licensed by VARA.

4.5 DMCC Public Register: NOT FOUND. No matching registration for STON.fi Development LLC.

5. REGULATORY CONCERN: UNLICENSED VASP OPERATIONS

Dubai Law No. 4 of 2022, Article 6, provides that no person may carry out or purport to carry out any virtual asset activity in the Emirate without a license or approval from VARA. VARA's definition of 'Virtual Asset Platform' explicitly includes **decentralized platforms** managed by a VASP.

Federal Decree Law No. 6 of 2025 (effective September 2025) further captures 'technology-enabling platforms, protocols, and decentralised applications' -- effectively eliminating the 'it is just code' defense for DeFi protocols. Penalties under this law reach AED 1 billion ($272M) administratively.

Recent enforcement precedent: In March 2026, VARA ordered KuCoin to halt all operations in Dubai for operating without a license. In October 2025, VARA fined 19 unlicensed crypto firms in a single enforcement round (fines AED 100,000-600,000 each). 38 entities now appear on VARA's public unlicensed VASPs list. STON.fi's situation is directly analogous.

The Complainant requests VARA investigate whether STON.fi Development LLC, its principals (CEO Slavik Baranov, COO Stanislav Bazylevich), and associated entities are conducting virtual asset activities from Dubai without the requisite VARA license.

6. STATEMENT OF FACTS (UPDATED)

6.1 The Authorized Deposit (May 4, 2024 -- TX1)

The Complainant deposited 20,000,000 TLE + 500 TON into a STON.fi v1 liquidity pool. TX1 completed successfully with all 10 on-chain actions status 'ok.' The pool minted 2,997,002,997 LP tokens.

6.2 The Unauthorized Duplicate (May 4, 2024 -- TX2)

16 minutes later, the wallet software generated TX2 -- a duplicate carrying 0.000000001 TON gas and an empty payload. The Router absorbed 19,999,999.99998 TLE without executing any operation. The compute phase was skipped entirely (cskip_no_gas). See Section 3 for full technical analysis.

6.3 Support Contact and Broken Promise (May 2024)

May 5: Support acknowledged the issue -- 'It is just lost. We cannot get anything from router.' Then promised: 'In June-July we expect to have this opportunity.' May 12: Max.Com (STON.fi representative) dismissed the formal complaint: 'Don't understand why you are wasting time for these docs.' Then stated: 'Impossible to do anything... because it is a DEX.' On that same day, 56 pay_to operations executed on the same Router.

6.4 DOGS Mass Recovery (August 2024)

While the Complainant's messages went unanswered, STON.fi executed mass recovery for approximately 50 million DOGS token users using the identical StonfiPaymentRequest mechanism through the same Router v1 contract. Same pay_to function. Same infrastructure.

6.5 Undisclosed Requirements (October 2024)

Support stated: 'TLE not contain the requirement condition to restore.' Requirements never disclosed, never published, never explained. 64 pay_to operations executed on the same day.

6.6 Abandonment (December 2024)

Final contact with Max.Com -- responded with a thumbs-up emoji only. His Telegram profile later updated to 'ex. STON.fi, ex. xRocket' -- he departed without resolving the case.

6.7 Formal Settlement Demand (March 9-27, 2026)

Settlement demand of 200,000 TON delivered through 4 channels (support bot, Twitter DM, Telegram DEX bot, LinkedIn InMail to CEO). Template responses only. Demand escalated to 1,000,000 TON on March 19 with NO_GAS evidence. STON.fi engaged March 22, made 4 admissions (Section 10), escalated to 'senior colleagues.' 5-day deadline expired March 27 without response.

7. THE SELECTIVE RECOVERY POLICY

STON.fi's refusal to recover the Complainant's assets is not based on technical impossibility but on a discretionary, undisclosed policy. This constitutes:

Violation	Description
Arbitrary Discrimination	Recovery for DOGS (50M users, Aug 2024) but denied for TLE -- same mechanism
Retroactive Application	Requirements that did not exist at deposit time applied retroactively to deny recovery
Breach of Representation	Express promise of June-July 2024 recovery relied upon to Complainant's detriment
Absence of Transparency	Recovery criteria never published -- users cannot assess their rights in advance
Unjust Enrichment	Assets retained from unauthorized TX without any service rendered (see Section 3)

8. ON-CHAIN FORENSIC EVIDENCE (UPDATED)

8.1 The pay_to Mechanism -- Source Code Evidence

STON.fi's publicly available source code (router.func) documents the pay_to handler as: `'send tokens, called from pools (on swap, liquidity providing, refund etc)'`. The word 'refund' is explicitly listed as a use case by STON.fi's own engineers.

Date	pay_to Operations	Context
May 9, 2024	49 in 1 minute	Normal operations -- rapid execution
May 12, 2024	56	Day STON.fi said "impossible because DEX"
Aug 26-30, 2024	34+ (StonfiPaymentRequest)	DOGS mass recovery (~50M users)
Oct 11, 2024	64	Day STON.fi cited undisclosed "requirements"
Dec 31, 2024	50+ in 30 minutes	Year-end batch operations
Feb-Mar 2026	10+ per hour	Ongoing daily -- mechanism fully operational

8.2 Admin Capabilities

The Router admin holds init_code_upgrade capability with a 7-day timelock (admin-calls.func). This means STON.fi can modify the Router's code -- including adding direct token recovery functions. The claim of permanent technical impossibility is contradicted by the admin's own contractual capabilities.

8.3 Router Balance

As of March 2026, the Router's TLE wallet holds **33,970,912.82 TLE** -- the Router is active, processing transfers daily. The tokens are not 'lost' in any technical sense. They are held by a functioning, administered smart contract.

8.4 Router Code Hash

`276f7c2058931d4685750a9856a5ac2dfa04d1b83c932d1e429fa3ceecd42faf`

Three contracts share this code hash; the main Router holds the majority of trapped TLE.

9. THE DOGS PRECEDENT (AUGUST 2024)

In August 2024, STON.fi executed mass token recovery for approximately 50 million DOGS token users using the identical StonfiPaymentRequest mechanism (opcode 0xdda48b6a) through the same Router v1 contract. This occurred while the Complainant's follow-up messages went unanswered.

Comparison Point	DOGS Recovery	TLE Case
Mechanism	pay_to / StonfiPaymentRequest	Same mechanism available
Contract	Router v1	Same Router v1
Users Affected	~50,000,000	922 holders
Recovery Executed?	YES -- automated	NO -- refused for 22 months
Timing	August 2024	Requested May 2024 -- still denied

This precedent conclusively demonstrates that STON.fi possesses both the technical capability and the operational willingness to execute token recovery -- selectively.

10. STON.fi's OWN ADMISSIONS -- March 22, 2026 (NEW)

On March 22, 2026, STON.fi support engaged substantively for the first time in 22 months. Their statements contain admissions that fatally undermine their own defense:

#	STON.fi Statement (verbatim)	Legal Significance
1	"This transaction is not associated with any interaction with the STON.fi protocol itself"	NO SERVICE RENDERED. If protocol not involved, no protocol-based justification for retention. = Unjust Enrichment
2	"At least until the full migration of liquidity from v1 to v2 pools is completed"	RECOVERY IS POSSIBLE. Conditioned on migration = not permanently impossible. Contradicts all prior denials.
3	"It is simply a standard token transfer"	NOT A DEX OPERATION. Bare transfer without service. Must be returned or compensated.
4	"Senior colleagues are reviewing" + "You will definitely receive a response"	CASE REACHED DECISION-MAKERS. Not routine -- requires leadership involvement. Written commitment to respond.

The Complainant responded to each point with on-chain data. The key rebuttal: *'If the protocol was not involved, there is no protocol-based justification for retention. Assets received without protocol interaction, without service, and without authorization must be returned or compensated. This is Unjust Enrichment.'*

Full communication record is publicly available at: https://codex.claims/updates

11. TON FOUNDATION COMPLICITY (NEW)

The Complainant additionally reports that TON Foundation (operators of the tonkeeper/ton-assets repository on GitHub) has acted to suppress the Complainant's legitimate token project:

11.1 Six Rejected Pull Requests (13 Months)

PR #	Date	Status	Significance
#491	May 11, 2024	Rejected	SAME DAY STON.fi said "impossible"
#543	May-Jun 2024	Rejected	No reason given
#544	May-Jun 2024	Rejected	No reason given
#669	June 12, 2024	Rejected	Month STON.fi promised recovery
#1899	Late 2024	Rejected	No reason given
#1901	Late 2024	Rejected	No reason given
#1934	Late 2024	Rejected	No reason given

11.2 Documented False Statement

On January 4, 2025, GitHub Collaborator 'salateur' (an official contributor with elevated privileges) publicly stated:

"The rest are either do not require any kind of verification (token with one holder) or with incorrect code in the PR."

This statement is demonstrably false:

Claim by salateur	Documented Truth
"Token with one holder"	854+ unique wallet holders at that time
	21,000+ community members across platforms
	$31,401 in liquidity across exchanges
	15,000 bot users in first 4 days
"Incorrect code in the PR"	TLE.yaml follows exact format of all verified tokens
	Preserved in commit 10da336 -- verifiable on GitHub

Permanent link: https://github.com/tonkeeper/ton-assets/issues/639#issuecomment-2571404037

Token verification would have forced STON.fi to treat the TLE case seriously. The coordinated rejection -- PR #491 on May 11, the same day STON.fi claimed impossibility -- suggests alignment.

12. CAUSATION: DELAY-INDUCED LOSSES (UPDATED)

Category	Amount	Notes
TLE Deposited	20,000,000 TLE	Full balance committed to pool
TON Deposited	500 TON (~$3,000)	At May 2024 market rate (~$6/TON)
TLE Recovered (LP burns)	~1,026,537 TLE	Only 5.1% recovered
TLE Permanently Lost	~18,973,463 TLE	94.9% of deposit
Token Price at Incident	~$21 per TLE	Market cap ~$420,000
Token Price Now	Near zero	Project destroyed by locked liquidity
Holders Affected	922	Compensated 1,828,696 CODEX from own funds
Duration	22+ months	May 2024 -- present
Settlement Demanded	1,000,000 TON	~$3,000,000 USD current rate

Had STON.fi honored its June-July 2024 commitment, the pool would have retained substantially all deposited assets. The 22-month delay and ultimate refusal directly caused the near-total loss.

13. COMMUNICATIONS RECORD (UPDATED THROUGH MARCH 27, 2026)

Date	From	Summary
May 5, 2024	STON.fi	"Just lost. Possible in June-July."
May 12, 2024	Max.Com	"Impossible because DEX." (56 pay_to same day)
Jun-Jul 2024	Max.Com	"Still waiting for opportunity" -- no action
Aug 2024	STON.fi	DOGS recovery for 50M users (complainant ignored)
Oct 11, 2024	STON.fi	"Requirements not met" (64 pay_to same day)
Dec 3, 2024	Max.Com	Thumbs-up emoji only -- final contact
Mar 9, 2026	Complainant	Settlement demand: 200,000 TON via 4 channels
Mar 9, 2026	STON.fi	Template: "Under review"
Mar 16, 2026	Complainant	72-hour reminder
Mar 16, 2026	STON.fi	Identical template: "Wait for updates"
Mar 18, 2026	SYSTEM	DEADLINE EXPIRED -- no substantive response
Mar 19, 2026	Complainant	Escalated: 1,000,000 TON + NO_GAS evidence
Mar 22, 2026	STON.fi	4 admissions (Section 10) -- escalated to senior team
Mar 22, 2026	Complainant	Point-by-point rebuttal + technical summary for seniors
Mar 22, 2026	STON.fi	"Senior colleagues reviewing" -- "definitely" respond
Mar 27, 2026	SYSTEM	5-day senior deadline EXPIRED -- no response
Mar 28, 2026	Complainant	THIS VARA COMPLAINT FILED

Full communication record publicly available: https://codex.claims/updates

14. RELIEF SOUGHT (UPDATED)

This complaint raises fundamental regulatory concerns affecting the integrity of Dubai's virtual asset market and the protection of users globally.

14.1 Investigate Licensing Status

Investigate whether STON.fi Development LLC operates virtual asset activities from Dubai without a VARA license, in violation of Law No. 4 of 2022 and Federal Decree Law No. 6 of 2025. If no valid license exists, take enforcement action including fines and cease-and-desist orders.

14.2 Compel Entity Disclosure

Require STON.fi to publicly disclose the full legal name, registration number, registered address, and regulatory status of the entity responsible for user funds held in its smart contracts.

14.3 Investigate Unauthorized Asset Retention

Examine whether the retention of 20,000,000 TLE tokens from an unauthorized transaction (NO GAS, NO PAYLOAD, COMPUTE SKIPPED) -- without rendering any service -- constitutes unjust enrichment under UAE law and violation of VARA's consumer protection framework.

14.4 Require Disclosure of Recovery Criteria

Direct STON.fi to publish complete recovery eligibility criteria. Assess whether selective application (recovery for DOGS but not TLE) constitutes discriminatory treatment.

14.5 Investigate Misleading Statements

Examine whether STON.fi's statements -- 'impossible because DEX' on the day of 56 pay_to operations, 'requirements not met' without disclosure of requirements -- constitute misleading conduct.

14.6 Asset Recovery and Compensation

Facilitate pay_to recovery of Complainant's tokens or compensation of 1,000,000 TON for: 22 months of deprivation, project destruction (token value $21 to near-zero), community harm (922 holders), selective denial, broken promises, and unjust enrichment.

14.7 Regulatory Sanctions

If violations confirmed, apply appropriate sanctions including fines (up to AED 50M), cease-and-desist orders, personal liability for directors, and requirements for public disclosure and remediation.

15. APPENDIX A: BLOCKCHAIN ADDRESSES

Entity	Raw Address
Complainant (tleton.ton)	0:a6196e05ce2eba1ebad7f7d407b825b2921cdecd47d3a9d55c01923a6ad16354
STON.fi Router v1	0:779dcc815138d9500e449c5291e7f12738c23d575b5310000f6a253bd607384e
Router TLE Wallet	0:e53422d449d47b34309cc0eb4e2f9fec6dc8d8ea3fb33d3987a4ebcce6ffb023
TLE/TON Pool	0:b6b7361dcfc311f79cdfb05bf2e3c556eae34876db09aee3df9d26497033f174
TLE Jetton Master	0:27b93f37ad75bef1d7b522e57fac85092c10337be2045d9a73ebe30364523854

Key Transactions:

TX1 (Authorized): 8df890f334a32207deb3ee7d6485fbe7848ae7e345328bfcf5a300fca3a9db1e

TX2 (Unauthorized): 48cf27299cfd70a24751c1f64b26b4c3d1a251bc1948d9ed413d08c1495cdf15

All data verifiable at: tonviewer.com | tonscan.org | tonapi.io

16. APPENDIX B: STON.fi SUPPORT CONVERSATION EXCERPTS

Date	Speaker	Verbatim Excerpt
May 5, 2024	Support	"I understood: you just sent 20M TLE to STON.fi DEX Router address. It's not providing liquidity, it's just lost. We cannot get anything from router."
May 5, 2024	Support	"The good news is that it would be possible in June-July."
May 5, 2024	Support	"This is not 'we'. This is a router address."
May 12, 2024	Max.Com	"So, don't understand why are you wasting time for these docs"
May 12, 2024	Max.Com	"At the moment it's impossible to do anything... because it is a DEX"
Mar 22, 2026	Support	"This transaction is not associated with any interaction with the STON.fi protocol itself"
Mar 22, 2026	Support	"At least until the full migration of liquidity from v1 to v2 pools is completed"
Mar 22, 2026	Support	"We also kindly ask you to keep the discussion constructive and avoid spreading misleading assumptions"

Complete record: https://codex.claims/updates | Screenshots available upon request.

17. APPENDIX C: GITHUB EVIDENCE

salateur's false statement (permanent link):

https://github.com/tonkeeper/ton-assets/issues/639#issuecomment-2571404037

Issue #2016 (comprehensive evidence filing):

https://github.com/tonkeeper/ton-assets/issues/2016

TLE.yaml (correctly formatted, commit preserved):

https://github.com/tonkeeper/ton-assets/pull/669/commits/10da336019e358718027b4fd896af562b470d47f

DECLARATION

I, Ali ALGhamdi, authorized representative of Codex Arcanum LLC, hereby declare that all information provided in this complaint is true and accurate to the best of my knowledge. All blockchain evidence cited herein is publicly verifiable and independently confirmable.

The Complainant has:

- Attempted direct resolution for 22 months (May 2024 -- March 2026); - Delivered formal settlement demand through 4 channels (March 9, 2026); - Provided ample time for response (9 days + 5 additional days for senior review); - Compensated 922 affected holders from own resources (1,828,696 CODEX tokens); - Documented all evidence with SHA256 seals and Bitcoin timestamps (Block #939,910); - Maintained all evidence publicly at https://codex.claims

All rights to pursue additional remedies under applicable law are reserved.

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Date: March 28, 2026

Reference: VARA-STONFI-2026-0328

Evidence Portal: https://codex.claims

Forensic Proof: https://codex.claims/forensic-proof

Communication Record: https://codex.claims/updates

350+ Sealed Evidence Files: https://codex.claims/files