JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY
Division of Law
124 Halsey Street - 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Attorney for New Jersey Division of Consumer Affairs

By: Glenn T. Graham
        Deputy Attorney General
        973-648-4846

                                        STATE OF NEW JERSEY
                                        DEPARTMENT OF LAW & PUBLIC
                                        SAFETY
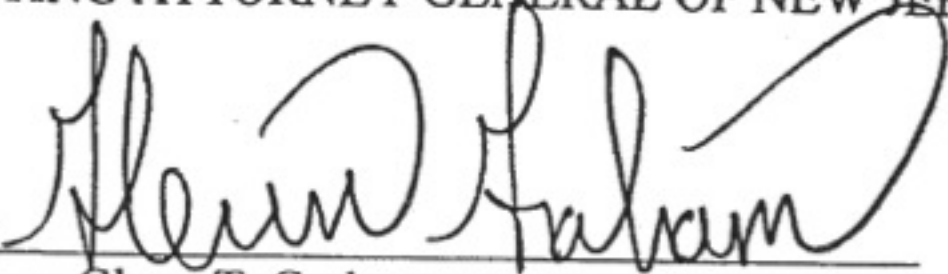   DIVISION OF CONSUMER AFFAIRS

In the Matter of   Administrative Action

Jeremy Rubin, individually   **INTERROGATORIES**
and d/b/a Tidbit

TO: Jeremy Rubin d/b/a Tidbit
        229 Commonwealth Avenue
        Boston, Massachusetts 02116
                AND
        410 Memorial Drive
        Cambridge, Massachusetts 02139

PLEASE TAKE NOTICE THAT the New Jersey Division of Consumer Affairs, Office

of Consumer Protection ("Division"), demands answers of Jeremy Rubin, individually and d/b/a

Tidbit, to the following Interrogatories in the above-entitled investigation, pursuant to N.J.S.A.

56:8-3 and 56:8-4 of the New Jersey Consumer Fraud Act ("CFA") under oath or certification

and on or before December 20, 2013.

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JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: _____

Glenn T. Graham
Deputy Attorney General

Dated: December 4, 2013
             Newark, New Jersey

PROOF OF SERVICE

I, *Princess Slater*, being of full age, certify that on December 4th, at approximately 10:08 a.m., I caused to be served the within Interrogatories on *Jeremy Rubin* at *229 Commonwealth Avenue, Boston, Massachusetts 02116* and at *410 Memorial Drive, Cambridge, Massachusetts 02139*, via *Certified and Regular mail*.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 12-4-13

_____
Princess Slater

INSTRUCTIONS AND DEFINITIONS

A. Instructions:

1.   The Interrogatories are directed to Tidbit as well as its owners, officers, directors, shareholders, founders, agents, employees, representatives, attorneys, corporations, subsidiaries, affiliates, successors, assigns or any other person acting or purporting to act on its behalf.

2.   Unless otherwise specifically indicated, the period of time encompassed by these Interrogatories shall be from January 1, 2012 up to and including the date of your answers.

3.   Unless specifically indicated, each and every responsive document produced must be Bates-stamped, Bates-labeled or otherwise consecutively numbered and the person making the production shall identify the corresponding Interrogatory Number to which each document or group of documents responds.

4.   Whenever in these Interrogatories you are asked to "Identify" or to provide an "Identity", you are requested:

    a.   When referring to a person, "Identify" or "Identity" means to give, to the extent known, the person's full name, present or last known address and telephone number, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

    b.   When referring to a document, "Identify" or "Identity" means to give, to the extent known, the: (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author[s], addressee[s] and recipient[s].

5.   If information requested herein are withheld under a claim of privilege or otherwise, identify the Interrogatory as which the objection is made, and set forth with particularity the basis upon and the extent to which the information is being withheld.

6.   To the extent you assert any objection to these Interrogatories, state with particularity the basis for the objection.

B.   Definitions:

1.   "Tidbit" and "Rubin" mean Jeremy Rubin, individually and d/b/a Tidbit, as well as his owners, officers, directors, shareholders, founders, managers, agents, servants, employees, representatives, attorneys, corporations, subsidiaries, affiliates, successors, assigns or any other individual or entity acting or purporting to act on his behalf.

2.   "Any" includes "all" and vice versa.

3.   "Access" means to instruct, communicate with, store data in, retrieve data from, or otherwise make use of any resources of a computer, computer system, or computer network.

4.   "Bitcoin code" means the software code distributed and/ or developed by Tidbit that uses and/or causes users' computers to mine for bitcoins.

5.   "Breach of security" means unauthorized access to electronic files, media or data that compromises the security, confidentiality or integrity of data when access to the data has not been secured by encryption or by any other method or technology that renders the data unreadable or unusable. Good faith acquisition of data by an employee or agent of Tidbit for a legitimate business purpose is not a breach of security, provided that the data is not used for a purpose unrelated to the business or subject to further unauthorized disclosure.

6.   "Computer" shall be defined in accordance with N.J.S.A. 2A:38A-1.

7.   "Concerning" means relating to pertaining to, referring to, describing, evidencing or constituting.

8.   "Correspondence" means any Document intended to transmit information Including letters, memoranda, electronic mail, faxes, "instant messages," "text messages," voice mail messages and notes.

9.   "Document" includes all writings, correspondence, recordings, drawings, graphs, charts, photographs, phone records, compact discs, video cassettes, computer files, electronic/magnetic files of any type and any other data compilations from which information can be obtained and translated, if necessary, by use of detection devices into reasonably usable form.

10.   "Include" and "Including" shall be construed as broadly as possible and shall mean "without limitation".

11.   "New Jersey" and "State" shall refer to the State of New Jersey.

12.   "Person[s]" means any natural person, individual, any business entity (whether partnership, corporation, limited liability company or corporation, trust, estate, incorporated or

unincorporated association or cooperation), any governmental agency or entity and any other legal or commercial entity however organized.

13. "You" and "Your" mean Tidbit and Rubin.

14. "User" means any person who uses a computer or mobile device.

15. As used herein, the terms "all" and "each" shall be construed as all and each.

16. As used herein, the conjunctions "and" and "or" shall be interpreted conjunctively and shall not be interpreted disjunctively to exclude any information otherwise within the scope of this Request. References to the singular include the plural and references to the plural include the singular.

INTERROGATORIES

1. Identify all person[s] (other than attorneys) with whom the person[s] executing the Certification accompanying these Interrogatory answers consulted in the preparation of such answers. As to each identified person[s], identify the Interrogatory for which that person[s] furnished information.

2. State the full name of Tidbit (including corporate name and d/b/a's), as well as its address, telephone number, date and state of incorporation (or organization).

3. Describe Tidbit's corporate structure and state the names of all parents, subsidiaries, divisions, affiliates, branches, joint ventures, franchises, operations under assumed names, websites, and entities over which it exercises supervision or control. For each such entity, describe its function or business purpose, and the nature of its relationship to Tidbit.

4. Identify all officers, directors, principals and owners of Tidbit, and all shareholders with a 5% or more ownership of Tidbit, stating each shareholder's percentage of ownership.

5. Identify your total number of employees and state your total annual revenue.

6. Describe the services and products offered by you.

7. Identify all customers of Tidbit and the services or products they purchased from you. Attach a copy of all contracts and/ or agreements.

8. Describe the method, manner, and process in which the Bitcoin code was developed and deployed.

9. Describe the method, manner and process your customers use the Bitcoin code, including the benefit(s) of the Bitcoin code to customers.

10. Describe the benefit(s) of the Bitcoin code to users.

11. Describe the benefit(s) you receive from having customers and/or websites utilize the Bitcoin code, including transaction fees and newly minted bitcoins.

12. Identify the person(s) who developed the Bitcoin code and produce all versions of the code.

13. Provide contact information, including full name, address, e-mail address, and telephone numbers for the following individuals and/or handles:

     (a) Oliver Song;

     (b) Carolyn Z;

     (c) Kcking;

     (d) Rubin; and

     (e) any other person(s) associated with Tidbit and/or the Bitcoin code.

14. How many websites utilized and/or were affected by the Bitcoin code? Identify all websites by URL and provide copies of all contracts and/ or agreements with all website providers.

15. Identify all persons whose computers were caused to mine for Bitcoins through the Bitcoin code, including:

    (a) First and last name;

    (b) IP address; and

    (c) Contact information.

16. Identify all Bitcoin wallet addresses associated with the Bitcoin code. For each Bitcoin account, further identify all account information, including: (a) first and last name; (b) username, alias or shortlink; (c) e-mail address; and (d) account identifier. Produce all documents in support of your response to this interrogatory.

17. Identify all website publishers, advertisers, affiliates and/or other third-parties with whom you have a contractual relationship. Attach a copy of all contracts.

18. Does Tidbit review the privacy policies of websites utilizing the Bitcoin code? If so, describe the process and produce all documents and correspondence in support of your response to this Interrogatory.

19. Does Tidbit conduct quality control, compliance and/or other reviews prior to permitting customers and/or websites from utilizing the Bitcoin code? If so, describe the process for all reviews and produce all documents and correspondence in support of your response to this Interrogatory.

20. Identify all instances where Tidbit, its employees and/or websites utilizing the Bitcoin code accessed consumer computers without express written authorization or accessed consumer computers beyond what was authorized. For each instance:

   (a) Describe the nature and purpose of the access; and

   (b) Identify the source of the unauthorized access.

21. Set forth and attach a copy of all your past and present privacy policies.

22. Set forth and attach a copy of all your past and present data retention policies.

23. Set forth and attach a copy of all your past and present record destruction policies.

24. Set forth and attach a copy of all your past and present data collection policies.

25. Set forth and attach a copy of your past and present breach of security policies.

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26. What disclosures did Tidbit provide website publishers and/or Bitcoin code users concerning Bitcoin mining?

27. Identify any state or federal inquiries or investigations, of which you are aware, concerning Tidbit. Attach a copy of all documents and correspondence in support of your answer to this Interrogatory.

CERTIFICATION

I hereby certify that the statements made by me in the foregoing answers to Interrogatories are true and correct to the best of my knowledge, information and belief.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment for contempt of Court.

_____
Signature

Dated: _____

_____
Name printed

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