

IN THE 15TH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY,
FLORIDA

CASE NO. 50-2013-CP-005060-XXXX-NB
PROBATE DIVISION

IN RE: ESTATE OF DAVID ALAN KLEIMAN,

Deceased.

LYNN WRIGHT,

Petitioner,

Adversary Proceeding
Case No. _____

v.

IRA KLEIMAN, as Personal Representative
of the Estate of David Kleiman,

Respondent,

and

DR. CRAIG WRIGHT, TULIP TRUST, UYEN T. NGUYEN,
W&K INFO DEFENSE RESEARCH, LLC,
a Florida limited liability company, and
COIN-EXCH PTY, LTD., an Australian
proprietary limited company,

Interested Parties.

PETITIONER LYNN WRIGHT'S VERIFIED PETITION
TO DETERMINE BENEFICIARY SHARES AND FOR
DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF

Petitioner, Lynn Wright ("Lynn"), an Interested Person, pursuant to Florida Probate Rule 5.385 and sections 86.041 and 733.105, Florida Statutes, brings this Petition to Determine Beneficiary Shares and for Declaratory Judgment and Injunctive Relief Against Respondent, Ira Kleiman, as Personal Representative of the Estate of David Kleiman, stating:

Jurisdiction and Parties

1. The circuit court has exclusive jurisdiction over the settlement of estates of decedents. § 26.012(c), Fla. Stat.

2. Pursuant to section 86.041, Florida Statutes, this Court has jurisdiction to declare rights of an interested party and to direct the personal representative to refrain from particular actions.

3. Petitioner, Lynn Wright (“Lynn”), is a resident of New South Wales, Australia, and is an interested party.

4. Respondent, Ira Kleiman (“Ira”), is an individual residing in Palm Beach County, Florida, who has been appointed Personal Representative of the Estate of David Alan Kleiman (“Estate”), Case No. 50-2013-CP005060-XXXX-NB, Probate Division, in the 15th Judicial Circuit, in and for Palm Beach County, Florida.

5. W&K Info Defense Research, LLC (“W&K Info Defense”) is a Florida limited liability company and an interested party.

6. Dr. Craig Wright (“Craig”) is a resident of London, United Kingdom, and is an interested party, upon information and belief, as a beneficiary of Tulip Trust.

7. Tulip Trust is a foreign trust and an interested party as it is, upon information and belief, the sole member with the right to vote with respect to the transfer of membership interests of W&K Info Defense. Uyen T. Nguyen (“Ms. Nguyen”) was previously a resident of Palm Beach Gardens, Florida, and, upon information and belief, is now a resident of Palm Beach Gardens, California, and may be an interested party.

8. Coin-Exch Pty, Ltd. (“Coin-Exch”) is an Australian proprietary limited company and may be an interested party.

General Allegations

9. David Alan Kleiman (“Dave”) passed away April 26, 2013.

10. Ira, Dave’s brother, claims to be a beneficiary of the Estate.

11. Letters of Administration appointing Ira as the personal representative of the Estate were issued on February 4, 2016.

12. One of the assets of the Estate is an unknown and disputed interest in W&K Info Defense.

13. In February 2011, W&K Info Defense Research, LLC (“W&K Info Defense”) was formed as a Florida limited liability company. Lynn was an initial member of and owner of 1/3 of the membership interests in W&K Info Defense. In addition to Lynn, upon information and belief, Craig Wright R&D, for which Wright acted as trustee, and Dave were also initial members of and each owners of 1/3 interests in W&K Info Defense.¹

14. The name W&K Info Defense was comprised of “W” for Lynn Wright, “K” for Dave Kleiman, and “Info Defense” for Craig, as he already was the principal of Information Defense Proprietary, Limited, an Australian entity.

15. On February 16, 2011, Dave filed the Articles of Organization of W&K Info Defense with the State of Florida, which listed the effective date of the LLC as February 14, 2011, and named Dave as a Manager Member. A copy of the Articles is attached as **Exhibit 1**.

¹ At the time that W&K Info Defense was formed, it was governed by the then existing Florida Limited Liability Company Act, Chapter 608, Florida Statutes. In 2013, Chapter 608 was repealed and the Florida Revised Limited Liability Company Act, Chapter 605, was passed by the Florida legislature, effective January 1, 2014. For all LLCs formed prior to that date, as of January 1, 2015, Chapter 605 went into effect and Chapter 608 was repealed. Louis T. M. Conti & Gregory M. Marks, *Florida’s New Revised LLC Act, Part I*, 87-Oct Fla. B.J. 52 (2013). Therefore, Chapter 605 now governs W&K Info Defense.

16. Upon information and belief, there is no fully executed written operating agreement for W&K Info Defense.

17. In November, 2010, Lynn and Craig separated as husband and wife with their divorce being finalized on March 15, 2013. Prior to the divorce being finalized, Craig and Lynn agreed to and effected, in part, a property settlement agreement in June 2011. As part of the property settlement, in June 2011, Craig, as the then trustee of Craig Wright R&D, transferred 50% of its transferable interest in W&K Info Defense to Lynn. Thus, shortly after W&K Info Defense was formed, Lynn became the owner of one-half (1/2) of Craig Wright R&D's initial interest in W&K Info Defense, in addition to her one-third (1/3) membership interest in W&K Info Defense.

18. At the time of Craig Wright R&D's transfer to Lynn, it possessed at least 1/3 of the membership interests in W&K Info Defense.

19. In December 2012, Lynn transferred 100% of her transferrable interests in W&K Info Defense to Craig Wright R&D.

20. Upon information and belief, sometime after Dave's passing, Craig Wright R&D changed its name to Tulip Trust.

21. Upon information and belief, Craig Wright is not presently a trustee of the Tulip Trust.

22. Upon information and belief, Ramona Ang is a trustee of the Tulip Trust with full rights and power to make transfers from the Tulip Trust to other persons.

23. On March 28, 2014, it is believed that Ms. Nguyen filed an LLC Reinstatement for W&K Info Defense with the Florida Secretary of State, changing the registered agent from Dave to Ms. Nguyen, changing the principal place of business of W&K Info Defense to

California, and listing herself and Coin-Exch Pty, Ltd. as authorized persons. A copy of the 2014 Reinstatement is attached as **Exhibit 2**.

24. On April 22, 2015, it is believed that Ms. Nguyen (apparently, as the online document is unsigned) filed an Annual Report for W&K Info Defense with the Florida Secretary of State, again listing herself and Coin-Exch Pty, Ltd. as authorized persons. A copy of the 2015 Annual Report is attached as **Exhibit 3**.

25. Upon information and belief, Ms. Nguyen may claim an interest in W&K Info Defense and that she is also a member of W&K Info Defense. If true, that would dilute the interests of the other members, Lynn and the Tulip Trust, and the distribution interest of the Estate.

26. Ms. Nguyen and Coin-Exch are personally unknown to Lynn, except that she more recently learned of their existence and that each may claim some rights or interest in W&K Info Defense, and that there may be a business relationship between Ms. Nguyen and Ira to attempt to obtain control of W&K Info Defense.

27. On April 12, 2018, Ira filed an LLC Reinstatement for W&K Info Defense with the Florida Secretary of State, listing himself as registered agent, with the principal place of business now shown as 5104 Robino Circle, West Palm Beach, Florida, and listing himself as MGRM or Manager Member. A copy of the 2018 LLC Reinstatement is attached as **Exhibit 4**.

28. On February 22, 2019, Ira filed an Annual Report for W&K Info Defense with the Florida Secretary of State, again listing himself as registered agent and a Manager Member. A copy of the 2019 Annual Report is attached as **Exhibit 5**.

29. On March 3, 2020, Ira filed an Annual Report for W&K Info Defense with the Florida Secretary of State, again listing himself as registered agent and a Manager Member. A copy of the 2020 Annual Report is attached as **Exhibit 6**.

30. On or about July 10, 2020, Tulip Trust transferred to Lynn one-third of all of the membership interest in W&K Info Defense representing, without limitation, one-third of all of the voting interest in W&K Info Defense and one-third of all the transferable economic interest in W&K Info Defense, which includes, but is not limited to, one percentage interest in W&K Info Defense previously owned only by Tulip Trust which was not previously owned by Lynn.

Count I - Petition to Determine Beneficiary Shares

31. Lynn incorporates the allegations in paragraphs 1 through 30 as though restated in their entirety.

32. Ira has claimed at times that Dave's interest in W&K Info Defense was 50% and at other times 100%.

33. Lynn is presently a member of W&K Info Defense with a one-third membership interest in W&K Info Defense, with all voting rights as such member.

34. The names, residences, and post office addresses of all persons in interest, except creditors, as far as known or ascertainable by diligent search and inquiry, and the nature of their respective interests are as follows:

NAME	ADDRESS	INTEREST
Ira Kleiman, as Personal Representative of the Estate of David Kleiman	5104 Robino Circle West Palm Beach, FL 33417	a disputed interest in W&K Info Defense
Lynn Wright	c/o Alan M. Burger, Esq. McDonald Hopkins LLC 505 S. Flagler Drive, #300 West Palm Beach, FL 33401	a disputed interest in W&K Info Defense
Craig Wright as beneficiary of the Tulip	c/o Andres Rivero, Esq. Rivero Mestre LLP	a disputed interest in W&K Info Defense, held in a

Trust; Ramona Ang as Trustee of Tulip Trust	2525 Ponce de Leon Boulevard, Suite 1000 Miami, FL 33134	beneficial trust
W&K Info Defense Research, LLC	5104 Robino Circle West Palm Beach, FL 33417	an interest in having the disputed ownership of the company determined
Uyen T. Nguyen	4371 Northlake Blvd., #314 Palm Beach Gardens, FL 33410 3128 Merced Avenue, El Monte, El Monte Palm Beach Gardens, CA 91733	a possible disputed interest in W&K Info Defense
Coin-Exch Pty, Ltd.	502 / 32 Delhi Rd North Ryde, NSW 02113 AU	a possible disputed interest in W&K Info Defense

35. None of the above persons is believed to be a minor or an incapacitated person or under legal guardianship in this state.

36. There may be persons who have interests in this estate as beneficiaries of the decedent whose names are not known to the petitioner.

WHEREFORE, Petitioner, Lynn Wright, asks this Court, after formal notice and hearing, to enter its order determining the percentage of distributions from W&K Info Defense Research, LLC to which the Estate is entitled, and for such other and further relief as this Court deems just and proper.

Count II – Declaratory Judgment and Injunctive Relief

37. Lynn incorporates the allegations in paragraph 31 as though restated in their entirety.

38. Florida’s declaratory judgment act provides:

Any person interested as or through an executor, administrator, trustee, guardian, or other fiduciary in the administration of a trust, a guardianship, or the estate of a decedent . . . may have a declaration of rights or equitable or legal relations to:

- (1) Ascertain any class of creditors, devisees, legatees, heirs, next of kin, or others;
- (2) Direct the executor, administrator, or trustee to refrain from doing any particular act in his or her fiduciary capacity; or
- (3) Determine any question related to the administration of the guardianship, estate, or trust, including questions of construction of wills and other writings.

§ 86.041, Fla. Stat.

39. Upon the death of Dave, upon information and belief, Craig Wright R&D, n/k/a Tulip Trust, was the sole remaining member of W&K Info Defense with the right to vote with respect to the transfer of membership interests in W&K Info Defense.

40. After formation of a limited liability company, a person only becomes a member with the consent of all of the members. § 605.0401(3)(c), Fla. Stat. (2020). Upon information and belief, Tulip Trust has never given its consent to admit Ira as a member of W&K Info Defense.

41. Section 605.0504 of the Florida Revised LLC Act governs the “Power of legal representative,” stating:

If a member who is an individual dies . . . the member’s legal representative may exercise all of the member’s rights for the purpose of settling the member’s estate or administering the member’s property, including any power the member had to give a transferee the right to become a member.

§ 605.0504, Fla. Stat. (2020). However, a legal representative does not automatically become a member of an LLC. Instead, the Estate (and ultimately the heirs) is a transferee by operation of law who obtains a transferable interest. See § 605.0102(65)-(67), Fla. Stat. (2020).

42. A “transferable interest” means the right to receive distributions from a limited liability company. § 605.0102(66), Fla. Stat. (2020).

43. Section 605.0502 governs the transfer of a transferable interest:

(1) Subject to s. 605.0503,² a transfer, in whole or in part, of a transferable interest:

* * *

(c) Does not entitle the transferee to:

1. Participate in the management or conduct of the company's activities and affairs; or

2. Except as otherwise provided in subsection (3), have access to records or other information concerning the company's activities and affairs.

(2) A transferee has the right to receive, in accordance with the transfer, distributions to which the transferor would otherwise be entitled.

Therefore, Ira, as the personal representative, does not obtain the voting rights of Dave, the deceased member, and is not entitled to participate in the management and conduct of W&K Info Defense, but only has the rights under section 605.0504 to settle the Dave's Estate and to receive distributions as a beneficiary of the Estate.

44. Ira contends that he has the authority to act as a member of W&K Info Defense by holding himself out to the State of Florida as a manager member of W&K Info Defense and by listing himself as the registered agent and as MGRM on filings with the State of Florida, all of which he lacked authority to do.

45. Ira contends that he has the authority to act as a member of W&K Info Defense by his act of filing a lawsuit in federal court, naming W&K Info Defense as one of the plaintiffs, which he had no authority to do, and Ira continues to prosecute that action. *See Ira Kleiman and W&K Info Defense Research, LLC v. Craig Wright*, Case No. 9:18-cv-80176-BB, in the United States District Court, Southern District of Florida.

46. Section 605.0301, Florida Statutes, provides:

A person does not have the power to bind a limited liability company, except to the extent the person:

² Section 605.0503 relates to charging orders against an LLC.

- (1) Is an agent of the company by virtue of s. 605.04074³;
- (2) Has the authority to do so under the articles of organization or operating agreement of the company;
- (3) Has the authority to do so by a statement of authority filed under s. 605.0302;
or
- (4) Has the status of an agent of the company or the authority or power to bind the company under a law other than this chapter.

Lynn contends that Ira, as personal representative of the Estate or otherwise, fits none of these categories and is therefore not authorized to act on behalf of W&K Info Defense.

47. Lynn also contends that neither the Estate nor its heirs are entitled to obtain property of W&K Info Defense, to act on its behalf, or to meddle in its operation. Until W&K Info Defense is dissolved and wound down, the Estate, and ultimately the heirs, are only entitled to the right to receive *distributions* to which Dave would otherwise be entitled. “A person has a right to a distribution before the dissolution and winding up of a limited liability company only if the company decides to make an interim distribution. A person’s dissociation does not entitle the person to a distribution.” § 605.0404(2), Fla. Stat. (2020),

48. Ira has acted and continues to act completely outside his authority as personal representative of the Estate and on behalf of W&K Info Defense.

49. An actual, justiciable, and continuing dispute and controversy therefore exists between Lynn, on the one hand, and Ira, on the other hand, with respect to Ira’s ability to act as a member of W&K Info Defense in the manner in which he is presently acting through the litigation of the federal court case, his filings with the State of Florida, and any other actions he has taken on behalf of W&K Info Defense.

³ § 605.04074 governs agency rights of members and managers.

50. Lynn seeks a declaration, pursuant to section 86.041, Florida Statutes, that Ira did not and presently does not have authority as personal representative of the Estate to initiate the suit against Craig on behalf of W&K Info Defense or to continue to prosecute the lawsuit on behalf of W&K Info Defense, that he is not a member of W&K Info Defense with the right to vote with respect to the transfer of membership interests in W&K Info Defense and does not have authority to hold himself out as such, and that he does not have authority to act on behalf of W&K Info Defense.

51. Pursuant to section 86.041(3), Florida Statutes, Lynn seeks an order directing Ira, as personal representative of the Estate and in his individual capacity, to immediately cease any and all of these unauthorized activities and enjoining Ira from further acting on behalf of W&K Info Defense in any manner.

52. The names, residences, and post office addresses of all persons in interest, except creditors, as far as known or ascertainable by diligent search and inquiry, and the nature of their respective interests are as follows:

NAME	ADDRESS	INTEREST
Ira Kleiman, as Personal Representative of the Estate of David Kleiman	5104 Robino Circle West Palm Beach, FL 33417	a disputed interest in W&K Info Defense
Lynn Wright	c/o Alan M. Burger, Esq. McDonald Hopkins LLC 505 S. Flagler Drive, #300 West Palm Beach, FL 33401	a disputed interest in W&K Info Defense
Craig Wright, as beneficiary of the Tulip Trust; Ramona Ang as Trustee of Tulip Trust	c/o Andres Rivero, Esq. Rivero Mestre LLP 2525 Ponce de Leon Boulevard, Suite 1000 Miami, FL 33134	a disputed interest in W&K Info Defense, held in a beneficial trust
W&K Info Defense Research, LLC	5104 Robino Circle West Palm Beach, FL 33417	an interest in having the disputed ownership of the company determined

Uyen T. Nguyen	4371 Northlake Blvd., #314 Palm Beach Gardens, FL 33410 3128 Merced Avenue, El Monte, El Monte Palm Beach Gardens, CA 91733	a possible disputed interest in W&K Info Defense
Coin-Exch Pty, Ltd.	502 / 32 Delhi Rd North Ryde, NSW 02113 AU	a possible disputed interest in W&K Info Defense

53. None of the above persons is believed to be a minor or an incapacitated person or under legal guardianship in this state.

54. There may be persons who have interests in this Estate as beneficiaries of the decedent whose names are not known to the petitioner.

WHEREFORE, Petitioner, Lynn Wright, requests this Court (1) enter a declaratory judgment that Respondent Ira Kleiman is not a member of W&K Info Defense, that he has no authority to act on behalf of W&K Info Defense, that he has authority only in his capacity as personal representative of the Estate to act in such manner as is necessary to determine the Estate's interest in W&K Info Defense; (2) order and direct Ira Kleiman, as personal representative of the Estate and individually, to forthwith and forever cease and desist from any further action on behalf of W&K Info Defense, except for seeking a determination from this Court as to the Estate's interest in W&K Info Defense; (3) for such supplemental relief pursuant to section 86.061, Florida Statutes, as may be appropriate, including attorneys' fees and other damages under section 605.0205, Fla. Stat., and (4) for such other and further relief as this Court deems just and proper.

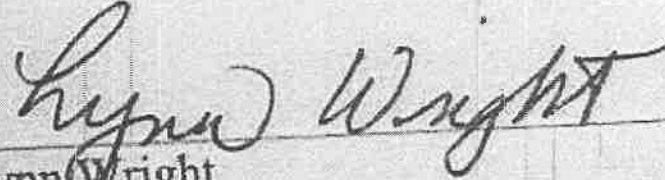
Respectfully submitted this 16 day of July, 2020.

MCDONALD HOPKINS LLC
Attorneys for Petitioner Lynn Wright
505 South Flagler Drive, Suite 300
West Palm Beach, FL 33401
Tel: 561-472-2121
Fax: 561-472-2122
aburger@mcdonaldhopkins.com
ltimeteo@mcdonaldhopkins.com
wpbpleadings@mcdonaldhopkins.com

By: /s/Alan M. Burger
ALAN M. BURGER
Florida Bar No. 833290

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing, and the facts alleged are true, to the best of my knowledge and belief.



Lynn Wright

The undersigned certifies that a copy hereof has been furnished to the following persons by the method of service designated below on the dates shown.

Name	Address	Method of Service	Date
Ira Kleiman, as Personal Representative of the Estate of David Kleiman	c/o Devin Freedman, Esq. Boies Schiller Flexner LLP 100 SE Second Street Miami, FL 33131	FedEx overnight, signature required	7/16/20
Craig Wright, as beneficiary of Tulip Trust; Ramona Ang as Trustee of Tulip Trust	c/o Andres Rivero, Esq. Rivero Mestre LLP 2525 Ponce de Leon Boulevard, Suite 1000 Miami, FL 33134	FedEx overnight, signature required	7/16/20
W&K Info Defense Research, LLC	5104 Robino Circle West Palm Beach, FL 33417	FedEx overnight, signature required and U.S. Mail	7/16/20
Uyen T. Nguyen	4371 Northlake Blvd., #314 Palm Beach Gardens, FL 33410 3128 Merced Avenue, El Monte, El Monte Palm Beach Gardens, CA 91733	FedEx overnight, signature required, to both addresses, and U.S. Mail	7/16/20
Coin-Exch Pty, Ltd.	502 / 32 Delhi Rd North Ryde, NSW 02113 AU	FedEx overnight, signature required and U.S. Mail	7/16/20

By: /s/Alan M. Burger
 ALAN M. BURGER
 Florida Bar No. 833290

**Electronic Articles of Organization
For
Florida Limited Liability Company**

L11000019904
FILED 8:00 AM
February 16, 2011
Sec. Of State
tcline

Article I

The name of the Limited Liability Company is:
W&K INFO DEFENSE RESEARCH LLC

Article II

The street address of the principal office of the Limited Liability Company is:
3119 CONTEGO LANE
PALM BEACH GARDENS, FL. US 33418

The mailing address of the Limited Liability Company is:
4371 NORTHLAKE BLVD #314
PALM BEACH GARDENS, FL. US 33410

Article III

The purpose for which this Limited Liability Company is organized is:
ANY AND ALL LAWFUL BUSINESS.

Article IV

The name and Florida street address of the registered agent is:
DAVID A KLEIMAN
3119 CONTEGO LANE
PALM BEACH GARDENS, FL. 33410

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: DAVE KLEIMAN



Article V

The name and address of managing members/managers are:

Title: MGRM
DAVID A KLEIMAN
4371 NORTHLAKE BLVD #314
PALM BEACH GARDENS, FL 33410 US

L11000019904
FILED 8:00 AM
February 16, 2011
Sec. Of State
tcline

Article VI

The effective date for this Limited Liability Company shall be:

02/14/2011

Signature of member or an authorized representative of a member

Electronic Signature: DAVE KLEIMAN

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

2014 LIMITED LIABILITY COMPANY REINSTATEMENT

DOCUMENT# L11000019904

FILED
Mar 28, 2014
Secretary of State

Entity Name: W&K INFO DEFENSE RESEARCH LLC

Current Principal Place of Business:

3119 CONTEGO LANE
PALM BEACH GARDENS, FL 33418 US

New Principal Place of Business:

3128 MERCED AVE, EL MONTE
EL MONTE
PALM BEACH GARDENS, CA 91733 US

Current Mailing Address:

4371 NORTHLAKE BLVD #314
PALM BEACH GARDENS, FL 33410 US

New Mailing Address:

3128 MERCED AVE, EL MONTE
EL MONTE
PALM BEACH GARDENS, CA 91733 US

FBI Number:

FBI Number Applied For ()

FBI Number Not Applicable (X)

Certificate of Status Desired (X)

Name and Address of Current Registered Agent:

KLEIMAN, DAVID A
3119 CONTEGO LANE
PALM BEACH GARDENS, FL 33410 US

Name and Address of New Registered Agent:

NGUYEN, UYEN T
4371 NORTHLAKE BLVD #314
PALM BEACH GARDENS, FL 33410 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida

SIGNATURE UYEN NGUYEN

Electronic Signature of Registered Agent

03/28/2014

Date

AUTHORIZED PERSONS:

Title MS
Name NGUYEN, UYEN T MS
Address 4371 NORTHLAKE BLVD #314
City-St-Zip PALM BEACH GARDENS FL 33410 US

Title DR
Name COIN-EXCH PTY LTD
Address 502 / 32 DELHI RD
City-St-Zip NORTH RYDE, NS 02113 AU

I hereby certify that the information indicated on this report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath, that I am authorized to execute this report as required by Chapter 605, Florida Statutes

SIGNATURE UYEN NGUYEN

Electronic Signature of Authorized Person

MS

03/28/2014

Date



2015 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L11000019904

Entity Name: W&K INFO DEFENSE RESEARCH LLC

Current Principal Place of Business:

3128 MERCED AVE. EL MONTE
EL MONTE
PALM BEACH GARDENS, CA 91733

Current Mailing Address:

3128 MERCED AVE. EL MONTE
EL MONTE
PALM BEACH GARDENS, CA 91733 US

FEI Number: NOT APPLICABLE

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

NGUYEN, UYEN T
4371 NORTHLAKE BLVD #314
PALM BEACH GARDENS, FL 33410 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MS	Title	DR
Name	NGUYEN, UYEN T MS	Name	COIN-EXCH PTY LTD
Address	4371 NORTHLAKE BLVD #314	Address	502 / 32 DELHI RD
City-State-Zip	PALM BEACH GARDENS FL 33410	City-State-Zip	NORTH RYDE NS 02113

I hereby certify that the information included on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under seal. That I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 885, Florida Statutes, and that my name appears above, or on an attached form or other file incorporated

SIGNATURE: UYEN NGUYEN

MS

04/22/2015

Electronic Signature of Signing Authorized Person(s) Detail

Date



2018 FLORIDA LIMITED LIABILITY COMPANY REINSTATEMENT

DOCUMENT# L11000019904

Entity Name: W&K INFO DEFENSE RESEARCH LLC

Current Principal Place of Business:

5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417

Current Mailing Address:

5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417 US

FEI Number: NOT APPLICABLE

Certificate of Status Desired: Yes

Name and Address of Current Registered Agent:

KLEIMAN, IRA
5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida

SIGNATURE: IRA KLEIMAN

04/12/2018

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MGRM
Name	KLEIMAN, IRA
Address	5104 ROBINO CIRCLE
City-State-Zip	WEST PALM BEACH FL 33417

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath, that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above or on an attachment with an appropriate endorsement.

SIGNATURE: IRA KLEIMAN

MGRM

04/12/2018

Electronic Signature of Signing Authorized Person(s) Detail

Date



2019 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L11000019904

Entity Name: W&K INFO DEFENSE RESEARCH LLC

Current Principal Place of Business:

5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417

Current Mailing Address:

5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417 US

FBI Number: NOT APPLICABLE

Certificate of Status Desired: Yes

Name and Address of Current Registered Agent:

KLEIMAN, IRA
5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida

SIGNATURE: IRA KLEIMAN

02/22/2019

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title: MGRM
Name: KLEIMAN, IRA
Address: 5104 ROBINO CIRCLE
City-State-Zip: WEST PALM BEACH FL 33417

I hereby certify that the information reported on this report or supplemental reports is true and accurate and that my electronic signature and date have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes, and that my name appears above, or on an attachment with all other signatures.

SIGNATURE: IRA KLEIMAN

MGRM

02/22/2019

Electronic Signature of Signing Authorized Person(s) Detail

Date



2020 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L11000019904

Entity Name: W&K INFO DEFENSE RESEARCH LLC

Current Principal Place of Business:

5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417

Current Mailing Address:

5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417 US

FEI Number: NOT APPLICABLE

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

KLEIMAN, IRA
5104 ROBINO CIRCLE
WEST PALM BEACH, FL 33417 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: IRA KLEIMAN

03/03/2020

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title	MGRM
Name	KLEIMAN, IRA
Address	5104 ROBINO CIRCLE
City-State-Zip	WEST PALM BEACH FL 33417

I hereby certify that the information disclosed on this report or supplemental report is true and accurate and that my electronic signature and date here the same as for AP01 or if made under name that I am a managing member or manager of the limited liability company or the holder or trustee empowered to execute this report as required by Chapter 605, Florida Statute and that my name appears above or on an attachment with all other as e-enclosed.

SIGNATURE: IRA KLEIMAN

MGRM

03/03/2020

Electronic Signature of Signing Authorized Person(s) Detail

Date

