

Bryan M. Paysen

Georgetown, Texas

In response to the allegations made by HUMBL, Inc & Brian Foote:

RE: "PAID-BASHING"

I do not now, nor have I ever, received compensation from Freedman Normand Friedland, formerly "Roche Freedman."

I do not have "38 burners" (Twitter accounts), as has been alleged, to amplify negative sentiment toward HUMBL.

I have not received, nor do I plan to receive, any compensation from ANY party for my social media activity. I follow and critique HUMBL for fun and for free, as do many others.

Any statements made by me on social media that may imply I am "paid to bash HUMBL" or that I have "38 burners" are sarcastic responses to absurd conspiracy theories concocted by individuals within HUMBL or those that may have an investment in HUMBL. I regret that these statements, made in jest, have been purposefully taken out of context to create a false narrative by those who seek to harm me and the firm representing the plaintiffs in the Class Action Lawsuit against HUMBL.

Brian Foote states:

"To my knowledge, I have never met Respondent PAYSAN and have no idea why he constantly attacks, threatens, insults and demeans me on Twitter."

This is not true. Brian Foote is well aware that I am a plaintiff in the Class Action Lawsuit against HUMBL, as I am personally named in several of HUMBL's own SEC filings. This may be perjury #1.

RE: DIGINERO

Diginero (Digital Dinero) was a 100% self-funded project that began in December 2021. After reviewing the white-labeled Wyre product released by HUMBL called "HumbIPay," and being less than impressed, I investigated the costs of reproduction with a public job posting on UpWork. I described the scope of the project and set a budget of \$10,000.

The job posting read (Exhibit 1):

**WYRE Digital Wallet Programmer
Mobile App Development**

Looking for a programmer that can create an app that allows a user to create a simple Wyre Wallet that can be funded with credit/debit/ACH. The user will then be able to buy/on-ramp to stablecoin, send to a recipient wallet, and off-ramp to fiat. I can create simple user-interface mockups to be replicated.

Here is Wyre's API information <https://www.sendwyre.com/>

I received 30+ responses from interested developers, and after a few interviews, I selected a husband-and-wife team based in India at a cost of \$12,000 (Exhibit 2). The project was fairly easy to develop, however, I elected not to launch due to the declining health of the crypto market and the somewhat prohibitive costs of maintaining a crypto-related business bank account.

Diginero received no outside funding, and to make clear, neither Roche Freedman nor its successors, had any involvement or knowledge of this private endeavor.

“I didn’t build Diginero to be competitive with HumblPay, but to demonstrate that HUMBL’s products are built on non-proprietary technology that is easily replicated and that the company is grossly over-valued.”

*Twitter accounts controlled by me in the past 12 months only include @pravadcles, @drcrumbl, and @fiatP2P

**The crypto-friendly business banks I explored (which included Silvergate) often had minimum monthly charges of \$1,000+/-

RE: ALLEGATIONS OF THREATS

I have never made any threats to HUMBL management or their employees, nor have I commented on or targeted anyone at HUMBL for their ethnic heritage. I believe Brian Foote and his associates are feigning offense and fear to shift responsibility for their business failures, and the company’s ever-declining stock price, onto critical social media accounts, of which there are many (Exhibit 3).

Brian Foote and his associates routinely make social media posts that include their current whereabouts with geo-tagged photos, as well as their upcoming plans to attend public events. If they had a genuine concern for their safety, HUMBL would likely refrain from making these posts.

Foote claims:

“HUMBL’s executives, including me, decided that it was not safe to open the HUMBL offices on August 4, 2022, in case @jamesdean1966 appeared, as he posed a threat to HUMBL and its employees fearful to go to the office,” and “This threat had the further effect of creating an unsafe work environment for HUMBL employees, including me, to be able to perform my duties as CEO in our co-working space”

Coincidentally, on this very same day, HUMBL executive Brian Boormeester posted to Twitter photos of himself along with HUMBL CEO Brian Foote, VP Karen Garcia, VP Michele Rivera, and VP Alfonso Arana Sr in their exact location at Brigham Young University in Provo Utah 700 miles away (Exhibit 4). Each of the aforementioned individuals appears to be in good spirits and presumably already had no intention of going to the San Diego office that day. Foote may have provided a disingenuous retrospective of August 4th, 2022 in which he paints himself and HUMBL employees as victims of a crime that didn’t occur, to target both myself and Roche Freedman. This may be perjury #2.

Furthermore, on October 7th, 2022, well after the alleged “threats” received in August, Alfonso Arana Sr. (@HUMBL_Delivery) personally invited me (@pravadcles) to “meet up, provide a tour, and eat a meal” in San Diego (Exhibit 5). Extending a public invitation to meet and dine with me is a gesture incompatible with a party who claims they feel physically threatened by me.

I am not the Twitter user @JamesDean1966; I am not the individual that created the squirrel-threesome meme (Exhibit 6) in which CEO Brian Foote appears to be coupling with shareholders Kevin Connor (AKA @theyachtboyz) and Mark Dolin (@shopmarkey)

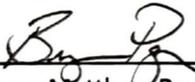
THREATS & DEFAMATORY EFFORTS MADE AGAINST ME

There has been a concerted effort to intimidate me and assassinate my character in response to my name appearing as a plaintiff in the Class Action Lawsuit filed against HUMBL and George Sharp. I have documented evidence of attempted blackmail and thinly veiled threats of violence from individuals who are known HUMBL “ambassadors” or investors with a demonstrable history of promoting the stock. One of these individuals also appears to suggest that HUMBL is, in fact, a scam (Exhibit 7). My personal information, including my home address and the addresses of my family members, has also been posted to Twitter, presumably to dissuade me from proceeding with the lawsuit against HUMBL.

There is a group of vicious individuals within the HUMBL community that has knowingly and purposefully formed a false narrative that intends to portray me as a violent criminal and Roche Freedman as a corrupt law firm to disrupt the litigation against HUMBL. These individuals continue to manufacture and promulgate disinformation despite knowing that I have no violent felony criminal convictions and that Kyle Roche is not involved in the case against HUMBL.

In the event that HUMBL persists in this meritless lawsuit I intend to request the unmasking of the following social media accounts that have made threats and/or knowingly promulgated false information about me and my counsel:

- @hotrodlincoln66
- @flyboy1075
- @FactCheckBryanP
- @BlasterMaster88,
- @TheFadeHashira
- @WonderfulsMr
- @smashtub
- @tpogv_charlie
- @finklesfixtures


Bryan Matthew Paysen


11/20/2022

Texas Notarial Certificate (Jurat)

The State of Texas
County of Williamson

Subscribed and sworn to before me on this 20th day of November, 2022 by Bryan Matthew Paysen.

(Seal)





(Notary's Signature) Notary Public, State of Texas

EXHIBIT 1

WYRE Digital Wallet Programmer

[VIEW JOB POST](#) [INVITE FREELANCERS](#) [REVIEW PROPOSALS \(31\)](#)
Shortlisted (0)

Mobile App Development

Posted 11 months ago

 Worldwide

Looking for a programmer that can create an app that allows a user to create simple Wyre Wallet that can be funded with credit/debit/ACH.

The user will then be able to buy/on-ramp to stablecoin, send to a recipient wallet, and off-ramp to fiat.

I can create simple user-interface mockups to be replicated.

Here is Wyre's API information

<https://www.sendwyre.com/>

 **\$10,000.00**
Fixed-price

 **Intermediate**
I am looking for a mix of experience and value

EXHIBIT 2

 **D K**
India · Sun 3:14 AM



WYRE Digital Wallet Programmer

Completed on Sep 4 ★★★★★

Overview Messages Details

Milestone timeline

-  Designs using Figma and Unlimited Iterations
Looking for a programmer that can create an app that allows a user to create simple Wyre Wallet that can be funded with credit/debit/ACH. The user will then be able to buy/on-ramp to stablecoin, send to a recipient wallet, and off-ramp to fiat. I can create simple user-interface mockups to be replicated. Here is Wyre's API information <https://www.sendwyre.com/>
\$1,200.00 Paid
Due Jan 10
-  Server Setup • iOS App Setup • Android App Setup
\$1,200.00 Paid
Due Jan 17
-  • Registration • Login • Reset Password/username • Login with FaceID • Log in with Touch ID • Home Page
\$2,400.00 Paid
Due Jan 31
-  Create Crypto Wallet • Available Currencies • Add Funds / Buy Crypto with Credit/Debit/ACH
\$2,400.00 Paid
Due Feb 14
-  Search Users (Lookup Recipient on the Platform) • Send to a Wallet Address • Scan Wallet • Enter Wallet
\$2,400.00 Paid
Due Feb 28
-  Request a Payment • Withdraw to Local Currency • Landing Page • Android Playstore Deployment • iOS Appstore Deployment
\$2,400.00
Due Mar 14

Billings



| | |
|--|-------------|
|  Paid Out | \$9,600.00 |
|  Funded (Escrow Protection) | \$0.00 |
|  Project Price | \$12,000.00 |

[Rehire](#)

EXHIBIT 3



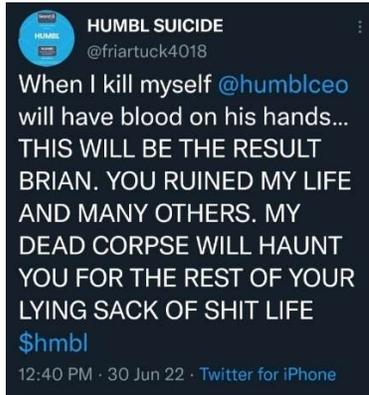
AL @miaflasan · 7m
Replying to @wolfowillowick
@Novafan2006 and 4 others

Well seems like I will be joining the lawsuit against HUMBL , I am sure George warned Brian not to do this and that's why he resigned the same day, A 1-10 wipes me out and I will lose over 400,000 dollars.

You can reply to this conversation
1 ↻ ♥ ↗



AL @miaflasan · 6m
I will produce every single video, clip , promise I will fight this until the bitter end we have supported them so much and this is not the way to repay us.



Jomo86 06:13 PM
\$HMBL today I removed the Humbl stickers I had on my truck window and work water bottle. I'm am too embarrassed to publicly promote this company any longer. I'm also tired of having a daily reminder of the \$100k I am down on this stock. Still hoping for a miracle years from now or will use as a tax write off when needed.



Spaceman007 08:54 AM
\$HMBL I'm not discounting the fear that can be created by unstable people posting on social media. But if Brian was so worried, why was he posting pictures of himself traveling overseas, looking VERY healthy, while retail shareholders continue to be crucified? I think this really speaks to his lack of self-awareness and common sense. Is he so blind to his own optics that he can't see the rage-inducing effect he has on people who have lost a TON of money due to his big BS talk? I am honestly starting to think there is some kind of cognitive issue here - some kind of detached from reality syndrome, like maybe Asperger's? There is clearly a disconnect here. Imho, as long as Brian continues as CEO, Humbl will continue to fail miserably. He is a liability to himself...and us.

EXHIBIT 4

 **Brian P. Boermeester**
@bpb_HUMBL

Kicking off the 2022 season @
BYU! ¹⁰⁰ #HUMBL @humblceo
@MattBoermeester @Michele
_HUMBL @Karenhumbl
@aarana_Sr @kalanifsitake
@BYUCougars



Michele Rivera and 3 others
3:09 PM · 04 Aug 22 · Twitter for iPhone

 **Brian P. Boermeester** ... · 04 Aug :
#HUMBL



7 22 113

EXHIBIT 5

 **Alfonso Arana Sr** ✓ @a... · 07 Oct :
Replying to @HUMBL_Delivery
Any time anybody is in San Diego, we
would love to meet up, provide a
tour, and eat a meal with you!! DM
me, and I will set it up.

1 34 173

 **Alfonso Arana Sr** ✓
@aarana_Sr

Replying to @aarana_Sr and
@HUMBL_Delivery
This invite is open to everyone
including @pravadcles.

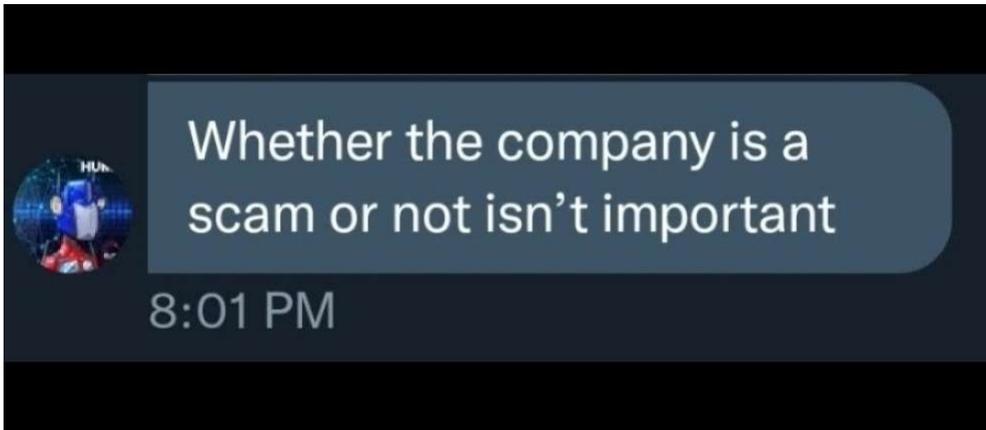
12:23 PM · 07 Oct 22 · Twitter for iPhone

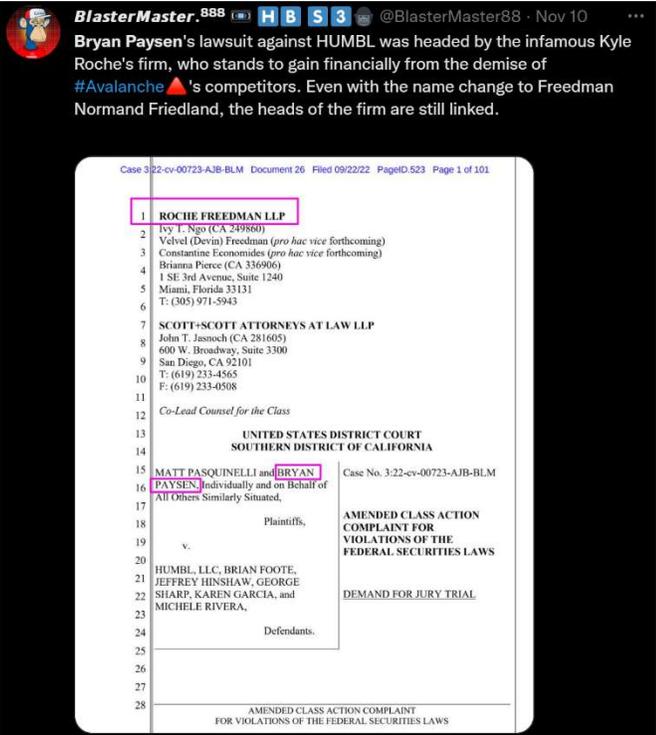
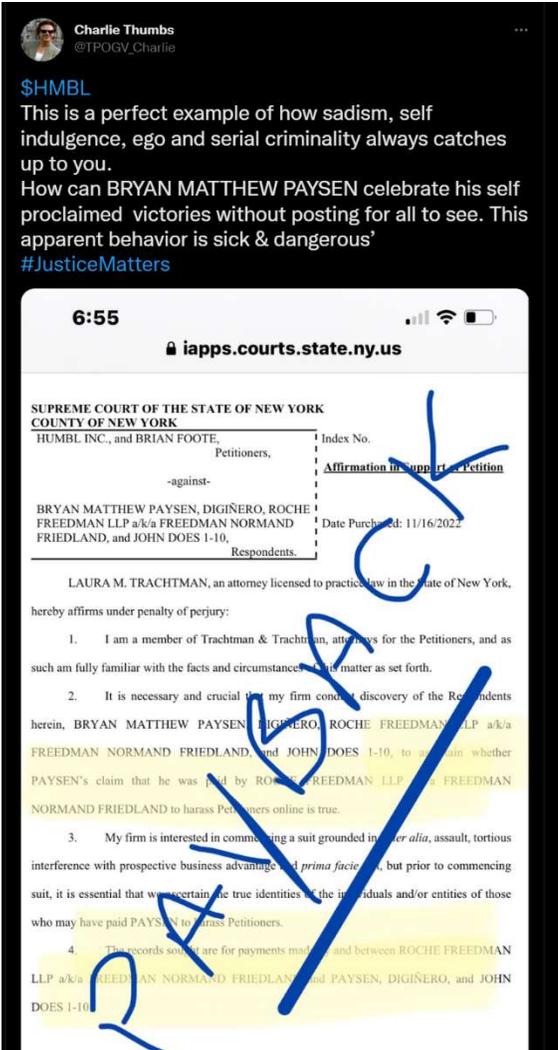
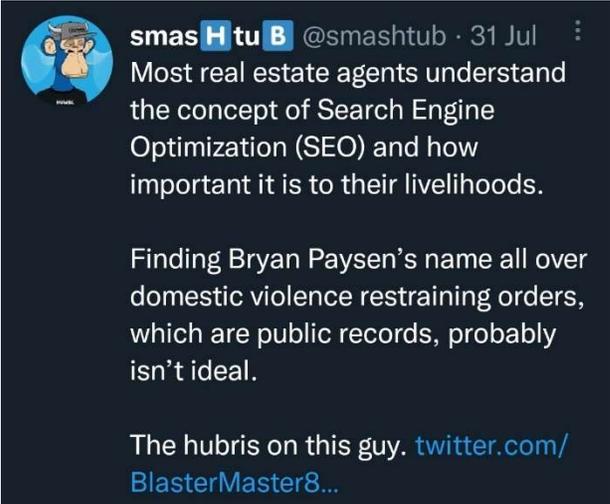
EXHIBIT 6

**Kevin Connor (@theyachtboyz/Porky) is snugly affixed in the middle.*



EXHIBIT 7





BlasterMaster.888 (verified) **H B S 3** @BlasterMaster88 · Sep 25

Replying to @TheYachtBoyz

Sounds like Kyle Roche of Roche Freedman found his psycho doppelgänger, in joining Bryan Matthew Paysen's lawsuit against HUMBL

Kyle's personal nature emerges?

Kevin Dutton, a psychologist and writer specializing in the study of psychopathy at the University of Oxford, says that among professionals, lawyers count the second highest proportion of psychopaths, because of the opportunities the career affords them to pursue their predilections.

Psychopaths crave feelings of power and control over other people. Many display traits of grandiosity, narcissism, sociopathy and Machiavellianism.

We are not saying Kyle is a psychopath, as only a psychologist can classify people. However, we see these traits in his behavior, and in the following, Kyle appears to express a disturbing determination to exert power and control over others:



YachtBoyz.eth (verified) @TheYachtBoyz

\$HMBL fam make sure you take a look at this! I am sure there is more to come on this, but don't overlook it!!!

#blockchain #web3 #SOL #hmb1 #Crypto #NFTs #NFTCommunity

cryptoleaks.info/case-no-3

cons SEC in evil conspiracy

in his rush to hurt competitors, and distract regulators from his actions, Emin Gün Sirer is harming everyone in blockchain

providing what Kyle calls "legal services", Ava Labs granted them massive amounts of

AVAX (the Avalanche blockchain's tokens)

Ava Labs corp's stock (Ava Labs holds AVAX for founders and investors).

7:43 PM · Sep 25, 2022 · Twitter for iPhone

BlasterMaster.888 (verified) **H B S 3** @BlasterMaster88 · Sep 25

Replying to @BlasterMaster88 and @TheYachtBoyz

HUMBL is one of "half the companies in this space" Roche Freedman is suing for Ava Labs' gain

secret Ava Labs/Roche Freedman pact begin to emerge.

Kyle reveals that he started out as a "crypto expert" for Ava Labs. But how, you might ask, could a lawyer be a "crypto expert" for a company that develops and promotes a blockchain.

Kyle reveals that answer. He can contribute a special kind of expertise and knowledge — which he explains he has been able to obtain because:

I sue half the companies in this space

In the USA, when you sue an individual or company, you can demand access to their confidential accounts, commercial data, email and social media communications, and more, using a special legal process known as "discovery". This has resulted in him:

seeing the insides of every single crypto company

Kyle boasts that being able to collect information in this way has resulted in him becoming one of the:

top 10 people [experts] in the world [in crypto]

If a blockchain company could unfairly gain access to the confidential information of others, they could use it as a powerful competitive tool. It seems that Kyle sharing this special expertise with Ava Labs was one of the key factors that convinced Emin Gün Sirer to make the pact.

Until proven otherwise, we must assume that Ava Labs may even have directed Roche Freedman as to what confidential information they should harvest from the industry. It is unclear how much confidential information Ava Labs has obtained, but the potential for extreme wrongdoing is very concerning.

Naturally, you can be sure that during discovery against a target, Roche Freedman automatically demands the identities of investors, contractual agreements with partners, customer lists, payroll details, and information about every other kind of financial transaction, related to the organizations they are litigating against, and their founders and executives. They will also ask for complete email, Slack and other communication histories, which provide them with a treasure trove of information valuable to a competitor, including even technical insights.