

Good morning, Your Honor. I'm Asaf Fulks, the plaintiff, and I'm here because Coinbase currently holds my funds and refuses to return them. On August 9, 2022, I transferred \$2,012.83 worth of Crypto.com "CRO" Coins (12,960.9778) to my Coinbase.com wallet using the provided address.

The core issue is that Coinbase won't grant me access to these funds, citing a lack of support for the "Cronos" network. This is perplexing because Coinbase, a well-established cryptocurrency platform, claims it cannot support a basic feature that even beginners can handle in minutes for free. To access the Cronos network, all one needs to do is install MetaMask, input the wallet seed phrase (information only Coinbase possesses), and select the Cronos network. Coinbase has the capability and authority to release my funds, and I've offered to cover any transfer fees, but they have refused.

Coinbase also attributes this problem to "user error." However, the issue arises from Coinbase supporting only the Ethereum "ERC" network for CRO coin transfers, while three networks can handle these transfers. This creates confusion as both ERC and Cronos networks share the same wallet addresses, making it impossible for users to tell if the recipient "supports the network." Coinbase should have anticipated this and implemented safeguards to protect users.

This places an unfair burden on users to navigate a confusing and potentially risky system. I've made numerous crypto transfers without issues, and I've brought copies of similar claims from other users who faced the same problem. This is not "user error" but a flaw in Coinbase's product.

Coinbase's standard user agreement states that users must transact in a "Supported Digital Asset" conforming to the provided wallet address. CRO coin is a supported asset, and I sent it to the provided address.

In summary, Coinbase holds my funds and can return them at no cost. They launched a product that caused foreseeable confusion without safeguards. The user agreement should not absolve them of responsibility. My total claim is \$5,212.83, including funds' value, court-related expenses, and time spent on this matter.