

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SCOTT BISHINS and DARSHAN
HASTHANTRA, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

CLEANS PARK, INC., ZACHARY
BRADFORD, and S. MATTHEW
SCHULTZ,

Defendants.

Case No. 1:21-cv-00511-LAP

**AMENDED CLASS ACTION
COMPLAINT FOR VIOLATIONS OF
THE FEDERAL SECURITIES LAWS**

JURY TRIAL DEMANDED

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GLOSSARY OF DEFINED TERMS

Term	Definition
ASIC	Application-Specific Integrated Circuit, or computer hardware which is designed for a specific function, such as bitcoin mining.
ATL Data Centers, Inc.	Company that was acquired by CleanSpark in December 2020. ATL was ultimately an alter ego of Fastblock and Block Data.
Bitcoin	When “Bitcoin” is capitalized it refers to the Bitcoin network, which was created in 2009 and is the world’s largest and most popular form of cryptocurrency. The lowercase “bitcoin” refers to the units of the cryptocurrency.
Block Data Processing Corp.	Company that attempted to purchase the assets of ATL, and was essentially an alter ego of Fastblock and ATL.
Bradford	Defendant Zachary Bradford was CleanSpark’s Chief Executive Officer (“CEO”) and President since October 2019. Bradford served as CleanSpark’s Chief Financial Officer (“CFO”) from 2014 through October 2019.
CleanSpark	Defendant CleanSpark, Inc. that has its principal executive offices located in Woods Cross, Utah and its common stock trades on the NASDAQ exchange under the symbol “CLSK.” The Company was incorporated in Nevada in October 1987 as SmartData Corporation (“SmartData”) and it began trading publicly in January 1988.
CleanBlok	A wholly-owned subsidiary of CleanSpark.
Coinmint LLC	The company that agreed to house and power certain of CleanBlok’s cryptocurrency mining equipment in its facilities, and to use commercially reasonable efforts to mine Bitcoin through an agreed upon third-party provider on behalf of CleanBlok.
Company	Defendant CleanSpark, Inc.
de Andrada, Gustavo Lima Calderia	Director of Block Data, who was listed an organizer of ATL in its Articles of Organization, and was identified as a seller of ATL to CleanSpark in the Agreement and Plan of Merger.
ESG	Environmental, social, and corporate governance.
Fastblock	Bitcoin mining company seemingly owned by Bernardo Schucman. “Fastblock Data Centers” and “Fastblock Mining” seem to be synonymous companies.
Hash	A measure of computing power. The computing power of bitcoin mining equipment is often evaluated my measuring the number of calculations, or “hashes,” per second. A “terahash” is one trillion hashes. One “petahash” is equivalent to one thousand terahashes, and one “exahash” is equivalent to 1000 petahashes.
Hashrate	The number of hashes per second that can be executed by a machine or group of machines.
Love, Lori	CleanSpark’s Chief Financial Officer (“CFO”) from October 2019 until she resigned on December 14, 2021.

Marathon	Marathon Patent Group which sought to purchase FastBlock Mining (an alter ego of ATL) in August 2020, but withdrew the offer in September 2020 after due diligence revealed problems with FastBlock.
Microgrid	A local, decentralized, energy grid with control capability, which means it can disconnect from the traditional grid and operate autonomously.
MW	Megawatts, or measure of electrical output.
Schultz	Defendant C. Matthew Schultz was CleanSpark's Chairman of the Board since October 2019 and as Director since March 2014. Schultz was CleanSpark's CEO from 2014 through October 2019 and has served as Executive Chairman since October 2020.
Schucman, Bernando	Owner of Block Data, who was listed an organizer of ATL in its Articles of Organization, and was identified as a seller of ATL to CleanSpark in the Agreement and Plan of Merger.
Virtual Citadel	A Bitcoin mining business whose assets were ultimately conveyed to ATL.

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