

EXHIBIT 1**TABLE 1 — SCHEDULE OF PREDICATE ACTS**

The Actor(s) column names the primary actor or actors alleged to have carried out or directed each act; it does not limit which Defendants are liable for it. As alleged throughout this Complaint, other Defendants aided, abetted, counseled, induced, or procured the commission of these acts, or acted in concert in committing them; and as members of the alleged association-in-fact enterprise and parties to the conspiracies pleaded herein, each Defendant is answerable for the acts of the others committed in furtherance of the scheme.

No.	Date	Actor(s)	Wire / act	Materially false representation / role in the scheme
1	Jul 8 2022	A. Tate; New Era	Hustlers University / YouTube	Induced Plaintiff's \$49.99 Hustlers University subscription via false reps (single fee for War Room & HU; instructors "always available"; money-back guarantee); refund then denied under an undisclosed No-Refund Policy.
2	2022	A. Tate; New Era	Hustlers University crypto proceeds	Hustlers University collected recurring subscription payments in cryptocurrency and routed over \$2,500,000 in proceeds onward through a chain of wallets to obscure their origin — laundering the earliest proceeds of the scheme, made knowing the proceeds were fraud-derived.
3	Dec 17 2022; Dec 19–20 2023; Jun 6 2026	A. Tate	@Cobratate	Posts representing that large sums (" \$200,000 being sent TONIGHT") would be paid to participants — not paid.
4	Dec 24 2022; Sep 13 2023; Apr 19 2024; Oct 15 2024	Tristan Tate	@TateTheTalisman	Membership, subscription, and merchandise promotional wires soliciting consumers into the enterprise's paid platforms and merchandise sales: "The War Room made my setup possible. Join" (Dec 24 2022); "A killer from the Crypto Campus of The Real World ... Join us" (Sep 13 2023); "Buy Fireblood" (Apr 19 2024); and "somebody who's inside of the real world will win the lambo. Join or don't" (Oct 15 2024) — the proceeds of which Tristan Tate knowingly received and retained.
5	Feb 10 2024	A. Tate; New Era; University.com TRW; Legendary; Thrifty; Joslin	jointherealworld.com checkout	False product-value reps on the checkout — "Live calls," "24/7 Support," "1000+ video lessons" — when no live calls were held, no 24-hour support existed, and fewer than 1,000 video lessons were accessible. Plaintiff paid Mar/Apr 2024.

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6	2024 – present	A. Tate; University.com TRW; New Era	jointherealworld.com	False and misleading product-value and earnings representations on the subscription marketing pages — access to “multimillionaire professors” teaching “12+ wealth-creation methods,” “daily live sessions,” and that a subscriber can “Scale from Zero to \$10k/month” and “made their money back in a couple of weeks” — inducing enrollment into the recurring paid subscription.
7	2024 – present	A. Tate; University.com TRW; New Era	jointherealworld.com	Represented the subscription as “Cancel anytime, risk-free” while the enterprise in fact enforced an undisclosed no-refund policy — the same misrepresentation made to and denied against Plaintiff.
8	Jan 2026 – present	A. Tate; University.com TRW; New Era	jointherealworld.com	Displayed false scarcity for an unlimited-capacity digital subscription — “98% Sold Out,” “This Is Your Last Chance,” “it’s now or never” — to pressure immediate enrollment.
9	Mar 2024 – present	A. Tate; University.com TRW; Thrifty; Thrift Tech; Joslin	university.com / jointherealworld.com code	Served checkout code designated “Wudan LLC” as the bank-wire recipient of subscription proceeds, which the checkout did not disclose to paying subscribers.
10	Mar 28 2024; Apr 28 2024 – present	A. Tate; University.com TRW; New Era; Legendary	checkout systems	Recurring subscription charges under enterprise billing descriptors, including Plaintiff’s Mar 28 and Apr 28 2024 charges.
11	Apr 18 2024	New Era; University.com TRW	support@neweralearning.net	Enterprise received Plaintiff’s Apr 18 2024 outreach regarding the Orifice AI project — advance knowledge nine months before the Hackathon.
12	Jun 11 2024	Abbasie	@issathecooker	“anytime you think of jeeting \$DADDY ... go to @cobratate’s likes” — earliest documented Issa–Tate coordinated token price-support signal.
13	Jun 13 2024	Tristan Tate; A. Tate	@TateTheTalisman / @Cobratate	Coordinated \$DADDY launch: a “burn vs. take” poll and a “Crypto has a new \$daddy ... Andrew Tate” introduction (embedded Solana transaction).
14	Jul 2024 – Jul 2026	A. Tate; Defied Trust; University.com TRW	@Cobratate / @therealworld_ai	Continued coordinated \$DADDY price-support posts (e.g., Nov 13 2024; Jul 4 2026) — the same pump method applied to Bangchain — extending the pattern’s open-ended continuity into mid-2026.
15	Jul 5 2024; Jan 18 2025; Jun 4 2025	University.com TRW	@therealworld_ai	Three \$DADDY-token promotional posts through the subscription portal’s verified account (“\$DADDY still holding strong”; “\$DADDY x \$TRUMP TAKEOVER”; “\$DADDY and \$TRW this cycle”).

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16	Oct 2 2024	A. Tate; Defied Trust	@Cobratate (≈3.1M views)	“\$50 million of capital is ONLINE ... funded students’ ideas instantly ... acquire funding instantly here: fundraiser.com” — false; the sole prize/funding wallet held ~\$16,513.
17	Nov 19 2024 – present	A. Tate	\$DADDY YouTube interview	Recorded admissions: “somebody else created DaddyCoin and I decided to work with him”; “an actual infrastructure and ecosystem that can back up daddy”; Real World token = buy 5% of the school; “Daddy’s going to a billion ... even if I have to buy it all myself.”
18	Dec 6 2024	A. Tate; Defied Trust	@Cobratate (≈722.8K views)	“We are 50% through proposed business plans. Submit your ideas for funding via Fundraiser.com” — implying an active funding-review process that did not exist.
19	Jan 2025 – present	Thomas	fundraiser.com/hackathon	Operates the fundraiser.com platform transmitting the prize-pool, “JUDGES STANDING BY,” Main Sponsor, contest-terms, and showcase displays; accepted Plaintiff’s submission; never judged or awarded; deleted @fundraiser_com posts after suit was filed.
20	Jan 2025 – present	Thomas; A. Tate; Defied Trust	deck.fundraiser.com/aideck	Pitch deck representing a startup “launchpad,” private seed funding, high-value industry connections, mentorship, and Telegram access to industry leaders; team page shows “Coming Soon” and the disavowed Solana logo — none delivered.
21	Jan 2025 – present	Thomas; New Era; Defied Trust; Caputra (TopG)	fundraiser.com/hackathon	False “Main Sponsor” designations (THE REAL WORLD and TOP G among them) representing that sponsors “support and fund” the event; three of the four named Main Sponsors were Tate-controlled brands.
22	Jan 2025 – present	Thomas; University.com TRW; New Era; Thrifty; Thrift Tech; Joslin; A. Tate	fundraiser.com/apply	Hackathon prize and funding representations drove participants into the /apply “up to \$1M in venture funding” interface, conditioned on a recurring \$99/mo “The Real World” subscription — inducing both purchase and retention.
23	Jan 2025 – present	Thomas; Thrifty; Thrift Tech; Joslin; Inspire; Fischer	subscription payment infrastructure	Custom-integrated Thrifty’s subscription-payment infrastructure with fundraiser.com/apply, transmitting recurring \$99/mo charges from applicants as a condition of funding consideration.
24	Jan 2025 – present	Inspire; Fischer	Value.io checkout code	Built and operate the Value.io multi-processor card-vault/routing gateway embedded in the checkout — a cascade designed to defeat per-processor enforcement — routing and transmitting the subscription charges the scheme induced.

No.	Date	Actor(s)	Wire / act	Materially false representation / role in the scheme
25	Jan 2025 – present	(enterprise); Thrifty; Thrift Tech; Joslin; Defied Trust; Wudan	payment layer / remittance	Directed remittance of U.S.-collected subscription proceeds outbound to Defied Trust in the United Arab Emirates, a tax-free jurisdiction — transactions each exceeding \$10,000, comprising U.S. card settlement and outbound UAE remittance, made knowing the proceeds were fraud-derived and with the intent to promote the carrying on of the scheme by returning its proceeds to the enterprise’s principals.
26	Jan 2025 – present	Thomas; Joslin; Thrift Tech (cobratate.com)	fundraiser.com → cobratate.com/contact	“Contact Andrew Tate” interface (formspre.io-backed) harvesting participants’ names and emails under the false pretense of direct contact with Tate, populating the enterprise’s marketing list.
27	Jan 2025 – May 2026	War Room Inc.	thewarroom.ag/checkout/card	Offered and sold the enterprise’s paid “War Room” membership through the thewarroom.ag checkout within the Nevada-directed conversion funnel, receiving the proceeds — each offer and each payment instruction a separate interstate wire — before the enterprise moved that checkout to reachtwr.com/pay.
28	Jan 5 – Aug 5 2025	Tristan Tate	@TateTheTalisman	False earnings inducement into the paid subscription — “Put in \$800. Made \$27,000. THE REAL WORLD simply works” (Jan 5 2025) — and continued \$DADDY price-support: “Daddy market cap after 1.5 years is still over 30m ... Only daddy exists and is still used” (Jun 26 2025); “still a viable eco system with buyers still trading and making profits” (Aug 5 2025).
29	Jan 12 2025	A. Tate; Thomas	@Cobratate / @fundraiser_com video	Announced the Hackathon: >\$1,000,000 prize pool, \$500,000 grand prize, expert judging, up to \$1,000,000 funding, “I’ll be sponsoring everything myself”; @fundraiser_com “We encourage you!” — all false; wallet held ~\$16,513.
30	Jan 12–13, 30 2025	Abbasie	@issathecooker	“Biggest Solana AI Hackathon” amplification of Tate’s disavowed announcement, and a Jan 30 “thank you for submitting to the hackathon” post publicly endorsing Plaintiff’s entry.
31	Jan 2025	A. Tate; University.com TRW	Instagram @officialrealworlduni	Republished the Hackathon solicitation — “HACKATHON G-AI \$1M+ in prizes, Top Venture Capital, Incubation + Promotion” — as an Instagram Reel through the enterprise’s official subscription account, a separate channel carrying the same false prize and funding representations.

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32	Jan 13 2025	A. Tate; Defied Trust	@Cobratate	Hackathon announcement tweet falsely representing Solana Foundation sponsorship — publicly disavowed by the Solana Foundation the same day.
33	Jan 13 2025 – present	A. Tate; Thomas; New Era; University.com TRW; Defied Trust; Thrifty; Thrift Tech; Joslin	platforms / wires	After the Jan 13 2025 Solana disavowal (and the affixed Community Note), each of these Defendants continued to benefit from and sustain their role in the scheme each day, and each new customer charge brought in while fundraiser.com displayed knowingly false information at the top of the funnel was an additional act, establishing open-ended continuity.
34	Jan 14 2025 – present	A. Tate; Caputra Brands	@Cobratate	“Join the Fight: merch.topg.com/product” — a wire soliciting merchandise sales through the TopG node operated by Caputra Brands. Not alleged as a purchase by Plaintiff.
35	Jan 16, 18 2025 – present	A. Tate; War Room Inc.	@Cobratate	Promotional wires soliciting enrollment into the enterprise’s paid War Room: “apply.thewarroom.ag” (Jan 16 2025) and “Finding the war room in 2025 is like finding Bitcoin in 2014” (Jan 18 2025) — a misleading early-adopter earnings implication; each continuing display a fresh wire. Pattern act and § 1962(c) attribution to War Room; not alleged as a purchase by Plaintiff.
36	2025 – present	A. Tate; War Room Inc.	thewarroom.ag / reachtwr.com	Marketed the paid War Room as a “world-spanning network of ambitious men” with “over 3,500 members” and “specialists, experts, and professionals in every field,” soliciting enrollment into the recurring paid membership.
37	Jan 30 2025	Thomas	@fundraiser_com	Coordinated @fundraiser_com engagement wire amplifying Plaintiff’s Hackathon entry in furtherance of the scheme: “Pussality!” (Jan 30 2025), posted below Plaintiff’s submission post — echoing a prominent term from the Hackathon promotional video.
38	Jan 17 2025	A. Tate; Defied Trust	@Cobratate (≈166.8K views)	“\$1 MILLION DOLLARS IN PRIZES / HACKATHON G-AI / January 15–30” — a separate false prize-pool transmission made while the wallet held ~\$16,513.

No.	Date	Actor(s)	Wire / act	Materially false representation / role in the scheme
39	Jan 17–18 2025	A. Tate	@Cobratate	Explicit coordinated market-manipulation promises for the enterprise’s \$DADDY coin — “5000 retweets and ill announce some cooks ... so can all get a quick pump from The Top G” (Jan 17 2025); “create a filthy European pump ... Will give it to students of jointherealworld.com” (Jan 18 2025) — and crypto products gated to enrollment (a “\$Daddy Wallet” recycling “profits ... into staking rewards,” “available only to students of jointherealworld.com”; a “trenches stream 100% controlled by students ... the platform will decide the move before it’s public”).
40	Jan 18 2025	A. Tate; Defied Trust	@Cobratate (≈423.1K views)	“ROBOT ARMY WITH \$DADDY ... BURN 1% ... through the G DAO wallet ... (TOKENS WILL NOT BE SOLD) ... JUDGES ARE STANDING BY” — four false reps; converted the contest into token-supply capture into an enterprise-controlled wallet.
41	Jan 19 – Jun 16 2025	University.com TRW	@TateOfficialUni / @joinTatesUni	Quantified false earnings inducing paid enrollment in the “Crypto Campus”/“Trenches Campus”: “\$17,000 & \$28,000 profit for two of our students today. All from just a CLICK of a button” (Feb 7 2025); a student “made \$60,000 via our platform” (May 27 2025); “22,000+ students ... made more than most 9–5 jobs pay in a month” (Jun 1 2025); those heeding the “Multi-Millionaire Crypto Professor” “retired their entire bloodline” (Jan 19 2025).
42	Jan 30 2025	A. Tate; Abbasie	@Cobratate DM; Telegram	Tate DM to Bryan Mitchell (“head of hackathon wants to reach out”) and Abbasie’s ratifying Telegram (“andrew told me to text you”) imposing the token lock-up condition.
43	Jan 30 2025	Abbasie	Telegram	Abbasie identified himself as the creator of the enterprise’s \$DADDY token — “I made \$DADDY and have handled a lot of very successful CTOs” — establishing his crypto-layer role and the link between the \$DADDY pump method and the unauthorized Bangchain token.
44	Jan 31 2025	A. Tate	@Cobratate reply (≈71.5K views)	Public reply recasting Plaintiff’s Bangchain submission as “perfect for the average crypto trader,” pumping the unauthorized Bangchain-named token to Tate’s followers.

No.	Date	Actor(s)	Wire / act	Materially false representation / role in the scheme
45	Jan 30 2025 – present	Thomas; A. Tate; Abbasie	fundraiser.com/hackath on showcase	Maintained the showcase display of Plaintiff’s first-ranked Bangchain entry as an ongoing judged competition — placed pursuant to the lock-up quid pro quo — while conducting no judging and awarding no prize.
46	Apr 2 2025	A. Tate; Defied Trust	@Cobratate (≈734.9K views)	“Students of THE REAL WORLD ... have access to funding ... apply with your business here: fundraiser.com” — conditioning represented funding on a \$99/mo subscription, six weeks after the submission deadline passed with no prize paid.
47	May 20 – Aug 7 2025	University.com TRW	@TateOfficialUni / @joinTatesUni	A recurring false-scarcity price campaign: “the price WILL increase ... lock in the \$49/month price” (May 29 2025); “5 MINUTES LEFT ... your chance is gone — forever” (May 31); “FINAL CALL – 1 HOUR LEFT ... Price increases in 1 hour” (May 31); then “the price increase is still processing ... final chance to sneak in at \$49/month” (Jun 1) and “price ... going to rise again this week. This is your SECOND WARNING” (Jun 2) — the same \$49 price recurring after each “final” deadline; scarcity later paired with crypto gating (“8 days left ... before this window slams shut. \$TRW x \$DADDY,” Aug 7).
48	Jan 2026 – present	A. Tate; New Era; University.com TRW; Legendary; Thrifty; Joslin	jointherealworld.com / university.com checkout	Updated product-value and social-proof representations on the subscription checkout inducing paid enrollment, materially false in at least the following respects: “Access to all 12 business models; VIP account ranking; 7 connected devices; Step-by-step learning & priority support; Daily course updates & live broadcasts; 155,000+ members already leveling up inside.” The platform did not make all twelve business models available, did not hold the represented daily live broadcasts, and had a membership count materially lower than the 155,000+ represented.

No.	Date	Actor(s)	Wire / act	Materially false representation / role in the scheme
49	Feb 2026 – present	Tristan Tate; University.com TRW	@TateTheTalisman / @appealworld / @therealworld_ai	Continuing enrollment and earnings-claim solicitation wires into the paid subscription platform through the eve of filing: “Join a network of successful elites here” (Feb 16 2026); “join The Real World and get rich” (Apr 24 2026); “TRW members are making money and getting rich” (Jul 12 2026); and “TRW members know exactly what they need to do to get rich this year” (Jul 13 2026) — each continuing display a fresh wire, extending the pattern’s open-ended continuity to the eve of this Complaint. Pattern and continuity act; not alleged as a purchase by Plaintiff.
50	Feb 2 2026	A. Tate; Defied Trust	@Cobratate (≈300K views)	“Allocating a further 10,000,000 usd to fund projects via Fundraiser.com” — three weeks before this suit was filed; a non-party applicant publicly replied his submission was “floating in limbo indefinitely.”
51	Jul 11 2026 – present	War Room Inc.; Roe 3 (Reach TWR)	reachtwr.com/pay checkout	After suit was filed, the enterprise moved its War Room checkout from thewarroom.ag/checkout/card to reachtwr.com/pay, where as of Jul 11 2026 it offered a “War Room Membership” at variable pricing from \$2,400 up to \$8,000 through that checkout — each offer and each payment instruction a separate interstate wire — continuing the wire-fraud pattern and confirming continuity into mid-2026.
52	Ongoing	A. Tate; New Era; University.com TRW; Joslin; Thrift Tech	university.com / jointherealworld.com pricing	Persistent false “SOLD OUT” \$499/mo “Vanguard” tier never actually offered — manufacturing false scarcity, false anchoring, and false social proof to drive \$99/mo subscriptions.

EXHIBIT 2**TABLE 2 — SCHEDULE OF BROADCAST PREDICATE ACTS³**

The Actor(s) column names the primary actor or actors alleged to have carried out or directed each act; it does not limit which Defendants are liable for it. As alleged throughout this Complaint, other Defendants aided, abetted, counseled, induced, or procured the commission of these acts, or acted in concert in committing them; and as members of the alleged association-in-fact enterprise and parties to the conspiracies pleaded herein, each Defendant is answerable for the acts of the others committed in furtherance of the scheme.

No.	Date	Actor(s)	Wire / act	Materially false representation / role in the scheme
1	Jun 29 2026 – present	A. Tate; Tristan Tate	video broadcast (Rumble)	Quantified false-earnings inducement into the paid subscription, broadcast on air: “You invest \$50 a month in yourself and you get two and a half grand a month back at a minimum” — representing a guaranteed 50-to-1 monthly return that does not exist.
2	Apr 7, 2026 – present	A. Tate; Tristan Tate	video broadcasts (Rumble)	Recurring on-air enrollment ad-reads soliciting paid enrollment: “The Real World is a school which will teach you 12 different ways to make money on the internet ... for \$100 a month. And join us now” (Apr 7 2026); “you get millionaire mentors. Live calls every single day teaching you how to make money ... Join the real world now and start making money today” (Apr 20 2026) — when live calls were not held daily and the platform did not make all twelve advertised business models available.
3	Mar – Jun 2026 – present	A. Tate; Tristan Tate	video broadcasts & descriptions (Rumble)	Enrollment solicitations directing viewers into the paid subscription, including a video description — “Learn from people who know how to make millions: www.jointherealworld.com ” (Mar 28 2026) — and recurring in-broadcast plugs to “make sure you’re inside the real world.”

³ The persistent on-screen banner during these broadcasts furthered the enterprise’s commercial nodes; its chronology, contents, and predicate treatment are set forth at ¶¶ 52–57 of this Complaint.