

INVESTMENT EVALUATION OF ICO PROJECT



UNITED TRADERS

uttoken.io

ICO:
30.11.2017 - 24.12.2017



AVERAGE SCORE

5,5 / 7,0

High
Quality Rate

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The evaluation is only a reflection of DigRate's review of the documents and other resources available as of the time of the publishing of this report. Any updates and/or changes to the documents following the date of the publication of this document are not considered in the evaluation.

The DigRate team expresses its respect to all enthusiasts of the cryptocurrency world.

The legal opinion was prepared by [NewLawyers](#).

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United Traders is a proprietary trading company established in 2009 by way of a merger of two teams of traders from Moscow and St. Petersburg who were previously engaged by SwiftTrade (Canada) and Dimension Trading (USA). The company primarily specializes in manual trading on the NYSE, NASDAQ, BATS and others via its own platform, Aurora.

As of October 2017, United Traders engaged traders from 42 countries worldwide. Various algorithms, including but not limited to, high-frequency algorithms are generally employed in the trading business. The company is primarily focused on American stocks, futures and options. The company also trades on the European and Asian markets, with additional operations in currency and cryptocurrency trading.

One of the company's activities is training in trading and finance. The company offers one-month training sessions that cover the proprietary trading system, and help to provide capital to all trainees. The trading program was developed for newbies and is aimed at improving financial capabilities.

Of the traders engaged by United Traders 95% use the company's proprietary platforms. A software package allows the company to support the entire trading cycle, namely:

- Arche – a client application designed to trade on the NYSE and NASDAQ;
- Aurora – the company's flagship, is a multimarket platform (desktop Windows) that supports operations on the NYSE, NASDAQ, BATS, ARCA, CME, CBOE, CBOT, EUREX, MOEX, SPBEX, Kraken and BTC-e (previously);
- Aurora Manager – a platform that allows the company to manage a group of traders, broker clients or several accounts held by a single asset manager. Access to this application is granted upon request from any relevant proprietary group;
- Trader Account – a reporting tool used by traders who employ Arche, Aurora, Sterling Trader PRO, Laser Trade, Fusion and Shiva.

**Medium-to-high
probability of
investment return,
considerable
sensitivity to
market
environment**

The project team has a pragmatic approach to the problems existing in the cryptocurrency ecosystem and proposes to solve them by introducing a complex of products to the market, within the framework of a single platform. The concept and tools the developers offer are necessary for the further development of the entire cryptocurrency market. The platform modules created by United Traders already have working prototypes, which should allow it to attract large amounts of capital. The project team has presented a detailed road map and financial plan, specifying its targets. All of the above leave no doubt as to the serious intentions of the project's developers and the possibility of implementing the project.

Despite the undoubted competence of the developers, some aspects of the project raise questions. For example, it is unclear how the project plans to solve the problem of high loads on the global investment marketplace technically, as the transaction processing speed of the Ethereum network is rather low. Although the team has presented business models for each of the products, some elements still raise questions.

DigRate also questions the potential attraction of banks to participate in cryptocurrency trading. The project team has not provided an analysis of the competitive environment, and has not disclosed information about the legal structure of the company. Despite the developers stating that during the presale the project attracted several large investment funds, information about them has not been disclosed.

How do we evaluate the Quality Rate?

Advantages:

- The project team has a functioning business, which will be the basis for a new blockchain solution.
- The public has shown considerable interest in the project.
- The team is widely known in professional circles.
- A clear development strategy and financial plan have been presented.

Disadvantages:

- Legal documents for the legal entity have not been provided.
- There is no information on partnership agreements with large companies and VC investors.
- There is no package of legal documents (SAFT, Terms & Conditions).

High
Quality Rate

What can be improved?

- Publish documents for the legal entity.
- Disclose information about partnership agreements with large companies.
- Disclose information about large investors that have shown interest in the project.
- Add an analysis of the competitive environment to the whitepaper.
- Work out the business models for the products more thoroughly.
- Attract well-known foreign companies and experts to the project to increase trust for global investors.
- Develop and publish a package of legal documents (SAFT, Terms & Conditions).

Criteria	Score
Does the problem the project plans to solve really exist?	7
Is the company's product unique?	6
Does the team understand its competition?	4
Is blockchain technology a solution to the market problem?	6
Has the project laid out its operating business model?	5
Is there already a working product that can be sold to customers?	6
Is there a clear roadmap and financial plan?	7
Is the issuance of tokens limited?	6
Is there an asset base that would protect current holders from token devaluation?	5
Do the project participants have a clear motivation for owning the tokens?	5
Is the company's legal structure transparent?	4
Has the company taken preventive measures to avoid problems with ICO market regulators?	5
Is the project popular on social networks and in thematic communities?	6
Is the project widely discussed in blockchain news resources?	6
Does the project team have extensive experience and a strong track record?	6
Does the project have a strong advisory board?	5
Are the project's partners large and well-known?	5
Is the project attracting large VC investors?	5

AVERAGE SCORE

5,5



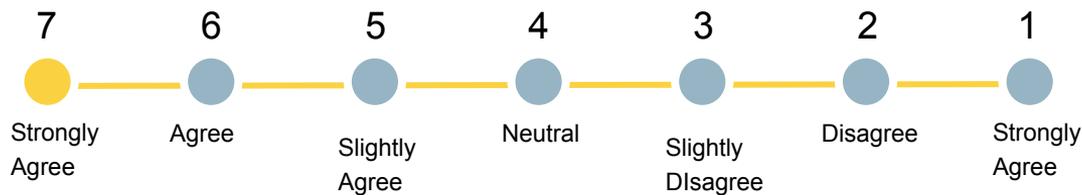
Project Concept



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Does the problem the project plans to solve really exist?



The project team plans to solve several basic problems:

- barriers on the VC investment market;
- distrust of experts offering investment recommendations;
- underdeveloped potential for services tokenization.

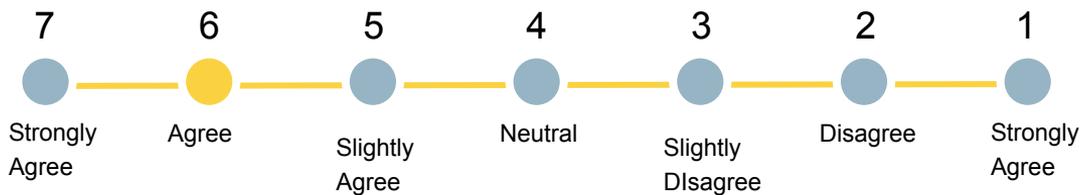
The developers of the United Traders (UT) platform have demonstrated a pragmatic approach towards the problems that exist in the modern financial system, and propose to resolve them by implementing a set of products on a single platform.

Firstly, there are many national, financial and legal barriers to VC investments today. VC investments are concentrated in national clusters, with Silicon Valley at the head. The main beneficiaries of these clusters are intermediaries, and VC funds, usually operating in the interests of large conglomerates. This market arrangement is inefficient and does not contribute to the progress of humanity on a global scale. Blockchain technology, according to the developers, is a key element in the development of the global VC market.

Secondly, the developers of the project say there is a huge problem of the credibility of so-called experts in the world of finance and investment. By experts they mean all those who make financial transactions, give investment recommendations, and attest to the reliability of certain people and organizations. The developers offer a solution to this problem based on blockchain technology that consists of recording in a ledger all actions significant to the reputations of subjects, who in the long term would like to prove a strong reputation and receive income.

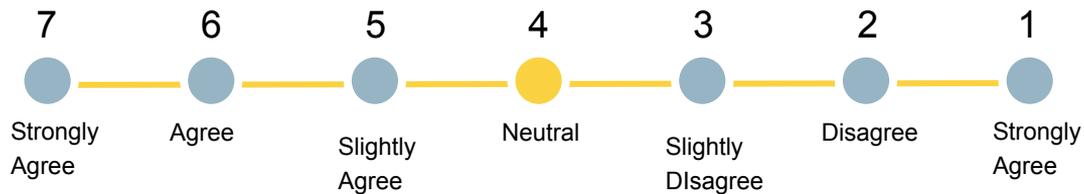
Thirdly, according to the developers, by way of analogy with investing in physical goods, smart contracts open up large opportunities for investing in services, and the services sector has great potential for mass tokenization.

Is the company's product unique?



The new United Traders ecosystem is intended to be based on a set of modules that unite capital, investment products, innovative ideas, and expert knowledge into a single system. Blockchain and cryptocurrency technologies have great potential for this use, and integrating them into the world of large capital and investment funds would be a major step for the development of the world financial system. In turn, the concept and tools offered by the United Traders developers are necessary for the further development of the entire cryptocurrency market, and, if the plans are implemented, the project is ready for rapid development.

Does the company understand its competition?



The project team certainly knows its competition well, as it has been running a successful business for several years. However, the whitepaper does not include information on the competitive environment.

Business Model

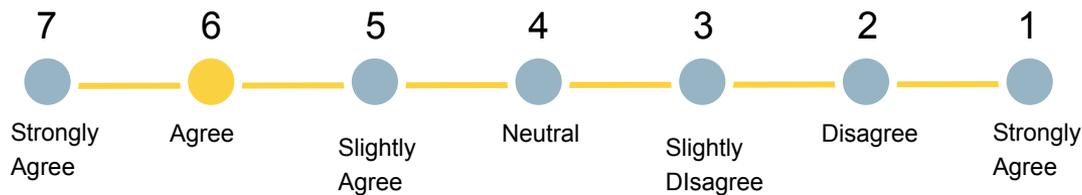


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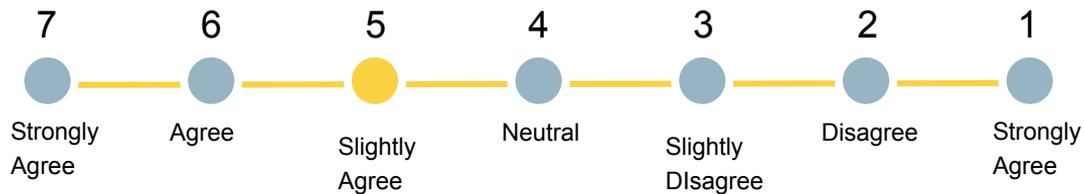
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Is blockchain technology a solution to the market problem?



United Traders has been providing services on the market for several years. According to the developers, the introduction of blockchain technology for already functioning platforms will allow them to reach a wider audience; open up global access to VC investment markets; give fair assessments of experts based on their actions in blockchain technology that cannot be fabricated; and open many opportunities for advertising. Smart contracts provide nearly unlimited opportunities for asset tokenization. Based on the company's goals, blockchain technology is undoubtedly an essential element for the ecosystem that United Traders is trying to build.

Has the project laid out its operating business model?



The company offers users three main products:

- UT Investment Marketplace, which, on the one hand, is an online store for investment ideas, and on the other, is a platform for presenting ideas.
- The United Traders Exchange (UTEX) is a platform where cryptocurrencies can be traded.
- Mega Dictionary is a dictionary, with a search system and a thematic rubricator of articles with a smart-linking system that helps users obtain the maximum amount of useful and relevant information.

For each of its products, the company has introduced a business model. Some elements have been worked out in detail, while others are still at the developmental stage and raise questions.

UT Investment Marketplace

On the marketplace, users are to be able to offer investment ideas. At this point, a list of available investments includes strategies pursued by traders engaged by United Traders on stock and cryptocurrency markets. Moreover, ideas that provide for investments in shares of companies that intend to hold IPOs, private companies (OTC) and start-up tokens (ICOs) are to be included as well.

To attract the most promising projects to the marketplace on exclusive terms, the company plans buy their tokens at an early stage. The purchased tokens are to be treated as own capital or become the basic component for a new investment product available to investors.

Each idea is to be evaluated by experts, who are initially to be United Traders employees. Subsequently, reviews are to be provided by users themselves through votes. The voting is to be weighted by the value of different users voices, which is intended to help achieve high quality reviews. Value is a reflection of users' experiences recorded in the blockchain. The developers say the system for assessing the experience of participants has not been worked out sufficiently at the moment.

The marketplace revenue is to come from commissions charged to investors for participating in ideas and from the authors of investment ideas that post ideas on the United Traders platform. However, the question of how the problem of high loads on the global marketplace is to be resolved technically remains open, as transaction processing speeds are low on the Ethereum network.

UTEX as a Cryptocurrency Exchange

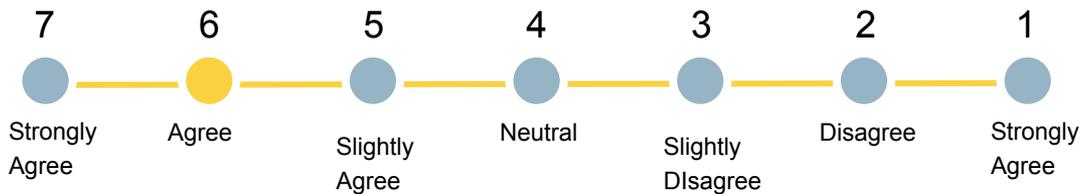
Professional traders engaged by United Traders and investors who have been granted access to the investment marketplace are to become pioneer exchange users. The company intends to involve miners and cryptocurrency funds. At the first stage, users are to have access to trading on third-party crypto exchanges through the Aurora platform. At the next stage, they will be able to select a special way to execute orders via Smart Route UT, which is to execute large orders at the best prices by distributing orders on several crypto-exchanges simultaneously. Then the platform itself is to be added to the UTEX exchange, but without quotes or the ability to set limit orders. After that, access to quotes and the possibility of issuing limit orders are to be provided, and from that moment UTEX should be considered fully launched.

In January 2018, the project team plans to add the possibility of paying for trading services in UTT tokens. First, payments for services on the platforms, then for trading commissions, and, after the launch of UTEX, exchange commissions. The developers say they have put a great deal of effort into the legal side and want to provide banks with the opportunity to trade using their services. The developers say they are negotiating with lawyers and market regulators, but there is no information on the results of these talks. DigRate experts believe in today's legislative environment, the participation of banks in cryptocurrency trades is highly unlikely.

Mega Dictionary

The content of the site is to be presented in thematic dictionaries with terms, definitions and informative articles on various subjects. At the initial stage, salaries for developers, authors and moderators are to come at their own expense. Before advertisers begin to pay to support the information, the company expects that 50,000 articles are needed for each language: from that point forward, site traffic in each language segment would presumably be over 50,000 unique visitors per day, which would attract potential advertisers. Further growth of organic traffic and the base of regular visitors are expected to lead to full salary payments at the expense of advertisers. The main sources of income are placement of contextual ads, banners and other types of advertising in the dictionary and thematic articles, with the CPA payment system. There are also other ways of monetizing the site: paid placement of articles, user subscriptions to paid services, exchanges of articles, authors and translators. However, the developers say the advertising payment system has not yet been fully developed and will have to adapt to users' needs. Blockchain technology is to be introduced into the ratings system and for the payment of work.

Is there already a working product that can be sold to customers?

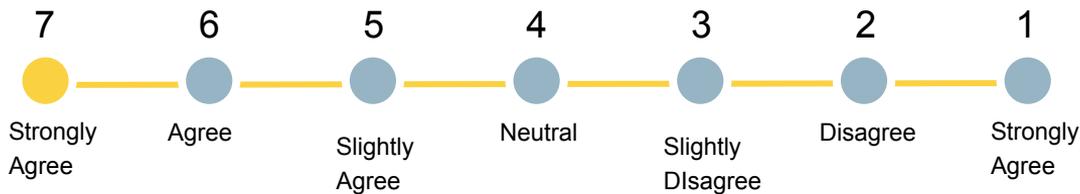


Unlike many ICO projects, United Traders is not a start-up, but an already existing business with ready-made solutions and prototypes of future modules. The developers of the project are known in their sector, and United Traders has been recognized as an authoritative organization on several occasions. Additionally, a team of traders specializing in trading US stocks is actively working on launching new programs, which currently make up the entire United Traders ecosystem. The projects under development include: a trader communications platform, UT Magazine; a multi-market platform, Aurora; and the Kvadrat Black fund (halted activities in December 2016). Some of the company's products have already been developed, and some are being tested.

Project representatives stated in their [official theme at the Bitcoin Forum](#): "We do not plan to publish the source code of our centralized applications. We will publish code that relates to decentralized functions. First of all, these functions are connected with the formation of rating systems and decentralized exchange. The code will be available as it is written. " All updates are available for viewing on Github, new codes are added weekly.

A smart contract for the project for the crowdsale has not been provided, as, according to the United Traders developers, there is a significant vulnerability on the Ethereum network. The developers of the project state: "We can not risk the money of investors, so we use a "cold" wallet and individual addresses. This is the safest way to sell tokens."

Is there a clear roadmap and financial plan?



A large part of the United Traders ecosystem has already been created and has well-established operations. The company's roadmap presents the history of the ecosystem's development, and describes in detail the steps for further development. As a financial plan, the company presented a scheme of distribution of investments attracted during the presale and crowdsale, as well as targets for each product (Investment Marketplace, UTEX, and Mega Dictionary). The project developers have calculated the target indicators based on statistical data, taking into account unfavorable factors that may have a negative impact on these indicators.

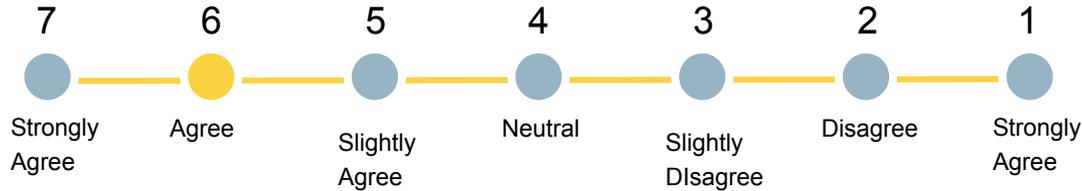
Tokens



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Is the issuance of tokens limited?

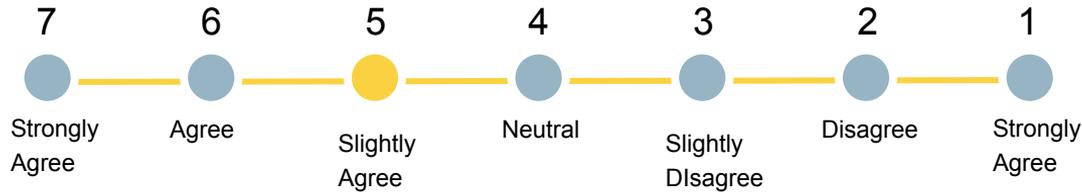


The United Traders ecosystem is to use the Ethereum blockchain. Inside the system, a UTT token conforming to the ERC20 standard is to be used. The project is to issue 100 million tokens, with 65 million to be sold during the ICO and pre-ICO, 30 million distributed among team members, and five million allocated to partners and members of the bounty campaign. All unsold tokens are to be destroyed. The initial price of the UTT token is 0.002 ETH. Payment for the tokens is accepted in ETH, BTC, USD, EUR. There are no restrictions on storing tokens.

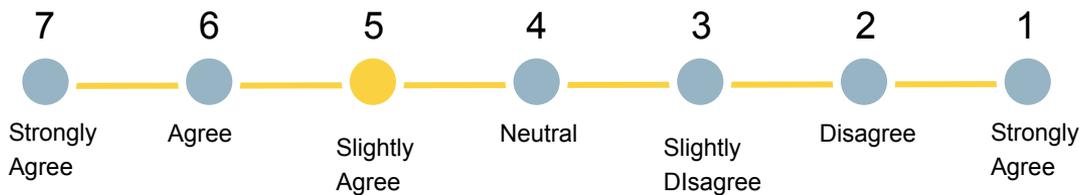
At the time of registration, accounts are created on the United Traders system for all participants. Buyers of UTT tokens can indicate their address on the Ethereum network on the uttoken.io website from the time of registration until 00:00 GMT on December 27, 2017. If participants specify an address on the Ethereum network, then on December 28, 2017 at 00:00 GMT the UTT tokens are to be sent to this address. If no address is specified, then UTT tokens are to be credited to accounts linked to the United Traders system at 00:00 GMT on December 28, 2017. From then on, tokens can be taken out manually or used in the United Traders system.

As the project's tokens are based on the Ethereum protocol, it has similar risks to the stability of the network.

Is there an asset base that would protect current holders from token devaluation?



The developers expect that due to excessive demand, the price of tokens at the start of trading on the exchange will exceed the price of tokens during the ICO by 100%-300%. Excess demand for tokens is to come from active promotional campaigns and low limits on the number of tokens per customer. Additionally, due to the launch of new products and services that can be purchased with UTT tokens and active promotion, the price of the token could grow several times more within a year of the start of trading. Furthermore, the developers guarantee they will buy back tokens from the market if the price falls below its fair estimate; however, they do not specify how exactly this fair estimate will be calculated.

Do the project participants have clear motivation for owning the tokens?

The developers claim that as soon as possible after the ICO, they will add the possibility of paying for all services on the United Traders ecosystem in UTT. To stimulate payments in tokens, the project team plans to provide discounts, making payments in tokens more profitable. Initially, the exchange of tokens will be dynamic and tied to the UTT exchange rate. Subsequently, with a decrease in the volatility of the UTT rate and an increase in the capitalization of issued tokens, the project team will no longer maintain dynamic currency conversion and will completely switch to paying for services in UTT. Team representatives say UTT tokens will be quoted on top-level crypto exchanges, such as HitBTC, Bittrex and Poloniex. At the moment, the United Traders team is negotiating to cooperate with exchanges.

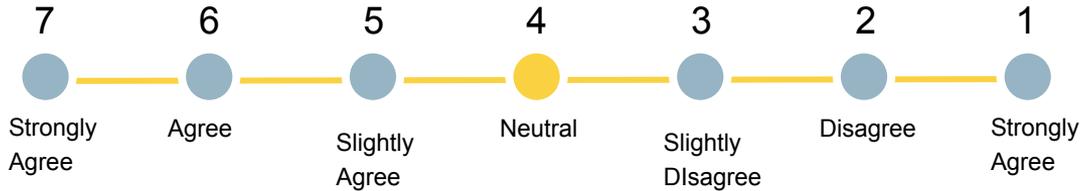
Legal Documentation



UNITED TRADERS

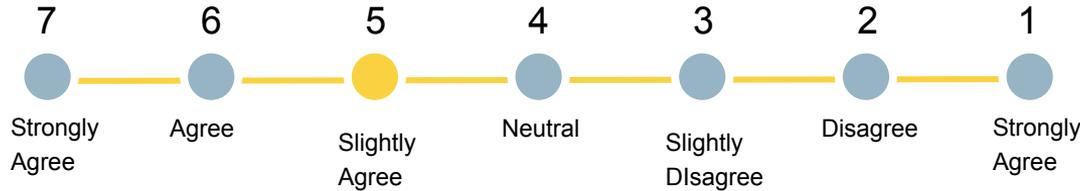
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Is the company's legal structure transparent?



The United Traders team says the project is controlled by an international group of legal entities incorporated in the British Virgin Islands, Cyprus, the UK and Russia. The sale of tokens is to be launched by an organization based in BVI that currently owns the core United Traders assets. However, according to the developers, they are in the process of registering and obtaining licenses for the exchange of UTT in the US, the UK, the Cayman Islands and Switzerland. Therefore, the project team has not provided public access to the legal documents for the legal entity at this stage.

Has the company taken preventive measures to avoid problems with ICO market regulators?



The whitepaper includes the legal aspects and legal status of the UTT token. The developers have laid out the rights of token buyers and owners, as well as the risks associated with the acquisition of UTT. The company has also indicated that citizens or residents of geographical areas in which access to cryptocurrency or digital tokens is prohibited by law, decrees, or regulatory or administrative acts are forbidden from acquiring and using UTT tokens. However, it is not indicated how the traffic from these regions will be limited.

Additionally, the developers say they have conducted their own verification of the UTT token using the Howey Test according to generally accepted methodology, and claim that there is an 80% probability the token will not be classified as a security.

According to the team, the only reason the UTT token could be classified as a security is that some of the buyers may have some expectation of future growth in the price of the token, and, as a consequence, the motive for buying tokens may be seen as speculative.

Additionally, the developers say that to open a trading account users will need to fill in forms, send a copy of their passport and sign a contract. All token buyers will have to undergo KYC procedures before tokens are delivered to them. On November 29, 2017, there was no publicly available package of legal documents (SAFT, Terms & Conditions).

Legal Opinion



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By New Lawyers, a Digital Rating Agency partner.

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Subject

The report analyzes the UTT token (hereinafter “Token”), issued as part of the ICO project from United Traders (“Project”). The results of the analysis can be used taking into account the limitations given at the end of this report.

Documentation

- The main marketing material that contains information about the Token placement is the whitepaper, which explains the specificity of the Token, and the scope of the rights and opportunities of its owners on behalf of the Project team (“Team”).
- On the website uttoken.io (“Website”), when purchasing a Token by means of a bank transfer (“Situation 1”), it is suggested that you familiarize yourself with the offer for the purchase of Tokens (“Offer”).
- If Tokens are purchased with cryptocurrency (“Situation 2”), the buyer is offered details of the corresponding wallet, without any reference to the Offer.
- In addition to the Offer, a Privacy Policy document is also available when registering on the website.
- The whitepaper, Offer, Privacy Policy are hereinafter collectively referred to as “the Documents”.
- The last access to the Documents was carried out on December 4, 2017.
- The team mentions that in its work it seeks to comply with the law. Information about cooperation with any law firms could not be found. It is not clear whether lawyers were involved in the preparation of the Documents.

Rights granted to holders of tokens

- The Token is likely to be a means of payment within the framework of the Project infrastructure.
- Details of the Token's capabilities are disclosed in the whitepaper. A comparative analysis of the whitepaper with the Offer shows that the Token's functionality is disclosed in the Offer in less detail.
- There is a possibility that users who have read the whitepaper and have not read the Offer will have an erroneous idea of the scope of the opportunities that they actually acquire. This probability is more typical for Situation 2.

Token Issuer

- To make a relatively firm conclusion about who Token's issuer is, it is possible only in relation to Situation 1. In this case, the issuer is UT Overseas Inc., registered in the British Virgin Islands (“BVI”).
- In Situation 2, the conclusion about the issuer can only be hypothetically inferred based on the indication of UT Overseas Inc. on the official company Website.
- Given the specifics of BVI legislation, it is impossible to completely exclude the possibility that key members of the Team are not officials of UT Overseas Inc. and, possibly, its shareholders. Thus, there is an open question about the ability of UT Overseas Inc. to bear responsibility for Token Holders.

Know Your Client

- The Documents do not contain information about what KYC procedures the Team plans to use and whether it plans to use them at all.
- In Situation 1, in the Offer the user is obliged to provide the requested information, but it is not specified whether the Team will send requests for this information and what it will contain.

Terms of Tokens sale

- In relation to Situation 1, the Tokens are sold on the basis of the Offer, which states that Tokens are transferred "as is".
- In general, the level of elaboration of the Offer is not high. In particular, by indirect indicators, it seems the Offer may have been intended for other purposes.
- In addition to the obvious technical defects in the Offer, there are also some controversial points and contradictions.
- The Offer specifies measures aimed at limiting the issuer's responsibility to the Token Holders; however, it seems that these measures are insufficient.
- The Offer also contains provisions on the liability of Token Holders in circumstances related to charges, claims, and suits to the issuer. However, these provisions need to be clarified and developed.
- In Situation 2, information on conditions for the sale of Tokens is contained only in the whitepaper, but it cannot be considered as a document containing the conditions for the acquisition of Tokens.

Managing the risk of Tokens qualifying as securities

- The Team believes that Token is not a security. This conclusion is justified by the passing of the Howey Test, as well as links to comments by lawyers whose names are not disclosed.

- Putting the Token to the Howey Test is a controversial approach, because the test identifies only one type of security – an investment contract. Why the Team does not see any reason to qualify the Token as a security on other grounds (using other tests) or in other jurisdictions is unclear.
- At the same time, in order to avoid the risks of the Token qualifying as a security, the Team is taking a number of measures that are aimed at protecting it from US citizens acquiring Tokens. How the Team intends to verify compliance with these prohibitions is unclear, especially in the view of the uncertainty regarding its plans for conducting KYC procedures.
- The Team also prohibits the acquisition of Tokens by citizens or residents of a "geographical area in which access to cryptocurrency or digital tokens is prohibited." The list of such geographical zones is not given.
- It should be noted that in relation to Situation 2, all restrictions regarding the acquisition of Tokens are provided only in the whitepaper.

Use of raised funds from the Token sale

The whitepaper reveals the main purposes for the raised funds raised during the Token sale.

Holding Structure

- There is a lack of complete clarity regarding the holding structure of the Project.
- The Documents mention the company that is the issuer of Tokens (UT Overseas Inc., registered in BVI), and in relation to Situation 2, the question of who Token's issuer is is ambiguous.
- According to unofficial sources, UT Overseas Inc. was registered in 2008. Obtaining detailed information, in particular on directors, shareholders and authorized capital, is chargeable.
- In Russia two legal entities are registered at the same addresses:
 - LLC "IC UNITED TRADERS", PSRN 1157746490164, authorized capital is 10,000 rubles (the director is also the sole founder, and is not mentioned as part of the Team);
 - LLC "IC" UNITED TRADERS ", PSRN 1157746656583, authorized capital is 6 million rubles (the names of the founders are similar to the names of some founders of the Project listed on the website).
- At least three companies with the name United Traders are listed in the registers of companies in the State of Delaware (USA).
- United Traders Pārštāvniecības (Latvia) is also listed on unitedtraders.com, located at Skultes iela 16 - 70, Skulte, Marupes novads, Riga, Latvia.
- All companies, except UT Overseas Inc., are not mentioned in the Documents. What kind of participation they have in the implementation of the Project is unclear, and this information is not disclosed in the Documents.

Operating Structure

- The Documents provide detailed information on the Team.
- A selective comparative analysis of the data on these individuals with the data presented on the LinkedIn network suggests the majority of the Team members are in Russia. Perhaps they are employees of the above-mentioned Russian companies.
- At the same time, a significant number of issues concerning the operational model of the Project remain unclear, in particular:
 - on the basis of which contracts Russian companies and UT Overseas Inc. cooperate;
 - whether the members of the Team fulfill their functions within the framework of the specified agreements or on other grounds;
 - in which office (in Russia or other jurisdictions) interaction with Token Holders and other necessary business processes will be carried out;
 - what is the degree of involvement of Russian top management in the operations of UT Overseas Inc.;
 - to what extent have the tax risks associated with the implementation of activities in Russia in the interests or on behalf of UT Overseas Inc. been worked out.
- Within the framework of the Project, among other things, the Team plans to create an investment marketplace and a UTEX crypto exchange. It is unclear to what extent this will require obtaining licenses in a particular jurisdictions, in particular in the United States or in other key markets for the Project.

Intellectual Property

- The Offer states that "the sole and exclusive owner of the UNITED TRADERS platform and its source code, as well as all improvements, corrections and changes, all copyrights, patents, trade secrets or trademarks and other rights to intellectual property objects intended for protection or relating to the platform, is UT Overseas inc".
- The purpose of this study is not to confirm data on intellectual property objects owned by United Traders. In this regard, we performed only a sample analysis of the most obvious points.
- According to the Whois service, the site is registered by the UNITED TRADERS organization, with a name that potentially matches the name of one of the Team members.
- According to the Madrid Monitor (a tool for verifying data on the registration of intellectual property in accordance with the Protocol to the Madrid Agreement on the International Registration of Trademarks on the World Intellectual Property Organization website), for Holders with elements in the name that coincide with "united traders" or "ut overseas", Objects are not registered.
- The means of confirming the rights to intellectual property objects used in the Offer is questionable - through the recognition by the user of UT Overseas inc. rights on such objects - which seems insufficient. Additionally, it is unclear from the Offer what objects are involved.

Personal data

- The issues of obtaining, processing, storing and transferring personal data are disclosed mainly in the Privacy Policy. This document resembles documents of this kind used by IT companies, although some of its legal aspects seem controversial.
- The law applicable for the Privacy Policy does not appear in the Privacy Policy.
- Users agree to the usage of almost all personal data by UT Overseas inc. and its affiliated persons.

- The tools for the withdrawal of the agreement on the use of personal data are provided in the Privacy Policy, although it may work with restrictions.
- It is not indicated where processing and storage of personal data is carried out.

Counteraction to the laundering of proceeds from crime and financing of terrorism

As stated earlier, the Documents do not contain information on measures to prevent money laundering or the financing of terrorism. However, the potential for implementing such measures is laid out in the Offer and Privacy Policy.

Disclaimer

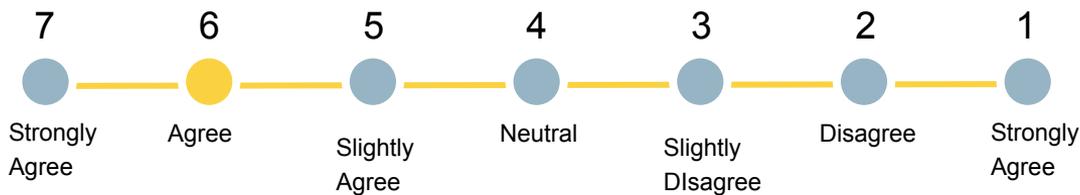
- The analysis presented in this report is intended for information purposes only, is based only on publicly available information and is not a legal opinion of NewLawyers on the laws of any government. In the analysis we used only freely available information that can be obtained by any interested person, without any financial investment.
- The only purpose of our research is to form a general idea of the degree of elaboration of the legal aspects of the Project by the Team. The purpose of this study has never been, is not and will not be, among other things, an assessment of the legal correctness of the ICO, the correctness of any of the Team's legal positions, the quality and (or) the adequacy and (or) sufficiency of the Documents used, the ability of the Team to fulfill obligations for the Project, the confirmation (or refutation) of certain facts, the implementation of legal advice, etc.
- The conclusions cannot under any circumstances be used or interpreted as a recommendation for the commission of any transaction using Tokens or other investment decisions related to Tokens. Our interpretation of the Documents may differ from the Team's interpretation and / or its individual members and / or any other persons.
- Despite the fact that we have taken all reasonable measures to exclude mistakes in our analysis, mistakes may be present. We are not responsible for any mistake, misprint, inaccuracy, ambiguity, or discrepancy in the interpretation of the Documents (including if our interpretation is incorrect). Contact your lawyer for professional legal and other advice in the context of your particular situation. The first person who reads the "Disclaimer" section to the end and reports it to NewLawyers is given a 50% discount, and the next 10%, for any NewLawyers legal services related to the implementation of the blockchain project in 2018.

Media Environment



UNITED TRADERS

DIGRATE
digital rating agency

Is the project popular on social networks and in thematic communities?

As the creators of the project are well-known, and United Traders is a long-standing successful business, the number of subscribers to the company's channels on social networks is quite high. Presumably, most of them appeared when the company was being developed, when ICO was not yet planned. Nevertheless, the project is actively discussed on social networks and is commented on on bitcointalk.org.

According to the team, "managing partners hold private meetings and negotiations, as well as participate in major conferences related to cryptography in the United States. On November 24, 2017 Roman Vishnevsky delivered a keynote speech at the [Global Youth Forum 2017](#) in Dubai (OAU), and on November 25, United Traders held their own conference in Moscow on blockchain, mining and cryptocurrency technologies - [Blockchain UTconference](#). "Also on November 29-30 Anatoly Radchenko spoke at the conference [BlockShow Asia 2017](#)."

Project subscribers on popular social networks (12/07/2017):



14,077
Subscribers



25,666 Views



58
Subscribers



1,366
Subscribers

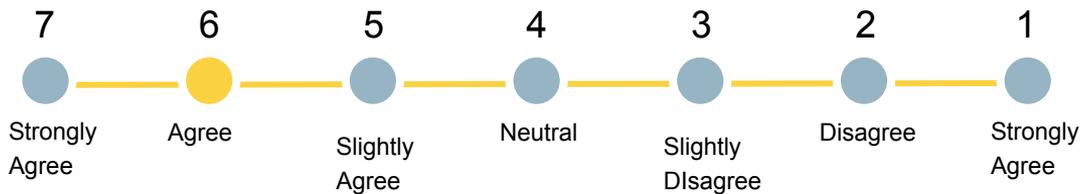


2,757 Members



30,532
Subscribers

Is the project widely discussed in blockchain news resources?



A lot of releases and articles about United Traders have been published on thematic news and business portals, and there are active discussions on blockchain resources. Several independent ratings agencies have conducted risk reviews of this ICO and given assessments on it. Some of them called the project "the most anticipated and promising" project of the year and noted that they will participate in the ICO with their own investments, and that this sum exceeds their investments in other projects.

News resources that have published articles about the project:

**Financial
One**

Coinspeaker[®]

Fintech Finance

PEOPLETALK

КАПИТАЛ

ЦЕНТР ДЕЛОВОЙ ИНФОРМАЦИИ

Forbes



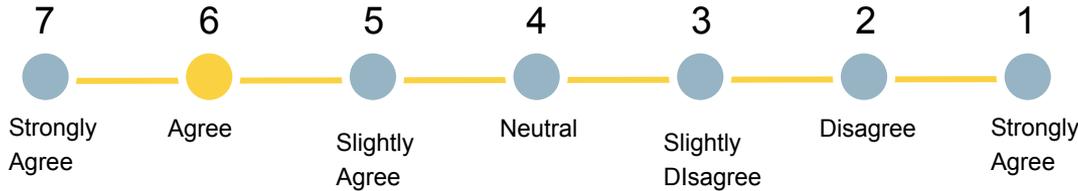
Team



UNITED TRADERS

DIGRATE
digital rating agency

Does the project team have extensive experience and a strong track record?



Developers of the United Traders represent an already formed team that has been operating since 2009 and has been actively introducing developments. The managers of the project are well-known personalities in the financial world. Three of the company's four partners began their careers as professional traders in US and Canadian prop-trading companies. The project team is represented by 64 specialists from various professional fields: marketing, software development, finance and sales. However, despite the professionalism, it cannot be said that the team has considerable experience in the implementation of blockchain projects.



Roman Vishnevsky

Managing Partner



Swift Trade, Higher School of Economics.



Dmitry Belousov

Managing Partner

Swift Trade, Bauman Moscow State Technical University.



Anatoly Radchenko

Managing Partner



Dimension Trading, Saint Petersburg State University ITMO.



Alexander Kurdyukov

Technical Director



Aeroflot, Alfa Bank, Lomonosov Moscow State University.

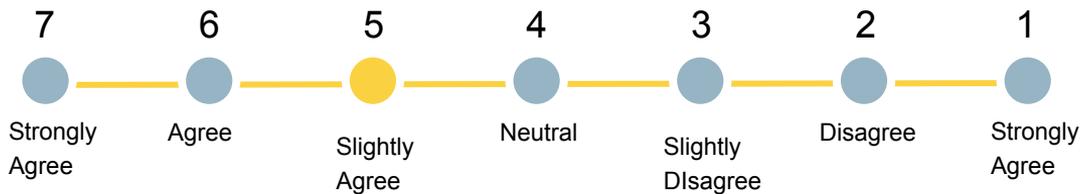
Project Support



UNITED TRADERS

DIGRATE
digital rating agency

Does the project have a strong advisory board?



The project has gathered a rather unusual team of consultants in comparison to other ICOs. It consists of only three members. First, Simon Libretti is a famous trader, with 18 years experience, who has been cooperating with United Traders for a long time. Second, the association "NP RTS", a company it cooperates with in the development of the St. Petersburg Stock Exchange and the electronic platform "Sunrise". However, the most interesting member of the Advisory Board is a 200 Million Dollar Trader, who earned \$283 million on transactions in cryptocurrencies. The trader has chosen to remain anonymous, but his interest in United Traders has been shown via a message he sent on the Ethereum blockchain: "United Traders - strong buy! uttoken.io," as well as the purchase of UTT tokens valued at over \$5 million. The company states it will consult with an unknown trader on blockchain and cryptography, but it is impossible to confirm this information.



SIMON LIBRATI

Founder of Clearpool Group, WTS proprietary trading, Co-Founder of FNG ETF, trading on NYSE Social and media tech fund

Simon started his career as a trader in Montreal. Over 18 years he has been deeply involved in all areas of trading - from funding to developing and managing teams worldwide.



200 Million Dollar Trader

“A Trader So Secret They’re Only Known by a Number”
Bloomberg.com

“He or she or they.” a Bloomberg.com correspondent writes, “did not reveal their identity even now, having become an advisor to United Traders. The only available public information is Ethereum network address: 0x00A651D43B6e209F5Ada45A35F92EFC0De3A5184.”

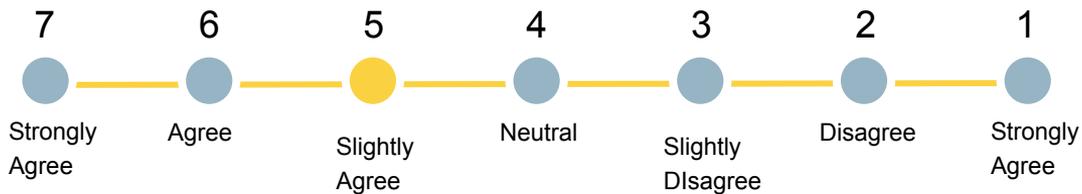


NP RTS ASSOCIATION

The Association of Financial Market Participants “Nonprofit Partnership for the Development of the RTS Financial Market”.

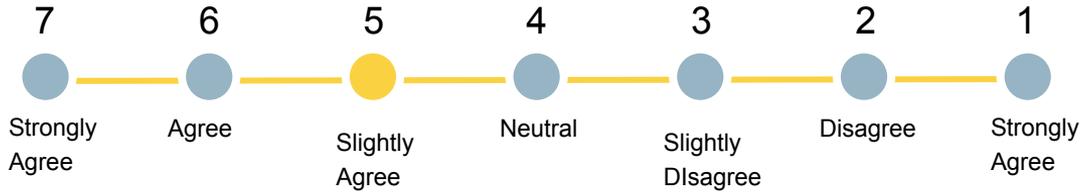
The NP RTS Association was established in 1995 and unites about 70 professional financial market participants. In the beginning of 2000 The RTS received a stock exchange license. A little later, the most successful Russian market for futures and options (FORTS) appeared on the RTS, which was included in the Top 10 international derivatives sites.

Are the project's partners large and well-known?



The company is cooperating with the NP RTS Association on the development of the St. Petersburg Stock Exchange and electronic platform Voskhod. The proof of this is the fact that RTS President Roman Goryunov personally attended a United Traders presentation and delivered a speech. It should also be noted that in January 2017, the first element of the company's new back-end, the partner system, was released. The system lets customers join the United Traders platform and earn on it. According to the team, profits can be received by ordinary customers who recommend UT services to their friends, as well as professionals who earn on traffic. The partnership program was chosen as a strategic solution to attract customers, instead of trying to get into the highly competitive market for the purchase of traffic from search engines and social networks. Thus, by the time the company's platforms is fully functioning, the partners, who are also customers, will likely begin actively joining.

Is the project attracting large VC investors?



The developers say the project has attracted a number of large investment funds, which, taking into account the specifics of United Traders, seems likely. However, detailed information on this was not found.

A1

Very high

High probability of investment return,
low sensitivity to market conditions.

Score: 6.1-7

A2

High

Medium-to-high probability of investment
return, considerable sensitivity to market
environment.

Score: 5.1-6

B1

Satisfactory

Considerable risk exposure, high sensitivity
to market conditions.

Score: 4.1-5

B2

Low

Low development potential, highly
speculative investment.

Score: 2.1-4

C

Very low

High default risk in the short term.

Score: 0-2

D

Default

In default, with little-to-no prospect for
recovery

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