From: **regulatoryoperations** regulatoryoperations@austrac.gov.au
Subject: Automatic reply: Re: AUSTRAC request for information - 2nd s76Q(1) [EXTERNAL] [Notice-225001] [SEC=OFFICIAL]
Date: 7 November 2026 at 4:14 pm
To: Allan Endresz aendresz@zucoins.com

OFFICIAL

Australian Government
AUSTRAC

FIGHTING FINANCIAL CRIME TOGETHER

To view this email as a web page, click here.

Thank you for contacting the Australian Transaction Reports and Analysis Centre (AUSTRAC).

This is an automated response confirming receipt of your email. Your Reference ID is: Notice-225001 .

Please use the Reference ID if you need to contact us regarding this email.

Email	Phone	Website
contact@austrac.gov.au	1300 021 037	www.austrac.gov.au

THIS IS A SYSTEM GENERATED EMAIL

Please do not reply to this message. If this email was not intended for you then please delete this email and contact us. If you notice any unauthorised activity with your account, please contact us.

Disclaimer

Recipients of this email are directed to our Privacy Policy.

Copyright notice

This email contains material that is copyright of the Commonwealth of Australia. You may download, display, print and reproduce this material in unaltered forms only (retaining this notice) for your personal, non-commercial use or use within your organisation.

Do not remove this line: EMAILTHR-66442.EMAIL-1200698

OFFICIAL

From: Allan Endresz <aendresz@zucoins.com>
Sent: Saturday, 07 November 2026 05:12:26
To: regulatoryoperations <regulatoryoperations@austrac.gov.au>
Subject: Re: AUSTRAC request for information - 2nd s76Q(1) [Notice-225001] [EXTERNAL] [SEC=OFFICIAL]

OFFICIAL

Attention: Sonia Ingram
A/g Manager, Registration Team

Re: VASP Registration Application – Ezybonds (Pacific) Limited Partnership (AAN 100063392) ("Business").

Clarification of Entity Relationships and Designated Service Provider pursuant to subsection 76Q(1) of the AML/CTF Act.

Dear Sonia,

I refer to your email below (dated 6 November 2026) requesting further information and documents from the Business pursuant to subsection 76Q(1) ("**the Notice**") of the Anti-Money Laundering and Counter Terrorism Financing Act 2006 ("**AML/CTF Act**").

I note that you are only requesting "**further information**" arising from the previously published "Terms of Use" on zutopia.com, which stated that the Services were "**provided by Zutopia and Zucoins L.P.**"

I further note that this email and attachment represents a full and complete response to your email and Notice. In your email and Notice, I am unable to identify any request for the production of further documents. Please confirm same.

Accordingly, after consultation with my legal team, I am pleased to provide you with the following responses.

(a) Relationship between Zucoins L.P. and Zutopia

"**Zutopia**" is a trademark and registered business names used by Ezybonds (Pacific) Limited Partnership (ABN 97 682 270 092) providing the P2P Marketplace Services. The Partnership has registered the business names "**ZutopiaP2P**" and "**ZutopiaP2P Marketplace**".

Zucoins L.P. is a separate limited partnership. It is not the operator of the Zutopia P2P Marketplace and does not provide any Services. The connection between the two entities is limited to:

• Common general partnership by Allan Paul Endresz; and
• A trademark consent under which Zucoins L.P. (the owner of the "**Zucoins**" and "**Zucoin**" trademarks) has permitted Ezybonds (Pacific) Limited Partnership to use those marks on the Zutopia platform and website solely to identify the virtual digital asset available for trading.

Zucoins L.P. has no operational, contractual or beneficial role in the provision of the Zutopia P2P Marketplace Services.

(b) Relationship between Zucoins L.P. and Ezybonds (Pacific) Limited Partnership

Ezybonds (Pacific) Limited Partnership and Zucoins L.P. are separate legal entities. Both have Allan Paul Endresz as a general partner (in the case of Ezybonds (Pacific) Limited Partnership, as the General Trustee Partner).

There is no parent-subsidiary, agency or joint-venture relationship under which Zucoins L.P. provides or controls the

designated services. Zucoins L.P. does not receive customer funds, application fees or settlement proceeds arising from use of the Zutopia marketplace. Its only relevant relationship with the Partnership is the trademark consent described above.

As General Trustee Partner of Ezybonds (Pacific) Limited Partnership, Allan Paul Endresz holds the "**Zutopia**" trademarks on behalf of the Partnership.

Entity that provides or intends to provide the designated VASP services

Consistent with the application and supporting documents filed with Austrac since 12 May 2026, the designated services (Item 50A of Table 1, section 6 of the AML/CTF Act – "making arrangements" for the exchange of, a virtual asset for money or money for a virtual asset) are provided, and will only be provided, solely by:

Ezybonds (Pacific) Limited Partnership
ABN 97 682 270 092
AAN 100063392
Operating under the registered business names "ZutopiaP2P" and "ZutopiaP2P Marketplace" and trademark "Zutopia".

Zucoins L.P. does not provide, and does not intend to provide, any designated services under the AML/CTF Act in connection with the Zutopia P2P Marketplace.

Updated Terms of Service

In response to the Notice, my legal team has now updated the Terms of Service (as at 7 November 2026) and published them on the web site at zutopia.com.

Briefly, the updated Terms of Service now clearly:

• Removes references to "Terms of Use".
• Identifies Ezybonds (Pacific) Limited Partnership (ABN 97 682 270 092) as the sole provider of the Services;
• Discloses the registered business names "ZutopiaP2P" and "ZutopiaP2P Marketplace";
• Explains that "Zutopia" is a trading name and trademark held on behalf of the Partnership by its General Partner;
• States that Zucoins L.P. is a separate entity that does not provide the Services; and
• Records the limited trademark consent under which Zucoins L.P. permits use of the "Zucoins" and "Zucoin" marks.
• Removes the previous wording that referred to Services being "provided by Zutopia and Zucoins L.P."

A copy of the updated Terms of Service (dated 7 November 2026) is attached to this email for your records. The published version can be viewed at zutopia.com.

I trust that my response and actions will clarify your request for information pursuant to the Notice. I look forward to receiving your official confirmation of Ezybonds (Pacific) Limited Partnership being registered as a VASP.

Please contact me should you require any further information.

For the record, I respectfully note that Austrac's registration assessment process commenced on 12 May 2026.

Yours sincerely,
Allan Paul Endresz
General Partner
Ezybonds (Pacific) Limited Partnership
AML/CTF Compliance Officer
Operating as Zutopia

OFFICIAL

****
Please note that your email address is known to AUSTRAC for the
purposes of communicating with you. The information transmitted in

purposes of communicating with you. The information transmitted in this e-mail is for the use of the intended recipient only and may contain confidential and/or legally privileged material. If you have received this information in error you must not disseminate, copy or take any action on it and we request that you delete all copies of this transmission together with attachments and notify the sender. This footnote also confirms that this email message has been swept for the presence of computer viruses.
****