TURBO

CRYPTO-ASSET WHITE PAPER

Document control	Details
Asset	Turbo (TURBO)
Primary network	Ethereum
Contract	0xa35923162c49cf95e6bf26623385eb431ad920d3
Maximum supply	69,000,000,000 TURBO
Circulating supply	68,999,043,798 TURBO (as of 21/09/2026)
Prepared for	TURBO community
Publication date	9 November 2026
Information as of	9 November 2026

Prepared with reference to Regulation (EU) 2023/1114 (MiCA), Commission Implementing Regulation (EU) 2024/2984, Commission Delegated Regulation (EU) 2025/422, and relevant ESMA/European Commission guidance and Q&As.

TURBO does not confer any contractual claim against an issuer, redemption right, reserve claim, guaranteed return or entitlement to payment from any central entity. Holders have the ability to hold, transfer and dispose of TURBO subject to the rules of the applicable blockchain, wallet, exchange and other infrastructure used to interact with the asset.

Table of Contents

1. Executive Summary
2. Regulatory Status and Scope
3. Summary for Prospective Holders
4. Part A - Offeror / Person Seeking Admission to Trading
5. Part B - Issuer
6. Part C - Crypto-Asset Project
7. Part D - Offer to the Public / Admission to Trading
8. Part E - Information about TURBO
9. Part F - Rights and Obligations
10. Part G - Underlying Technology
11. Part H - Risk Factors
12. Part I - Sustainability / Environmental Disclosure
13. Decentralisation and Identifiable-Issuer Analysis
14. Governance, Community and Communications
15. Tokenomics and Distribution
16. Roadmap and Future Development
17. Legal and Regulatory Framework

1. Executive Summary

Turbo (TURBO) is an Ethereum-based ERC-20 crypto-asset that originated in 2023 as an experiment in AI-assisted cryptocurrency creation. TURBO is decentralized and community-driven, with smart-contract ownership permanently renounced and a fixed maximum supply of 69 billion TURBO.

The project originated from an experiment in which its creator, Rhett Mankind, used GPT-4 guidance and a stated initial development budget of approximately US$69. Following launch, the ecosystem developed through independent community participation, including developers, artists, creators, educators, businesses, liquidity providers, exchange partners and holders.

The Ethereum token contract is 0xa35923162c49cf95e6bf26623385eb431ad920d3. The contract incorporates an ownership model and ownership-renouncement functionality. Ownership has been renounced and no administrator retains authority to modify the core token rules. The principal regulatory feature relevant to TURBO is decentralisation and the absence of an identifiable issuer or central entity.

2. Regulatory Status and Scope

TURBO is a crypto-asset other than an asset-referenced token or e-money token. No identifiable central entity, offeror or person seeking admission to trading exists in relation to TURBO.

Category	Comment
Crypto-asset category	Crypto-asset other than an ART or EMT.
Identifiable issuer or central entity	None exists.
Offeror	None exists.
Person seeking admission to trading	None exists.
Central legal entity / foundation	None exists.
Protocol controller	No central controller exists; contract ownership has been renounced.
MiCA Title II consequence	Based on the current TURBO structure and the absence of a central entity, offeror, or person seeking admission to trading; TURBO is treated in this document as falling outside the MiCA Title II issuer/white-paper regime applicable to crypto-assets with an identifiable issuer. This document is therefore published as a voluntary community disclosure and is not presented as a statutory MiCA white paper.
Purpose of this document	Voluntary disclosure, partnership and exchange due diligence.

MiCA Article 4(1) ordinarily requires a legal person making an offer to the public of a Title II crypto-asset to prepare, notify and publish a white paper. Article 5 similarly addresses a person seeking admission to trading. However, the European Commission's answer of 18 February 2026 to ESMA_QA_2552 states that Article 5(2) is not designed for crypto-assets with no identifiable issuer and that, consistently with Recital 22, such crypto-assets are outside Title II and are not subject to a MiCA white-paper requirement. This Commission answer is reflected here as regulatory guidance and does not constitute a binding judicial interpretation.

3. Summary for Prospective Holders

3.1 Warning

Warning: This summary should be read as an introduction to the full document. A prospective holder should base any decision to acquire TURBO on the document as a whole and not on this summary alone. TURBO may lose some or all of its value, may not always be transferable and may not be liquid. TURBO is not covered by the investor compensation schemes under Directive 97/9/EC or the deposit guarantee schemes under Directive 2014/49/EU.

This document is not a prospectus under Regulation (EU) 2017/1129 and does not constitute an offer or solicitation to purchase financial instruments.

3.2 Key characteristics

- ERC-20 crypto-asset deployed on Ethereum.
- Maximum supply of 69,000,000,000 TURBO.
- No mechanism for discretionary future minting.
- No protocol-imposed transaction tax.
- The TURBO smart contract contains no blacklist or wallet-freezing functionality.
- Smart-contract ownership has been renounced.
- Open participation: holders and independent builders may interact with and build around the token without permission from a central protocol administrator.
- No central treasury or foundation controls TURBO.
- Market price is determined by supply, demand, liquidity and market activity; no price or return is guaranteed.

4. Part A - Offeror / Person Seeking Admission to Trading

MiCA Annex I / Commission Implementing Regulation (EU) 2024/2984 requires information concerning the offeror or person seeking admission to trading. No such person exists in the present TURBO structure. This section therefore records the factual position of TURBO.

Category	Comment
A.1 Name	None exists.
A.2 Legal form	None exists.
A.3 Registered address	None exists.
A.4 Head office	None exists.
A.5 Registration date	None exists.
A.6 LEI	None exists.
A.7 National identifier	None exists.
A.8 Telephone	None exists.
A.9 Email	Info.community@turbotoken.io
A.10 Response time	Community enquiries are monitored on an ongoing basis.
A.11 Parent company	None exists.
A.12 Management body	None exists.
A.13 Business activity	None exists.
A.14 Parent activity	Not applicable.
A.15 Newly established	Not applicable.
A.16/A.17 Financial condition	Not applicable because no offeror/person seeking admission exists.

5. Part B - Issuer

No issuer or central entity exists for TURBO. Rhett Mankind was the creator and original deployer of TURBO in 2023. Following deployment, ownership of the TURBO smart contract was renounced. Rhett Mankind is not the current controller

of the smart contract, and no company, foundation, DAO, treasury or other undertaking exists as issuing or controlling TURBO today.

Field	Current position
B.1 Issuer different from offeror/person seeking admission	Not applicable: no identifiable central entity, offeror or person seeking admission exists.
B.2 Name	None exists.
B.3 Legal form	None exists.
B.4 Registered address	None exists.
B.5 Head office	None exists.
B.6 Registration date	None exists.
B.7 LEI	None exists.
B.8 National identifier	None exists.
B.9 Parent company	None exists.
B.10 Management body	None exists.
B.11 Business activity	None exists.
B.12 Parent activity	None exists.

The absence of an identifiable issuer or central entity arises from the decentralized structure, absence of central protocol control, absence of a central issuing entity, and community-driven operation of TURBO.

Field	Comment
C.1-C.12 Trading-platform operator information	Not applicable: no trading platform is drawing up this document on behalf of TURBO.
C.13 Other person drawing up the white paper	This document is prepared as a voluntary community disclosure.
C.14 Reason for preparation	To provide a comprehensive, transparent and MiCA-aligned factual disclosure, exchange/CASP due diligence and contingency planning.

6. Part C - Crypto-Asset Project

6.1 Project identity and origin

TURBO originated in 2023 as an experiment in AI-assisted cryptocurrency creation. Its creator, Rhett Mankind, used GPT-4 guidance and an initial development budget of approximately US$69. The project subsequently attracted independent community participation and developed into a globally distributed crypto-asset ecosystem.

Category	Comment
Historical creator/deployer	Rhett Mankind - historical creator/deployer as described in the project narrative.
Current protocol administration	No central protocol administrator exists.
Development	Independent developers/builders may develop applications and integrations.
Community moderation	Volunteer moderators may administer community communications/channels; this does not confer protocol-level control over the Ethereum token contract.
Foundation/company	None exist as controlling TURBO.
Treasury	No project-controlled reserve treasury exists.

Exchange partners	Exchanges independently decide whether and how to list TURBO.

6.2 Crypto-asset classification

TURBO does not provide holders with a contractual right to a defined good or service from an issuer, nor does it confer a claim against an issuer, reserve or other central counterparty. TURBO is a crypto-asset other than an asset-referenced token or e-money token.

6.3 Project plans and resources

Turbo does not operate under a rigid centrally managed product roadmap. Future initiatives are expected to arise from independent community contributors. Examples include software, educational material, artwork, integrations, events, social media activity, merchant adoption and other third-party applications.

No centrally controlled development or marketing budget exists. Community activity may involve third parties and legal entities acting independently; participation by such parties does not, by itself, establish that the entity is the issuer or central entity of TURBO.

7. Part D - Offer to the Public / Admission to Trading

TURBO was launched in 2023. No current offeror conducting a public offer of TURBO in the Union exists, and no person is seeking admission to trading on behalf of TURBO. Community advocacy or requests for exchange listings do not, by themselves, establish that a person or entity is acting as a person seeking admission to trading on behalf of TURBO. The relevant exchange retains independent discretion over whether to admit TURBO to trading.

Field	Comment
E.1 Public offer / admission	No current offeror or person seeking admission exists; exchange listings have historically been independently determined by exchanges.
E.2 Reasons	Historical creation and subsequent community adoption; no current centrally controlled fundraising programme or issuer-led token offering exists.
E.3 Fundraising target	Not applicable.
E.4 Minimum subscription	Not applicable.
E.5 Maximum subscription	Not applicable.
E.6 Oversubscription	Not applicable.
E.7 Allocation	Not applicable.
E.8 Issue price	Not applicable.
E.9 Pricing currency/asset	Not applicable.
E.10 Subscription fee	Not applicable.
E.11 Offer price determination	Market price after launch; no current issuer-set price.
E.12 Quantity offered	No current issuer-controlled offering exists.
E.13 Target holders	Open market / unrestricted participation, subject to applicable jurisdictional and platform restrictions.
E.14 Holder restrictions	No protocol-level holder restrictions exist.
E.15–E.32 Refund/withdrawal/placement mechanics	Not applicable.
E.33 Trading platforms	TURBO is traded on multiple third-party venues; listings are independently determined by the relevant venues.
E.34–E.36 MIC/access/costs	Venue-specific and not controlled by TURBO.
E.37 Offer expenses	Not applicable.

E.38 Conflicts	Potential conflicts may arise at individual holders, service providers, exchanges or community contributors; no central issuer-level conflicts body exists.
E.39 Applicable law	No single law is designated by TURBO for secondary-market trading; venue and transaction-specific laws apply.
E.40 Competent court	No central contractual court designated by TURBO.

TURBO was launched without a conventional presale or initial token sale, and no funds were raised by the creator or a central team through an initial token offering. The original distribution included tokens allocated to the community and tokens retained by the creator. The original distribution totaled 69,000,000,000 TURBO. As of 21 September 2026, 68,999,043,798 TURBO are in circulation, reflecting 956,202 TURBO that have been burned. No reserve treasury remains under project control.

8. Part E - Information about TURBO

Field	Comment
F.1 Crypto-asset type	ERC-20 crypto-asset other than an ART or EMT.
F.2 Functionality	Transferable digital token used as an open crypto-asset; compatible with Ethereum wallets and applications.
F.3 Planned functionality	No centrally mandated future functionality. Independent builders may integrate TURBO into applications.
F.4 White paper type	OTHR - crypto-assets other than ARTs and EMTs, if Title II applies.
F.5 Submission	Not applicable; this document is a voluntary community disclosure and is not being submitted as a statutory MiCA whitepaper.
F.6 Characteristics	Fixed maximum supply; ERC-20; no future minting; no protocol tax; ownership renounced.
F.7 Commercial/trading name	Turbo / TURBO.
F.8 Website	Official project website: https://turbotoken.io/
F.9 Starting date	29 April 2023.
F.10 Publication date	21 September 2026.
F.11 Other services by issuer	Not applicable.
F.12 Language	English.
F.13 Voluntary data flag	Yes - this document is published as a voluntary community disclosure.
F.14 Personal data flag	Yes - the document refers to the historical creator by name.
F.15 Home Member State	Not applicable while no offeror/person seeking admission exists.
F.16 Host Member States	Not applicable while no offeror/person seeking admission exists.

Field	Comment
G.1 Purchaser rights/obligations	TURBO does not confer contractual governance, redemption, repayment, dividend or other issuer-level rights. Holders may transfer tokens subject to blockchain mechanics and applicable law.

G.2 Exercise of rights	Transfers and other available token functions are performed through compatible wallets/applications and the Ethereum network.
G.3 Modification	No central authority as having the ability to modify the core token contract following renouncement of ownership exists.
G.4 Future public offers	No centrally controlled future public offer is currently planned or exists.
G.5 Issuer-retained assets	No issuer or central entity exists.
G.6 Utility token	No.
G.7-G.8 Utility goods/services	Not applicable.
G.9 Admission sought	No person on behalf of TURBO exists as seeking admission.
G.10 Purchase/sale modalities	TURBO may be acquired or sold through third-party exchanges, decentralized protocols and other venues where supported, subject to local law and venue policies.
G.11 Transfer restrictions	No protocol-level transfer restrictions exists.
G.12 Supply adjustment protocol	No protocol mechanism for discretionary supply increases. Individual holders may burn tokens through the available burn functionality, reducing circulating supply.
G.13 Supply adjustment	Maximum supply is fixed at 69,000,000,000 TURBO; voluntary burns can decrease circulating supply.
G.14 Value protection scheme	Not applicable.
G.15 Protection scheme description	Not applicable.
G.16 Compensation scheme	Not applicable.
G.17 Compensation description	Not applicable.
G.18 Applicable law	No single issuer-designated law governs token ownership; applicable laws depend on the relevant activity, venue and jurisdiction.
G.19 Competent court	No central contractual court designated.

10. Part G - Underlying Technology

10.1 Ethereum

TURBO is an ERC-20 token deployed on Ethereum. Ethereum uses Proof-of-Stake consensus. The Ethereum network provides the distributed ledger on which the primary TURBO token contract operates.

10.2 Token contract

Contract address: 0xa35923162c49cf95e6bf26623385eb431ad920d3.

- ERC-20 standard implementation.
- Maximum token supply: 69,000,000,000 TURBO.
- Owner function exists in the contract ABI and ownership has been renounced.
- Renounce-ownership functionality is present in the verified contract ABI.
- Burn and burnFrom functionality exists; burns can reduce supply but cannot increase the maximum supply.
- No proxy or upgrade mechanism is used to modify the deployed TURBO contract.
- The TURBO contract imposes no protocol transaction tax and contains no blacklist or wallet-freezing functionality.

10.3 Other network representations

Ethereum: 0xa35923162c49cf95e6bf26623385eb431ad920d3

Solana: 2Dyzu65QA9zdX1UeE7Gx71k7fiwyUK6sZdrvJ7auq5wm

Robinhood Chain: 0x134A73B9B3DC68B716298e0934E8c449B7B3967F

The Ethereum contract described in this document is the primary TURBO token contract. Users should independently verify the contract address, operator, custody model and applicable terms of any representation of TURBO on another network.

10.4 Fees and incentives

TURBO imposes no protocol transaction tax. Network transaction fees are determined by the underlying blockchain and are not retained by any central TURBO entity.

10.5 Technology audit

A formal third-party smart-contract security audit was conducted by Blockstars Technology on 10 May 2023.

11. Part H - Risk Factors

Market and price risk: TURBO may experience substantial volatility. Its market price is determined by market supply, demand, liquidity and sentiment. No return or minimum value is guaranteed.

Liquidity risk: Liquidity may differ materially across venues and may deteriorate during periods of market stress.

Technology risk: Ethereum, wallets, bridges, applications and other infrastructure may contain vulnerabilities or experience outages, congestion, reorganisation or other operational failures.

Smart-contract risk: No software is free from defects. Although the contract is deployed and publicly verifiable, unexpected technical issues may still occur.

Bridge / wrapped-asset risk: Representations of TURBO on other networks may depend on third-party bridge or token infrastructure and can involve additional smart-contract, custody and counterparty risks.

Key-management risk: Loss or compromise of private keys can result in permanent loss of TURBO.

Regulatory risk: Crypto-asset laws and supervisory approaches continue to evolve. Classification, trading availability and service provision may be affected by future legislation or regulatory interpretation.

Decentralisation / governance risk: There is no central entity obligated to develop, maintain or support the ecosystem. Community initiatives may cease, fragment or develop in different directions.

Information risk: Community-produced information may be inaccurate, incomplete or inconsistent. Official channels should not be treated as equivalent to communications from a regulated issuer.

Market abuse risk: Secondary-market activity can involve manipulation, insider dealing or other prohibited conduct. Participants remain responsible for compliance with applicable law.

Counterparty / CASP risk: Users interacting with exchanges, brokers, custodians, wallets or other CASPs are exposed to the risks of those intermediaries.

No contractual redemption: TURBO does not provide a contractual redemption right against an issuer or reserve.

12. Part I - Sustainability / Environmental Disclosure

MiCA requires disclosure of principal adverse impacts on climate and other environment-related impacts associated with the consensus mechanism used to issue the crypto-asset. Commission Delegated Regulation (EU) 2025/422 specifies the applicable indicators, methodologies and presentation requirements.

For Ethereum, the relevant consensus mechanism is Proof-of-Stake. The sustainability information below is presented using the applicable MiCA sustainability framework and, where third-party estimates are used, those estimates are identified as such and have not been independently verified by TURBO.

Field	Comment
S.1 Relevant legal entity	Not applicable to TURBO. No issuer or central entity exists.
S.2 Crypto-asset	Turbo (TURBO).
S.3 Consensus mechanism	Ethereum Proof-of-Stake.
S.4 Incentive mechanisms and fees	Ethereum validator incentives and network fees; TURBO itself imposes no transaction tax.
S.5 Beginning of reporting period	Not separately established by TURBO.
S.6 End of reporting period	Not separately established by TURBO.
S.7 Energy consumption	Not independently determined by TURBO.
S.8 Energy consumption sources/methodology	No TURBO-specific methodology has been independently verified for this disclosure.
S.9-S.13 Supplementary indicators	Not separately determined or independently verified by TURBO.
S.14-S.15 Sources/methodologies	No TURBO-specific methodology has been independently verified for this disclosure.
S.16+ Optional indicators	Not provided.

13. Decentralisation and Identifiable-Issuer Analysis

13.1 Regulatory framework

Recital 22 of MiCA states that where crypto-assets have no identifiable issuer, they should not fall within Titles II, III or IV. The European Commission's answer dated 18 February 2026 to ESMA_QA_2552 confirms the practical consequence for Article 5(2): where a crypto-asset has no identifiable issuer, it is outside Title II and no white paper is required under MiCA.

13.2 Factual indicators supporting no identifiable issuer

- Historical creator/deployer is identified, but no current issuer or central entity exists.
- Smart-contract ownership has been permanently renounced.
- No foundation, company, issuer vehicle or central protocol administrator exists.
- No central treasury exists.
- No central entity has authority to mint, tax, blacklist, freeze or upgrade the token contract.
- Community development is performed by independent participants rather than a central management body.
- Exchange listings are independently determined by exchanges.
- Community moderators may administer communications and community channels, but are not identified as possessing protocol-level authority over the token contract.

13.3 Important legal distinction

Control of community communications is distinct from control of the crypto-asset protocol. Official social-media, Telegram, Discord and website moderators may administer those communication channels without possessing protocol-level authority over TURBO. Control over social-media accounts, websites, community channels or communications does not confer authority over the Ethereum token contract or the supply, transfer or administrative functions of TURBO.

13.4 Rhett Mankind

Rhett Mankind was the historical creator and original deployer of TURBO. Following deployment, ownership of the smart contract was renounced. He is not the current controller of the protocol, and no ongoing authority over the smart contract is attributed to him.

13.5 Assessment of Current Control and Issuer Status

The existence of a historical creator and original deployer does not, by itself, establish the existence of a current issuer for TURBO. The assessment of whether an identifiable issuer exists is based on current facts and control arrangements.

The following factors are relevant to TURBO's current structure:

- **Protocol control:** Ownership of the Ethereum smart contract has been renounced, and no current administrator has authority to modify the core token rules.
- **Economic control:** No central company, foundation, treasury or other undertaking currently controls TURBO or holds assets on behalf of the protocol.
- **Token issuance:** The deployed contract contains no discretionary minting mechanism that would permit a current administrator to increase the maximum supply.
- **Governance:** No central management body, elected committee, or formal governance entity has authority to direct the protocol.
- **Development:** Development and ecosystem activity are undertaken by independent contributors and third parties rather than by a central issuer.
- **Communications:** Community moderators may administer official communication channels, but such administrative access does not provide protocol-level control.
- **Exchange listings:** Listings are determined by the relevant trading venues. Community advocacy or communications concerning listings do not, by themselves, establish a person seeking admission to trading on behalf of TURBO.

On the basis of these characteristics, the current TURBO structure does not identify a natural or legal person, or other undertaking, that acts as the issuer of the crypto-asset.

14. Governance, Community and Communications

Turbo does not operate under a conventional corporate governance structure. There are no elected executives, formal voting committees or centralized decision-making bodies responsible for directing the protocol.

Area	Comment
Protocol governance	None exists.
Smart-contract administration	Ownership has been renounced.
Community moderation	Volunteer moderators administer community communications.
Website/social channels	Managed by community volunteers/moderators.
Development	Independent developers and contributors.
Marketing	No central marketing budget exists; community-led promotion and collaborations.
Treasury	No central project treasury exists.
Exchange listings	Independent decisions by exchanges.
Community initiatives	Education, software, integrations, art, events, social media, merchant adoption and other independent activity.

15. Tokenomics and Distribution

Category	Comment
Maximum supply	69,000,000,000 TURBO.
Current circulating supply	Current circulating supply 68,999,043,798 TURBO (as of 21 September 2026). Burned - 956,202 TURBO, representing the difference between the original 69,000,000,000 TURBO supply and the current circulating figure.
Inflation	No inflation mechanism exists.
Future minting	No future minting exists.
Transaction tax	0% protocol-imposed transaction tax.
Burning	Burn functionality permits holders to reduce supply; burns do not create additional tokens.
Treasury	No reserve treasury, foundation treasury or central multisig holding undistributed TURBO exists as of 21/09/2026.
Original distribution	Community crowdfunding allocation and creator allocation.
Original creator allocation	9,000,000,000 TURBO
Creator-linked wallet balance	3,700,000,000 TURBO (as of 21/09/2026)
Team allocation	No separate team allocation exists.
Ongoing distribution	No centrally controlled ongoing distribution programme exists.

TURBO was launched without a conventional presale or initial token sale, and no funds were raised by the creator or a central team through an initial token offering. The original distribution included tokens allocated to the community and tokens retained by the creator. The original distribution totaled 69,000,000,000 TURBO. As of 21 September 2026, 68,999,043,798 TURBO are in circulation, reflecting 956,202 TURBO that have been burned. No reserve treasury remains under project control.

16. Roadmap and Future Development

TURBO does not publish a binding corporate development schedule. The ecosystem's future development is community-driven, with independent participants deciding whether and how to build applications, integrations, educational material, creative projects and other initiatives.

- Strengthening community participation.
- Supporting independent ecosystem integrations.
- Exploring AI and decentralized technology applications.
- Expanding global accessibility while respecting applicable law.
- Preserving permissionless participation and decentralized architecture.

These priorities reflect the decentralized and community-driven nature of TURBO and do not constitute commitments by a central issuer.

17. Legal and Regulatory Framework

17.1 Regulatory Status

TURBO is treated as a crypto-asset other than an asset-referenced token or e-money token. TURBO is not represented as a financial instrument. This white paper is not a prospectus under Regulation (EU) 2017/1129 and does not constitute investment advice or a recommendation to acquire TURBO.

17.2 No promise of value

Nothing in this document should be construed as an assertion regarding the future value, price appreciation or expected return of TURBO.

17.3 No Contractual Issuer

No central entity, redemption counterparty, guarantor or central treasury exists in relation to TURBO. Holders should not assume that any person or entity is legally obligated to maintain, develop, support or redeem TURBO.

17.4 CASP Obligations

The absence of an identifiable issuer does not remove EU regulatory obligations applicable to CASPs providing services in respect of TURBO. CASPs remain responsible for their own MiCA obligations, including assessing whether an identifiable issuer exists and whether a white paper is required.

17.5 MiCA Decentralisation Status

Recital 22 of MiCA provides that crypto-assets with no identifiable issuer do not fall within Titles II, III or IV. The European Commission confirmed in ESMA_QA_2552 on 18 February 2026 that where a crypto-asset has no identifiable issuer, it is outside Title II and no MiCA white paper is required under MiCA. TURBO has no issuer or central entity, and its decentralized structure is described throughout this white paper.

Category	Purpose	Status
Ethereum Contract Address 0xa35923162c49cf95e6bf26623385eb431ad920d3	Primary token identification.	Identified.
Ownership-renouncement transaction	Evidence that contract ownership was renounced.	Confirmed.
Contract creation transaction	Establish deployer and launch history.	Identified.
Initial token allocation transactions	Reconcile historical distribution and creator allocations.	Identified.
Creator wallet history	Assess continuing holdings and activity without equating holdings with issuer status.	Reviewed.
Legal-entity searches	Confirm absence/presence of company/foundation/issuer vehicle.	Reviewed; no entity identified as the issuer or central controller of TURBO.
Official website/social-channel control	Identify moderators and practical control of communications.	Identified.
Treasury / multisig searches	Confirm whether any project-controlled reserve exists.	Reviewed; no project-controlled reserve treasury exists.
Exchange listing history	Determine whether any person sought admission to trading or listings were independently initiated.	Community advocacy/requesting activity identified, with final listing decisions made independently by the relevant exchanges.

Review item	Comment
Confirm TURBO is not an ART or EMT	Yes.
Complete MiCA Article 97 classification analysis	Yes.
Confirm no identifiable issuer under Recital 22	Yes.
Confirm no current offeror / person seeking admission to trading	Yes.
Verify ownership renouncement and all remaining admin powers	Yes.
Verify no mint / tax / blacklist / freeze / upgrade mechanism	Yes.
Verify historical founder allocation and review founder-linked wallet history	Yes.
Confirm no central treasury / multisig controls project funds	Yes.
Map moderators and distinguish channel control from protocol control	Yes.
Review EU-facing marketing / collaborations for any regulated offering activity	Yes.
Verify Ethereum contract and all bridge / wrapped representations	Yes.

18. Principal Regulatory References

Regulation (EU) 2023/1114 (MiCA), including Recital 22 and Articles 4-15, 19, 66 and 97.

Commission Implementing Regulation (EU) 2024/2984 on the forms, formats and templates for crypto-asset white papers.

Commission Delegated Regulation (EU) 2025/422 on sustainability indicators and methodologies.

ESMA_QA_2552, European Commission answer dated 18 February 2026 concerning crypto-assets with no identifiable issuer.

ESMA Joint Guidelines JC 2024 28 under Article 97 on the standardised classification test for crypto-assets.