

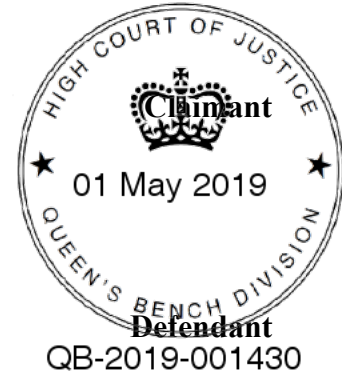


**IN THE HIGH COURT OF JUSTICE**  
**QUEEN'S BENCH DIVISION**  
**MEDIA AND COMMUNICATIONS LIST**  
**BETWEEN:**

**CRAIG WRIGHT**

**and**

**PETER MCCORMACK**



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**PARTICULARS OF CLAIM**

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**Parties and background**

1. The Claimant is a computer scientist and businessman based in England and Wales. He is highly active within the cryptocurrency sphere, running a number of cryptocurrency and blockchain businesses.
2. The Defendant is a podcaster and a blogger who specialises in publishing content about news and other developments in bitcoin and associated cryptocurrencies. He regularly publishes podcasts and blogs about cryptocurrency on his website, "What Bitcoin Did" (accessible here: <https://www.whatbitcoindid.com/>).
3. The Defendant has a public account on the social media platform Twitter. His account, @PeterMcCormack (accessible here: <https://twitter.com/PeterMcCormack>) was set up in August 2017. The Defendant is an extremely active user of Twitter, having posted around 12,500 tweets on the platform. The Defendant uses his Twitter account to tweet about news and other developments in bitcoin and associated cryptocurrencies. The account currently has around 57,500 followers and, pending



disclosure of relevant metrics, the inference will be invited that at the same time the words complained of below were published, the Defendant had a similar number of followers.

### **The First Publication**

4. On 29 March 2019 at 8:17 pm the Defendant first published a tweet (“*The First Publication*”). The First Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1111724006040842246>. In the First Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

“[retweet of a tweet by @CalvinAyre]:

*Calvin Ayre @CalvinAyre March 29*

*Craig has started filing lawsuit against those falsely denying he is Satoshi....they can all have a day in court to try to prove their fake case but the judge will rule that Craig invented Bitcoin because he did and he can prove it.*

[retweet of a tweet by @CalvinAyre]:

*Calvin Ayre @CalvinAyre*

*yup...Dr Craig Wright is Satoshi Nakamoto...and #BSV is the only real #Bitcoin. All others are attacking Craig to sell their dysfunctional snake oil crypto products. Craig has proven this to me directly in a number of ways.”*

...

[tweet by the Defendant]:

*Replying to@ Calvin Ayre*

*Can I go first?*

*Craig Wright is not Satoshi*



*Craig Wright is not Satoshi*

*Craig Wright is not Satoshi*

*Craig Wright is not Satoshi*

*Craig Wright is not Satoshi*

*Craig Wright is not Satoshi*

*Craig Wright is not Satoshi*

*Craig Wright is not Satoshi*

*Craig Wright is not Satoshi”*

5. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

#### **PARTICULARS OF INNUENDO**

5.1. The individual, or group of individuals behind the pseudonym Satoshi Nakamoto (“Satoshi”) is/are generally accepted within the bitcoin and cryptocurrency community as the original creator, or one of the original creators, of the cryptocurrency bitcoin.

5.2. This would have been known to a substantial but unquantifiable number of unidentifiable readers of the First Publication, and these readers would have understood the words complained of herein to bear the meaning set out above.

#### **The Second Publication**

6. On 10 April 2019 1:47 pm the Defendant first published a tweet (“*The Second Publication*”). The Second Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1115959436898709509>. In the Second Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

“[retweet of a tweet by @CalvinAyre]:



*Calvin Ayre @CalvinAyre Apr 10*

[photograph of the Claimant in a group]

*Craig and I polishing our muskets at today's Troll Hunting meeting in London.  
#CraigisSatoshi.*

...

[tweet by the Defendant]:

*Replying to @CalvinAyre*

*"Craig Wright is not Satohis! [sic]*

*When do I get sued?"*

7. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

### **PARTICULARS OF INNUENDO**

7.1.Paragraph 5.1 above is repeated.

7.2.On and prior to 10 April Calvin Ayre had made it publicly known that the Claimant was intending to bring proceedings for libel against individuals who had alleged on Twitter that the Claimant had fraudulently claimed to be Satoshi.

7.3.The photograph which featured in the Second Publication was of the Claimant, Calvin Ayre and a group of lawyers. The reference to '*Troll Hunting*' in the Second Publication was a reference to the pursuit by means of libel proceedings of those who had 'trolled' the Claimant on Twitter by accusing him of falsely claiming to be Satoshi Nakamoto.

7.4.These facts and matters would have been known in part or in full to a substantial but unquantifiable number of unidentifiable readers of the Second Publication.

Such readers would have understood the words complained of herein to bear the meaning set out above.



### **The Third Publication**

8. On 10 April 2019 at 10:23 pm the Defendant first published a tweet (“*The Third Publication*”). The Third Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1116089341946863616>. In the Third Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*“Dear @CalvinAyre,*

*I would like to formally state that:*

- 1. Craig Wright is not Satoshi*
- 2. Craig Wright is a fraud*
- 3. I hope as many people ReTweet this as possible*

*Please send legal correspondence to 5 Goldington Road*

*Bedford*

*Bedfordshire*

*MK40 3JY*

*UK*

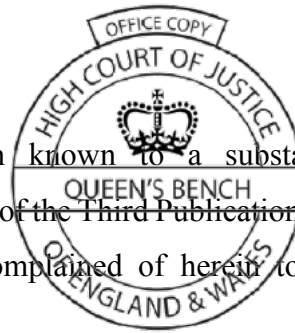
*Regards*

*Peter”*

9. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

### **PARTICULARS OF INNUENDO**

9.1.Paragraphs 5.1 and 7.2 above are repeated.



9.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Third Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### **The Fourth Publication**

10. On 12 April 2019 at 2:16 pm the Defendant first published a tweet ("*The Fourth Publication*"). The Fourth Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1116691603027001344>. In the Fourth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*"@CalvinAyre mate, that is over 1k RTs and 2.3k likes, I demand my lawsuit....  
... but you aren't going to do it are you? You are just trying to bully people into  
silence with empty threats.*

*Craig wright it [sic] a fraud, bring it or go jogging!*

*Peter McCormack @Peter McCormack*

*"Dear @CalvinAyre,*

*I would like to formally state that:*

- 1. Craig Wright is not Satoshi*
- 2. Craig Wright is a fraud*
- 3. I hope as many people ReTweet this as possible*

*Please send legal correspondence to 5 Goldington Road*

*Bedford*

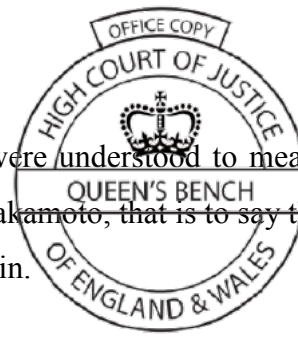
*Bedfordshire*

*MK40 3JY*

*UK*

*Regards*

*Peter"*



11. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

### **PARTICULARS OF INNUENDO**

11.1. Paragraphs 5.1 and 7.2 above are repeated.

11.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Fourth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### **The Fifth Publication**

12. On 12 April 2019 at 5:04 pm, 12 April 2019 at 5:04 pm, and 12 April 2019 at 5:15 pm respectively, the Defendant first published a series of tweets (“*The Fifth Publication*”). The Fifth Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1116733748794540033>. In the Fifth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*“1/So I got my letter from Craig Wright and @Calvin Ayre. This is what they are sending out to people, now you can all see.*

*I absolutely reject their requirements.*

*(PS I don't recommend anyone else does this).*

*[Photograph of a legal letter sent by the Claimant's solicitors sent on 12 April 2019]*

*2/I believe that claiming to be Satoshi and promoting a fake version of bitcoin is fraudulent. I believe this is in the public interest.*

*Let's go to court.*



*Before any claims of virtue signalling or clout... I'm doing this because it is the right thing to do. I've lost everything before and if I lose it again, so what. BSV is a fake Bitcoin run by frauds.*

*Fuck them!"*

13. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

### **PARTICULARS OF INNUENDO**

13.1. Paragraphs 5.1 and 7.2 above are repeated.

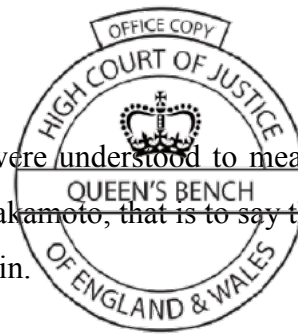
13.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Fifth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### **The Sixth Publication**

14. On 12 April 2019 at 7:28 pm the Defendant first published a tweet ("*The Sixth Publication*"). The Sixth Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1116770179633963008>. In the Sixth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*"I was right to allege Craig Wright fraudulently claimed to be Satoshi. I DO NOT accept he is Satoshi. I am not sorry Dr Wright (are you even a Doctor?) I will repeat this."*





15. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

### **PARTICULARS OF INNUENDO**

15.1.Paragraph 5.1 above is repeated.

15.2.These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Sixth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### **The Seventh Publication**

16. On 14 April 2019 at 4:25 pm the Defendant first published a tweet (“*The Seventh Publication*”). The Seventh Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1117448742892986368>. In the Seventh Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*“My formal response to the letter issued by the lawyers of Craig Wright and @Calvin Ayre. This was sent today. We look forward to resolving this quickly and efficiently.*

*Dear Sirs,*

*I confirm receipt of your letter regarding Craig Wright, who in my professional opinion is definitely not the person behind the pseudonym Satoshi Nakamoto.*

*I have taken legal advice. The claim is so vexatious I now have 15 lawyers who are willing to represent me on a pro bono basis.*



*In answer to your question, my real name is Peter McCormack and I am the person behind the pseudonym The King of Bedford.*

*Under my handle @petermccormack, I Peter McCormack [...] have posted accurately that Craig Wright is a fraud with the interest of protecting investors from investing money in his fake Bitcoin SV under the belief that this is Satoshi's Vision. This is definitely not in my opinion Satoshi's vision.*

*As readers of my Twitter know, Craig Wright is a fraud in relation to his claims that he is "Satoshi," this information has been in the public domain for many years before I started sharing it. I find it difficult to understand how I can affect the reputation of your client; this mistakenly states that he has any reputation left. It is highly arguable when reading information about him he does not.*

*For reference, if you Google "Craig Wright is a Fraud" there are currently 6,330,000 results. While we can allow for a margin of error, where there is smoke, there is usually fire, and here there is enough fire to make Mordor feel like a holiday in Iceland.*

*Your client has repeatedly and fraudulently claimed to be Satoshi Nakamoto. He did not play an integral part in the development of Bitcoin: it is highly questionable that he can in fact code. He did not produce the report 'Bitcoin: a peer-to-peer- Electronic Cash System in October 2008.' He did not send the first Bitcoin to Hal Finney in January 2009 and did not play an integral part in the development of Bitcoin. He may have explained his role in detail on previous occasions. However, anyone can do this, look, 'Hey, I Peter McCormack am Satoshi Nakamoto, I created Bitcoin.' See, I just did it.*

*I believe Craig Wright to be a con man.*

*[...]*

*Please also let your client [sic] I have my own requirements:*



[...]

2. *His undertaking to delete all online publications where he fraudulently claims that he is Satoshi Nakamoto;*

3. *His undertaking not to repeat these fraudulent claims;*

[...]

5. *His agreement to join in a statement to an open court in which he apologises for and acknowledges the falsity of his claims;*

[...]

*Everyone he has defrauded with his false claims is plainly entitled to substantial damages in respect of his fraudulent claims.*

[...]

*Apology to everyone involved in Bitcoin*

*I was wrong to fraudulently claim that I Craig Wright to be Satoshi Nakamoto. I accept that I am not Satoshi. I am sorry. I will not repeat this fraudulent claim.”*

17. In their natural and ordinary meaning the words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

18. In the alternative, by way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

**PARTICULARS OF INNUENDO**



18.1.Paragraph 5.1 above is repeated.

18.2.These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Seventh Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

**The Eighth Publication**

19. On 15 April 2019 at 8:29 pm the Defendant first published a tweet (“*The Eighth Publication*”). The Eighth Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1117872560278925312>. In the Eighth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*“Replying to @CalvinAyre*

*You can double down as much as you like...or...try and understand why nobody supports you, everyone thinks Craig is a fraud and exchanges are delisting you.*

*He is not Satoshi.*

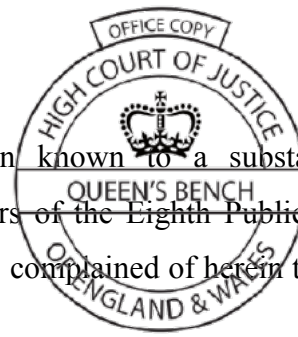
*There is no conspiracy.*

*You are just sitting on the wrong side of history.”*

20. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

**PARTICULARS OF INNUENDO**

20.1.Paragraphs 5.1 and 7.2 above are repeated.



20.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Eighth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

20.3. Further or alternatively readers of the Eighth Publication would have read the Seventh Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### **The Ninth Publication**

21. On 16 April 2019 at 11:53 am the Defendant first published a tweet (*"The Ninth Publication"*). The Ninth Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1118105056811933696>. In the Ninth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

“[retweet of a tweet by @CalvinAyre]:

*Calvin Ayre @CalvinAyre Apr 15*

*And it does not change anything. Craig is Still Satoshi, Real #BitcoinSV is still superior technology and Craig is still going to court to prove his legacy....and the market will recover.*

[tweet by Defendant]:

*When are we going to court? You said I would hear from your solicitors yesterday and I was rather disappointed that I didn't. Also, as you are in London, have you the nauts to do an interview with me?*

...

[retweet of a tweet by @AndyTurner]:

*If everything is in the hands of lawyers then there's no way you'd be getting an interview. You're going to have to wait & see Peter. But, you said you've got 15 lawyers offering their services - aren't they dissuading you from escalating this?*



[tweet by Defendant]:

*There are different opinions. The only ones who dissuade are because of time and cost. I can't explain how much I want this to go to court. Craig Wright will lose as we have a mountain of evidence that he is a fraud and is not Satoshi.*

[retweet of a tweet by @AndyTurner]:

*Ok. But then there's evidence & then there's legally admissible evidence. Courts work in mysterious ways. For most of us it's #popcorn time.*

[tweet by Defendant]:

*I am not worried in the slightest.*

[retweet of a tweet by @Crypto Law review]:

*Look, is this a publicity play for you? If so, even that can be messaged way better than whatever is emerging. Just by way of objective & impartial \*constructive\* critique, the optics are not good. Not in the least. You're winning this battle, but losing the #cryptolaw war.*

[tweet by Defendant]:

*Replying to @CryptoLawRev @AndyTurner*

*I am happy with this. Let's go to court and prove once and for all that he is a liar and a fraud. Craig Wright is not Satoshi."*

22. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

## **PARTICULARS OF INNUENDO**

22.1.Paragraph 5.1 is repeated.

22.2.These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Ninth Publication and these



readers would have understood the words complained of herein to bear the meaning set out above.

22.3. Further or alternatively readers of the Ninth Publication would have read the Seventh Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### **The Tenth Publication**

23. On 16 April 2019 at 8:52 am the Defendant first published a tweet (*"The Tenth Publication"*). The Tenth Publication remains online and is accessible via the following url: <https://twitter.com/PeterMcCormack/status/1118059501431791616>. In the Tenth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*"There are different opinions. The only ones who dissuade are because of time and cost.*

*I can't explain how much I want this to go to court. Craig Wright will lose as we have a mountain of evidence that he is a fraud and is not Satoshi"*

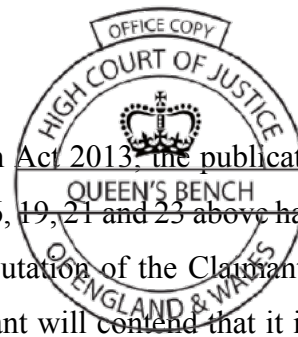
24. By way of innuendo, the said words meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed bitcoin.

### **PARTICULARS OF INNUENDO**

24.1. Paragraphs 5.1 and 7.2 above are repeated.

24.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Tenth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### **Serious Harm, damage and remedies**



25. For the purposes of section 1(1) of the Defamation Act 2013, the publication of the words referred to at paragraphs 4, 6, 8, 10, 12, 14, 16, 19, 21 and 23 above have caused and/or was likely to cause serious harm to the reputation of the Claimant. Without limiting the generality of the averment, the Claimant will contend that it is a matter of obvious inference having regard to the words referred to at paragraphs 4, 6, 8, 10, 12, 14, 16, 19, 21 and 23 but in support of his case on this point the Claimant will rely, if necessary, on the following facts and matters:

25.1. The imputations complained of are inherently serious in terms of their propensity to cause harm to the reputation of the Claimant, and the probability is that publication of such imputations in relation to the Claimant would have this result. They go to the heart of his personal reputation for honesty and ethical conduct and, given his involvement within the cryptocurrency industry, to the heart of his professional reputation. No retraction or apology has been published, and so readers of the tweets complained of continue to believe that the Claimant is guilty of the conduct alleged.

25.2. The publications complained of were widely published to any internet user, without subscription or registration. In this regard paragraph 3 is repeated. Therefore, pending disclosure of the relevant statistics, the inference will be invited that a very substantial number of readers viewed the publications.

25.3. Furthermore, given the seriousness of the allegations made in the publications complained of, the forum the publications were made in, and the Defendant's express averments in respect of the publications, republication of the publication complained of and the allegations complained of therein was reasonably foreseeable and the Defendant is responsible in law for all such republications. The publications have been published extraordinarily widely. By way of example:

25.3.1. The Third Publication was retweeted over 1,200 times, and liked over 2,800 times by other Twitter users.

25.3.2. The Fifth Publication was retweeted over 850 times, and liked over 3,500 times by other Twitter users.





25.3.3. The Seventh Publication was retweeted over 1,900 times, and liked over 8,600 times by other Twitter users.

25.4. The Claimant will also rely on the grapevine effect.

26. In addition to the serious harm caused to his reputation by the publication and republication of the publications complained of, the Claimant has suffered considerable distress and embarrassment. In support of his claims for general and/or aggravated damages for libel, the Claimant will rely upon the following facts and matters:

26.1. Paragraphs 25.1 to 25.4 are repeated.

26.2. The publications complained of at paragraphs 4, 6, 8, 10, 12, 14, 16, 19, 21 and 23 have made by the Defendant as part of a campaign to undermine and invalidate the Claimant's attempts to vindicate his reputation in the courts of England and Wales via legal proceedings.

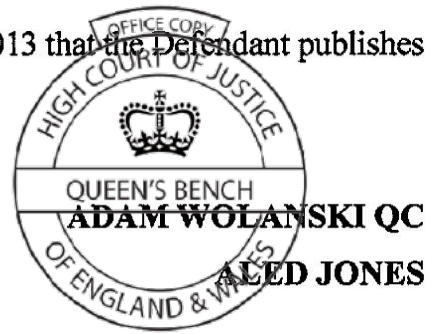
27. In respect of damage to his reputation, the Claimant claims in respect of the entirety of the damage suffered throughout the EU and brings his claim in in the courts of England and Wales on the grounds that both Claimant and Defendant are domiciled here and that England and Wales is where the Claimant's centre of interest lies.

28. Unless a suitable undertaking is provided by the Defendant that he will not repeat or republish the words complained of or any similar allegations defamatory of the Claimant, the Claimant will seek an injunction to restrain further publication or republication.

AND the Claimant claims:

- (1) Damages, including aggravated damages, for libel;
- (2) An injunction to restrain the Defendant whether by himself or otherwise howsoever from further publishing, causing, authorising or procuring the publications of the allegations complained of or similar allegations defamatory of the Claimant.

- (3) An order under Section 12 of the Defamation Act 2013 that the Defendant publishes a summary of the judgment in the proceedings.



### STATEMENT OF TRUTH

I believe that the facts stated in these Particulars of Claim are true.

Full name: Craig Steven Wright

Signed:

Served this 1st day of May 2019 by SCA ONTIER LLP, Halton House, 20-23 Holborn, London EC1N 2JD, Solicitors for the Claimant.