



**IN THE HIGH COURT OF JUSTICE**

**QUEEN'S BENCH DIVISION**

**MEDIA AND COMMUNICATIONS LIST**

**BETWEEN:**

**CRAIG WRIGHT**

**Claimant**

**and**

**PETER MCCORMACK**

**Defendant**

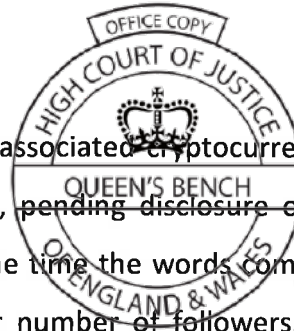
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**AMENDED PARTICULARS OF CLAIM**

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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. As of 28 October 2019, the Claimant has 73,220 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 originals 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 at 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. #Craigis-Satoshi.*

...

[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.

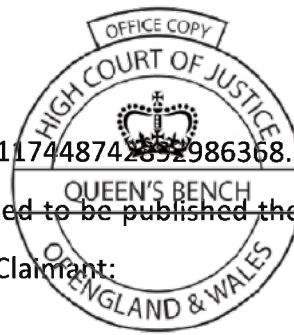
### **PARTICULARS OF INNUENDO**

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/1117448742852986368>. 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 naughts 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.

#### **The Eleventh Publication**

24A. On 19 June 2019 at 5:38 pm the Defendant first published a tweet ("*The Eleventh Publication*"). In the Eleventh Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*"On advice of my lawyers, I can only say limited things about my lawsuit, as such: 1. Craig Wright is not Satoshi 2. Craig Wright is a fraud 3. Craig Wright is a moron 4. Craig Wright is a liar 5. Calvin Ayre is a berk 6. Calvin Ayre's little bum beard is creepy Joq. On."*

24B. 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**

24B.1. Paragraph 5.1 is repeated.

24B.2. The Claimant has brought libel proceedings against the Defendant in respect of the allegation that the Claimant has fraudulently claimed to be Satoshi Nakamoto.

24B.3. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Eleventh Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

**The Twelfth Publication**

24C. On 22 August 2019 at 4:54 am the Defendant first published a tweet ("*The Twelfth Publication*"). The Twelfth Publication remains online and is accessible via the following url: <https://Twitter.com/PeterMcCormack/status/1164384928781557765>. In the Twelfth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*"CSW is getting better at fraud, he's learned about metadata now, just not mastered it.*

*With the white paper he amended it in 2008 while the creation date is 2009. Nice try Craig, keep working on these fakes, you'll master it eventually.*

*Dear all. Could I please encourage you all to \*download\* Craig Wrights version of the Bitcoin White paper to your thumb or hard drive. I will explain later. I have archived it so you can choose to download from either source."*



24D. In their natural and ordinary meaning the said words meant and were understood to mean that the Claimant had fraudulently claimed to have written the Bitcoin White Paper.

### The Thirteenth Publication

24E. On 28 August 2019 at 5:13 pm the Defendant first published a tweet ("*The Thirteenth Publication*"). The Thirteenth Publication remains online and is accessible via the following url: <https://Twitter.com/PeterMcCormack/status/1166745543386771457>. In the Thirteenth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*"Faketoshi's vision*

*The art of fraud*

*Craig Wright*

*Foreword by bum beard Calvin."*

24F. 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

24F.1. Paragraph 5.1 above is repeated.

24F.2. The phrase "*Faketoshi*" is a synthesis of the words 'Fake' and 'Satoshi'.

24F.3. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Thirteenth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.



### The Fourteenth Publication

24G. On 28 August 2019 at 9:03 pm the Defendant first published a tweet (“The Fourteenth Publication”). The Fourteenth Publication remains online and is accessible via the following url: <https://Twitter.com/PeterMcCormack/status/1166804784059473922>. In the Fourteenth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

*“I am thinking that a class action lawsuit would only be right for falsely claiming a technology is Satoshi’s Vision when CSW is not Satoshi. This has affected a lot of people. I’ll be talking to both my US lawyers and those who have been defrauded. Let’s Wright this Wrong.”*

24H. 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.

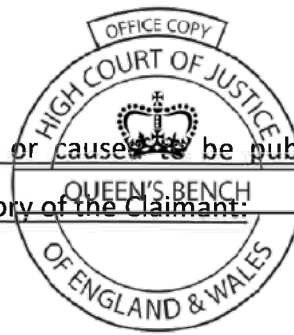
### PARTICULARS OF INNUENDO

24H.1. Paragraph 5.1 above is repeated.

24H.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Fourteenth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

### The Fifteenth Publication

24I. On 29 August 2019 at 8:31 am the Defendant first published a tweet (“The Fifteenth Publication”). The Fifteenth Publication remains online and is accessible via the following url: <https://Twitter.com/PeterMcCormack/status/1166976645498101760>. In



the Fifteenth Publication the Defendant published or caused to be published the following words which referred to and were defamatory of the Claimant:

"A class action lawsuit would be against:

- Craig Wright (the forger)

- @CalvinAyre (bum beard)

- @JimmyWinMedia (the snake)

All three are likely guilty of misleading investors by lying that Craig is Satoshi and that BitcoinSV is Satoshi's Vision."

Meeting US lawyers next week.

24J. 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**

24J.1. Paragraph 5.1 above is repeated.

24J.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Fifteenth Publication and these readers would have understood the words complained of herein to bear the meaning set out above.

#### **The Sixteenth Publication**

24K. On 18 October 2019 the Defendant participated in video discussion hosted by 'Hotep Jesus' and broadcast on You Tube ("the Hotep Jesus discussion"), where it thereafter remained generally accessible to any viewer. The discussion also featured Kurt Wuckert Jr, Connor Murray and an individual known as Shinobi. The Hotep Jesus discussion is accessible at <https://www.youtube.com/watch?v=Do5DkAlOyuY&t=10980s>.



24L. During the course of the discussion (at 3hr:18m) the Defendant spoke and published the following words defamatory of the Claimant:

*"The reality is, is Bitcoin is king. Like, you can do what the fuck you want with BSV; it's dead, it's already dead. The market's voted, it's dead. If you're going to put your time at it, it's dead. The price is going to die; it's -- the only thing keeping it afloat, is Calvin's money; that's literally it. Add to that, you are supporting a bunch of people who are liars, frauds and morons. Craig Wright is a fucking liar, and he's a fraud; and he's a moron; he is not Satoshi. He can come at me in the fucking UK, he can take me to Court; he can come with his -- his fucking billions of dollars; I don't give a shit, come at me. Sue me, I don't give a fuck; you're still a liar, you're still a fraud, and you're still a moron."*

24M. The Defendant spoke the said words in the knowledge, and intending, that they be recorded and made available in permanent form, namely as an electronic video recording available to be viewed on YouTube and/or similar video platforms. Accordingly, he is liable for the republication of the said words to viewers of the Hotep Jesus discussion on YouTube as a libel.

24N. 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

24N.1. Paragraph 5.1 above is repeated.

24N.2. These facts and matters would have been known to a substantial but unquantifiable number of unidentifiable readers of the Sixteenth 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, 23, 24A, 24C, 24E, 24G, 24I and 24K 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, 23, 24A, 24C, 24E, 24G, 24I and 24K 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 publications 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.

25.5. In respect of publications one to eleven above the Defendant, on a date unknown to the Claimant, deleted those publications. The deletion of the publications complained of occurred at least a month after the Particulars of Claim were issued and served on the Defendant. The deletion of tweets results in the deletion of associated metrics, including as to the extent of publication and the identity of readers of the Tweets.

25.6. Nonetheless, in addition to the averment made in paragraph 25.3 about the Third, Fifth and Seventh Publications, the Claimant avers:

25.6.1. The First Publication was retweeted over 22 times, and liked over 557 times by other Twitter users.

25.6.2. The Second Publication was retweeted at least once, and liked over 58 times by other Twitter users.

25.6.3. The Fourth Publication was retweeted over 16 times, and liked over 107 times by other Twitter users.

25.6.4. The Sixth Publication was retweeted over 103 times, and liked over 1050 times by other Twitter users.



25.6.5. The Eighth Publication was retweeted over 9 times, and liked over 115 times by other Twitter users.

25.6.6. The Ninth Publication was liked over 65 times by other Twitter users.

25.6.7. The Tenth Publication was liked over 13 times by other Twitter users.

25.6.8. The Eleventh Publication was retweeted over 120 times, and liked over 1,500 times by other Twitter users.

25.6.9. The Eleventh Publication was retweeted over 120 times, and liked over 1,500 times by other Twitter users.

25.6.10. The Twelfth Publication was retweeted 23 times, and liked over 190 times by other Twitter users.

25.6.11. The Thirteenth Publication was retweeted 14 times, and liked over 125 times by other Twitter users.

25.6.12. The Fourteenth Publication was retweeted over 65 times, and liked over 880 times by other Twitter users.

25.6.13. The Fifteenth Publication was retweeted over 80 times, and liked over 820 times by other Twitter users.

25.7. The number of retweets and likes is a fraction of the number of likely publishes. However due to the destruction of relevant data, in flagrant breach of the Defendant's duty to retain and preserve materials relevant to these proceedings, the precise scale number of publishes of publications one to eleven is now difficult if not impossible to ascertain.

25.8. The inference will be invited that the readership of publications one to eleven were, in a similar manner to the readership of publications twelve to fifteen, influential Twitter users who were often active in the field directly related to the





Claimant's field of employment and area of interest, namely the cryptocurrency sphere. The Defendant will also rely, in support of this contention, on the responses to publications twelve to fifteen by other Twitter users. In particular:

25.8.1. In respect of the Twelfth Publication:

25.8.1.1. The Twitter account @KlausLovgreen, an account with over 3,500 followers, replied to the Twelfth Publication stating: "The bitcoin community will always reveal scams eventually." (accessible here: <https://Twitter.com/KlausLovgreen/status/1164459218746990593>).

25.8.1.2. The Twitter account @Orbital Lexic, an account with over 2,400 followers, replied to the Twelfth Publication stating: "It's his arrogance. It clouds his ability to really know his own abilities. To be so smart, he's really fucking stupid.."

25.8.1.3. The Twitter account @sovereignmonkey, an account with over 1,700 followers, replied to the Twelfth Publication stating: "For someone who makes such bold claims about what he invented, it's odd that nothing that faketoshi has produced is immutable. That should tell you everything you need to know about who he's not." (accessible here: <https://Twitter.com/sovereignmonkey/status/1164428466093248512>).

25.8.2. In addition to the responses identified above a number of influential Twitter accounts retweeted the twelfth publication to their followers. These accounts included @CryptoOz (an account with over 9,130 followers), @smartbrain (an account with over 3,600 followers), and @JRJTALKER (an account with over 2,1000 followers).

25.8.3. In respect of the Thirteenth Publication:



25.8.3.1. The Twitter account @KlausLovgreen, an account with over 3,500 followers, replied to the Thirteenth Publication stating: "You are on a roll." (accessible here: <https://Twitter.com/KlausLovgreen/status/1167049905237626880>).

25.8.3.2. The Twitter account @DYORPodcast, an account with over 6,500 followers, replied to the Thirteenth Publication stating: "Hahaha." (accessible here: <https://Twitter.com/DYORPodcast/status/1166745853241044993>).

25.8.4. In respect of the Fourteenth Publication:

25.8.4.1. The Twitter account @thecryptomonk, an account with over 62,000 followers, replied to the Fourteenth Publication stating: "This is something i would definitely stand behind." (accessible here: <https://Twitter.com/thecryptomonk/status/1166810062616182790>).

25.8.4.2. The Twitter account @BoogieCrypto, an account with over 5,600 followers, replied to the Fourteenth Publication with a photoshopped image of the Claimant with the phrase "the true story of a real fake": (accessible here: <https://Twitter.com/BoogieCrypto/status/1166805214718058503>).

25.8.4.3. The Twitter account @BitcoinBroski, an account with over 3,300 followers, replied to the Fourteenth Publication stating: "Let's Wreck this Wright" (accessible here:



<https://Twitter.com/BitcoinBroski/status/11670274053508259>

84).

25.8.5. In addition to the responses identified above a number of influential Twitter accounts retweeted the Fourteenth Publication to their followers. These accounts included @GigaBitcoin (an account with over 17,900 followers), @KRyanBradshaw (an account with over 9,700 followers), and @CJlovescrypto (an account with over 8,800 followers).

25.8.6. In respect of the Fifteenth Publication:

25.8.6.1. The Twitter account @TheNvsibleHand, an account with over 7,200 followers, replied to the Fifteenth Publication stating: "Where is my \$ #FakeSatoshi." (accessible here: <https://Twitter.com/TheNvsibleHand/status/1167283861815996422>).

25.8.6.2. The Twitter account @MyLegacyKit, an account with over 1,900 followers, replied to the Fifteenth Publication stating "That's not the point. Craig is constantly being profiled and marketed as being Satoshi, providing the foundations of the presumed true Bitcoin project. Since that is a disgusting lie supported by frauds, attracting investors, it makes sense to explore the legal attack options.": (accessible here: <https://Twitter.com/MyLegacyKit/status/1166997467075923968>).

25.8.6.3. The Twitter account @Freemason UK, an account with over 6,400 followers, replied to the Fifteenth Publication stating: "I don't have \$bsv holdings. I'd love to be part of a suit though. They deserve to be held accountable" (accessible here: [https://Twitter.com/Freemason\\_UK/status/1167000313573851136](https://Twitter.com/Freemason_UK/status/1167000313573851136)).



25.8.7. In addition to the responses identified above a number of influential Twitter accounts retweeted the Fifteenth Publication to their followers. These accounts included @KRyanBradshaw (an account with over 9,700 followers), @CryptoOz (an account with over 9,000 followers), and @rchguy (an account with over 1,900 followers).

25.8.8. As to the Sixteenth Publication:

25.8.8.1. The video was viewed at least 8,099 times and liked at least 373 times.

25.8.8.2. The video attracted at least 285 comments.

25.8.8.3. The impact of the video on viewers is demonstrated by the tweet by the host of the Hotep Jesus discussion, Hotep Jesus on 19 October 2019, with reference to the Defendant's comments during the discussion, '@PeterMcCormack makes me believe CSW [i.e. the Claimant] is a fraud'.

25.9. Further, the Claimant's reputation within the academic community and the computer science, cryptocurrency and financial technology industries has been seriously harmed by the publications complained of. This is reflected in the withdrawal of invitations to speak at numerous academic conferences in the period immediately following publication of the words complained of:

25.9.1. In the period 1 January to 31 March 2019, the Claimant spoke at and presented eight academic papers at the following academic conferences:

25.9.1.1. The Fourth International Congress on Information and Communication Technology, held in London on 25 and 26 February 2019, at which the Claimant presented the following academic papers:



25.9.1.1.1. A Distribution Protocol for Dealerless Secret Distribution;

25.9.1.1.2. Personal Device Security using Elliptic Curve Cryptography for Secret Sharing;

25.9.1.1.3. A proof of Turing Completeness in Bitcoin Script;

25.9.1.1.4. Systems and methods for Implementing Deterministic Finite Automata via Blockchain;

25.9.1.1.5. Decentralized Autonomous Corporations.

25.9.1.2. The Annual International Conference on Interdisciplinary Legal Studies, held in Oxford on 6 March 2019, at which the Claimant presented the following academic papers:

25.9.1.2.1. An evidentiary framework using Bitcoin and Smart Contracts in a manner that constitutes a signed written agreement in commercial transactions.

25.9.1.3. The Geeklaw Conference, held in Leicester on 12 March 2019, at which the Claimant presented the following academic papers:

25.9.1.3.1. Legality of buying and selling bitcoin and the myths around anonymity.

25.9.1.4. The International Multi-Conference on Systems, Signals and Devices, held in Istanbul on 21 to 24 March 2019, at which the Claimant presented the following academic papers:



25.9.1.4.1. Agent-based Turing Complete Transactions  
integrating feedback within a Blockchain System.



25.9.2. Prior to publication of the words complained of, the Claimant had been invited to speak at numerous further such conferences. In several instances those invitations followed the successful submission by the Claimant of proposed academic papers for blind peer review. However following publication of the words complained of, invitations to the Claimant were withdrawn by the following conferences:

25.9.2.1. The Twenty-sixth International Conference on Telecoms, held in Hanoi, Vietnam on 8 to 10 April 2019;

25.9.2.2. The IEEE International Conference on Computer Communications, held in Paris, France on 29 April to 2 May 2019;

25.9.2.3. The Forty-first ACM/IEEE International Conference on Software Engineering, held in Montreal, Canada on 25 to 31 May 2019;

25.9.2.4. The Sixth International Symposium on Networks, Computers and Communications, held in Istanbul, Turkey on 18 to 20 June 2019;

25.9.2.5. The Twenty-second International Conference on Business Information Systems, held in Seville, Spain, on 26 to 28 June 2019;

25.9.2.6. The Forty-second International Conference on Telecommunications and Signal Processing, held in Budapest, Hungary on 1 to 3 July 2019;

25.9.2.7. The Second Vietnam Symposium in Leadership and Public Policy, held in Ho Chi Minh City, Vietnam on 28 to 29 October 2019;



25.9.2.8. The Twenty-fifth Asia-Pacific Conference on Communications, held in Ho Chi Minh City, Vietnam on 6 to 8 November 2019;

25.9.2.9. CHAINSIGHTS Fintech and Blockchain Summit, held in New York City, USA on 10 October 2019; and

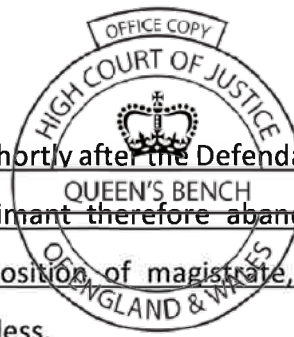
25.9.2.10. MoneyConf, held in Lisbon, Portugal on 5 to 7 November 2019.

25.9.3. Given the timings of these exclusions it is to be inferred that the primary cause of these exclusions was publication of the words complained of.

25.9.4. As a result of the exclusion of the Claimant from the conferences set out at paragraphs 25.9.2.1 to 25.9.2.8 the academic papers which the Claimant had been due to present were not presented at those conferences and, as a result, the Claimant has been unable to publish them to the world at large. The inability of the Claimant to present and publish those papers has led to considerable difficulties for the Claimant in pursuing academic opportunities. The Claimant wishes to develop an academic career in England (having previously taught as an Adjunct Lecturer in the Faculty of Business, School of Computing and Mathematics at Charles Sturt University, Australia) but needs to demonstrate the recent publication of academic papers to obtain such positions.

25.9.5. Further, the inability of the Claimant to publish academic papers has a detrimental impact upon the value of the patents which the Claimant files and creates. The publication of academic papers assists in the promotion of patents: a patent which has a published academic paper behind it can be worth many times as much as a patent which does not.

25.10. The publication of the words complained of has made it more difficult for the Claimant to achieve his ambition of becoming a magistrate in Surrey. Any application he made for such a position would be severely compromised by the existence in the public domain of the words complained of, given that they allege



serious dishonesty on the part of the Claimant. Shortly after the Defendant started publishing the words complained of, the Claimant therefore abandoned the application he had started making for the position of magistrate, assuming (reasonably) that the application was now hopeless.

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 25.10 are repeated.

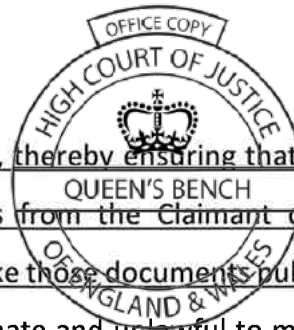
26.2. The publication of the words complained of has had an impact on the Claimant's relationship with his family. The Claimant no longer picks his children up from school, and is rarely seen in public with his children, because of the vilification he believes the words complained of will subject him to amongst other parents.

26.3. The publications complained of at paragraphs 4, 6, 8, 10, 12, 14, 16, 19, 24A, 24C, 24E, 24G, 24I and 24K above 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.

26.4. As the Defendant explained during the Hotep Jesus discussion (at 3hr:01m) his objectives in publishing the First to Tenth publications complained of included:

26.4.1. To "divert attention away" from 'Hodlonaut', the Norwegian blogger Magnus Granath whom the Claimant has threatened to sue for libel; and to do so by "taking down" (i.e. destroying) the Claimant. The Defendant further explained that the means by which he would 'take down' the Claimant were by labelling him a liar and a fraud on his Twitter feed, which he believed he could do because of his "platform and audience", i.e. by virtue of the power and influence of the Defendant's Twitter feed.





- 26.4.2. To provoke a libel claim by the Claimant, thereby ensuring that he would obtain otherwise unavailable documents from the Claimant during the disclosure stage of litigation and could make those documents public. As the Defendant must have known, it is illegitimate and unlawful to make public documents obtained during the disclosure process unless and until those documents are deployed in open court.
- 26.5. The Defendant's admitted dominant motives for publishing the words complained of, as set out above, were improper. The fact that he was motivated to 'bring down' the Claimant, and to attract a libel suit in order to exploit and potentially misuse the disclosure process for his own ends, has caused the Claimant further distress.
- 26.6. Further, as he explained during the Hotep Jesus discussion, the Defendant is a strong supporter of BTC, a coin that rivals the coin developed and promoted by the Claimant, BSV; and, conversely, he is a strong critic of BSV. By way of example, at 04.17 he said "The problem with Bitcoin is it's a censorship-resistant money, therefore it needs to be decentralised; as decentralised as possible. You've got to avoid any opportunity for the governments to switch it off, therefore box sizes need to be kept small so that we can run as many nodes as possible. That's why BTC is king. Any of this stuff to do with BSV, which is just a follow-up to BC Age, has been proven time and time again that nobody cares; nobody's interested. Big box sizes mean more centralisation, which ultimately means it won't be censorship resistant. So, yeah."
- 26.7. By further way of example, the Defendant said (at 47.03): "I think it's very very important, to focus on the people who actually running this project and involved in it. So there's not a single credible person, technically credible person who's -- who worked on Bitcoin who's now working on BSV. That must tell you something: why is not a single credible person -- there has not a single credible person moved across, okay."



26.8. Moreover, during the Hotep Jesus discussion the Defendant repeatedly described Satoshi as "irrelevant". By seeking to undermine the significance and relevance of Satoshi, the Defendant was seeking to denigrate BSV, since BSV is closely associated with Satoshi.

26A. As demonstrated by his comments as set out above, as well as by the contents of the Sixteenth Publication, the Defendant had a further improper motive in publishing the words complained of, namely to attack and undermine BSV in order to benefit the coin he supports, namely BTC. This has caused the Claimant additional distress.

26A.1. Furthermore, having regard to the matters in paragraph 26.3 to 26.7 above, in response to the Defendant's case that publication of the words complained of was in the public interest:

26A.1(i). The Defendant did not publish the statements complained of in the belief that such publications were in the public interest; and

26A.1(ii). If, which is denied, the Defendant believed that it was in the public interest to publish the statements complained of, such a belief was not reasonable.

27. 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.

**ADAM WOLANSKI QC**

**ALED JONES**

Served

Reserved etc

ADAM WOLANSKI QC

ALED JONES

**STATEMENT OF TRUTH**

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

Full name: **Craig Steven Wright**

Signed:

Served this 19<sup>th</sup> day of December 2019 by SCA ONTIER LLP, Halton House, 20-23 Holborn, London EC1N 2JD, Solicitors for the Claimant.