

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:18-cv-80176-BB/BR

IRA KLEIMAN, as the Personal
Representative of the Estate
of DAVID KLEIMAN, and W&K
Info Defense Research, LLC,

Plaintiffs,

v.

CRAIG WRIGHT,

Defendant.

_____ /

Paul G. Rogers Federal
Building and U.S. Courthouse
701 Clematis Street
West Palm Beach, Florida 33401
Friday, June 28, 2019
9:17 a.m. - 11:28 a.m.

C O N F I D E N T I A L

CONTINUED VIDEOTAPED DEPOSITION OF
DR. CRAIG STEVEN WRIGHT

Taken before Darline M. West,

Registered Professional Reporter, Notary Public

in and for the State of Florida At Large,

pursuant to Notice of Taking Deposition filed

by the Plaintiffs in the above cause.

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25 (Appearances continued on the following page:)

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17 RYAN KICK - Video Technician (Magna Legal

18 Services)

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1 Reporter's Note:

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(Exhibits were retained by Plaintiffs' counsel.)

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1 P R O C E E D I N G S

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3 THE COURT: Good morning, everyone.

4 Just let's sort of get some understandings
5 out of the way firsthand, because I know we're
6 doing two different things today, and I want to
7 make sure everyone's comfortable and -- and has
8 things set up the way they want to be set up.

9 So the first thing we're going to do is the
10 continuation of Dr. Wright's deposition. So
11 what I want -- just first of all, you can set up
12 the courtroom for that any way you want to. You
13 don't have to sit at respective tables and have
14 Dr. Wright sit on the witness stand. We did
15 this once before, and opposing counsel actually
16 moved their chairs over and sat face-to-face at
17 this table, because they were going to hand lots
18 of documents across.

19 Miss McGovern, I assume you want
20 Dr. Wright sitting next to you. Absolutely.
21 Absolutely. So he does not have to sit up here.
22 So he can sit where he is right now.

23 I assume you're Dr. Wright. Good morning.

24 DR. WRIGHT: Good morning.

25 THE COURT: So, again, Mr. Freedman and

1 your team, you may sit wherever you want to
2 sit to make the deposition work. I
3 understand the videographer's here.
4 Whatever. This deposition is your game.

5 And now the other thing that I wanted
6 to explain. My view is, it is a regular
7 deposition. I am only here to rule on any
8 objections that come up; and otherwise, the
9 rules of a deposition apply. So I am not
10 here to micromanage your deposition.

11 And I did want to clarify up front that
12 I think at the last hearing I -- I talked a
13 little bit about what I believe the scope
14 should be. I believe it was --
15 Mr. Freedman, you had requested in your
16 motions which were topics relating to the
17 national security objections that Dr. Wright
18 lodged in this deposition, questions related
19 to issues upon which Dr. Wright lodged
20 marital privilege objections, and then
21 limited questioning relating to the trusts
22 and the existence of the current Bitcoin
23 holdings.

24 Is that your understanding of what the
25 limits are on the deposition this morning?

1 MR. FREEDMAN: Yes, Your Honor.

2 THE COURT: Miss McGovern, do you agree
3 that's what we talked about where the
4 limits?

5 MS. MCGOVERN: Yes, I do, Your Honor.

6 THE COURT: Great. Okay. So, great,
7 we got that out of the way. I am going to
8 clear the courtroom before we start the
9 deposition.

10 The deposition is not a public
11 proceeding. So if there's anyone in the
12 courtroom who is not part of either team, I
13 need them to leave at this time. So I don't
14 know if the parties -- are these all folks
15 with you or people, or do these people that
16 need to leave? I don't know.

17 MR. FREEDMAN: These are on our side.

18 THE COURT: They're all with you.
19 Okay.

20 And Miss McGovern, those a part of Mr.
21 Freedman's team. Any objection to them
22 staying in during the deposition?

23 MR. FREEDMAN: Well, our Honor,
24 actually, sorry. That's incorrect. There
25 are two attorneys here in the room,

1 Mr. Robert Keefe and John McAdams.

2 THE COURT: Okay.

3 MR. FREEDMAN: Sitting next to
4 Mr. McAdams is my assistant, Nathalie
5 Bermond.

6 THE COURT: Okay.

7 MR. FREEDMAN: And then Dr. Michael
8 Edman (sic) is here. I just want to confirm
9 --

10 THE COURT: That's fine.

11 MR. FREEDMAN: He is with us, but he's
12 not an attorney.

13 THE COURT: Okay. You can be seated.

14 So the three of them are affiliated
15 with Boies Schiller Flexner directly and
16 part of your team or attorneys for the
17 Plaintiffs?

18 MR. FREEDMAN: Yeah. Three of them --
19 two of them are attorneys for the
20 Plaintiffs. One is them is an assistant to
21 the attorney for the Plaintiff, and one of
22 them is a retained expert in the case.

23 THE COURT: All right. As to the
24 retained expert, is there any objection to
25 him remaining in the courtroom?

1 MS. MCGOVERN: Yes, Your Honor.

2 THE COURT: Okay. I'll agree. Is it
3 Dr. Keith?

4 MR. FREEDMAN: Dr. Edman.

5 THE COURT: Dr. Edman, I'm going to ask
6 -- have to ask you to step outside. All
7 right.

8 And then, I think -- so timing-wise, I
9 think I allotted two hours. My hope is, it
10 won't take that long. I will give
11 Mr. Freedman the full two hours, if he needs
12 it.

13 I tentatively have my court reporter
14 coming at 10:30 in the hopes that if you
15 finish early in the deposition, we can roll
16 into the other hearings we have to have
17 today. My thought was, if we can start
18 either, you know, 10:30, 11-ish, we can take
19 a break for lunch around 12:30, and then
20 come back between 1:30 and two, depending on
21 where we are.

22 I know we have at least two attorneys
23 in the courtroom who have concerns about
24 getting home for sunset. So let me ask Mr.
25 Freedman and Miss Markoe, what is the latest

1 you can get out of here comfortably? I
2 don't like to keep the court reporter and
3 the court staff past 5:30 any way. But if
4 we go to 5:30, can you each get home
5 comfortably tonight? I think sundown's
6 after 8:00 o'clock.

7 Miss Markoe, is that okay with you?

8 MISS MARKOE: That's fine.

9 THE COURT: Okay. So let's tentatively
10 say we'll go to 5:30. I would like very
11 much to get all the testimony in today. If
12 we are not able to get in argument but we
13 get all the testimony, I will be happy to
14 entertain argument later. It's not my
15 intention to rule today. I'll tell the
16 counsel right now. It's my intention to
17 hear the evidence, and then I want to take
18 this matter under advisement and think about
19 it. So -- and I want to give you each full
20 opportunity to argue after you've heard all
21 the evidence.

22 So, as I said, my goal today is get all
23 the testimony in. If we don't get to
24 argument, we'll -- we'll come back for that.
25 All right? Again, we can talk about if that

1 happens, I suppose Dr. Wright has a right to
2 be here for that. I know he's got some very
3 important family situations and other
4 professional obligations over the next month
5 or so. So we can talk about whether he
6 would waive his right to be present for
7 argument, but if we get there.

8 All right. From my perspective, those
9 are sort of the topics I wanted to cover.
10 Anything else from other side or I'll let
11 you start your -- oh, I'm sorry. One other
12 thing. I have to leave at 10:00 o'clock to
13 conduct criminal duty court. You can
14 continue along with your deposition if I
15 step out. So if I get up and leave, just
16 keep going. If anything comes up while I'm
17 gone that I need to rule on, put it to the
18 side. I'll come back and I'll rule at that
19 time. Okay?

20 Other than that, Mr. Freedman, anything
21 else that -- that you think we should cover
22 kind of on the front end?

23 MR. FREEDMAN: If I can move this so I
24 can see Dr. Wright.

25 THE COURT: Yeah. I think that's on

1 wheels. So just roll it wherever --
2 wherever you need to go.

3 Miss McGovern, anything else before we
4 get started?

5 MISS MCGOVERN: No, Your Honor.

6 THE COURT: Great. Okay.

7 MR. FREEDMAN: I think the videographer
8 has to --

9 VIDEO TECHNICIAN: Yeah.

10 THE COURT: Do whatever you need to do.
11 All right. So, at this point, I am handing
12 the keys to the car to you both. Whenever
13 you're ready, get started. If I get up and
14 leave, you'll let me know, and off you go.

15 (A discussion was held off the record with
16 the court reporter.)

17 THE COURT: You know, Folks, the court
18 reporter tells me because we don't have the
19 tape-recording system on, because we're off
20 the record, the microphones aren't working,
21 and she can't hear what Mr. -- I'm sorry,
22 Ms. McGovern and Dr. Wright may be saying.
23 I'm going to let her move closer to where
24 Dr. Wright is sitting. She may need a
25 minute or two to move her equipment. So

1 whenever she's ready, you all can get
2 started.

3 MS. MCGOVERN: This is for procedural
4 reasons, we are marking the deposition
5 confidential.

6 THE COURT: Of course. Of course.
7 Understood.

8 Okay. Let's give the court record a
9 second to relocate and if the videographer
10 needs to relocate...

11 (A recess was taken.)

12 VIDEO TECHNICIAN: We are now on the
13 record.

14 This begins videotape No. 1 in the
15 continuation deposition of Dr. Craig Wright
16 in the matter of the Estate of David
17 Kleiman, et al., versus Craig Wright.

18 Today's date is June 28, 2019. The
19 time is 9:17 a.m. This deposition is being
20 taken at 701 Clematis Street, West Palm
21 Beach, Florida. The videographer is
22 Ryan Kick. The court reporter is
23 Darline West. We are both representing
24 Magna Legal Services.

25 Will counsel and all parties present

1 state their appearance and whom they
2 represent.

3 MR. FREEDMAN: Vel Freedman for the
4 Plaintiffs.

5 MS. MCGOVERN: Amanda McGovern and
6 Andrés Rivero, Zaharah Markoe for Dr. Craig
7 Wright.

8 MR. BRENNER: Andrew Brenner for the
9 Plaintiff.

10 MR. ROCHE: Kyle Roche for the
11 Plaintiffs.

12 THE COURT REPORTER: Dr. Wright, would
13 you raise your right hand, please.

14 Do you solemnly swear to tell the
15 truth, the whole truth, and nothing but the
16 truth?

17 THE WITNESS: I so do swear.

18 THEREUPON,

19 DR. CRAIG STEVEN WRIGHT,
20 called as a witness on behalf of the Plaintiffs
21 herein, having been first duly sworn, was examined
22 and testified further as follows:

23 DIRECT EXAMINATION (Continued)

24 BY MR. FREEDMAN:

25 Q. Good morning, Dr. Wright.

1 A. Good morning.

2 Q. Dr. Wright, you were previously married to
3 Miss Lynne Wright?

4 A. That is correct.

5 Q. And what was her maiden name?

6 A. She was Carol Lynne Black.

7 Q. What is her date of birth?

8 A. [REDACTED].

9 Q. What is her current address?

10 A. I believe [REDACTED], [REDACTED], in
11 Australia.

12 Q. And what is her current e-mail address?

13 A. I don't know.

14 Q. What is her current phone number?

15 A. I don't know.

16 Q. When did you first meet Miss -- how would
17 you like me to refer to her? Would -- you want me to
18 say -- is Lynne okay?

19 A. Lynne is fine.

20 Q. All right. When did you first -- first
21 meet Lynne?

22 A. It was in the '90s.

23 Q. Do you know when in the '90s?

24 A. The exact date, no.

25 Q. First half of the decade, second half of

1 the decade?

2 A. The middle.

3 Q. So about 1995, give or take a year or two?

4 A. Yes.

5 Q. And where did you first meet her?

6 A. I initially spoke to her online, and I
7 first met her in Australia.

8 Q. And when did you get married to Lynne?

9 A. We got married shortly after that in --
10 around Christmastime in '96, in Canada.

11 Q. Did you live in Canada for any time?

12 A. Only briefly.

13 Q. How long?

14 A. Only weeks at a time.

15 Q. But the family residence or the marital
16 residence was in Australia?

17 A. Yes.

18 Q. What was the address of the marital
19 address?

20 A. I don't remember.

21 Q. Was it [REDACTED]?

22 A. Later on. That was the last address.

23 Q. When did -- when did you move to [REDACTED]?

24 A. I don't remember the date.

25 Q. Approximate year?

1 A. Probably 2004, I think.

2 Q. Did there come a time when you got divorced
3 from Miss -- from Lynne?

4 A. Yes.

5 Q. When did you get divorced?

6 A. We separated in 2010. We got finally
7 divorced through the court in 2012.

8 Q. Do you remember the month you were
9 separated in 2010?

10 A. September, October.

11 Q. Do you remember the month you got divorced
12 formally by the courts?

13 A. No.

14 Q. Is there a court judgment or order
15 formalizing the divorce?

16 A. Yes.

17 Q. Do you have a copy of that?

18 A. No.

19 Q. Can you obtain a copy of that?

20 A. Public record. You can go to a court
21 and...

22 Q. My understanding the courts in Australia
23 aren't public records.

24 A. The actual divorce hearings are listed. So
25 you don't get all the internal documents, but you can

1 get the actual hearing date, et cetera.

2 Q. Okay. And what would we look under to find
3 what would be the name of the case?

4 A. My name, her name, family court.

5 Q. Which family court and which -- where would
6 it be located in Australia?

7 A. Family court is federal court.

8 Q. In -- in what area? Is it New South Wales?

9 A. That's where we lived, yes.

10 Q. Is that where the court case was filed?

11 A. It's -- it's commonwealth court. It's
12 federal.

13 Q. Commonwealth federal court.

14 And were you able to agree on how to divide
15 up the property, or did the court have to resolve a
16 dispute over it?

17 A. Both.

18 Q. So some you agreed to and some you were not
19 able to agree to?

20 A. It was agreed in court.

21 Q. "It was agreed in court."

22 So -- but there was like a mediation
23 provided over by a judge?

24 A. Magistrate.

25 Q. "Magistrate."

1 Did Lynne have every -- ever have any
2 ownership interest in Bitcoin that you mined before
3 2014?

4 A. No.

5 Q. Did Lynne ever have any ownership interest
6 in blockchain intellectual property that you were
7 ever aware of?

8 A. No.

9 Q. Did the divorce settlement deal with any
10 Bitcoin assets?

11 A. Indirectly. It dealt with companies.

12 Q. And how did that indirectly deal with
13 Bitcoin assets?

14 A. All of the Bitcoin, IP, et cetera, that I
15 had that was mined and created into a company I owned
16 called Wright International Investments. Wright
17 International Investments was set up to own
18 everything I was creating. I attempted to move that
19 into other Australian companies, but that fell
20 through because of the tax office. The issue was
21 which companies went to whom, which other assets went
22 to whom. I kept Wright International Investments.

23 Q. What were the -- what was the value of the
24 Bitcoins on the date that the divorce was settled?

25 A. I don't know.

1 Q. Do you know of an approximate idea of the
2 value of the Bitcoin?

3 A. When we did our settlement, it was in 2011.
4 The value of the Bitcoin was not what was being
5 discussed. The value of Bitcoin in 2011 was about
6 \$80,000. The debts associated with it were in the
7 order of millions.

8 Q. Do you remember when in 2011 you reached
9 settlement?

10 A. May.

11 Q. And I'm presuming you have a copy of this
12 settlement agreement?

13 A. No, I don't.

14 Q. Who has a copy of the settlement agreement?

15 A. I don't know.

16 Q. Were you represented by counsel?

17 A. Lynne was represented by counsel; I wasn't.

18 Q. And you kept no copy of the settlement
19 agreement with your wife?

20 A. I did. But I don't need it anymore. I
21 don't have it anymore.

22 Q. When did you just -- get rid of the
23 settlement agreement with your wife?

24 MS. MCGOVERN: Object to form.

25 THE WITNESS: 2014.

1 BY MR. FREEDMAN:

2 Q. And how did you destroy the settlement
3 agreement with your wife?

4 MS. MCGOVERN: Object to form.

5 BY MR. FREEDMAN:

6 Q. You can answer the question.

7 A. I didn't keep the files.

8 Q. Did -- did you have an automatic delete set
9 up on your computers?

10 A. I didn't say that there were on computers.
11 I said, "files."

12 Q. So they were paper files?

13 A. Yes.

14 Q. How did those paper files leave your
15 possession?

16 A. I left the possession of the paper files.
17 I didn't take them with me.

18 Q. Where did you leave them?

19 A. They would have been left in the property
20 that was in Bagnoo.

21 Q. What was the property address in Bagnoo?

22 A. [REDACTED], Bagnoo.

23 Q. When did you leave that property address?

24 A. When it was sold.

25 Q. When was it sold?

1 A. I believe 2014, off the top of my head.

2 Q. Who owned the property when it was sold?

3 A. It was jointly owned between Lynne and
4 myself.

5 Q. And who purchased the property from you?

6 A. I don't remember the name of the person who
7 purchased it.

8 Q. Did you know them before they purchased it
9 from you?

10 A. No, I did not.

11 Q. They were strangers?

12 A. Yes.

13 Q. So you left your marital settlement
14 document in possession of complete stranger?

15 MS. MCGOVERN: Object to form.

16 BY MR. FREEDMAN:

17 Q. Is that right?

18 A. No. Lynne was in charge of the property at
19 that stage.

20 Q. So you left all of your documents with
21 Lynne?

22 MS. MCGOVERN: Object to form.

23 Mischaracterizes the witness's testimony.

24 THE COURT: I'm going to say something
25 no judge has said before. Can you object

1 louder?

2 BY MR. FREEDMAN:

3 Q. Okay. There was a pending question,
4 Doctor. I'll -- I'll re-ask.

5 Did you leave all of your marital
6 settlement documents with Lynne?

7 A. I left them in the property.

8 Q. And you formalized your settlement
9 agreement with Lynne in May of 2011. Why were the
10 documents still on the property -- and you got
11 divorced in 2012. Strike that. Let me say that
12 again.

13 You formalized your divorce in May 2011 --
14 your agreement with Lynne in 2011. The divorce was
15 formally entered in 2012.

16 Why were you still -- had documents in a
17 property that belonged to Lynne in 2014?

18 A. The property didn't belong to Lynne. It
19 was joint.

20 Q. Were you both living at the property?

21 A. Neither of us were living at the property.

22 Q. Who was living at the property?

23 A. Nobody.

24 Q. It was vacant from 2000 -- when was it --
25 when did it become vacant?

1 A. It was a farming property that we went back
2 and forwards to while we were married.

3 Q. If Lynne sued you for breach of that
4 settlement agreement, Dr. Wright, how would you
5 obtain a copy of it?

6 A. It's too late to sue me. You can't sue me
7 in Australian law.

8 MS. MCGOVERN: Please just answer the
9 question, Dr. Wright.

10 THE WITNESS: I wouldn't. There's no
11 need to.

12 BY MR. FREEDMAN:

13 Q. Did a divorce settlement deal with any
14 blockchain intellectual property?

15 A. No. It dealt with the ownership of
16 companies.

17 Q. Was Tulip Trading, Ltd. dealt with in the
18 divorce?

19 A. That was created after we separated.

20 Q. So that was created after 2010?

21 A. Correct.

22 Q. But you were not divorced when it was --
23 when was it created?

24 A. It was created -- I believe, the date was
25 June or July 2011.

1 Q. And when you -- did you create Tulip
2 Trading?

3 A. I didn't create it. It was a company that
4 I paid created it.

5 Q. Okay. And -- and you paid that company for
6 the property sometime after 2010 and before 2000 --
7 sorry. Sorry. Let me strike that.

8 You paid the company for Tulip Trading
9 sometime after 2010, but before the formal divorce of
10 2012?

11 A. Yes.

12 Q. Okay. And when you paid for that company,
13 you assumed full ownership of the company?

14 A. It was set up under a bearer share
15 structure initially.

16 Q. Who was the owner of the company when --
17 who was the bearer share owner of the company when
18 you set it up?

19 A. I owned the bearer shares. There were
20 nominee shareholders and nominee directors.

21 Q. So the listed owner of Tulip Trading at the
22 time of its incorporation was a company that you
23 owned the shares to; is that correct?

24 A. In effect, yes.

25 Q. Okay. And Miss -- Lynne had no ownership

1 interest in Tulip Trading?

2 A. No, Lynne had no ownership interest in
3 Tulip Trading.

4 Q. And then in 2012, when the divorce was
5 entered, I understand -- strike that.

6 What was Lynne's educational background?

7 A. Lynne has a master's degree in education.
8 She was a former nurse.

9 Q. And was she involved in your companies?

10 A. Lynne had been involved in my companies,
11 yes.

12 Q. Which companies was she involved in?

13 A. She was involved in many of the companies.
14 I can't remember all the names. I've had many
15 companies. Lynne was also involved in W&K
16 Information Defense in Florida with Dave, and she
17 helped him there. She was involved in Cloudcraft
18 that was set up. She was involved in various
19 iterations of De Morgan. And others, I would have to
20 look up the records.

21 Q. Did Lynne know about your creation of
22 Bitcoin?

23 A. Yes. But she never really cared about it,
24 and she just thought I was wasting too much time and
25 working on things she didn't understand.

1 Q. And did she know that you were one of the
2 people behind Satoshi Nakamoto?

3 A. There is no other people behind -- I'm the
4 only person behind Satoshi Nakamoto.

5 Q. How did she know that?

6 A. Lynne --

7 MS. MCGOVERN: Object to form.

8 BY MR. FREEDMAN:

9 Q. How did she know that you were the only
10 person behind Satoshi Nakamoto?

11 MS. MCGOVERN: Object to form.

12 Mischaracterizes the testimony. He stated
13 that he is the only one, not that she knew.

14 MR. FREEDMAN: Strike that.

15 BY MR. FREEDMAN:

16 Q. Did she know that you were the only person
17 behind Satoshi Nakamoto?

18 A. Yes.

19 Q. How did she know that?

20 A. She saw me working. She saw me studying.
21 She saw me get up. I only, at that stage, slept
22 maybe four to five hours a night. I did up to four
23 degrees simultaneously. I worked full time on this.
24 I came home on this and worked on it without anyone
25 else's help. I did that since the '90s, until I

1 solved what I needed to solve.

2 Q. And did -- how did she make the connection
3 between that work and the moniker Satoshi Nakamoto?

4 MS. MCGOVERN: Object to form. You can
5 answer.

6 THE WITNESS: Lynne knew about some of
7 my past. Lynne knew that I used a lot of
8 Japanese pseudonyms when I was online and
9 talking to people. And Lynne knew that I'd
10 been brought up, after my father left, in
11 part, by a Japanese man who I learned
12 martial arts from and also learned a lot
13 about the aspects before he died of Japanese
14 culture.

15 BY MR. FREEDMAN:

16 Q. But how did she make the specific
17 connection to the specific moniker Satoshi Nakamoto?

18 MS. MCGOVERN: Object to form.

19 THE WITNESS: She was my wife. She
20 lived there with me. She knew a lot of what
21 I was doing. She was involved with the
22 accounts. She was involved with seeing
23 everything I spent. I don't hide any
24 transactions from my spouse. So she would
25 have been able to see the purchase of the

1 Bitcoin.org domain on my credit card
2 statement.

3 BY MR. FREEDMAN:

4 Q. When did you purchase the Bitcoin.org
5 domain name?

6 A. August 2008. I don't off the top of my
7 head remember the exact date.

8 Q. And you did that with a credit card?

9 A. Yes, I did.

10 Q. Do you remember which credit card?

11 A. Not off the top of my head, no.

12 Q. Do you have the records that would tell you
13 which credit card?

14 A. I was audited by the Australian tax office
15 in 2008-2009 tax period. The records were handed
16 over to the Australian Tax Office. In effect, that
17 included all of my expenditures. It included all of
18 my receipts. It included all of my statements.

19 Q. And you said previously that your wife had
20 access to -- to all the accounts.

21 What did you mean by "the accounts"?

22 A. I mean exactly that. I mean, the accounts,
23 the bank accounts. I don't have anything secret from
24 my spouse, my current one or my former one. I
25 share -- I don't have separate bank accounts. I

1 don't have separate credit cards. I don't have
2 anything else.

3 Q. Did she have access to the Satoshi Nakamoto
4 account?

5 MS. MCGOVERN: Object to form. Lack of
6 foundation.

7 BY MR. FREEDMAN:

8 Q. Did she have access -- you can answer, Dr.
9 Wright.

10 Did she have access to the Satoshi Nakamoto
11 account?

12 A. You're misrepresenting the term "account."
13 Account here being a log-in and a bank account. The
14 Satoshi Nakamoto account, there's no such actual
15 thing. There's an e-mail address.

16 And so is that what you're referring to?

17 Q. Did she have the log-in information for the
18 e-mail address associated with Satoshi Nakamoto?

19 A. No.

20 Q. Did Lynne participate in your Bitcoin
21 operations?

22 MS. MCGOVERN: Object to form.

23 THE WITNESS: Sorry. Can you explain
24 what you mean by my "Bitcoin operations"?

25

1 BY MR. FREEDMAN:

2 Q. Did she participate in your mining of
3 Bitcoin?

4 A. I acted for Wright International
5 Investments as an agent of my company to my Bitcoin.
6 I didn't mine apart from my laptop, which was
7 minimized. It was minimal. My mining on my laptop
8 was something I did to test the public software.
9 Lynne was involved in that she had to help with
10 ordering of computers and paying of bills, but I
11 don't believe she ever understood any of what was
12 happening.

13 Q. Did she ever own a business that you worked
14 for or with?

15 A. She had shares in businesses, but that's
16 not owning.

17 Q. Did she have shares in a business that you
18 worked for or with?

19 A. Yes.

20 Q. Can you name those?

21 A. Not all of them, no. I'd have to check
22 records. I know that she had shares in De Morgan. I
23 know that she had shares in Ridges Estate. I know
24 that she had shares in things that I didn't end up
25 working for.

1 Q. Are those all the ones you can remember
2 now?

3 A. I'd need to look up what she has. I know
4 that she had shares in W&K, but I didn't work for
5 that. I know she had shares in other companies that
6 I ended up taking over after her bankruptcy. But I
7 didn't originally have shares in those; she did.

8 Q. And what happened to her shares in W&K?

9 A. That would still be her shares.

10 Q. Did she have shares in Wright International
11 Investments?

12 A. No.

13 Q. Did Lynne ever meet Dave Kleiman?

14 A. Yes.

15 Q. When?

16 A. When I came to Florida, I don't remember
17 the date off the top of my head, Lynne came with me.
18 We were staying in Orlando, and we also went to
19 Miami. I don't remember which trip. I've been to so
20 many -- I -- I travel so much, I don't remember the
21 exact dates of every one anymore.

22 Q. Is Lynne a beneficiary of any trusts you've
23 settled?

24 A. No.

25 Q. Is Lynne a trustee of any trusts you've

1 settled?

2 A. No.

3 Q. Have you discussed Bitcoin with Lynne after
4 your marriage ended?

5 A. Yes.

6 Q. When?

7 A. I don't remember the dates.

8 Q. What were the general subjects of those
9 conversations?

10 A. I focus on technology. I'm very focussed,
11 and most people would consider it strange. I have a
12 one-track mind. I'm actually autistic, and I have
13 what most people commonly mislabel as Asperger's,
14 although I'm high-functioning.

15 So when people try and talk about general
16 things, generally it all ends up with mathematics,
17 Bitcoin, quantative studies, and whatever else.
18 Outside of my small bailiwick of what I focus on, I
19 rarely talk to anything other than that.

20 Q. Have you discussed anything about this
21 lawsuit with Lynne?

22 A. Not to my recollection -- recognition, no.

23 Q. Do you mean recollection, Dr. Wright?

24 A. My apologies. Yes.

25 Q. Okay. Dr. Wright, you're presently married

1 to Miss Ramona Watts?

2 A. Yes.

3 Q. What's her date of birth?

4 A. [REDACTED].

5 Q. What is her current address?

6 A. Current address is my address in the UK,

7 which is [REDACTED] in [REDACTED].

8 Q. What is her current e-mail address?

9 A. Ramona@[REDACTED]

10 Q. What is her current phone number?

11 A. [REDACTED].

12 Q. What was her last name at birth?

13 A. A-N-G.

14 Q. And how many times has she been married?

15 A. I'm her second marriage.

16 Q. What was her first married name?

17 A. Watts.

18 Q. Where did you first meet Ramona? Is it

19 okay if I call her Ramona?

20 A. Yes.

21 Q. When did you first meet Ramona?

22 A. I was doing charity work.

23 Q. And when did you first meet her?

24 A. I don't remember the exact date. I was --

25 Q. Go ahead. Sorry.

1 A. I was doing charity work. I set up
2 computers and did other things for a number of
3 charities, and my first time meeting her was with one
4 of those. It wasn't -- I mean --

5 Q. Was it in Australia?

6 A. Yes.

7 Q. In approximately what year was it?

8 A. The first time I met her, probably 2011.

9 Q. And when did you start dating her?

10 A. The end of 2011.

11 Q. And when did you get married?

12 A. We got married in 2013.

13 Q. When in 2013?

14 A. 23rd of November.

15 Q. Did you have a prenuptial agreement with
16 Ramona?

17 A. I've never had a prenuptial agreement.

18 Q. Did you enter into a post-nuptial
19 agreement?

20 A. I've never had any nuptial agreement.

21 Q. Did you ever discuss Dave with Ramona
22 before you got married?

23 A. Yes.

24 Q. What -- tell me about that conversation.

25 A. I don't really remember. I've discussed

1 Dave with Ramona.

2 Q. So you can't remember anything about the
3 conversation you had with Ramona about Dave?

4 A. I don't sit there and put down
5 recollections of what I discussed with individuals.
6 It's, I guess -- I discuss my friends, I said,
7 because I had very few.

8 MS. MCGOVERN: Please don't speculate.
9 If you know the answer to a question, just
10 answer it. If you don't know, just say you
11 don't know.

12 Please don't speculate. If you don't
13 remember, you simply don't remember.

14 THE WITNESS: I don't remember.

15 BY MR. FREEDMAN:

16 Q. Did you refer to him as your best friend?

17 A. Yes.

18 Q. And did you tell her that he had helped you
19 create Bitcoin?

20 A. No.

21 Q. Why not?

22 MS. MCGOVERN: Object to form.

23 BY MR. FREEDMAN:

24 Q. You can answer.

25 A. Dave didn't help me create Bitcoin. He

1 helped, as did many others, with editing white paper.
2 Dave's main help actually came after. Dave was a
3 forensic specialist, and Dave helped me remove myself
4 as Satoshi more than anything else.

5 Q. Did you tell her that Dave helped you mine
6 Bitcoin?

7 A. Dave never helped me mine Bitcoin.

8 Q. Did Ramona learn that you created Bitcoin
9 before you were married?

10 A. Yes.

11 Q. When did she learn that?

12 A. I don't remember the date.

13 Q. How did she learn that?

14 A. As I said, I'm very hyper-focussed, and
15 even the kids ended up mining Bitcoin.

16 Q. When did the kids start mining Bitcoin?

17 A. 2011.

18 Q. And how did she learn you created Bitcoin?

19 A. I talked to her about everything, including
20 my past, before we got married.

21 Q. You gave her detailed accounts of what you
22 had done to create Bitcoin?

23 A. As much as she could understand, yes.

24 Q. Did you ever e-mail Ramona about Bitcoin
25 before you were married?

1 A. Not about Bitcoin, no.

2 Q. Did you e-mail her about Satoshi Nakamoto
3 before you got married?

4 A. No.

5 Q. Did you e-mail her about blockchain before
6 you got married?

7 A. We had companies that were involved in
8 Bitcoin. And based out of before I got married, they
9 were all about Bitcoin. So all those company e-mails
10 happened before we got married. But I wasn't
11 discussing, hey, I'm Satoshi or anything like this.
12 We were talking about company business.

13 Q. So you had a business relationship with
14 Ramona before you got married?

15 MS. MCGOVERN: Object to form.

16 Mischaracterizes the witness's testimony.

17 BY MR. FREEDMAN:

18 Q. You can answer the question.

19 A. We had companies together.

20 Q. So you had a business relationship?

21 A. We had companies together.

22 Q. And you had companies together after you
23 got married as well?

24 A. Yes.

25 Q. And you conversed about those companies

1 before you got married?

2 A. Yes.

3 Q. And you conversed about those companies
4 after you got married?

5 A. You can't be a company director with
6 someone who's a company director without talking
7 about the company that you're in.

8 Q. So the answer's yes?

9 A. Yes.

10 Q. Did Ramona ever meet Dave Kleiman?

11 A. No.

12 Q. Did she ever speak with Dave Kleiman on the
13 phone?

14 A. I don't know.

15 Q. Did she ever speak with Dave Kleiman over
16 Skype?

17 A. I don't know.

18 Q. Did she ever e-mail Dave Kleiman?

19 A. I don't know.

20 Q. Was Ramona involved in your business
21 interactions with Steven Matthews and Robert McGregor
22 in 2016?

23 MS. MCGOVERN: Objection. Lack of
24 predicate.

25

1 BY MR. FREEDMAN:

2 Q. Strike that.

3 Did you have business interactions with
4 Steven Matthews and Robert McGregor in 2016?

5 A. I believe you're saying Stefan Matthews.

6 Q. "Stefan Matthews." Thank you, Dr. Wright.

7 Did you have business relationships with
8 Stefan Matthews and Robert McGregor in 2016?

9 A. Yes.

10 Q. Was Ramona involved in those business
11 interactions?

12 A. Yes. I had resigned as a director.

13 Q. So the answer is yes?

14 A. Yes.

15 Q. Was she on e-mails between you and
16 Matthews?

17 A. I don't know.

18 Q. Was she on e-mails between you and
19 McGregor?

20 A. I don't know.

21 Q. What were those business dealings with
22 Matthews and McGregor about?

23 A. They're about the companies.

24 Q. What about the companies?

25 A. Moving where we are now, setting up nChain.

1 Q. Setting up nChain to do what?

2 A. To continue the creation of my intellectual
3 property.

4 Q. Were those business directions -- sorry.
5 Strike that.

6 Did those business interactions involve the
7 selling of Satoshi Nakamoto's life rights?

8 A. The rights were added later.

9 Q. So, at some point, they came to involve
10 Satoshi Nakamoto's life rights?

11 A. Unfortunately, yes.

12 Q. When did that occur?

13 A. I don't remember the date. It happened
14 because of the media interaction. The original deal
15 had nothing to do with Satoshi Nakamoto. I was in a
16 panic as various media entities started querying me
17 and people took advantage of me and said they
18 wouldn't help me unless I signed that over.

19 Q. And who did you sign the life rights over
20 to?

21 A. I don't remember the exact nature of the
22 contract.

23 Q. But it had to do with business dealings
24 with Matthews and McGregor?

25 A. I don't remember the exact nature of the

1 contract.

2 Q. Did McGregor and Matthews have anything to
3 do with the provision of the contract that -- strike
4 that.

5 You signed a contract that signed over the
6 life rights of Satoshi Nakamoto; is that correct?

7 A. The story, you mean.

8 Q. And who gave -- who handed you that
9 contract?

10 A. I don't remember.

11 Q. Who e-mailed you that contract?

12 A. I don't think it was e-mailed.

13 MS. MCGOVERN: I'm gonna object to the
14 line of questioning as outside the scope of
15 the limited deposition for which we are here
16 today.

17 THE COURT: Sustained.

18 BY MR. FREEDMAN:

19 Q. Is Ramona a beneficiary of any trust you
20 have settled?

21 A. Yes.

22 Q. Which trusts?

23 A. I don't remember each trust off the top of
24 my head.

25 Q. Do you remember any of the trusts that

1 she's a beneficiary of?

2 A. Yes.

3 Q. Which?

4 A. There's a trust in the Seychelles known as
5 Tulip, which is a registered trust now in the
6 Seychelles. It owns now Wright International
7 Investments and Tulip Trading, Ltd. and a few other
8 companies.

9 Q. And is Ramona a trustee of any trust you
10 have settled?

11 A. Not to my knowledge.

12 Q. Dr. Wright, do you have any record of the
13 shares Miss -- that Lynne has in W&K Info Defense
14 Research?

15 A. Yes.

16 Q. Have you provided those to your lawyers?

17 A. Yes.

18 Q. Have you ever asked Lynne for records of
19 her ownership of W&K?

20 A. I believe that we discussed it.

21 Q. When?

22 A. I don't remember the date.

23 Q. After the filing of this lawsuit?

24 A. No. It would have been before.

25 Q. What is the basis for you saying that Lynne

1 is a shareholder of W&K?

2 A. Lynne set everything up with Dave. I was
3 going through a severe audit with the Australian Tax
4 Office trying to bankrupt me. So I didn't put any
5 shares at that stage into my own name directly, and
6 everything was agreed, when we were looking at
7 separating, that all of that work would go into her
8 name. So on the creation of W&K, everything was
9 meant to go between Lynne and Dave.

10 Q. And did you see any documents issuing
11 shares of W&K to Lynne?

12 A. Yes.

13 Q. Who issued those documents?

14 A. I don't know. I wasn't a director. Lynne
15 and Dave were both directors.

16 Q. So who sent her the shares?

17 A. I don't know. Lynne and Dave were both the
18 directors. I had nothing --

19 Q. So how did you obtain copies of the shares?

20 A. I was later sent a whole lot of files when
21 Lynne went into bankruptcy.

22 Q. So you have no direct knowledge that Lynne
23 actually has shares in W&K; is that correct?

24 MS. MCGOVERN: Object to form.

25 Mischaracterizes the testimony. Asked and

1 answered.

2 BY MR. FREEDMAN:

3 Q. You can answer the question.

4 A. That is not what I said. I said, when
5 Lynne went into bankruptcy, she delivered records to
6 me, because I handled that for her.

7 Q. So your knowledge of Lynne's shares in W&K
8 comes from the records you received from Lynne?

9 A. No.

10 Q. Where does it come from?

11 A. I was still in communication with Lynne in
12 2011 when I was setting up W&K, helping her, helping
13 Dave.

14 Q. So Lynne told you that she has shares in
15 W&K?

16 A. We were on the same phone call with Dave as
17 the company was being constructed. We were on the
18 same e-mails. So she didn't need to tell me. I had
19 the communications between Dave and myself and her at
20 the time. I saw all of this happening. And I
21 communicated with Dave as he was filing the company.

22 Q. Dr. Wright, I'm gonna hand you a
23 declaration you signed on May 13th, 2019.

24 MR. FREEDMAN: Mr. Kass, would you
25 mind.

1 BY MR. FREEDMAN:

2 Q. Dr. Wright, is this a declaration you
3 signed on or about May 13th, 2019?

4 MS. MCGOVERN: I'm gonna object to this
5 line of questioning and ask how this fits
6 within the limited scope of this deposition?
7 It doesn't appear to fit within the marital
8 privilege, it doesn't appear to fit within
9 the national security, and it doesn't appear
10 to fit with the limited questions regarding
11 the Bitcoin holdings.

12 MR. FREEDMAN: These are trusts that
13 Dr. Wright has identified as holding his
14 current Bitcoin holdings.

15 MS. MCGOVERN: So to the extent that
16 you're gonna be asking about the holdings
17 that Dr. Wright had, we have no objection.
18 If you go beyond that, we're going to object
19 and ask the judge to rule.

20 BY MR. FREEDMAN:

21 Q. Okay. Dr. Wright, is this the declaration
22 you signed on or about May 13th, 2019?

23 A. It is a copy.

24 Q. Are all the statements you made in the
25 declaration based on your personal knowledge?

1 A. They're based on my knowledge and belief at
2 the time.

3 Q. Dr. Wright, do you see on paragraph 2 of
4 the first page of this declaration, it says, "I give
5 this declaration based on my personal knowledge"?

6 MS. MCGOVERN: I'm going to object to
7 that question and ask for this line of
8 questioning to be asked while the judge is
9 present, as I believe you're outside the
10 scope.

11 MR. FREEDMAN: We're gonna take a
12 break. Let's go off the record.

13 MS. MCGOVERN: You -- wait. Vel,
14 before you unilaterally decide to go off the
15 record, you can continue with your other
16 questions so that we don't waste time and
17 just hold off on this until the judge is
18 able to reconvene, so we don't waste
19 everybody's time.

20 MR. FREEDMAN: I understand. But I
21 just need a second to rejig everything.

22 MS. MCGOVERN: Of course.

23 MR. FREEDMAN: We're going off the
24 record.

25 MR. RIVERO: We don't have to go on the

1 --

2 MR. FREEDMAN: Well, I'm gonna use the
3 restroom anyway, so let's go off the record.

4 VIDEO TECHNICIAN: Off the record at
5 9:56.

6 (A recess was taken.)

7 VIDEO TECHNICIAN: On the record at
8 10:04.

9 THE COURT: I'm caught up to where I
10 left off. There's not much happening. Let
11 me just read.

12 Okay. So, Miss McGovern, you had an
13 objection to the line of questioning being
14 beyond the scope.

15 What question in particular? Is there
16 a pending objection or --

17 MS. MCGOVERN: Yes, Your Honor.

18 THE COURT: He was getting close to the
19 line and you wanted me to be here as --

20 MS. MCGOVERN: Yes, that's exactly
21 right, Your Honor.

22 THE COURT: There's no pending question
23 to which there's an objection, but you just
24 wanted me to be here for this line of
25 questioning?

1 MS. MCGOVERN: I believe there might be
2 a pending question, and I objected to the
3 pending question, and my objection
4 specifically was to the extent that the
5 questions that he's asking about these trust
6 documents relate to the limited questions
7 permitted under this deposition for Bitcoin
8 holdings, we have no objections.

9 But to the extent that this is going to
10 become a line of questioning regarding the
11 declaration, the trusts, the creation of the
12 trusts, and all that sort of thing, that
13 goes outside the scope, and we object to it.

14 THE COURT: Okay.

15 MR. FREEDMAN: Your Honor --

16 THE COURT: How far are you gonna go on
17 this?

18 MR. FREEDMAN: Your Honor, I mean, I
19 could start the questioning over or I could
20 just explain to you my rationale.

21 These declarations were produced in
22 response to a direct court order to identify
23 his Bitcoin holdings. And Dr. Wright's
24 contention is now that he cannot identify
25 his current Bitcoin holdings.

1 So I think all of these trusts and the
2 trust documents and everything sworn about
3 them are fair game as it relates to the
4 current Bitcoin holdings.

5 MS. MCGOVERN: May I respond?

6 THE COURT: Yes.

7 MS. MCGOVERN: Dr. Wright has never
8 stated that he cannot provide the
9 information regarding his current Bitcoin
10 holdings. In fact, he stated repeatedly
11 that the Bitcoin holdings are 820,050.

12 What we believe the issue before this
13 court to be today is the inability, the
14 impossibility of providing the public
15 addresses. That's very different than the
16 holdings of Bitcoin.

17 So to the extent that he's asking about
18 the holdings of Bitcoin, we believe that
19 fits within the limited scope of the
20 deposition. But beyond that, it does not.

21 THE COURT: Okay. I'll let you draw
22 that line where you want. But I got to tell
23 you, for the purposes of the show cause
24 hearing this afternoon, I'm gonna let him
25 ask all the questions about the trusts, as I

1 think it is relevant. So if you want to ask
2 him --

3 MS. MCGOVERN: Oh, of course.

4 THE COURT: If you prefer to have him
5 ask in public at the show cause hearing,
6 I'll sustain your objection.

7 MS. MCGOVERN: Well, to the extent that
8 the questions are going to be asked once --
9 I think they're going to be asked once. But
10 we understood the deposition and the
11 evidentiary hearing to be separate and not
12 repetitive.

13 THE COURT: Understood. I agree.

14 Okay. So, Mr. Wright -- Mr. -- sorry,
15 Mr. Freedman, I'm gonna sustain the
16 objection to the extent that it goes beyond
17 the general topic of his overall holdings,
18 but I'm telling you in advance for purposes
19 of a later hearing today, I am going to
20 allow questioning about -- the more granular
21 questions about the specific public
22 addresses and his ability to access the
23 public addresses. So with that, you can
24 continue the deposition.

25 And -- and to be perfectly correct, to

1 my understanding, this was not a topic that
2 was attempted to be raised at Dr. Wright's
3 deposition in London. And there was an
4 objection raised which caused my ruling. So
5 I'm sustaining the objection for those
6 reasons.

7 MR. FREEDMAN: Your Honor, am I allowed
8 to ask questions about the declaration
9 submitted by Dr. Wright?

10 THE COURT: To the extent it's
11 foundational and it goes to the overall
12 question of his Bitcoin holdings and Bitcoin
13 holdings generally, yes. If you want to get
14 into the specific questions about the public
15 addresses and where they are and how they
16 can accessed, no.

17 But yes, you can ask him general
18 foundation questions. I believe that's the
19 declaration. I don't think Miss McGovern
20 was objecting to that.

21 MR. FREEDMAN: Okay. I'm going to
22 limit my questions, Your Honor, to the
23 trusts as opposed to the actual public
24 addresses. And if Miss McGovern has
25 objections to the trusts that are holding

1 those current Bitcoin holdings, then I guess
2 you'll rule on them as -- as they come.

3 If that's okay?

4 THE COURT: That's why I'm here.

5 MR. FREEDMAN: Perfect. Thank you.

6 (Plaintiffs' Exhibit 1, May 13, 2019
7 declaration signed by Dr. Craig Wright was marked for
8 identification.)

9 BY MR. FREEDMAN:

10 Q. Dr. Wright, this is the May 13th declar-
11 the 2019 declaration that you signed, which I'm
12 marking as Plaintiff's Exhibit 1.

13 And Dr. Wright, you gave this declaration
14 based on your personal knowledge; is that correct?

15 A. Yes.

16 Q. And the statements -- sorry.

17 And on your personal knowledge, you swore
18 the statements made in this declaration are true?

19 A. They're true in that it's a very simplified
20 version of everything.

21 Q. Okay. And you know that your declaration
22 was submitted to United States District Court?

23 A. Yes.

24 Q. And it was your intention that the court
25 should rely on the statements that are made in this

1 declaration?

2 A. It's my declaration as a simplified version
3 of a complex scenario.

4 Q. Dr. Wright, in paragraph 3 of your
5 declaration, you state that you used your best
6 efforts to gather certain trust documents.

7 Do you see that?

8 A. Yes. I'm not the trustee of these trusts.

9 Q. And you say specifically that you gathered
10 trust documents for two trusts, Tulip Trust 1 and
11 Tulip Trust 2.

12 In paragraph 3 do you see that?

13 A. Yes. What were called -- they were both
14 called Tulip Trusts, so we gave them a one and a two.

15 Q. And before we go into the actual Tulip
16 Trust documents, I just want to make sure we're on
17 the same page on precisely which documents you're
18 identifying in your declaration.

19 So if you look at paragraph 4 of that
20 declaration, you'll see that you identify a trust
21 document dated June 24th, 2011.

22 Do you see that?

23 A. I would need to look at the document to
24 make a comment.

25 Q. Okay. Well, maybe I can help you with your

1 other declaration, Dr. Wright.

2 Do you see where you write on paragraph 4,
3 which is referenced in paragraph 5 of my May 8th,
4 2019 declaration?

5 A. I would need to see the declaration --

6 Q. Sure.

7 A. -- to make a comment further.

8 Q. You know what, I'll just give you the
9 documents.

10 Did you take a look at the documents,
11 Dr. Wright?

12 A. Yes.

13 Q. And so, those are the trust documents dated
14 June 24, 2011; is that right?

15 A. The first one is, yes.

16 (Plaintiffs' Exhibit 2, E-mail from David
17 Kleiman to Craig Wright, Bates labeled Defense 2413
18 through 2415 was marked for identification.)

19 BY MR. FREEDMAN:

20 Q. Okay. And I'm gonna mark this as -- the
21 first one as Plaintiff's Exhibit 2.

22 And the first one is the one that starts
23 off from Dave Kleiman to Craig Wright, and it's an
24 e-mail. It's Bates labeled Defense 2413 through
25 2415.

1 Is that correct?

2 A. It is page 216.

3 Q. You're including this second page
4 (indicating)?

5 A. 2416.

6 Q. Okay. So, then, you're stating that --
7 let's -- let's make sure we're on the same page here.

8 Your para- -- paragraph 4 says "I attached
9 to this declaration the trust document dated
10 June 24th, 2011, which is referenced in paragraph 5
11 of my May 8th, 2019 declaration."

12 You're holding Defense 2413 through 2416.
13 Is that what you were referencing in your
14 declaration?

15 A. This is a document related to that. This
16 isn't the formal trust. This is what I have.

17 Q. But this is what you have from June 24th,
18 2011, correct?

19 A. Yes. I don't have all of the documents to
20 do with the setup with the trust. And this was
21 actually changed -- this was not to do with the
22 formal trust itself. It was to do with the technical
23 trust that I put around the key fragments. This was
24 changed afterwards because I was drunk when I went
25 over writing this and gave it to Dave. That's why he

1 snuck some other lines in there on me.

2 Q. Okay. But this is what you're referencing
3 in paragraph 4; is that correct?

4 A. It is the document I have to do with that.
5 I don't have everything to do with what became the
6 Tulip Trust.

7 Q. This is what you have?

8 A. That is what I have.

9 Q. And it's an authentic?

10 A. Yes.

11 Q. Okay. So the first page of this document,
12 2413, this is a copy of an e-mail from Dave Kleiman
13 to you; is that correct?

14 A. That is my understanding.

15 Q. And it was written on or about June 24th,
16 2011?

17 A. I had actually sent the original version to
18 Dave a little bit before that. And after badgering
19 Dave, he sent it back on that date. When I wrote it,
20 I had drunk four bottles of wine.

21 Q. You wrote to Dave "Craig, I think you were
22 mad, and this is risky, but I believe in what we were
23 trying to do"?

24 A. No. That is an e-mail. That is not the
25 other document.

1 Q. So let's make sure we're on the same page.

2 Document 2413 --

3 A. Yes.

4 Q. -- that first page only, is an e-mail from
5 Dave Kleiman to you?

6 A. That is the appearance of what it is, yes.

7 Q. Okay. And it was written on June -- on or
8 about June 24th, 2011?

9 A. Yes.

10 Q. And you recall receiving this e-mail on or
11 about June 24th, 2011?

12 A. Yes.

13 Q. Okay. Dr. Wright, in discovery, we
14 received this as a scan of a paper printout. We also
15 received it as a pdf file, but we did not receive it
16 as an actual e-mail file.

17 Can you explain why that is?

18 A. When I was outed in December 2015 as
19 Satoshi, I tried to remove all evidence of who I was.
20 I did my best to wipe out all of my social media. I
21 did my best to wipe out my e-mails and any other
22 record that would tie me to being Satoshi Nakamoto.

23 Q. So you kept only a paper copy; is that
24 correct?

25 A. No, I did not.

1 MS. MCGOVERN: Object. I'm gonna
2 object to the line of questioning. We
3 actually produced this document in e-mail
4 form. And we have produced the ESI of this
5 document.

6 MR. FREEDMAN: When did you make that
7 production?

8 THE COURT: I'll overrule the
9 objection.

10 BY MR. FREEDMAN:

11 Q. Okay. So, Dr. Wright --

12 MS. MCGOVERN: My objection was simply
13 to the extent that you're asking the witness
14 the actual discovery production. I want to
15 clarify for the record, that is, in fact,
16 been produced.

17 MR. FREEDMAN: What is the Bates label
18 of that production?

19 MS. MCGOVERN: I don't have it on the
20 top of my head.

21 BY MR. FREEDMAN:

22 Q. So, Dr. Wright, presumably you received
23 this on or about June 24th, 2011. You turn it into a
24 pdf on or -- at some point?

25 A. No.

1 Q. You never turned this document into a pdf?

2 A. That is not what I said. I cannot say
3 whether I did or didn't. The records and files did
4 not come from my records. In -- after we moved to
5 the UK and the Australian companies were shut down,
6 we received all of the company files and hard drives
7 from ex-employees of the companies. Those documents
8 were in unopened boxes until my lawyers were handed
9 them, and I did not know what was still there.

10 Q. So, Doctor, if you look at this e-mail,
11 you'll see it comes with three attachments: Tulip
12 Trust.pdf.asc, Tulip Trust.pdf.tar.asc, and Tulip
13 Trust.pdf.

14 Do you see those?

15 A. I do.

16 Q. And were the pages Defense 2414, 2415, and
17 2416 any of the attachments that are referenced in
18 that e-mail?

19 A. I couldn't exactly say without looking at
20 it forensically, but they appear to be what was
21 there, from my recollection.

22 Q. What were the other attachments, the other
23 two attachments?

24 A. Sorry. What do you mean "the other two" --

25 Q. Okay. Let's just look at document.

1 Tulip Trust.pdf.asc, do you know what that
2 is?

3 A. That's a digital signature file.

4 Q. So that's 2416?

5 A. That is what it would appear to be.

6 Q. Okay. And then Tulip Trust.pdf.tar.asc,
7 what is that?

8 A. That is a -- tar file's like a eunuch's
9 version of a zip file. It's not compressed, but what
10 happens is, everything in a directory is compiled
11 into a single format, and then that is a signed
12 version of that. So that's created --

13 Q. So what was compiled in that zip file?

14 A. It's not actually a zip file. It's a tar
15 file.

16 Q. What is compiled in that tar file?

17 A. Off the top of my head, I would not have a
18 -- I can't say.

19 Q. Okay. Was this encrypted file with the
20 Bitcoin keys that was --

21 A. No.

22 Q. Okay. And Tulip Trust.pdf, what was that?

23 A. I believe that would be the next document.

24 Q. 2414 and 2415?

25 A. Yes.

1 Q. Okay. So, Dr. Wright, let's go back to
2 your paragraph 4 of your declaration.

3 You say in paragraph 4 that this June 24th,
4 2011 is a trust document.

5 Do you see that?

6 A. Yes.

7 Q. And you say it's referenced in your May 8th
8 declaration. Do you see that?

9 A. I don't have the May -- the other document.
10 Sorry.

11 MR. FREEDMAN: Hold on.

12 (Plaintiffs' Exhibit 3, Document Bates
13 labeled 2416 was marked for identification.)

14 MR. FREEDMAN: And just so the record
15 is clear, 2413 through 2415 is Plaintiff's
16 Exhibit 2. 2416 is Plaintiff's Exhibit 3.
17 And now I've just handed Dr. Wright his
18 May 13th [sic] declaration, which is gonna
19 be Plaintiff's Exhibit 4.

20 (Plaintiffs' Exhibit 4, Dr. Wright's May
21 8th declaration was marked for identification.)

22 BY MR. FREEDMAN:

23 Q. All right. Dr. Wright, this declaration
24 and all the statements made in it are based on your
25 personal knowledge?

1 A. Yes.

2 Q. And based on your personal knowledge, you
3 swear that all the statements in this declaration are
4 true; is that right?

5 A. They're simplified. And the full truth is,
6 thus, more complex. The trust owns companies. The
7 companies own other structures. And there's a
8 difference between Bitcoin and Bitcoin. Bitcoin
9 refers to both the network and individual holdings as
10 assets.

11 There are multiple -- unfortunately,
12 Bitcoin is used in many ways. It's a problem that I
13 have with how I name things. So when you say the
14 Bitcoin, it can refer to Bitcoin, the network;
15 Bitcoin, the software; Bitcoin, the node; Bitcoin,
16 the implementation, and Bitcoin as the actual unit of
17 account.

18 Q. Dr. Wright, do you see that first paragraph
19 "I, Craig Wright, declare under penalty of perjury
20 under the laws of the United States of America that
21 the following is true and correct"?

22 A. Yes.

23 Q. And do you see on the last page of that
24 document, on page 4 "I declare that the foregoing is
25 true and correct under penalty of perjury and in

1 accordance with the laws of the United States of
2 America."

3 This sworn declaration was signed in London
4 on May 8th, 2019, and then your signature appears at
5 the bottom?

6 A. Yes.

7 Q. So this declaration is true and correct,
8 Dr. Wright?

9 A. Once again, there is a level of the truth.
10 I can say this is true, in that it captures an
11 overall simplified version of everything, and I can
12 explain everything in further details. It's like
13 saying I own a white car. Then I can explain
14 further. I own a white car with this VIN number. I
15 own a white car with this particular engine. I own a
16 white car of this make. I own a white car of this
17 year.

18 MS. MCGOVERN: Dr. Wright, please just
19 listen to the question and answer to the
20 best of your ability. He's simply asking
21 whether this declaration is something that
22 you've attested to.

23 THE WITNESS: This declaration is
24 something I've attested to. If I go off
25 track, I apologize.

1 I'm very binary, Your Honor, and when
2 questions aren't fully what I would say is
3 correct, I -- I'm a bit strange that way.

4 THE COURT: Let me just -- let me just
5 explain this way, Dr. Wright, you have an
6 excellent lawyer sitting on both sides of
7 you there. Their job is object to the
8 question. If they think the question is not
9 fair or you can't fairly answer the
10 question, they will lodge an objection, and
11 I'll rule on that. If they don't object,
12 answer the question to the best of your
13 ability. Okay?

14 THE WITNESS: Yes, Your Honor.

15 THE COURT: All right. Thank you.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, it was your intention the
18 court's relying on the statements made in this
19 declaration?

20 A. I said a basic overview of what the trust
21 structure was that then owned other things. I didn't
22 go into the holdings of each trust, no.

23 Q. But you expected the court to rely on your
24 basic overview; is that correct?

25 A. I'm not sure what you mean by "rely on."

1 Q. All right. Dr. Wright, can you look at
2 paragraph 5 of your declaration?

3 A. Which one?

4 Q. The May 8th declaration, Plaintiff's
5 Exhibit 4.

6 A. Yes.

7 Q. You say in June of 2011 you "took steps to
8 consolidate the Bitcoin that I mined with Bitcoin
9 that I acquired and other assets."

10 A. Yes.

11 Q. And then you say that in 2 -- October
12 of 2012, the formal trust -- excuse me, a formal
13 trust document was executed.

14 A. Yes.

15 Q. So when you say that -- sorry, Dr. Wright.
16 Let me pull this back up here. Okay.

17 So in October of 2012, you executed a
18 formal trust document. And I want to hand you -- is
19 this the document that you executed -- the formal
20 trust document you executed in October of 2012 --
21 sorry, that was executed in October of 2012?

22 A. This is not the trust document I did. This
23 is companies involve- -- that I was involved with.

24 Q. Dr. Wright, if you can switch back to
25 Plaintiff's Exhibit 1, which is your May 13th

1 declaration.

2 A. Yes.

3 Q. Can you take a look at paragraph 5 of it
4 for me.

5 A. Yes.

6 Q. What document are you referring to when you
7 say "I attach to this declaration the trust document
8 dated October 23rd, 2012, which is referenced in
9 paragraph 5 of my May 8th, 2019 declaration as two of
10 Trust 1."

11 A. It's quite possible this document that I
12 was given.

13 Q. Dr. Wright, you swore this is true based on
14 your personal knowledge.

15 What do you mean "it's quite possibly"?

16 A. There is another document from the next day
17 that was also issued that I signed.

18 Q. Dr. Wright, I think you're referring to
19 paragraph 6 of the May 13th -- of the May 13th
20 declaration, which says "I attach this document, the
21 trust document -- I attach to this -- sorry. Strike
22 that.

23 "I attach to this declaration the trust
24 document for Tulip Trust 2, which is dated
25 October 24, 2012 and is referenced in paragraph 18 of

1 my May 8th, 2019 declaration."

2 So, going back to paragraph 5 that
3 identifies an October 23rd, 2012 date as Plaintiff's
4 Exhibit -- what are we up to here -- 5, Plaintiff's
5 Exhibit 5 --

6 MS. MCGOVERN: Which is it?

7 MR. FREEDMAN: The one that starts of
8 "Deed of trust between." Bates No.
9 Defense 50985 through 50989.

10 (Plaintiffs' Exhibit 5, Document that
11 starts off "Deed of Trust between," Bates labeled
12 Defense 50985 through 50989 was marked for
13 identification.)

14 BY MR. FREEDMAN:

15 Q. Is Plaintiff's Exhibit 5 the October 23rd,
16 2012 trust document referenced in paragraph 5 of your
17 May 13th declaration?

18 A. I did not create the document, and I did
19 not sign it.

20 MS. MCGOVERN: Answer the -- just
21 listen to the question. He's asking whether
22 that -- this agreement is the agreement
23 that's referenced in your declaration.
24 That's the question.

25 THE WITNESS: To the best of my

1 knowledge, yes.

2 BY MR. FREEDMAN:

3 Q. Who created this document?

4 A. I don't actually know. I know people in
5 Abacus, who are running blind holdings for me, that
6 they would have the bearer shares certificates, et
7 cetera. It would be one of them, I would say.

8 Q. So -- but you received a copy of this fully
9 executed sometime around October 23rd, 2012; is that
10 correct?

11 A. I don't know when it was received.

12 Q. It was executed in October 2012. You
13 received it sometime thereafter?

14 A. It was received and in the trust files
15 after.

16 Q. Okay. When did you first get a copy of
17 this document?

18 A. I don't know. I -- my lawyers received all
19 of the sealed boxes of files. All of this was in
20 there. I hadn't touched any of that for years.

21 Q. So you put all of your Bitcoin in a trust,
22 but you never even looked at the trust document?

23 A. No, I didn't put all of my Bitcoin in the
24 trust. That's a misrepresentation. I put all of my
25 intellect property. My intellect property included

1 the algorithms that would initially have my mined
2 Bitcoins included.

3 Q. Dr. Wright, can you go back to your --
4 Plaintiff's Exhibit 4. It is your May 8th
5 declaration.

6 A. Yes.

7 Q. If you look on the first page, paragraph 4,
8 "I mined Bitcoin."

9 And here you're talking about the unit of
10 exchange, correct?

11 A. Which --

12 MS. MCGOVERN: I'm sorry. Where are
13 you?

14 MR. FREEDMAN: We're on paragraph --
15 Plaintiff's Exhibit 4, paragraph 4 of the
16 May 8th declaration.

17 THE WITNESS: It's this one.

18 MS. MCGOVERN: So this is four. Yes,
19 we have it in front of us.

20 BY MR. FREEDMAN:

21 Q. Paragraph 4 says "I mined Bitcoin."

22 And here Bitcoin is a reference to the
23 actual unit of exchange; is that correct?

24 A. No. It's the ledger in process.

25 Q. Okay. What I, as a layman would refer to

1 as a Bitcoin and that I could then send to one public
2 address to another, I'm gonna call that the unit of
3 exchange.

4 Is that okay?

5 A. No.

6 Q. What would you like me to refer to that as?

7 A. That's a totally wrong misrepresentation of
8 how Bitcoin works.

9 Q. Just give me the name you want me to refer
10 to it as, Dr. Wright.

11 MS. MCGOVERN: Please let Dr. Wright
12 explain his answer, Mr. Freedman.

13 THE WITNESS: When I created Bitcoin,
14 it was created as a digital cash system.
15 Each individual note was effectively a
16 cash-based coin with a unique serial number.
17 Each individual serial number was designed
18 to be used once, only once, and never
19 re-used. There are two to the 256 bits
20 minus one of information for keys.

21 The amount there is approximately such
22 that if you were to create the key 1 billion
23 times a second, there would be enough for
24 every atom in the known universe to have one
25 for a hundred trillion years, which exceeds

1 the length of the universe; thus, it's a
2 system not of bank accounts, but of
3 individual keys.

4 That was later subverted in 2011 and
5 after I left. And the introduction of
6 things like Pay-to-Script hash and other
7 things that I didn't want in Bitcoin have
8 changed the nature of what happens.

9 There are no actual addresses the way
10 that you are saying that addresses now exist
11 when I created Bitcoin. It is a public
12 ledger that records and maps double
13 spending. So there is a ledger entry to map
14 the key and script associated with the
15 mining of Bitcoin.

16 BY MR. FREEDMAN:

17 Q. Dr. Wright, in 2011 did you transfer all of
18 your Bitcoin into a blind trust?

19 A. I transferred my intellectual property,
20 which includes Bitcoin. Bitcoin being the nature of
21 the network, the nature of the software, the nature
22 of the nodes.

23 Q. All of it?

24 A. I transferred all of the original mined
25 Bitcoin, if that's what you're asking, all of the

1 ledger entries. Because what I transferred was
2 software that wasn't public. That, basically, is a
3 system that was designed so that you could have a
4 split-key technology, some of which are now patented,
5 allowing you to have a head office, who could spend,
6 and individual branches that would be able to receive
7 money, and it would calculate the entries in the
8 ledger and the coin.

9 So when you were actually doing the mining
10 or validation of process, each node would calculate
11 an address based on a distributed SEED algorithm.
12 That distributed SEED algorithm was known and
13 distributed so that each node to calculate what it
14 was mining to without any knowledge of the secret
15 keys associated with that.

16 Q. Dr. Wright, when you referred to "I mined
17 Bitcoin" --

18 A. Yes.

19 Q. -- the way I view that word is, I -- and
20 this is going to be very dumb down for you. But I
21 guess the correct number -- the Bitcoin protocol
22 tells me I've got the right number. I then update
23 the public ledger, and then the protocol awards me
24 with new Bitcoin.

25 Are you -- are you familiar with what I'm

1 saying even though it's not 100 percent technically
2 accurate? Do -- do you understand my --

3 A. I would say it's about .01 percent
4 technically accurate.

5 Q. But you understand it?

6 A. I would understand that you're incorrectly
7 saying how Bitcoin works --

8 Q. Okay. So --

9 A. -- and it has no relevance to what I was
10 doing.

11 Q. So that mining reward --

12 A. I would say 21,000,000 minus .0000004
13 Bitcoin or Satoshi exists already and are
14 distributed.

15 Q. Dr. -- Dr. Wright, in these trust documents
16 you identify a sum of 1,100,111 Bitcoin and eight
17 and, I think, 24,000 Bitcoin.

18 What were you referring to?

19 A. 825,050.

20 Q. What were you referring to when you said
21 "Bitcoin," when you said that? What is that sum?

22 A. That sum is the initial Bitcoin that my
23 machines mined between January 2009 and August 2010.

24 Q. And if you sent me one of those, what would
25 you have sent me? So, now, take off 1,100,111. You

1 send me one. You have 1,100,110.

2 What do I now have?

3 A. One particular coin would then be moved as
4 a new ledger entry. That ledger entry would take a
5 coin-based mined coin, which is validated on the
6 ledger, and it would pay to a new address as changed
7 to myself. That new address would be one or more
8 keys or other scripts that would pay me 49 Bitcoin,
9 as you say, or Satoshi, and multiplied by the
10 relevant number, because it's an integer, plus one of
11 the unit that people call Bitcoin to yourself.

12 Q. So that unit that people call Bitcoin that
13 you sent me one of, Satoshi multiplied by the
14 relevant number, I'm gonna refer to it as coin.
15 Okay?

16 A. Yes.

17 Q. All right. So let's get back, Dr. Wright.

18 So, Dr. Wright, in 2011, did you transfer
19 all of your coin, as I've just defined it, into a
20 blind trust?

21 A. What I actually did was, I transferred the
22 algorithms and software that I had used, the
23 nonpublic version of Bitcoin that I was working on,
24 into an encrypted file. That encrypted file was
25 then -- basically the key was split so that other

1 people could have it.

2 I created a system so that I had both legal
3 and technical controls. The legal system was as a
4 wrapper to ensure tax laws and other things were met.
5 The technical controls were, therefore, so that I
6 could basically, hand on heart, say I do not have
7 control of any of these assets.

8 Q. And is Plaintiff's Exhibit 5, the Deed of
9 Trust document, what you referred in your declaration
10 as Tulip Trust 1, is this part of that scheme to take
11 the coin out of your control?

12 A. This was after that had occurred. The coin
13 was out of my control in 2011. This is more of a
14 legal structure that was set up. This was not with
15 me. This was between the companies. I had
16 instructed people to take me off all the companies
17 and remove all of that information so that I wasn't
18 there anymore.

19 Q. So the coin left your possession by virtue
20 of -- your control, by virtue of Plaintiff's
21 Exhibit 2?

22 A. No.

23 Q. Do you have Plaintiff's Exhibit 2 in front
24 of you? Let me try to simplify that, actually. I'll
25 strike the last question.

1 The coin left your possession when you
2 transferred it to Dave Kleiman?

3 A. No.

4 MS. MCGOVERN: Your Honor, I'm gonna to
5 object. I think that the limited purpose
6 for the scope of the deposition was to
7 identify Dr. Wright's Bitcoin holdings. And
8 these details go towards ownership, control,
9 et cetera, which we're gonna be covering
10 this afternoon.

11 THE COURT: I'll sustain that
12 objection.

13 BY MR. FREEDMAN:

14 Q. Dr. Wright, how much Bitcoin or -- sorry.
15 How much coin did you own -- all right. Let me
16 strike that.

17 How much coin did you control on June 25th,
18 2011?

19 A. None.

20 Q. How much coin did you control -- how much
21 Bitcoin did you control on -- how much coin did you
22 control on June 9th, 2011?

23 A. None.

24 Q. How much coin did you control on June 8th,
25 2011?

1 A. None.

2 Q. Dr. Wright, can you go to Plaintiffs'
3 Exhibit 5 for me, and go to Bates No. 50986.

4 A. Yes.

5 Q. And then if you go down to the second
6 number three, not the first. The one on the bottom
7 of the page.

8 A. Yes.

9 Q. Do you see where it says "All Bitcoin and
10 associated ledger assets transferred into Tulip
11 Trading, Ltd. by Mr. David Kleiman on Friday, 10th of
12 June, 2011" -- and this is the important part --
13 "following transfer to Mr. Kleiman from Dr. Wright on
14 the 9th June 2011"?

15 A. That is basically referring to the fact
16 that I had an encrypted file. And there were two
17 different aspects of this: One is the encrypted file
18 over all of my assets. I created the encrypted file
19 in May, which was the technical part of the solution.

20 In May of 2011, which I discovered because
21 my wife didn't leave Facebook, she didn't even
22 realize she had it, that while actually drunk after a
23 ATO hearing, I had posted what I was going to do
24 publicly.

25 Q. So if you go back to Plaintiffs'

1 Exhibit 2 --

2 A. Yes.

3 Q. -- and you look at Defense 2414 and 2415,
4 is this memorializing the technical part of the trust
5 that you created, that you created in May 2011?

6 MS. MCGOVERN: I'm sorry. Can you
7 repeat the question.

8 BY MR. FREEDMAN:

9 Q. Yes. Let me just rephrase it.

10 Dr. Wright, you created the technical
11 solution to take the Bitcoin out of your control in
12 May of 2011; is that correct?

13 A. The Bitcoin that you were saying as
14 mined --

15 Q. All right. Coin. Let me refer to coin. I
16 apologize. It's a bad question.

17 A. The -- the coin that you were saying were
18 mined, that was actually part of the software
19 process. So the two things: Coin that I mined
20 between 2009 and 2010 was taken out of my control.
21 The other aspect was Bitcoin I later purchased in
22 2011.

23 Q. When in 2011 did you purchase Bitcoin --
24 coin?

25 A. Between May and June 2011.

1 Q. How much did you purchase?

2 A. I purchased what was -- I had planned to
3 purchase a little over one million Bitcoin. I had
4 money on Liberty Reserve from gaming operations and
5 sports-book operations. That was around
6 30 million U.S. dollars. That \$30 million was
7 transferred into Bitcoin. The market, at the time,
8 was very illiquid, and I didn't realize exactly how
9 much it would impact the market.

10 And so I caused a price spike when I bought
11 this, a significant one. The price of Bitcoin
12 temporarily went from cents to about \$30 and then
13 dropped back down again. And I was not able to
14 purchase all of the Bitcoin that I had planned.

15 Q. How much Bitcoin -- how much coin did you
16 purchase?

17 A. Somewhere between 650 and 700,000.

18 Q. And where is that coin?

19 A. Some of it was spent in corporations that I
20 was funding, and the last amount -- there's a little
21 over 100,000 Bitcoin that should remain nominally in
22 my name. When a company that was helping manage it,
23 the principals of that company, called HySecure,
24 were arrested here in Florida a few years ago for
25 money laundering and extortion and a few other

1 things.

2 When the principals of HySecure were
3 arrested, the person who was managing that, a Rosella
4 Di Grazia, fled. The last I had tracked her is
5 somewhere in Belize.

6 Q. So in 2011 you purchased between 650 to
7 700,000 coin?

8 A. Yes.

9 Q. Subsequently spent all but a hundred
10 thousand of that coin?

11 A. Yes.

12 Q. That remains under the control of a woman
13 you can't locate?

14 A. Yes.

15 Q. That coin is not addressed at all in the
16 Tulip Trust documents you identified in your
17 declaration; is that correct?

18 A. No. That is the only one Dave ever knew
19 about. Dave did not know anything about how many
20 mined Bitcoin I had, as coin, you say. Dave had no
21 knowledge of what I was doing mining Bitcoin. He had
22 knowledge later on when he helped me clean up and
23 stop being Satoshi.

24 Q. So if you look at 2414, that's Plaintiffs'
25 Exhibit 2.

1 A. Yes.

2 Q. And if you look about a quarter of the way
3 down the page, "I acknowledge I, Dave Kleiman, have
4 received 1,100,111 Bitcoin from Craig Wright."

5 A. Yes.

6 Q. What is that?

7 A. We had everything set up as rights to
8 Bitcoin. Initially Liberty Reserve were holding and
9 then later principals from HySecure were holding.
10 The tax office in Australia knows all about this. It
11 was constructed so that Bitcoin would not come into
12 Australia because there was GST implications and
13 other tax implications at the time.

14 I constructed a scenario where I could
15 spend Bitcoin I purchased overseas without bringing
16 it into Australia, which we significantly -- well,
17 wrapped in a derivative that we called rights to
18 Bitcoin. I ended up having to go before the GAAR
19 panel, which is the General Anti-Avoidance Review
20 panel because the tax office argued that the creation
21 of rights to Bitcoin was effectively a tax-avoidance
22 scheme. I won that, even though the tax office
23 didn't agree, because effectively I didn't bring any
24 of the Bitcoin itself into Australia without paying
25 the GST, et cetera.

1 When I did bring some into Australia, I
2 filed a -- I can't remember the exact name of it, but
3 it's a -- a special process where they do a full
4 review. And then I took it -- it went to Canberra
5 and court -- C-A-N-B-E-R-R-A -- an Australian capital
6 territory, like Washington, D.C. here now.

7 Q. Dr. Wright, so I make this questioning --
8 line of questioning easier, I ask you to put
9 Plaintiff's Exhibit 4 and Plaintiff's Exhibit 1 in
10 front of you. These are the May 8th and May 13th
11 declarations that you've sworn are true. Let me know
12 when you've got them in front of you.

13 A. Four and which one?

14 Q. One.

15 A. Which one's one?

16 Q. There are two declarations.

17 A. Which one's one again?

18 Q. One is your May 13th declaration, and four
19 is your May 8th declaration.

20 A. Okay.

21 THE WITNESS: Is that one?

22 MS. MCGOVERN: This is, I guess, one.

23 THE WITNESS: Can you write one on that
24 for me, please?

25 MS. MCGOVERN: Yes.

1 THE WITNESS: Thank you.

2 MS. MCGOVERN: And four?

3 MR. FREEDMAN: Four.

4 THE WITNESS: I have four and one.

5 BY MR. FREEDMAN:

6 Q. Okay. Let's start at four.

7 In paragraph 4 you wrote "I mined Bitcoin
8 during the years 2009 and 2010."

9 Do you see that?

10 A. Yes.

11 Q. Okay. That's referring to coin, as we've
12 come to understand it.

13 Now, look at paragraph 5 -- sorry.

14 That's referring to coin? You mined coin,
15 as we've now defined word "coin"?

16 A. I ran Bitcoin, but it's still a very
17 simplified way the way you're describing it. No, I
18 didn't mine Bitcoin the way anyone else mined Bitcoin
19 at the time.

20 Q. But it resulted in coin appearing under
21 your possession, as I understand the word "coin" to
22 be?

23 A. No, it was not under my possession. I
24 mined directly into an algorithm that was owned, and
25 I had set up the Trust 0133224D, was constructed in

1 1997 in Panama. That was -- that is now no longer in
2 existence. That trust --

3 MS. MCGOVERN: Dr. Wright, please just
4 answer the question with respect to the
5 Bitcoin that you mined in the relevant time
6 period. That was the question.

7 BY MR. FREEDMAN:

8 Q. Dr. Wright, you said "I mined Bitcoin
9 during the years 2009 and 2010," correct?

10 A. I was the person employed by Wright
11 International. I, for Wright International, acted as
12 the IT person for my company and ran the computers
13 that created the ledger; and thus, straight into the
14 company that was owned by the trust, created Bitcoin.

15 Q. And that trust, then, created the coin that
16 you mined?

17 A. The trust controlled the company, and the
18 company had ownership of the coin.

19 Q. The trust -- okay.

20 Now, go to paragraph 5 of that same
21 exhibit. That's Plaintiffs' Exhibit 4.

22 And in paragraph 5 you say "In June
23 of 2011 --

24 A. Yes.

25 Q. -- "I took steps to consolidate the Bitcoin

1 that I mined" --

2 A. Yes.

3 Q. -- "with Bitcoin that I acquired" --

4 A. Yes.

5 Q. -- "and other assets"?

6 A. Yes.

7 Q. Again, coin.

8 You consolidated the coin that you mined --

9 A. No.

10 Q. -- and the coin that you purchased and
11 other assets?

12 A. Again, you're conflating the technical
13 solution and the legal trust. In June of 2011, I
14 took a step to create, over the technical solution I
15 already had, an over-arching structure that would
16 encapsulate the ownership from a tax perspective.
17 Because I was facing bankruptcy at the time, so I
18 sought to capture all of my companies and all of the
19 ownership of those assets.

20 Q. So on the paragraph 4 declaration, you said
21 "I mined Bitcoin during the years 2009 and 2010."
22 We've established already that that was coin that you
23 mined.

24 And then in the fifth paragraph you say "I
25 took steps to consolidate the Bitcoin that I mined."

1 A. Again, you're confusing the fact that I did
2 an act as an employee of a company I founded.

3 Q. Doctor, I'm not asking who did it. I'm
4 just asking whether you consolidated it. I don't
5 care that it says I or somebody or you were acting
6 nominally on behalf of a corporation. I understand
7 you say that you were now acting on behalf of a
8 corporation. I'm trying to get to where these coin
9 ended up. So let's just focus on that portion for a
10 minute. Okay?

11 I mined Bitcoin during the years 2009, 2010
12 for a corporation. That resulted in a corporation
13 and a trust controlling coin, correct?

14 A. No. As I've stated already, the control of
15 that coin was already in a technical solution. I
16 created a legal structure around that technical
17 solution.

18 Q. But what does it mean "I mined Bitcoin
19 during the years 2009, 2010"?

20 A. I mean, between that period, myself, as the
21 person who was employed by Wright International
22 Investment, as the principal, acted to run those
23 machines. Mining doesn't mean that I personally own
24 anything. Right now I have many staff who mined
25 Bitcoin.

1 MS. MCGOVERN: Dr. Wright, Mr. Freedman
2 is simply trying to identify the Bitcoin
3 that you owned or -- in whatever form,
4 through trusts or corporations through
5 December 13th -- I'm sorry, through
6 December 31st, 2013, which is the relevant
7 time period. That's what he's trying to get
8 to. So please just answer those questions.

9 THE WITNESS: He stated "controlled."
10 I did not have control.

11 MS. MCGOVERN: I understand. Just
12 simply answer his questions with respect to
13 identifying all of the Bitcoin during the
14 relevant time period.

15 BY MR. FREEDMAN:

16 Q. Dr. Wright, in paragraph 4 of your
17 declaration you wrote "I mined Bitcoin during the
18 years 2009 and 2010."

19 Is that true?

20 A. Once again, acting for Wright International
21 Investment, I acted to run the computers that acted
22 with what you're saying as mining.

23 Q. And mining Bitcoin resulted in coin being
24 created; is that correct?

25 A. No.

1 Q. Resulted in the companies that were mining
2 obtaining control over coin?

3 A. No.

4 Q. So you didn't get -- in paragraph 5 --

5 A. Twenty-one million minus a few Satoshi
6 Bitcoin always exist.

7 Q. Dr. Wright, there's no pending question.
8 Please wait for a pending question.

9 MS. MCGOVERN: Dr. Wright, please just
10 answer the question. And again, if we could
11 just focus -- Mr. Freedman is simply trying
12 to identify the Bitcoin.

13 THE WITNESS: His questions were all --

14 MS. MCGOVERN: Not necessarily the
15 control of the Bitcoin or the ownership of
16 the Bitcoin. Simply the Bitcoin.

17 THE WITNESS: It's technically wrong.

18 MS. MCGOVERN: I understand. Just
19 listen to the question and attempt to answer
20 the question.

21 BY MR. FREEDMAN:

22 Q. Dr. Wright, if this trust didn't exist and
23 this technical mechanism didn't exist and you had
24 mined all this Bitcoin, you would have access to
25 billions of dollars; is that correct?

1 A. It is not correct. If I didn't have it, I
2 would have destroyed it.

3 Q. The market refers to an underlying asset
4 called Bitcoin.

5 Do you know what the market refers to when
6 it says that?

7 A. What do you mean by "the market"? Sorry.

8 Q. When I -- if you go -- type into Google
9 Bitcoin, it will come up with a value.

10 Have you seen that?

11 A. Do you mean BTC? That is not Bitcoin.

12 Q. BTC.

13 A. I have nothing to do with BTC. It is not
14 Bitcoin.

15 Q. BTC stemmed from what you created in 2009;
16 is that correct?

17 A. BTC is a system designed by a number of
18 criminals to enable a non-traceable version of Silk
19 Road.

20 Q. Fine. Dr. Wright, let's look at your
21 Plaintiffs' Exhibit 2. Defense 2414.

22 Do you see in the quarter of the page, "I,
23 Dave Kleiman, have received one" --

24 MS. MCGOVERN: One -- one second.

25 MR. FREEDMAN: Oh, sorry. Go ahead.

1 Tell me when you're there.

2 MR. BRENNER: It's the attachment to
3 the e-mail.

4 MS. MCGOVERN: Okay. This is two.

5 BY MR. FREEDMAN:

6 Q. Dr. Wright, look about the quarter of the
7 way down, "I, Dave Kleiman, have received 1,100,111
8 Bitcoin from Craig Wright of [REDACTED] --
9 probably sure I messed that up -- "Bagnoo, New South
10 Wales, Australia. At the time of the transfer, this
11 is valued at 100,000 U.S. dollars."

12 What did you transfer?

13 A. A key slice.

14 Q. So you did not transfer 1,100,000 Bitcoin?

15 A. The actual transfer was rights to interact
16 with an account which basically existed on Liberty
17 Reserve at the time.

18 Q. So when you wrote "Bitcoin" in this
19 document, you actually meant key slice?

20 A. No. I meant the interaction with the
21 purchased Bitcoin. Dave knew about those. At the
22 time, they existed on Liberty Reserve.

23 Q. Now, you just said, "Bitcoin."

24 What did you mean when you said "Bitcoin"?
25 'Cause I'm not sure what you're referring to anymore.

1 A. Rights to Bitcoin. Rights to access on
2 Liberty Reserve an account-based system and spend, by
3 contacting a third party, something that was held on
4 Liberty Reserve.

5 Q. What was held on Liberty Reserve?

6 A. Rights to Bitcoin.

7 Q. What do you mean by "Bitcoin"?

8 A. I mean what you would consider coin if it
9 was transferred back to me.

10 Q. So, coin?

11 A. No. Rights to --

12 Q. Rights to coin?

13 A. Yes.

14 Q. Okay. So what did you mean when you wrote
15 in -- and let's look at your Exhibit 4, Plaintiffs'
16 Exhibit 4, your May 8th declaration, paragraph 4 --
17 when you wrote "I mined Bitcoin during the years 2009
18 and 2010"?

19 A. Again, while working for Wright
20 International Investments that was owned by a trust
21 that I had set up years before, I ran computers, and
22 that created software that then was put into a
23 technically-locked file.

24 Q. And as I understand the word "coin," was
25 coin somehow controlled by that technically-locked

1 file?

2 A. A file can't control anything.

3 Q. Did the file contain the ability to control
4 the -- the coin?

5 A. No.

6 Q. If somebody was able to access the file,
7 would they be able to control the coin?

8 A. Yes.

9 Q. Okay. So you mined Bitcoin into that file
10 between 2009 --

11 A. No.

12 Q. -- into -- into that software?

13 A. Yes.

14 Q. -- between 2009 and 2010?

15 A. Yes.

16 Q. And you created -- when did you -- was that
17 software -- when you -- strike that.

18 Was the software you created to mine the
19 Bitcoin into originally encrypted with Shamir's
20 Secret Sharing scheme?

21 MS. MCGOVERN: I'm going to object to
22 the line of questioning. I feel that we're
23 entering into the issue that we're gonna be
24 discussing at the evidentiary hearing
25 regarding the Shamir Scheme and the

1 fragmented keys and access to the addresses.

2 We've been discussing the Bitcoin
3 holdings for a while, but I think this line
4 of questioning is now going back to my
5 original objection, which the court
6 sustained.

7 MR. FREEDMAN: But that's because I
8 can't talk to your client about Bitcoin in
9 the abstract and his Bitcoin holdings
10 because he re- -- he insists on getting
11 hyper technical on the way that he held
12 them. So I have no way to ask him about the
13 holdings unless we gain -- engage --

14 MS. MCGOVERN: I think the purpose of
15 the deposition originally was to go to
16 London and ask Dr. Wright how much coin he
17 mined through companies, or however it was
18 done, through December 31st, 2013. It's a
19 simple question.

20 MR. FREEDMAN: I'll be happy to ask
21 that.

22 MS. MCGOVERN: And I think he can
23 answer that question, and we can move on to
24 the next category of national-security
25 objections that we also need to cover by

1 11:00 o'clock.

2 MR. FREEDMAN: So we just found out
3 that there -- we just found out that there
4 is coin and -- that he mined and that there
5 is coin that he purchased. And he
6 controlled all of those before
7 December 31st, 2013. We're just trying to
8 get to the details of what that was.

9 THE WITNESS: No, I did not control
10 them.

11 MS. MCGOVERN: Please don't -- please
12 just wait for a pending question,
13 Dr. Wright.

14 Mr. Freedman, we don't agree with that
15 statement.

16 MR. FREEDMAN: Okay.

17 MS. MCGOVERN: Again, this -- this is a
18 deposition. This is a limited deposition
19 with respect to the holdings. If the
20 question simply is all of the bit coin that
21 was held at any point in time through the
22 relevant time period, that's a simple
23 question that can be answered, and we can
24 move on.

25 THE COURT: I'll sustain the objection

1 to this level of detail in this hearing. At
2 the later hearing, we'll see where we go.

3 MR. FREEDMAN: Okay.

4 BY MR. FREEDMAN:

5 Q. Dr. Wright, between the years of 2009 and
6 2010, how much coin did you mine?

7 A. I mined 821,050 coin using software that
8 was not public, and --

9 MS. MCGOVERN: Simply answer the
10 question. He simply asked you how much.
11 Just answer that question.

12 THE WITNESS: There's two parts.

13 -- and -- and an amount of around
14 another hundred to 150 on a laptop, but I
15 don't have all of those coins. Most of them
16 have either been transferred or lost.

17 BY MR. FREEDMAN:

18 Q. Hundred or 150 or a hundred thousand?

19 A. 100 to 150. Sorry. That means blocks, by
20 the way.

21 Q. 150 blocks?

22 A. Between a hundred and 150 blocks.

23 Q. And how many coin does that translate into?

24 A. Times 50.

25 Q. All right. Dr. Wright, I'm going to move

1 to the national-security section, but we may come
2 back to the -- to the coin -- the coin holdings if we
3 have time.

4 Dr. Wright, you participated in
5 videoconference with Dave Kleiman while you were in
6 New York City sometime in 2011, correct?

7 A. Yes.

8 Q. An individual by the name of Gareth
9 Williams was at that meeting; is that correct?

10 A. He wasn't at that meeting.

11 Q. Where was Gareth Williams?

12 A. He was in the UK.

13 Q. He was participated via videoconference?

14 A. Well, it was not really videoconference,
15 but electronic means.

16 Q. What were the means?

17 A. We used technical solutions that aren't
18 actually a videoconference.

19 Q. Okay. And it -- is that the same way Dave
20 Kleiman participated?

21 A. Yes.

22 Q. And Mr. Williams was in the UK?

23 A. Yes.

24 Q. You were in New York?

25 A. Yes.

1 Q. Is that correct?

2 A. Yes.

3 Q. And Dave Kleiman was in Florida?

4 A. To the best of my knowledge, yes.

5 Q. Where in New York were you?

6 A. I don't remember the name of the hotel.

7 Q. What was the purpose of your trip?

8 A. I was on my way to Venezuela.

9 Q. What were you going to do in Venezuela?

10 A. I was doing forensic work.

11 Q. For who?

12 A. I was doing forensic work with a group
13 associated with ICE. We were tracking movement of
14 money associated with FARC and FARC/V.

15 Q. What is ICE?

16 A. ICE is customs enforcement here in the U.S.

17 Q. Was there anyone else at the meeting
18 between you and Mr. Williams and Dave Kleiman?

19 A. No.

20 Q. How long did the meeting last?

21 A. Less than half an hour.

22 Q. What was the purpose of the meeting?

23 A. I was discussing tracking of SWIFT-based
24 assets, and Mr. Williams also had -- Mr. Williams had
25 a theory that a number of Russian oligarchs and

1 Mr. Clinton had a relationship.

2 Q. What -- what was the relationship?

3 A. He believed that Putin was funding the
4 Clintons.

5 Q. And how did that involve you?

6 A. I helped train Mr. Williams.

7 Q. Who -- who was Mr. Williams?

8 A. Mr. Williams was formally of mi6. He was
9 of GCHQ. He was an operative involved in the tracing
10 of monetary funds between different European
11 countries over SWIFT.

12 Q. So was he working for the -- the United
13 Kingdom Government -- sorry. Strike that.

14 Was he working in his capacity as an agent
15 for the Untied Kingdom Government when he
16 participated in this call with you?

17 A. Only partially.

18 Q. Why do you say "only partially"?

19 A. Because he took software that I wrote and
20 he used it to break into American servers because he
21 had -- had this bee in his bonnet about the Clintons.

22 Q. And why did you involve Dave Kleiman in
23 that conversation?

24 A. I wanted to clean up everything to do with
25 Satoshi. Dave was not only my friend, but he's a

1 forensic expert. I wanted to ensure that there was
2 no record of my being Satoshi left.

3 Q. What does that -- what does that have to do
4 with Mr. Williams' theory about the Clintons and
5 Putin?

6 A. Mr. Williams was a little bit like me, in
7 that when he gets focussed on one thing, he keeps
8 going back to it.

9 Q. I'm -- I still don't understand.

10 Can you elaborate what the connection
11 between your connection to Satoshi and Mr. Williams'
12 theory about Putin and the Clintons? I don't
13 understand the relationship.

14 A. Mr. Williams helped me with some of the
15 nature of SWIFT transfers and monetary transfers with
16 data around e-gold and other things that were using
17 to fund crime as well as movements of Russian
18 Government money.

19 Q. And how did that connect to erasing your
20 connection to Satoshi?

21 A. Part of that was to do with the fact that
22 Bitcoin was created as a system so that people
23 couldn't bypass controls around things like SWIFT.
24 Bitcoin was created as a system of money with an
25 evidentiary trial that could not be bypassed. It was

1 designed to be private so that the NSA, who
2 Mr. Williams had been seconded to, couldn't monitor
3 everyone's transactions; but people like the State
4 Department, who would take down individual
5 transactions and follow these, so that they could do
6 good old-fashioned policing, so to speak, and analyze
7 the transactions between individuals, such as in drug
8 markets or other crimes.

9 Q. How did that have to do with you erasing
10 your connection to Satoshi?

11 A. We had a communication before I left to go
12 to Venezuela, where Dave and Mr. Williams were all on
13 the line. Mr. Williams had helped me in the early
14 days when I was creating Bitcoin. And no one else,
15 other than Dave and Mr. Williams, knew at that point
16 that I was definitively Satoshi or what I've done.

17 Q. And when -- what was the date of this call,
18 video call?

19 A. I don't remember the exact date.

20 Q. And what did Dave Kleiman say during this
21 call?

22 A. I don't remember his exact talks, but he
23 was willing to help me because we had been friends a
24 long time. He was --

25 Q. When -- go ahead.

1 A. He was willing to help me get rid of all of
2 the past.

3 Q. Was this call the time when Dave found out
4 you were Satoshi?

5 A. No.

6 Q. And you made that ask of both Dave Kleiman
7 and Gareth Williams to help you erase your
8 connections to Satoshi on that call?

9 A. Yes. I agreed with Gareth that if
10 Mr. Williams deleted all the records of what I was
11 doing and helped me, that I would help him with
12 software that was necessary for some of his
13 investigations that were outside the scope of his
14 normal work.

15 Q. So you reached an agreement that he would
16 delete the records of you being Satoshi. What --
17 strike that.

18 What records did you ask Mr. Williams to
19 delete?

20 A. Communications between myself and him.

21 Q. And what were the contents of those --
22 sorry. Strike that.

23 And the content of those communications
24 would have revealed you being Satoshi?

25 A. Some of them, yes.

1 Q. What method of communication did you use
2 with Mr. Williams?

3 A. We used the number of encrypted channels,
4 including things like Cryptcat.

5 Q. Did you use Bitmessage?

6 A. No. It didn't exist at that point.

7 Q. Was Mr. Williams involved in Bitcoin in any
8 way beyond helping you -- beyond agreeing to delete
9 the records of you belonging to Satoshi?

10 A. Yes.

11 Q. How was Mr. Williams involved?

12 A. Mr. Williams was a very good mathematician,
13 and I used his skill of knowledge in analyzing graph
14 theory in associated with the creation of Bitcoin and
15 some of the mining algorithms that I was planning to
16 implement.

17 Q. Dr. Wright, you helped the U.S. Government
18 build cases and apprehend Viktor Bout?

19 A. I was involved with giving evidence or
20 producing evidence.

21 Q. Can you tell me about that a little bit.
22 What work did you do in that case?

23 A. I created software to break encryption and
24 to put back doors in systems allowing the capture of
25 data.

1 Q. Did the U.S. Government reach out to you
2 for that help?

3 A. No.

4 Q. Who reached out to you to provide that
5 assistance?

6 A. I had contacts with people like
7 Mr. Williams who worked for GCHQ.

8 MS. MCGOVERN: Your Honor, I'm going to
9 object to this extended line of questioning.
10 I believe the limited scope of the
11 deposition at the deposition was for
12 purposes of identifying individuals involved
13 or, as the claim -- or, as the Plaintiffs
14 believed, were involved in the Bitcoin
15 system. And this goes beyond that.

16 THE COURT: I'll sustain that
17 objection.

18 BY MR. FREEDMAN:

19 Q. Dr. Wright, you were also involved --

20 THE COURT: Just to let you know,
21 Mr. Freedman, you have five minutes left.

22 MR. FREEDMAN: I see. Can we take a
23 short break, then?

24 THE COURT: Yeah.

25 MR. FREEDMAN: Thank you.

1 THE COURT: Just so the record is
2 clear, we started at approximately 9:17, and
3 there was another five-minute break when I
4 was unavailable. It's now 11:15. So I was
5 gonna give you two extra minutes for
6 approximately five minutes. If you want to
7 take a second and organize yourself, we can
8 go off the record at this time.

9 MR. FREEDMAN: Yes. Thank you. Let's
10 go off the record.

11 VIDEO TECHNICIAN: Off the record at
12 11:14.

13 (A recess was taken.)

14 VIDEO TECHNICIAN: On the record at
15 11:21.

16 BY MR. FREEDMAN:

17 Q. Doctor, I'm going to ask you a series of
18 questions. In the interest of time, I'm gonna to ask
19 if you can answer them with a yes or no.

20 Sometime on or about June 24th, 2011, did
21 you transfer 1,100,111 Bitcoin to Dave Kleiman?

22 A. No.

23 Q. After that transfer, did you own any
24 Bitcoin?

25 A. Yes.

1 Q. Did you control any Bitcoin?

2 A. Yes.

3 Q. Did Dave Kleiman transfer the Bitcoin you
4 transferred to him in Tulip Trading on or about June
5 10th, 2011?

6 A. I didn't transfer Bitcoin. I just said
7 that.

8 Q. Did Dave Kleiman transfer any Bitcoin to
9 Tulip Trading on or about June 10th, 2011?

10 A. No.

11 Q. Were any Bitcoin then transferred by Tulip
12 Trading into the trust you called Tulip Trust 1?

13 A. Sorry. Can you repeat that?

14 Q. Were any Bitcoin transferred by -- by Tulip
15 Trading into the trust you called Tulip Trust 1?

16 A. No.

17 Q. Where are those Bitcoin now? Oh, sorry. I
18 apologize.

19 Where are the Bitcoin in Tulip Trust 1 now?

20 A. Sorry. I have to go over which one is
21 which.

22 You mean what we're calling mined coin?

23 Q. Yeah.

24 A. They are in an encrypted file, is the
25 simplest way to put it. The software can generate

1 all of the private -- the private keys. The software
2 is in an encrypted file where different shares are --
3 are constructed. Every file has a different Shamir
4 Secret Scheme.

5 Q. Were there a million Bitcoin?

6 A. No.

7 Q. How many are there now?

8 MS. MCGOVERN: Object to form.

9 THE WITNESS: There were --

10 BY MR. FREEDMAN:

11 Q. Sorry? How many are there now?

12 MS. MCGOVERN: Object to form.

13 BY MR. FREEDMAN:

14 Q. You can answer.

15 A. There has been no difference in the Bitcoin
16 that my software was engaged in mining. It is
17 821,050.

18 Q. Did you pay that sum of Bitcoin to the
19 trustee of Tulip Trust 2?

20 MS. MCGOVERN: Object to form.

21 THE WITNESS: No, I didn't pay
22 anything.

23 BY MR. FREEDMAN:

24 Q. What is the difference between the
25 1.1 million Bitcoin in Tulip Trust in the Dave --

1 sorry. Strike that.

2 What is the difference between the 1.1
3 Bitcoin referenced in Dave Kleiman's e-mail
4 attachment and the 821,000 Bitcoin in Tulip Trust 1?

5 A. The Bitcoin I was involved in, what you're
6 saying is, me -- my -- like I'm saying I mined for my
7 companies, was Tulip Trust 1. That was between
8 January 2009 and August 2010. That is separate to
9 the Bitcoin that was purchased from Liberty Reserve
10 and held by other entities at a later date.

11 Q. And what is the difference between Tulip
12 Trust 1 and Tulip Trust 2?

13 A. Basically we went through a number of
14 different structures to put around as legal controls
15 each of these structures. The IP and intellectual
16 property that I had held from my creation of Bitcoin
17 was held separately to the rights to Bitcoin that I
18 was holding on the Liberty Reserve and other external
19 exchanges.

20 Q. So the 821,000 Bitcoin you mined is
21 controlled legally and tech- -- legally by Tulip
22 Trust 1 and Tulip Trust 2; is that correct?

23 A. No.

24 Q. It's controlled technologically by Tulip
25 Trust 1 and legally by Tulip Trust 2?

1 A. No.

2 Q. Tulip Trust 2 -- in Tulip Trust 2 it says
3 at paragraph 10 "One key slice will go to each
4 trustee with three issued to Dr. Wright."

5 Why is a legal document discussing key
6 slices?

7 MS. MCGOVERN: Which -- which exhibit
8 are you on?

9 MR. FREEDMAN: It's 50986, and it's
10 Exhibit 5.

11 THE WITNESS: As I stated, this was a
12 document put together not by myself but by
13 other parties and needed to be updated and
14 changed because none of the parties involved
15 understood what I was actually doing.

16 BY MR. FREEDMAN:

17 Q. What is the amount of Bit- -- what was the
18 amount of Bitcoin -- what is the most amount of
19 Bitcoin in Tulip Trust 1?

20 A. In Tulip Trust 1, I don't remember, but the
21 total purchase that ended up resulting was a little
22 under 700,000.

23 Q. What is the most amount of Bitcoin in Tulip
24 Trust 2?

25 A. I'm sorry. Tulip Trust 1 should -- I got

1 them the wrong way around. I apologize.

2 The Bitcoin that I, as you said, mined for
3 my entity, was always, at the end, 821,050. It --
4 it's no change. It's never been spent. It's never
5 been moved. It's never been interacted with. The
6 other one that I purchased was a little under
7 700,000.

8 Q. So the million Bitcoin doesn't exist?

9 A. No.

10 Q. And Dr. Wright, Tulip Trust 1 document and
11 the Tulip Trust 2 document, when did you obtain
12 possession of those two documents?

13 A. I don't remember.

14 MS. MCGOVERN: I'm going to object to
15 the question. Outside the limited scope,
16 the subject of the deposition.

17 THE COURT: I'll let him answer that
18 question.

19 THE WITNESS: I don't remember. I have
20 company files. I don't remember when they
21 were sent to me.

22 MR. FREEDMAN: Okay. We're going to --
23 I'm going to end the deposition, but I
24 reserve the right, obviously with the
25 court's approval, to move for more time

1 based on what I perceive to be the extreme
2 difficulty of getting answers to questions
3 from Dr. Wright.

4 THE COURT: If that issue is presented
5 to me, I will allow the other side to be
6 heard if it is presented. But for now,
7 we'll stop the deposition for today. We
8 need to let the videographer -- we can go
9 off the record on the deposition.

10 VIDEO TECHNICIAN: Off the record at
11 11:28.

12 (Signature was not waived. The
13 deposition concluded at 11:28 a.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that DR. CRAIG STEVEN WRIGHT personally appeared before me and was duly sworn on June 28, 2019.

WITNESS my hand and official seal this 30th day of June 2019.



Darline Marie West

DARLINE MARIE WEST
Notary Public

My Commission Expires:
October 26, 2021
#GG 122085

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REPORTER'S CERTIFICATE

STATE OF FLORIDA
COUNTY OF PALM BEACH

I, DARLINE MARIE WEST, RPR, certify that I was authorized to and did stenographically report the foregoing deposition; and that the transcript is a true record thereof.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Dated this 30th day of June 2019.



DARLINE MARIE WEST, RPR

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C E R T I F I C A T E

STATE OF FLORIDA
COUNTY OF PALM BEACH

I, DR. CRAIG STEVEN WRIGHT, hereby certify that I have read the foregoing transcript of my deposition and that the statements contained therein, together with any additions or corrections made on the attached Errata Sheet, are true and correct.

Dated this _____ day of _____, 2019.

DR. CRAIG STEVEN WRIGHT

The foregoing certificate was subscribed to before me this _____ day of _____, 2019, by the witness who has produced a _____ as identification and who did not take an additional oath.

Notary Public
my commission expires:

1 E R R A T A S H E E T

2 IN RE: Kleiman, et al. v. Wright

3 DEPOSITION OF: DR. CRAIG STEVEN WRIGHT

4 TAKEN: 06/28/2019

5 Reported by: Darline Marie West, RPR, FPR, CLR

6 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE

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20 Please forward the original signed errata sheet to
this office so that copies may be distributed to all
21 parties.

22 Under penalty of perjury, I declare that I have read
my deposition and that it is true and correct subject
23 to any changes in form or substance entered here.

24 DATE: _____

25 SIGNATURE OF DEPONENT: _____

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