

CONFIDENTIAL UNDER THE TERMS OF THE CONFIDENTIALITY AGREEMENT

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 18-cv-80176

IRA KLEIMAN,
as personal representative of
the estate of David Kleiman,

Plaintiff,

v.

CRAIG WRIGHT,

Defendant.

DECLARATION OF CRAIG WRIGHT

I, Craig Wright, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am over the age of 18, and I am competent to testify.
2. I give this declaration based on my personal knowledge.
3. On May 7 and 8, 2019, I met with my counsel in the United Kingdom to provide them with additional details and clarity regarding trusts that I settled that hold or held Bitcoin that I mined or acquired on or before December 31, 2013.

Tulip Trusts

4. I mined Bitcoin during the years 2009 and 2010. I mined that Bitcoin directly into a trust, named [REDACTED].
The trust was located in Panama. No formal trust documentation was executed regarding the Bitcoin. There are no transactions related to the Bitcoin that I mined. I

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later transferred the encrypted files that control access to these Bitcoin in 2011, as explained below.

5. In June of 2011, I took steps to consolidate the Bitcoin that I mined with Bitcoin that I acquired and other assets. In October 2012, a formal trust document was executed, creating a trust whose corpus included the Bitcoin that I mined, acquired and would acquire in the future. The name of that trust is TulipTrust. It was formed in the Seycelles. I refer to this trust below as Tulip Trust I.

6. While the trustee was initially David Kleiman, additional trustees were appointed upon the execution of the formal trust document.

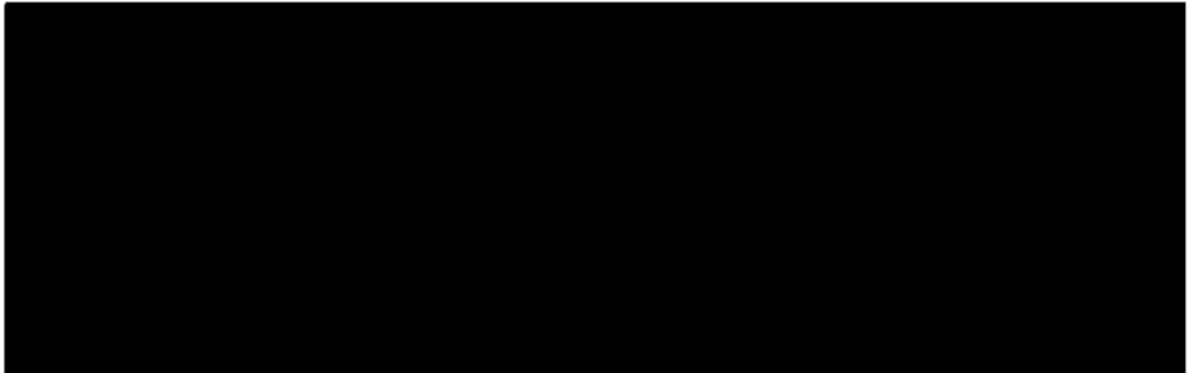
7. The trustees for Tulip Trust I are:

- a. the company in the UK registered by # [REDACTED], which is COIN Ltd. UK. This company was dissolved on July 4, 2017;
- b. Ms Uyen Nguyen;
- c. Craig Steven Wright;
- d. David Kleiman;
- e. Panoptcrypt Pty. Ltd. (ABN [REDACTED]), an Australian entity now in liquidation;
- f. Savanah Ltd., a Seycelles entity; and
- g. the holder of PGP key IDs [REDACTED]
[REDACTED], which is Satoshi Nakamoto (i.e., Craig Wright).

8. I have not been in touch with Ms. Nguyen since 2016. The last contact information I have for her is as follows:

[REDACTED]

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9. The contacts at COIN were Dave Kleiman and Ms. Nguyen, who was terminated as a director on June 1, 2016. Presently, there is no one other than myself who was a contract person for this entity.

10. Craig Steven Wright may be contacted through Rivero Mestre LLP.

11. The contact person for Panoptcrypt Pty. Ltd., prior to liquidation, was Ramona Watts. Ms. Watts may be contacted through Rivero Mestre LLP.

12. My individual point of contact for Savannah Ltd. was Denis Mayaka, whose email addresses are [REDACTED] and [REDACTED].

13. The beneficiaries of Tulip Trust I are Wright International Investments Ltd. (IBC [REDACTED]) and Tulip Trading Ltd. (IBC [REDACTED]).

14. I am the contact person for both beneficiaries. I can be contacted through my counsel Rivero Mestre LLP.

15. From 2011 through 2013, I directed staff at HighSecured and Signia Enterprises to acquire Bitcoin on the market and hold it on behalf of the Tulip Trust.

16. The principals of HighSecured were arrested in 2015. The balance of Bitcoin purchased and held remains unaccounted for.

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17. My primary contact at HighSecured was Ritzela DeGracia. Her email address was [REDACTED]. In attempts to locate her, I learned of the following address and phone number: [REDACTED]. All attempts to reach her at that phone number, however, have been met with no response.

18. In 2014, I settled a trust, also known as the Tulip Trust, in the Seychelles (registered trust number T000712). I refer to this trust as Tulip Trust II.

19. The trustee for Tulip Trust II is Equator Consultants AG. My contact person is Denis Mayaka, whose contact information is: [REDACTED] and [REDACTED]. Mr. Mayaka prepared an organogram that documents the trust.

20. The primary beneficiaries of Tulip Trust II are me and my wife, Ramona Watts.

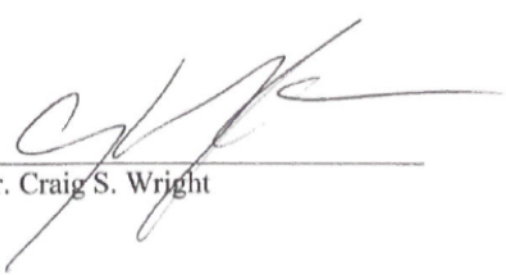
21. The secondary beneficiaries of this trust are [REDACTED]

22. All beneficiaries may be contacted through my attorneys, Rivero Mestre, LLP.

23. Access to the encrypted file that contains the public addresses and their associated private keys to the Bitcoin that I mined, requires myself and a combination of trustees referenced in Tulip Trust I to unlock based on a Shamir scheme.

I declare that the foregoing is true and correct under penalty of perjury and in accordance with the laws of the United States of America.

This sworn declaration was signed in London on May 8, 2019.



Dr. Craig S. Wright

