

Amended pursuant to CPR rule 17.1(2)(a) and pursuant to the Consent Order of Deputy Master Arkush dated 13 September 2021

Re-Amended pursuant to the Order of Judge Matthews dated 9 March 2022 and pursuant to CPR rule 17.1(2)(a)

Re-Re-Amended by order of Master Clark made following the hearing of 3 March 2023

Re-Re-Amended by order of Mellor J made following the hearing of 12 October 2023

Claim No: IL-2021-000019

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

INTELLECTUAL PROPERTY LIST

BETWEEN:

CRYPTO OPEN PATENT ALLIANCE

(for itself and as Representative Claimant on behalf of Square, Inc., Payward Ventures, Inc. (DBA Kraken), Microstrategy, Inc., and Coinbase, Inc.)

Claimant

– and –

CRAIG STEVEN WRIGHT

Defendant

RE-RE-RE-AMENDED PARTICULARS OF CLAIM

The Claimant

1. The Claimant, Crypto Open Patent Alliance (abbreviated to ‘COPA’), is a US-based non-profit mutual benefit corporation established in September 2020. It was formed to encourage the adoption and advancement of cryptocurrency technologies and to remove barriers to growth and innovation in the cryptocurrency space. As at the date of these Re-Re-Re-Amended Particulars of Claim it has ~~34~~ 36 members.

2. COPA is incorporated under the laws of the state of California. It has a registered address of 3000 El Camino Real, Building Two, Suite 900, Palo Alto, CA 94306 and California entity number C4638946.

Representative Claimant

2A The Claimant is a representative claimant under CPR 19.6. The parties with the same interests in this dispute who are represented by the Claimant are:

2A.1 Square, Inc.:

2A.2 Payward Ventures, Inc. (DBA Kraken):

2A.3 Microstrategy, Inc.; and

2A.4 Coinbase, Inc.

(collectively the “**Represented Parties**”)

2B The Claimant brings these proceedings on its own behalf and as representative claimant on behalf of the Represented Parties. The Claimant and the Represented Parties have the same interest in the outcome of these proceedings as they host the Bitcoin White Paper. The Represented Parties have consented to be represented by the Claimant in this matter and accept to be bound by any judgment or order as required by CPR 19.6(4).

The Defendant

3. The Defendant (hereinafter “**Wright**”) is a resident of England and Wales.

Bitcoin Definition and Relevant Concepts

4. Bitcoin is a type of cryptocurrency developed in 2008 and based on concepts first set out in a paper entitled “Bitcoin: A Peer-to-Peer Electronic Cash System”. Bitcoin is a decentralised form of digital currency that eliminates the need for traditional intermediaries such as banks and governments to enable financial transactions. Bitcoin can be transferred from user to user using a peer-to-peer network, with transactions being verified through a decentralised consensus mechanism by networked computer “nodes” that run Bitcoin software (the

“Bitcoin Network”). The computer nodes record the verified transactions in a distributed ledger called a blockchain, which is public and maintained independently by the computer nodes.

5. Bitcoin transactions make use of public-key cryptography to create key pairs that allow users to transfer Bitcoin. Each user’s key pair consists of a private key and - derived from it - a unique public key. An algorithm is applied to the private key to generate the public key (so the public key is derived from and correlated to the private key). A Bitcoin address (derived from, and a shorter version of the public key) is shared publicly and used as the address for a recipient to be able to receive funds, and the private key is used by a sender to sign (i.e. to authenticate) transactions to be able to transfer their Bitcoins to a recipient. The private key, essentially a user’s digital password, is required for the user to spend, withdraw, transfer, or carry out any other transaction.
6. When a person transfers Bitcoin to another, the sender signs the transaction with their private key, and posts the transaction to the Bitcoin Network. The Bitcoin Network verifies the transaction as being valid (by making sure the sender is not “double spending” any portion of Bitcoin the sender has already spent) before adding the transaction to the Bitcoin blockchain.

The Release of Bitcoin

The Bitcoin White Paper

7. The paper entitled “Bitcoin: A Peer-to-Peer: Electronic Cash System” was released on 31 October 2008 under the name Satoshi Nakamoto to the “metzdowd [cryptocurrency cryptography](#)” mailing list, a mailing list made up of people with an interest in [cryptocurrencies cryptography](#). It was also hosted on Sourceforge from around 9 November 2008 where it was published under the MIT License. It was posted on Sourceforge.net on 24 March 2009 (“**the Bitcoin White Paper**”). It is included in **Annex 1** to these [Re-Re-Re-Amended](#) Particulars of Claim. It is averred that Satoshi Nakamoto is a pseudonym for an unknown person or group of people (hereinafter “**Satoshi**”). Wright claims to be Satoshi, an assertion that is widely disputed.

8. The Bitcoin White Paper introduced and set forth the framework of Bitcoin. It defines a decentralised peer-to-peer protocol that can track and verify digital transactions, prevent double-spending, and generate a transparent record in the form of a shared ledger for anyone to inspect in nearly real-time. The Bitcoin White Paper also defines, *inter alia*, the steps required to operate as a computer node of the Bitcoin Network.
9. Prior to the release of the Bitcoin White Paper, Satoshi had shared a draft of the Bitcoin White Paper ~~in on~~ in ~~on~~ 22 August 2008 (the “**Draft Bitcoin White Paper**”) with a group of individuals. The identities of all those with whom it was shared are not known.

The first Bitcoins

10. It is averred that Satoshi ~~mined~~ created the first block of the Bitcoin blockchain, on the basis of the framework set forth in the Bitcoin White Paper, on 3 January 2009. This is referred to as Block 0 or the ‘Genesis Block’ (the “**Genesis Block**”). The second block, Block 1, was mined on 9 January 2009. The first transaction within the Bitcoin blockchain is recorded in Block 170 and corresponds to a transfer of 10 Bitcoins from Satoshi to Hal Finney, a computer scientist. The Bitcoins in this transaction were created as a result of the mining of Block 9.

Release of the Bitcoin source code

11. On 8 January 2009, Satoshi published a link to the first release of the Bitcoin executable file and the related source code on Sourceforge, again notifying the metzdowd ~~cryptocurrency~~ cryptocurrency ~~cryptology~~ cryptology mailing list (the “**Bitcoin Code**”). The Bitcoin Code on Sourceforge included the following: the Bitcoin White Paper in a “Research Paper” subfolder; archives containing the source code in a “Bitcoin” subfolder; and a list of project attributes, including “Programming Language: C++,” “Release Date: 2009-02-04,” and “License: MIT License”.
12. Since the release of Bitcoin in January 2009, both the Bitcoin Code and Bitcoin White Paper have been widely published and disseminated throughout the world.

Wright's claim to ownership of copyright in the Bitcoin White Paper

13. Initial claims that Wright purports to be Satoshi first appeared in mainstream media in December 2015, including in an article published by WIRED magazine on 8 December, which claimed that Wright was Satoshi. Three days later, on 11 December 2015, WIRED retracted its assertion by publishing an article entitled, "New Clues Suggest Craig Wright, Suspected Bitcoin Creator, May be a Hoaxer" (together, the "**WIRED Articles**").
14. Initially, Wright did not publicly accept WIRED's initial article proposing he may be Satoshi. However, on 2 May 2016, Wright publicly proclaimed, through a number of press outlets, that he was Satoshi and therefore the creator of Bitcoin. In so doing, he claimed authorship of the Bitcoin White Paper, as discussed further below. Wright has since that date maintained that he is Satoshi but has failed to validate that claim.
15. Prior to 2016 Wright had never publicly suggested or claimed he was Satoshi.
16. As the claimed author of the Bitcoin White Paper, Wright also claims to be the first owner of copyright in it pursuant to s.11 of the Copyright Designs and Patents Act 1988.

Wright's failed attempts to prove he is Satoshi

17. Wright has failed to provide any credible evidence that he is Satoshi despite publicly pronouncing he would do so on numerous occasions. On several occasions when Wright has chosen to proffer evidence that supports his claim, that evidence has been shown to be inauthentic, or of, at the very least, questionable authenticity or provenance.
18. Following the publication of the WIRED Articles in late 2015, Wright entered into a contract with a company called EITC on 17 February 2016 (the "**EITC Agreement**"). Under the EITC Agreement, Wright agreed:
 - 18.1. That there would be a public announcement that Wright was Satoshi pursuant to clause 2(c)(4).

18.2. That Wright would be interviewed and would “answer all questions put to him in a full, frank and truthful manner, including providing all such detail and information as he is able” pursuant to clause 4(a).

19A Under the EITC Agreement, Wright was paid AUS\$1,000,000 in consideration for the ‘Rights’ in order for EITC Holdings Limited to be able to commercially exploit Wright’s life story. The following terms were defined in the EITC Agreement:

“‘Rights’ means any and all rights, title and interest, throughout the world, in and relating to (1) the Story; (2) the Subject’s Materials; and (3) the Works...”

“‘Subject’s Materials’ means all information, documents, photographic and audiovisual works, email correspondence, electronic files and records, computer software applications and code, and any other documentary or other records relevant to the Story. This shall include at least 400 photographs, to [be] supplied by the Subject to the Buyer, covering the full period of the Subject’s life and including a selection of photographs of all the significant events of the Subject’s life”

“‘Story’ means the entire life story of the Subject both prior to and following this Agreement, including but not limited to the matters set out at Annex A hereto, provided however that the Story shall not include any personally identifiable information relating to the Subject’s family, without Subject’s reasonable consent”

19B Annex A to the EITC Agreement described Wright’s life story as including “the history of his career and professional work and research, and the history of the creation of and continued work on Blockchain technologies, Bitcoin, cryptocurrency...”. Annex A described Wright as “the inventor of the Blockchain technology and Bitcoin, which he released in November 2008 by way of a whitepaper under the pseudonym Satoshi Nakamoto”.

19C In the premises, the Claimant infers that prior to entering into the EITC Agreement Wright provided documents, such as those defined as being the ‘Subject’s Materials’, or other information, in order to convince EITC Holdings

Limited to enter into the EITC Agreement and pay Wright the sum of AUS\$1,000,000. It is inferred that such documents or information were said to prove that he was the person behind the pseudonym Satoshi and the author of the Bitcoin White Paper. It is averred that EITC Holdings Limited would not have entered into the EITC Agreement without Wright (or another on his behalf) having furnished some form of documents or information that would, on their face, indicate that Wright was Satoshi. The Claimant is not privy to the nature of any documents or information provided by Wright (or another on his behalf) prior to the entering into of the EITC Agreement, but avers that such documents or information would cast light on Wright's claims to be Satoshi. Wright has not, to date, publicly revealed the nature of the documents or information that he (or another on his behalf) shared with EITC Holdings Limited (or another party associated with it) in order to seek to persuade them to enter into the EITC Agreement and pay him the sum of AUS\$1,000,000.

19D It is further inferred that following the execution of the EITC Agreement, Wright provided the 'Subject's Materials' to EITC Holdings Limited or another party associated with it, in order to comply with his obligations under the EITC Agreement. Wright has not, to date, publicly revealed the nature of the documents or information that he (or another on his behalf) shared with EITC Holdings Limited (or another party associated with it) following the execution of the EITC Agreement. The Claimant is not privy to the nature of any documents or information provided by Wright (or another on his behalf) after the entering into of the EITC Agreement, but avers that such documents or information would cast light on Wright's claims to be Satoshi.

19. Pursuant to those contractual obligations, Wright conducted a number of interviews which were supposed to demonstrate that he was Satoshi. These interviews were subject to a reporting embargo and could not be published until 2 May 2016. One of these interviews was with GQ Magazine, who interviewed Wright on 26 April 2016. This interview was conducted by a journalist, Stuart McGurk, who was accompanied by a Bitcoin expert from University College London, Dr Nicholas Courtois (the “**GQ Interview**”). During this interview Wright stated:

“I'm not going to sign every fucking key I own in the world. I've got the first fucking nine keys, I've got the fucking genesis bloody block, I've got the fucking code, I've got the fucking papers. I'm not going to go through fucking everything. I don't really give a shit whether people like it.”

20. When the reports, including the GQ article, were made public on 2 May 2016 following the lifting of the reporting embargo, Wright also made simultaneous public proclamations on his own on his blog on 2 May 2016 that he was indeed Satoshi. Wright then publicly offered, in a further blog post on [3 4](#) May 2016, to provide “extraordinary proof” of his claims, stating:

“Over the coming days, I will be posting a series of pieces that will lay the foundations for this extraordinary claim, which will include posting independently-verifiable documents and evidence addressing some of the false allegations that have been levelled, and transferring bitcoin from an early block.

For some there is no burden of proof high enough, no evidence that cannot be dismissed as fabrication or manipulation... You should be sceptical. You should question. I would. I will present what I believe to be 'extraordinary proof' and ask only that it be independently verified. Ultimately, I can do no more than that.”

21. Accordingly, Wright has publicly asserted that one of the ways he can prove he is Satoshi is by referencing his ability to make transactions associated with the Genesis Block and other early Blocks. To date, Wright has failed to do so.
22. Wright has stated that he proposes to establish his authorship of the Bitcoin White Paper by reference to documents that he claims to exist, including drafts of the Bitcoin White Paper. Wright has in these proceedings declined to provide information under the Pre-Action Protocol identifying any such drafts. The following are particulars of occasions on which Wright has proffered documentary evidence which purports to (but does not) support his claim to be Satoshi.

(1) The Sartre Message

23. On 2 May 2016, the various press outlets with whom Wright had collaborated to try to demonstrate he was Satoshi published their articles on the ‘proof’ that Wright had given. Wright had sought to show that he was Satoshi to BBC and Economist journalists by demonstrating current possession of one of Satoshi’s private keys. Wright sought to demonstrate his possession of such a private key by signing a message with the private key.
24. Wright claimed to present a message, a hash of the message, and a signature of the hash in the form of the text of a speech by Jean-Paul Sartre (the “Sartre Message”). The signature was purported to correspond to a private key associated with Bitcoins mined in Block 9 of the Bitcoin blockchain (which are believed to be Bitcoins mined by Satoshi).
25. However, the Sartre Message offered no such proof. Rather, it is averred that Wright took a signature from a transaction on the public Bitcoin blockchain published first in 2009 and republished it. Wright presented a fragment of the Sartre Message and claimed that the signature corresponded to the Sartre Message. However, the provided signature was that of a 2009-era Bitcoin transaction that was publicly available in the blockchain and not one that was contemporaneously generated with regard to the Sartre Message (or one that corresponded to the Sartre Message).

(2) The BlackNet Abstract

26. On 10 February 2019, Wright published a picture of an abstract on Twitter regarding a project entitled ‘BlackNet’ which he asserts is an early iteration of the Bitcoin White Paper (the “**BlackNet Abstract**”). This abstract published by Wright appears to describe a Peer-to-Peer transaction system for sending “online consideration” without the use of a central intermediary. Wright asserts that the BlackNet Abstract was written in 2001 and submitted to the Australian Government.
27. The BlackNet Abstract is copied from the abstract of the Bitcoin White Paper. The abstract in the Draft Bitcoin White Paper from August 2008 was corrected and amended before it was finally published as the Bitcoin White Paper in October 2008. The BlackNet Abstract, despite Wright’s assertions that it was

written in 2001, contains the corrections made between August 2008 and October 2008 and entered into the Bitcoin White Paper. In the premises, it is averred that the BlackNet Abstract is a copy of the abstract of the Bitcoin White Paper (i.e. the one published in October 2008 which contains the corrections made between August 2008 and October 2008) and is therefore not a document which predates either the Draft Bitcoin White Paper or the Bitcoin White Paper.

(3) The 12 March 2008 Kleiman email

28. There are ongoing proceedings in the United States involving Wright, in which it is alleged that Wright stole a substantial amount of Bitcoin and related intellectual property assets from a company named W&K Info Defence Research, LLC, after the death of its founder, David Kleiman, by forging documents (the “**Kleiman Litigation**”). In those proceedings Wright asserts that he sent an email to David Kleiman on 12 March 2008 which shows him to be the originator of the idea of Bitcoin. The email he claims to have sent is as follows:

-----Original Message-----

From: Craig S Wright [mailto:craig.wright@information-defense.com]

Sent: Wednesday, 12 March 2008 6:37 PM

To: dave kleiman

Subject: FW: Defamation and the difficulties of law on the Internet.

I need your help editing a paper I am going to relase later this year. I have been working on a new form of electronic money. Bit cash, Bitcoin...

You are always there for me Dave. I want you to be a part of it all.

I cannot release it as me. GMX, vistomail and Tor. I need your help and I need a version of me to make this work that is better than me.

Craig

29. The domain used by the sender of this email is ‘information-defense.com’, which was not created until 23 January 2009. In the premises, the email could not have been sent in 2008 as claimed from the “craig.wright@information-defense.com” email address.

(4) The SSRN Submission

30. On or about 21 August 2019, Wright uploaded to the Social Science Research Network (SSRN) a document which he asserts to be the ‘final’ version of the Bitcoin White Paper, in which he is named as the author. The post claims that the document was written on 21 August 2008. Wright posted two versions of what he claims to be his original version of the Bitcoin White Paper within SSRN.
31. The metadata of the actual Bitcoin White Paper has a creation date of 24 March 2009. The first version Wright submitted to SSRN has discrepancies in the document properties. Examination of this first version reveals that its metadata was tampered with - supplemental metadata was added to this version to superficially indicate a creation date of 24 January 2008 and a “modified” date of 21 May 2008. This added metadata displays as the creation and modified date in the user interface of standard consumer software, i.e. the tampered dates are what would appear to a layperson upon cursory examination. However, a forensic examination of the metadata of this first version reveals another “creation date” entry embedded within the metadata, specifying a creation date that corresponds exactly to the creation date of the Bitcoin White Paper, specifically “/CreationDate (D:20090324113315-06'00)”.
32. The metadata of this first version includes an entry indicating that the original creation date is 29 March 2009, which is at odds with the creation date of 24 January 2008 that shows up in other parts of the metadata. In the premises, it is averred that this first version posted to SSRN is actually a copied version of the Bitcoin White Paper with alterations to its metadata (at least that the dates of 24 January 2008 and 21 May 2008 were added to the genuine metadata of the Bitcoin White Paper) to make it appear that it was created in 2008. It is averred that the dates of 24 January 2008 and 21 May 2008 were added to the genuine metadata of the Bitcoin White Paper by Wright to support his attempt to claim that he had drafted the Bitcoin White Paper.
33. The second version that Wright uploaded to SSRN, which is the version he has currently uploaded there, had further changes to the metadata compared to the first version. However, the original creation date of 24 March 2009 from the actual Bitcoin White Paper still exists within the second version’s metadata. It is

averred that Wright again sought to manipulate the metadata a second time but failed to remove the original creation date.

34. The genuine metadata in the actual Bitcoin White Paper and metadata contained within the two versions posted on SSRN by Wright all state the 24 March 2009 date as being the creation date, with the [dates times](#) agreeing to the millisecond.
35. In the premises, on several occasions when Wright has sought to prove he is Satoshi by way of documentary evidence, it has been shown that the documents he relies on are not what he claims they are.

[35A. In the course of these proceedings, in accordance with the order of the Court, \(a\) Wright has identified his “reliance documents”, namely those on which he primarily relies in support of his claim to be Satoshi; and \(b\) those and other documents disclosed by Wright have been the subject of examination and a report by an expert in forensic document examination for the Claimant. COPA maintains that the documents listed in the Schedule attached hereto have been altered and/or tampered with as set out in that Schedule.](#)

[35B. It is to be inferred \(a\) that Wright is responsible for the alteration of or tampering with these documents, whether by carrying them out himself or having others do so at his direction or with his knowledge; or at least \(b\) that he is aware of the alteration or tampering. In the circumstances, it is also to be inferred that the purpose of these acts was to create documents that would be deployed to prove that Wright is Satoshi. The Claimant places reliance on the alteration of and tampering with such documents in support of its case that Wright is not Satoshi.](#)

Wright’s threats to enforce his alleged rights

36. Wright has made public declarations of his intention to enforce the intellectual property rights he claims to own in Bitcoin, including in the Bitcoin White Paper. He has made his intentions known both generally to the public at large and directly to individuals, including one of the members of the Claimant.

37. On 13 February 2020, Wright published a blog entitled ‘Forking and Passing Off...’ on www.craigwright.net. This blog post stated, in relation to the issue of his being the sole creator of Bitcoin, that:

“In other words, I retain the copyright in the works I create using the open-source software.”

“As the sole creator of Bitcoin, I own full rights to the Bitcoin registry. People can fork my software and make alternative versions. But, they have no rights to change the protocol using the underlying database. I was explicit when I said so by putting forward reasons not to fork the database. Yet, both Bitcoin Core (Core) and Bitcoin ABC (ABC), global partnerships under law, have sought to use my database without authority. Rather than seeking licences, they have sought to attack my character and impugned me. This year, I am taking charge and control of my system.... Those involved with the copied systems that are passing themselves off as Bitcoin, namely BTC or CoreCoin and BCH or BCash, are hereby put on notice. Please trust me when I say that I’m far nicer before the lawyers get involved.” (emphasis added)

“As the creator of Bitcoin, I have what is known as database rights in the European Union and the UK.”

38. In the premises, since at least February 2020 Wright has evinced a clear intention to enforce his claimed intellectual property rights. Prior to that date Wright had not, so far as the Claimant is aware, sought to assert any of his claimed IP rights in or related to Bitcoin.
39. On 20 January 2021, Wright, through his lawyers Ontier, sent letters before action to various parties including:
- 39.1. the person or persons unknown controlling and operating the website Bitcoin.org and using the pseudonym Cobra;
 - 39.2. the persons controlling and operating the website BitcoinCore.org; and
 - 39.3. the persons controlling and operating the website Bitcoin.com.

40. These letters asserted that Wright is the individual behind the pseudonym “Satoshi Nakamoto” and that Wright is the owner of the copyright in the Bitcoin White Paper. The letter went on to state that Wright no longer consented to the continued publication of the Bitcoin White Paper on those websites, and demanded that they take down the Bitcoin White Paper on the basis of Wright’s assertion that he is the owner of the copyright therein.
41. On 21 Jan 2021, Ontier also sent a cease and desist letter in similar terms to @Square, @Sqcrypto and @SquareUK on Twitter. These are Twitter handles associated with Square, Inc (hereinafter “**Square**”). Square is one of the members of the Claimant and is one of the Represented Parties.
42. On 5 February 2021, the Claimant wrote a letter to Ontier because it and a number of its members, including Square, hosted copies of the Bitcoin White Paper. This letter was written because those members were concerned by the demands made in the 21 January 2021 letter. The 5 February 2021 letter sought further information about Wright’s claims including an explanation of “*the basis that [Wright] was the author of the White Paper and is the owner of the copyright therein*”. This letter included detailed questions going to the heart of Wright’s claims that he was the author of the Bitcoin White Paper, stating as follows:
 1. *Please explain on what basis you assert that your client is the individual behind the pseudonym ‘Satoshi Nakamoto’ and is the author of the White Paper.*
 2. *On what date or dates does your client say that he wrote the White Paper?*
 3. *At what location or locations does your client say that he wrote it?*
 4. *Please provide the above information for the version released on 31 October 2008 and all drafts (further references in these questions to the White Paper include all versions and drafts).*
 5. *Is it your client's position he wrote the White Paper alone, or with others? If the latter, please identify the co-author(s) and when such contribution(s) were made. If your client’s position is that another person or persons edited*

or otherwise contributed to the White Paper, but not such as to amount to co-authorship, please identify such person or persons and when such contribution(s) were made.

6. *On what basis provided for by any applicable international Convention does your client claim to be entitled to UK and other copyrights in the White Paper?*
 7. *Was your client employed by, did he hold any office with, or did he work under contract to, any person, organisation or business at any time during the period or periods identified in questions (1)-(4)? If so, please set out the nature and status of any such roles.*
 8. *Is it your client's position that the work that he says he did on the White Paper fell outside any such employments, offices or contractual relationships?*
 9. *Is it your client's position that he has at all times since authoring the White Paper owned the copyright therein? If at any time he has assigned or otherwise divested himself of said copyright, or agreed to do so, please provide information about any such transaction(s) and the basis on which he now claims to own copyright in the White Paper.*
43. On 19 February 2021, Ontier, on behalf of Wright, responded to the 5 February letter. They declined to answer the questions posed in the 5 February letter claiming it was “*an improper attempt to extract evidential material about our client and his claim to which your client and its members have no entitlement at this time*” and repeated the assertion, without adding support, that Wright is the owner of the copyright in the Bitcoin White Paper.
44. This letter also made it clear that Wright does not consent to the Claimant or its members using the Bitcoin White Paper and asked that both the Claimant and its members remove the Bitcoin White Paper from their respective websites and social media accounts.

45. Following up on his threats, including by way of his cease and desist letters, to enforce his rights against the crypto community, Wright has issued proceedings in the English Courts against Cobra on 24 February 2021. Cobra was one of the entities that received a cease and desist letter. The action against Cobra is against persons unknown, because the individual(s) behind Cobra are not public.
46. In the premises, Wright has threatened to enforce his alleged rights against the Claimant, members of the Claimant and third parties.

Relief sought

47. The Claimant seeks declaratory relief and related injunctive relief in relation to the Bitcoin White Paper.

Claimant's need for declaratory relief

48. There is a genuine commercial need for the Court to rule upon Wright's claim that he is the author of, and owner of the copyright in, the Bitcoin White Paper given Wright's refusal to provide evidence of such outside of litigation. Without a court ruling on his claims, Wright will continue to assert he is the author and owner.
49. The Bitcoin White Paper is hosted and made available online by the Claimant at <https://opencrypto.org/bitcoin.pdf>. It was first published online by the Claimant on 27 January 2021.
50. Several members of the Claimant presently host the Bitcoin White Paper.
51. Wright's actual threats, as well as the implicit threat embodied in his 13 February 2020 blog post, have been targeted at the public at large and have had a chilling effect on parties wishing to publish and utilise the insights of the Bitcoin White Paper. By way of example, the Bitcoin White Paper was removed from Bitcoincore.org in response to the cease and desist letter from Wright referenced at paragraph 39.2 above.
52. The Claimant, and its members, must be free to post, discuss, comment upon and otherwise utilise the Bitcoin White Paper in order to freely promote innovation.

53. The Claimant's Bylaws state the Claimant is "committed to making foundational cryptocurrency technology for everyone." The Claimant was incorporated to "encourage the adoption and advancement of cryptocurrency technologies and to protect against anything that might be a barrier to growth." The Claimant has a specific interest in making sure the Bitcoin White Paper is available to all, and it cannot carry out its function of ensuring access to the Bitcoin White Paper to all if it is required to remove it.
54. The Bitcoin White Paper is essential to the Claimant, its members and the cryptocurrency community at large, from a technical, historical, cultural and economic perspective. Wright's actions to date, which seek to suppress the publication of the Bitcoin White Paper by entities with whom he does not agree, cause harm both to the Claimant and its members, but also to the wider cryptocurrency community. Wright should not be able to suppress the Bitcoin White Paper as he is not the author.
55. The technical content of the Bitcoin White Paper frames and describes concepts in very specific ways that are helpful to orient programmers. Other cryptocurrencies, such as Ethereum, reference the Bitcoin White Paper in their own White Paper. The concepts described in the Bitcoin White Paper enable developers to, for example, explain to potential users the different attributes of new cryptocurrencies over Bitcoin. The relevance of the Bitcoin White Paper is therefore to the whole cryptocurrency sphere, and not merely to Bitcoin and those cryptocurrencies derived from it.

Wright's use of the threat of legal proceedings for his own gain

56. Wright is involved in BSV, which he has promoted as being the "true vision" of Bitcoin. BSV or Bitcoin SV (short for "Bitcoin Satoshi Vision"), is a cryptocurrency that is a hard fork from Bitcoin (a hard fork results in two versions of cryptocurrencies with a common origin, which from then on evolve independently).
57. BSV is, therefore, derived from Bitcoin and is promoted as a competitor offering to Bitcoin.

58. Wright has used the threats of legal action in order to publicise and promote BSV. He has stated this in his blog post of 29 January 2021 entitled ‘Bitcoin White Paper Statement of Jan 29, 2021’:

“And yet today, organisations use the Bitcoin name and the white paper itself to promote coins and products which they know to be inconsistent with the system as originally described. Such alternate coins and products not only fail to live up to the specification set out in the white paper, but still use the Bitcoin name and the white paper to promote themselves. As the author of the white paper, I feel compelled to exercise my legal rights and to ensure that it cannot be marketed in such a way—not just so that Bitcoin can live up to its potential, but so that people are not misled into supporting a different endeavour, having been led to believe that they were supporting Bitcoin.” (emphasis added)

“What I hoped to achieve by taking action against certain misusers of the white paper was to bring awareness to the Bitcoin system that is described within it, and to distinguish the system from others using the Bitcoin name. I believe the white paper speaks for itself. Whether something is ‘Bitcoin’ or not can be easily checked with reference to the document. If it fails to live up to the system of peer-to-peer electronic cash described therein, then it is not Bitcoin. Bitcoin SV is the Bitcoin system I described in the white paper.” (emphasis added)

59. In the premises, Wright has used his alleged ownership of the Bitcoin White Paper as a publicity tool for BSV and therefore seeks to benefit personally and commercially. Wright had never sought to enforce any of his alleged IP rights prior to the formation of BSV.

Further matters in support of the granting of the relief sought

60. The Claimant will rely on, *inter alia*, the following further matters to demonstrate that Wright’s claim to be Satoshi is not credible.

Failure to demonstrate access to accounts controlled by Satoshi

61. Wright has publicly asserted that he can prove he is Satoshi by reference to the Genesis Block. Wright should therefore, amongst other things, be able to show:

- 61.1. That he has control over Satoshi's private key and the Genesis Block.
 - 61.2. That he has access to and control over the various email accounts used by Satoshi.
 - 61.3. That he has access to and control of Satoshi's bitcointalk forum login.
62. To date Wright has not been able to carry out the above.

Findings in the Kleiman Litigation

- ~~63. The Claimant will rely upon a number of findings in the Kleiman Litigation which are probative of Wright's conduct, specifically his conduct in relation to his inability to produce tangible evidence to back up his assertions that he is Satoshi. Magistrate Judge Reinhart observed in a judgment dated 27 August 2019 that when Wright was:~~

~~*"confronted with evidence indicating that certain documents had been fabricated or altered, he became extremely defensive, tried to sidestep questioning, and ultimately made vague comments about his systems being hacked and others having access to his computers. None of these excuses were corroborated by other evidence".*~~

- ~~64. Magistrate Judge Reinhart continued that:~~

~~*"There was substantial credible evidence that documents produced by Dr Wright to support his position in this litigation are fraudulent. There was credible and compelling evidence that documents had been altered. Other documents are contradicted by Dr. Wright's testimony or declaration. While it is true that there was no direct evidence that Dr. Wright was responsible for alterations or falsification of documents, there is no evidence before the Court that anyone else had a motive to falsify them. As such there is a strong, and un rebutted, circumstantial inference that Dr. Wright willfully created the fraudulent documents."*~~

- ~~65. On these matters Magistrate Judge Reinhart was upheld by Judge Bloom in a judgment of 10 January 2020:~~

~~“The Court has also reviewed the transcripts from the Evidentiary Hearing held by Judge Reinhart and agrees with his credibility findings relating to the Defendant. Indeed, in answering opposing counsel’s questions, the Defendant was evasive, refused to give and interpret words in their very basic meanings, was combative, and became defensive when confronted with previous inconsistencies.”~~

General matters going to Wright’s credibility

66. In the Kleiman Litigation, Wright proffered an email from Dave Kleiman to Uyen Nguyen to the court as evidence supporting Wright’s request for the court to dismiss the action for lack of subject-matter jurisdiction. This email was purportedly dated 20 December 2012. When the email became public, members of the public showed that the PGP signature on the email was created a year after the death of Dave Kleiman. Wright subsequently withdrew the e-mail from evidence, stating that he could not verify the date of the email exchange. The email was therefore electronically tampered with and forged by Wright. As to the basis on which the Claimant alleges forgery, the Claimant relies on the above matters as establishing this allegation.

66A. In the Kleiman Litigation, Wright proffered a Deed of Trust document as evidence of the existence of a trust called the Tulip Trust. Wright has claimed that the Tulip Trust held Bitcoin and/or an encrypted file with keys to that Bitcoin. The Deed of Trust document that was adduced by Wright was dated 23 October 2012. That date was false, and computer forensic analysis of this document shows that it was backdated and that it was not created until at least 22 May 2015 (over two years after the death of David Kleiman on 26 April 2013). This document was therefore forged. As to the basis on which the Claimant alleges forgery, the Claimant relies on the above matters and the fact that this Deed of Trust document was found to be backdated in the Order of Justice Reinhart dated 27 August 2019.

67. In the premises, it is averred that Wright has a history of producing false documentation and making assertions which he cannot back up when required by a court. The Claimant will establish at the trial of this matter by way of forensic computer evidence that the above documents (being those referenced in

paragraphs 28-29, 66 and 66A) were, in fact, forged or otherwise doctored unless Wright admits such.

Scope of relief sought

68. The Claimant therefore seeks declarations as follows:

68.1. A declaration that Wright is not the author of the Bitcoin White Paper.

68.2. A declaration that Wright is not the owner of the copyright in the Bitcoin White Paper.

68.3. A declaration that any use by the Claimant of the Bitcoin White Paper will not infringe any copyright owned by Wright.

69. The declarations sought above are sought for the UK. The first two declarations are also sought on a wider basis for all countries which are signatories to the Berne Convention. It is averred that the resolution of the above declarations would be the same for all countries which are signatories to the Berne Convention. Furthermore, the law in all Berne Countries on the above issues is harmonised and the English Courts are therefore able to determine those issues.

Injunctive relief

70. Unless restrained, the Defendant threatens and intends to continue to claim that he is the author of and owner of copyright in the Bitcoin White Paper.

71. In the premises, injunctive relief is sought to restrain him from (1) claiming he is the author of and/or owner of copyright in the Bitcoin White Paper and (2) taking steps which involve him asserting the same.

Dissemination of judgment

72. In the premises, the Claimant seeks dissemination of judgment as an appropriate remedy to help ameliorate the chilling effect caused by Wright's actions set out in these Re-Re-Re-Amended Particulars of Claim.

AND THE CLAIMANT CLAIMS

- 1) Declarations that:
 - a) The Defendant is not the author of the Bitcoin White Paper.
 - b) The Defendant is not the owner of the copyright in the Bitcoin White Paper.
 - c) Any use by the Claimant of the Bitcoin White Paper will not infringe any copyright owned by the Defendant.
- 2) An injunction restraining the Defendant from:
 - a) Claiming he is the author of and/or owner of copyright in the Bitcoin White Paper; and
 - b) Taking steps which involve him asserting the same.
- 3) An order that at the Claimant's option and at the expense of the Defendant, appropriate measures are taken for the dissemination and publication of any judgment or order made in this case.
- 4) Costs.
- 5) Further or other relief.

JONATHAN HOUGH KC
JONATHAN MOSS
TRISTAN SHERLIKER

JONATHAN MOSS

JONATHAN MOSS

NICHOLAS SAUNDERS QC

JONATHAN MOSS

Statement of Truth

The Claimant believes that the facts stated in this Re-Re-Re-Amended Particulars of Claim are true. The Claimant understands that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth. I am duly authorised by the Claimant to sign this statement.



Signed

Full name: Philip Nathan Sherrell

Position or office held: Partner, Bird & Bird LLP

Dated: 31 October 2023

SERVED this 12th day of April 2021 by Bird & Bird LLP of 12 New Fetter Lane, London EC4A 1JP, Solicitors for the Claimant.

RE-SERVED this 15th day of September 2021 by Bird & Bird LLP of 12 New Fetter Lane, London EC4A 1JP, Solicitors for the Claimant.

RE-SERVED this 17th day of March 2022 by Bird & Bird LLP of 12 New Fetter Lane, London EC4A 1JP, Solicitors for the Claimant.

RE-SERVED this 10th day of March 2023 by Bird & Bird LLP of 12 New Fetter Lane, London EC4A 1JP, Solicitors for the Claimant

RE-SERVED this 31st day of October 2023 by Bird & Bird LLP of 12 New Fetter Lane, London EC4A 1JP, Solicitors for the Claimant

B E T W E E N :

CRYPTO OPEN PATENT ALLIANCE

Claimant

-and-

DR CRAIG STEVEN WRIGHT

Defendant

**SCHEDULE OF DR
WRIGHT'S FORGED
DOCUMENTS**

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Introduction

1. This Schedule is annexed to the Re-Re-Re-Amended Particulars of Claim and is the Schedule referred to in paragraph 35A. It is served pursuant to the judgment of the Court dated 24 October 2023 (“**the Judgment**”) and the order consequent upon that judgment.
2. As provided for in paragraphs 69-71 of the Judgment, this Schedule identifies the documents for which the Court has permitted the Claimant (“**COPA**”) to put forward allegations of forgery. The Schedule: (a) identifies by ID number which of the Reliance Documents COPA alleges to be forged and which other documents COPA alleges to be forged; (b) specifies all the reasons on which COPA relies in support of the allegations of forgery, cross-referenced to relevant paragraphs of the principal expert report of Mr Madden (including its appendices); and (c) specifies the reasons why COPA invites the inference that the Defendant (“**Dr Wright**”) was responsible for the alteration of or tampering with each document or was aware of the alteration or tampering.
3. In the body of this Schedule, each document is addressed in its own section, identified by ID number and a short reference name. Documents which are Reliance Documents are identified as such in the title. The first part of each section states briefly what the document purports to be. The second part gives reasons for the allegation of forgery, cross-referenced to the relevant paragraphs of Mr Madden’s report. The third part gives reasons for the inference to be drawn that Dr Wright was responsible for the forgery of the document or (in the alternative) that he at least knew of the forgery.
4. In addition to the specific reasons for the inference of responsibility or knowledge given in respect of each document, COPA relies upon the following additional reasons which apply to all the documents in the Schedule (and so are set out here rather than repeated for each individual document):
 - a. Given the extent of the forgery of documents which Dr Wright has disclosed and of documents on which he has relied for his claim to be Satoshi Nakamoto, it is to be inferred that Dr Wright was responsible for each of the forgeries or (alternatively) that he at least knew of the forgeries.
 - b. Given the lack of any plausible explanation why any other person would have committed forgeries as set out in this Schedule, it is to be inferred that Dr Wright was responsible for each of the forgeries.
 - c. Since 2016, Dr Wright has been very actively promoting his claim to be Satoshi Nakamoto and has been devoting considerable effort to that claim. It is likely that documents personal to him which bear signs of having been altered since that time to give support to his claim to be Satoshi Nakamoto were altered by him, at his direction or at least with his knowledge.

The fact that numerous documents have been altered with this apparent purpose since 2016 is consistent with him creating an evidential trail to provide false support to his dishonest claim.

- d. Each of the documents addressed here has been disclosed by Dr Wright and assigned an ID_ number within Dr Wright's own disclosure.
- e. Following receipt of Dr Wright's disclosure, COPA wrote to Dr Wright to inform him that it was likely to raise allegations of forgery in respect of his disclosure and to request access to the devices or forensic images from which the documents were obtained. Dr Wright refused COPA's request to allow for inspection of the devices or forensic images from which the documents were obtained, despite the evident value of such inspection (as now attested by the experts of both parties in forensic document examination).
- f. The characteristics and indications of tampering relied upon in this schedule are varied and appear across many different documents which were (and/or purport to be) created at a variety of times and which address a wide variety of different aspects of Dr Wright's claim to be Satoshi Nakamoto. Although the documents are in that sense varied, they have common features in that: (i) there are various common elements to the indications of tampering and the techniques used to alter their content, when Dr Wright's disclosure is taken as a whole; (ii) they were produced by Dr Wright and were in his custody and control; and (iii) that in each case, the effect of the tampering is to make the documents appear to support Dr Wright's claim to be Satoshi Nakamoto, contrary to fact.
- g. Following, and in evident response to, the service of the Madden Report, Dr Wright has acted as follows:
 - i. He has sought to disclaim responsibility for the documents previously designated by him as Reliance Documents, including through his provision of extended chain of custody information (information he had previously refused to supply even in more basic form) in which he has for the first time suggested that the documents were handled by many unidentified further persons. He has thus sought to distance himself from documents only once their veracity has been called into question.
 - ii. He has provided implausible explanations for alteration and tampering with documents and has raised factual allegations previously said by him to be irrelevant. These are new explanations which are the more implausible because Dr Wright has had the relevant documents for many years and has disclosed and/or deployed many of them in previous proceedings without previously giving these explanations. Furthermore, it is inconsistent with Dr Wright's own account of his technical skill in computer security that he did not identify document alterations or reasons for documents to be unreliable before the service of the Madden Report.

- iii. He has sought to replace his Reliance Documents with versions he has supposedly “discovered” in hard drives and which he claims to be preferable versions. Given his involvement in previous litigation concerning his claim to be Satoshi Nakamoto (e.g. the Kleiman, McCormack and Granath cases) it is implausible that he would only now have discovered accessible documents of key importance to that claim.

For the avoidance of doubt, COPA will say that this conduct is indicative of Dr Wright seeking to react to COPA's discovery of forged documents for which he was responsible or of which he at least had knowledge.

5. In the above paragraphs, reference to Dr Wright being “responsible for” forgeries means (as set out in paragraph 35B of the Re-Re-Re-Amended Particulars of Claim) that Dr Wright either carried out the relevant acts of tampering / alteration himself or that they were done at his direction and/or with his knowledge.
6. References to “ID” numbers in this document are references to such documents disclosed by Dr Wright in these proceedings under that number. References to witness statements are given by reference to surname and statement number in the conventional way. References to “PM” documents are references to Madden Report Appendices and their paragraphs. Thus, [PM1 at 2-3] would refer to paragraphs 2-3 of Appendix PM1.

ID_000073**Statistics Assessment homework**

1. The document purports to be a piece of homework prepared by Dr Wright in connection with his STAT6640 course at the University of Newcastle in Australia. It is dated on its face for 28 October 2005, but bears internal metadata dating it to 17 September 2005.
2. The document contains language similar to that found in the Bitcoin White Paper.

Reasons for Allegation of Forgery

3. ID_000073 contains hidden embedded content indicating that the content was copied directly from the Bitcoin White Paper, and which has then been edited *away* to appear to be precursor content. [PM38 at 16-21]
4. The document has been backdated. The first page of the document is very similar to ID_000077 including the same coversheet layout, course number, date of signature (28 October 2005) and deadline month (October 2005), and it shares other characteristics of ID_000077. However, ID_000077, a genuine document, is dated 28 October 2005 in its metadata as well as on its face, which is after the "Last modified" date in the internal metadata of ID_000073. [PM38 at 9 and 23]
5. ID_000073 bears the same signature date as the later ID_000077. Taking the metadata of ID_000073 at face value, that date was over a month in the future at the time ID_000073 purports to have been created. [PM38 at 9d]
6. ID_000073 contains embedded hidden text sourced from ID_000077, a reversal of the timeline given on the face of the documents and their metadata [PM38 at 11-13].
7. ID_000073 contains an embedded previous draft version within the document file, indicating that it previously contained the full table of contents found in ID_000077. This is inconsistent with the name given in connection with that previous draft, which is "Possible Project". [PM38 at 14-15].
8. Although the structure and cover sheet of the document is derived from ID_000077, the recorded edit time is very short compared to the content of the files, which is indicative that the main body of content of the file was sourced from a different precursor document. No such precursor document has been disclosed. [PM38 at 4]
9. Along with ID_000073, another version of the same document has been disclosed, ID_000142. Analysis using that version as well reveals that metadata have been edited. [PM38 at 23 to 35]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work done by him in 2005, elements of which then appeared in the Bitcoin White Paper), contrary to fact.
11. ID_000073 is substantially written in Dr Wright's own handwriting.
12. ID_000073 is headed on each page with Dr Wright's name and student number as identifying information, "Craig S Wright, c3047661".
13. ID_000073 is signed on the first page with the letters "CSW" against a statement declaring "that this assessment is my own work unless otherwise acknowledged".
14. In his evidence in these proceedings, Dr Wright relies on work done in connection with his MStat at Newcastle University, as part of his claim to have been working on the concepts behind the Bitcoin White Paper. [Wright 1 at 95]
15. In his evidence in these proceedings, Dr Wright claims to have discussed the concepts behind the Bitcoin White Paper with teaching staff at the University of Newcastle. [Wright 4 at 52].
16. Dr Wright has not disclosed the underlying source documents from which the content of ID_000073 was sourced. [PM38 at 23]
17. ID_000073 contains hidden text embedded within the document which contradicts the information presented on the face of the document, a characteristic of documents found throughout Dr Wright's disclosure in these proceedings including documents on which he primarily relies.

ID_000199

LLM Dissertation proposal 1 (Reliance Document)

1. The document purports to be an LLM Dissertation proposal made to Northumbria University prepared by Dr Wright in connection with his LLM course. It is dated as being created between 18 June 2007 and 23 October 2007, and contains language similar to that found in the Bitcoin White Paper.

Reasons for Allegation of Forgery

2. The document has been backdated. The document contains hidden, embedded Grammarly timestamps indicating its true date to be later than 18 August 2019 at 9:10am (UTC). [PM25 at 8-13]
3. Searching online revealed the presence of a very similar document uploaded by Dr Wright to the website SSRN which was created just a few hours after the Grammarly timestamp of ID_000199, on the same date 18 August 2019. That uploaded document (the "**SSRN Upload**") was created with software that did not yet exist in 2007. [PM25 at 40-46]
4. The SSRN Upload document has not been disclosed by Dr Wright.
5. The Grammarly software did not exist in 2007 [Madden Report at 62c] but is contemporaneous for 2019. [Madden Report at 70-72]
6. ID_003993, a document with the filename "LLM_ProposalA.doc" and which shares content with ID_000199 (including the embedded Grammarly timestamp) was emailed from Dr Wright to Lynn Wright on 18 January 2020. [ID_003927, PM26 at 25-38]
7. The document is part of a chain of editing of several documents, three of which are Reliance Documents of Dr Wright, all of which inherited the same embedded hidden Grammarly timestamp, indicating that the document ID_000199 is created as a downstream document from that source. The interaction with Grammarly (on 18 August 2019) took place before the creation of ID_000199 and other documents created from the same common source. [PM25 at 7-8 and 12-13]
8. A common precursor document to these files exists, which has not been disclosed. [PM25 at 24a]
9. Taken individually and as a set, the group of three Reliance Documents sharing common characteristics with ID_000199 are inconsistent in their metadata. [PM25 at 18-24]
10. Among Dr Wright's disclosure is another document, ID_003935, which presents as if it is a precursor to ID_000199 and which is dated as if it was last edited earlier than ID_000199.

However, ID_003935 contains hidden embedded text from ID_000199 (not present on its face) indicating that ID_003935 has probably been created downstream of ID_000199 and artificially backdated, with the misleading effect that it lends credibility to ID_000199, placing it within an apparently credible continuum of editing, contrary to fact. [PM25 26-27].

11. Within Dr Wright's disclosure is another document, ID_000217, which presents as if it is an ancestor document to ID_000199 and which is dated as if it was last edited earlier than ID_000199. At face value, the similar and earlier-dated file in the chain of editing (ID_000217) ought to have a longer Edit Time and a higher revision count than ID_000199, consistent with the same file being picked up and further edited while the Edit Time counter continues to count. However, the internal metadata records the reverse. This has the misleading effect of (on the face of the documents) appearing to place ID_000199 within an apparently credible continuum of editing, contrary to fact. [PM25 at 22-23]
12. ID_000199 has an Edit Time longer than the document it appears to be based on and (impossibly) longer than the time between its Created and Last Saved timestamps. [PM25 at 39]
13. ID_000199 has an implausible edit time of in excess of 131 days consistent with the use of clock manipulation techniques. [PM25 at 22b]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

14. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work done by him in 2007, elements of which then appeared in the Bitcoin White Paper), contrary to fact.
15. Dr Wright has positively asserted in these proceedings that ID_000199 is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
16. In addition to ID_000199, Dr Wright has also positively asserted in these proceedings that two other related documents [ID_000217 and ID_003702, both also included in this schedule], are documents on which he positively relies as supporting his claim to be Satoshi Nakamoto.
17. Dr Wright has also relied in these proceedings on his Northumbria University degree award transcript as being a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto. [ID_000491]
18. In his evidence in these proceedings, Dr Wright positively relies upon his LLM Thesis at the University of Northumbria as forming part of the story behind his claim to be Satoshi Nakamoto. [Wright 1 at 56-60]
19. In his evidence in these proceedings, Dr Wright claims to have discussed the concepts behind the Bitcoin White Paper with teaching staff at the University of Northumbria. [Wright 4 at 52]

20. Dr Wright has relied on his LLM Thesis Proposal, in previous proceedings, including on oath.
21. The document ID_000199 is part of a chain of editing of documents disclosed by Dr Wright, all of which have a common precursor source, as indicated by the inclusion of the same Grammarly timestamp and other characteristics. [ID_000199, ID_000217, ID_003702] [PM25 at 12]
22. Dr Wright shared a similar document to ID_000199 on social media on the same date indicated in the hidden embedded Grammarly timestamp. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the request, Dr Wright has claimed to have lost access to the relevant social media account.
23. A very similar document, the SSRN Upload, was uploaded to the internet by Dr Wright on the date indicated in the hidden embedded Grammarly timestamp.
24. Dr Wright is recorded in the metadata as the first author.
25. Dr Wright is a user of Grammarly software.
26. Although the document metadata presents Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright after 18 August 2019, and a copy of a similar document later sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003927, PM26 at 25-38]

ID_000217

LLM Dissertation proposal 2 (Reliance Document)

1. The document purports to be an LLM Dissertation proposal made to Northumbria University, prepared by Dr Wright in connection with his LLM course. It is dated as being created between 18 June 2007 and 28 October 2007, and contains language similar to that found in the Bitcoin White Paper.

Reasons for Allegation of Forgery

2. The document has been backdated. The document contains hidden, embedded Grammarly timestamps indicating its true date to be later than 18 August 2019 at 9:10am (UTC). [PM25 at 8-13]
3. The document contains embedded references to fonts including Calibri Light and Nirmala UI [PM25 at 20]. Those fonts were not yet published in 2008 [Madden Report at 165]. Further, the designers of those fonts have given evidence relied on by COPA in these proceedings that the fonts were not yet conceived of or designed by the purported date of this document.
4. The document contains embedded internal references to Microsoft schema not yet published in 2008 but which are contemporary to 2012 and later. [PM25 at 21]
5. Searching online revealed the presence of a very similar document uploaded by Dr Wright to the website SSRN which was created just a few hours after the Grammarly timestamp of ID_000199, on the same date 18 August 2019. That uploaded document (the “**SSRN Upload**”) was created with software that did not yet exist in 2007. [PM25 at 40-46]
6. The SSRN Upload document has not been disclosed by Dr Wright.
7. The Grammarly software did not exist in 2007 [Madden Report at 62c] but is contemporaneous for 2019. [Madden Report at 70-72]
8. ID_003993, a document with the filename “LLM_ProposalA.doc” and which shares content with ID_000217 (including the embedded Grammarly timestamp) was emailed from Dr Wright to Lynn Wright on 18 January 2020. [ID_003927, PM26 at 25-38]
9. The document is part of a chain of editing of several documents, three of which are Reliance Documents of Dr Wright, all of which inherited the same embedded hidden Grammarly timestamp, indicating that the document was created as a downstream document from a common source. The interaction with Grammarly (on 18 August 2019) took place before the creation of ID_000199 and other documents created from the same common source. [PM25 at 7-8 and 12-13]

10. There is a common precursor document to these files, which has not been disclosed. [PM25 at 24a]
11. Taken individually and as a set, the group of documents sharing common characteristics with ID_000217 are inconsistent in their metadata. [PM25 at 18-24]
12. Within Dr Wright's disclosure is another document, ID_000199, which presents as if it is a subsequent document to ID_000217 and which is dated as if it was last edited later than ID_000199. At face value, the similar and earlier-dated file in the chain of editing (ID_000217) ought to have a longer Edit Time and a higher revision count than ID_000199, consistent with the same file being picked up and further edited while the Edit Time counter continues to count. However, the internal metadata records the reverse. This has the misleading effect of (on the face of the documents) appearing to place ID_000217 within an apparently credible continuum of editing, contrary to fact. [PM25 at 22-23].
13. ID_000217 has an implausible edit time of 131 days 21 hours and 50 minutes consistent with the use of clock manipulation techniques. [PM25 at 22b]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

14. Dr Wright has positively asserted in these proceedings that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
15. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work done by him in 2007, elements of which then appeared in the Bitcoin White Paper), contrary to fact.
16. In addition to ID_000217, Dr Wright has also positively asserted in these proceedings that two other related documents [ID_000199 and ID_003702], are documents on which he positively relies as supporting his claim to be Satoshi Nakamoto.
17. Dr Wright has also relied in these proceedings on his Northumbria University degree award transcript as being a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto. [ID_000491]
18. In his evidence in these proceedings, Dr Wright positively relies upon his LLM Thesis at the University of Northumbria as forming part of the story behind his claim to be Satoshi Nakamoto. [Wright 1 at 56-60]
19. In his evidence in these proceedings, Dr Wright claims to have discussed the concepts behind the Bitcoin White Paper with teaching staff at the University of Northumbria. [Wright 4 at 52]
20. Dr Wright has relied on his LLM Thesis Proposal, in previous proceedings, including on oath.

21. The document ID_000217 is part of a chain of editing of documents disclosed by Dr Wright, all of which have a common precursor source as indicated by the inclusion of the same Grammarly timestamp and other characteristics. [PM25 at 12]
22. Dr Wright shared a hash-identical document to ID_000217 on social media on the same date indicated in the hidden embedded Grammarly timestamp. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the request, Dr Wright has claimed to have lost access to the relevant social media account.
23. A very similar document, the SSRN Upload, was uploaded to the internet by Dr Wright on the date indicated in the hidden embedded Grammarly timestamp.
24. Dr Wright is recorded in the metadata as the first author.
25. Dr Wright is a user of Grammarly software.
26. Although the document metadata presents Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright after 18 August 2019, and a copy of a similar document later sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file itself are also irregular. [ID_003927, PM26 at 25-38]

ID_000227

Economics of BitCoin Nodes (Reliance Document)

1. The document purports to contain notes relating to "The Economics of central core BitCoin Nodes" and is dated as if it was created in the period September-October 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. Within the document are several hidden embedded zip files containing references to Microsoft Schema dating from 2014-2015 which did not exist in 2008. These references are not visible to someone editing the document or reviewing its internal content without forensic analysis. [PM26 at 16-17]
3. Equations within ID_000227 were created with MathType software v6.9, a version dating from February 2013 which did not exist in 2008. [PM40 at 32, 42]
4. The document contains redundant hidden content of previous edits which do not appear on the face of the document. [PM26 at 19-20]
5. The hidden embedded text within the document includes references to a web page URL which did not exist until on or after 11 April 2019. [PM26 at 21]
6. The reference to the 11 April 2019 URL has been deleted from the face of the document and replaced with a footnote which appears to be a "note to self" about what would need to be added in a future draft ("Note: I will need to link to laws such as the CFAA (USA) – see LLM[...]"). Other footnotes have been introduced or edited to refer to Bitcoin in the future tense. The misleading effect of these edits is to make the document appear as if it was created at a time before Bitcoin was created. In fact, the document was created later, after 11 April 2019, and the anachronistic content was obscured by editing. [PM26 at 19-24].
7. The document was created from a precursor document after 11 April 2019. No precursor document has been disclosed by Dr Wright. [PM26 at 23]
8. The document ID_000227 has an implausible edit time of 20 days 19 hours and 22 minutes consistent with the use of clock manipulation techniques. [PM26 at 6-10]
9. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. The metadata of that zip file is also irregular. [ID_003937, PM26 at 1, 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work done by him in September / October 2008 which looked ahead to Bitcoin), contrary to fact.

11. Although the document metadata purports Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright after 11 April 2019, and a copy later sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright primarily relies. The metadata of that zip file is itself also irregular. [ID_003927, PM26 at 1, 25-38]
12. Dr Wright shared a document with identical content on social media on 16 January 2020, contemporaneously with the aforesaid email to Lynn Wright. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the Request, Dr Wright has claimed to have lost access to the relevant social media account.
13. The content introduced into the document, having the effect of making it appear to date from earlier than its true date, is phrased in the first person as a note from Dr Wright to himself.
14. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.
15. Dr Wright is recorded in the metadata as the first author.
16. Dr Wright has not disclosed the precursor documents [PM26 at 23].

ID_000254**Timecoin ODT Whitepaper (Reliance Document)**

1. The document purports to be a precursor draft of the Bitcoin White Paper and is presented as if written by Dr Wright. It is dated in the period 6 May 2008 to 12 December 2008 in its metadata, and Dr Wright states its approximate date to be 6 May 2008 in his Chain of Custody information.

Reasons for Allegation of Forgery

2. The document has been backdated. Rather than being a precursor document to the Bitcoin White Paper as it purports to be, this document has been created from the Bitcoin White Paper subsequently and edited in such a way that it appears as if it was precursor work. [PM2 60-64].
3. ID_000254 has apparently been converted from the Bitcoin White Paper (which is a PDF) into a more easily editable format and has then undergone further conversions via intermediate documents [PM2 60-64]. Font configurations and the absence of diagrams are consistent with this conclusion [PM2 17-28]. No such intermediate document has been disclosed.
4. Diagrams have been omitted from this document as a result of the conversion process from PDF. The inclusion of the object replacement character `☐` within the document at a point where a diagram would be expected to appear is consistent with ID_000254 being created by a process of conversion of a different document. [PM2 at 28]
5. Where diagrams are absent, the document nevertheless preserves margin indentations from the Bitcoin White Paper PDF, but which do not match the content of the document. [PM2 at 29-37]
6. The document irregularly contains words throughout in which hyphens ought to appear but are missing. This is not consistent with ordinary dictation or typing error but is as an artefact of conversion from PDF and backdating. [PM2 at 38-44]
7. A conversion of the Bitcoin White Paper PDF to editable form would result in corruption of formulae. In each case where those formulae would have appeared corrupted, they have been deleted from ID_000254, leaving behind white space. [PM2 at 45-48]
8. The document contains irregular line breaks consistent with conversion from the Bitcoin White Paper PDF into editable form and backdating. [PM2 at 49-51]
9. The document contains text that matches the corrected text of the Bitcoin White Paper (2009 version) [PM2 at 12]. It does not match the October 2008 or November 2008 versions of the Bitcoin White Paper, even though this document purports to be earlier than both of them.
10. The document has been disclosed with irregular metadata listed in relation to its Created and Last Accessed external metadata properties. [PM2 at 6-11]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

11. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (presenting as a predecessor draft of the Bitcoin White Paper and supposedly written by him in early 2008), contrary to fact. Further, the document uses the same software (OpenOffice Writer) as used by Satoshi Nakamoto.
12. Dr Wright has positively asserted in these proceedings that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
13. The document bears Dr Wright's name and contact details.
14. The contact details included refer to Charles Sturt University. In his evidence in these proceedings, Dr Wright has claimed to have drafted and shared versions of the Bitcoin White Paper while studying at Charles Sturt University, and to have discussed the concepts with teaching staff at Charles Sturt University. [Wright 1 at 87, Wright 4 at 52]
15. In his evidence in these proceedings, Dr Wright positively relies upon the presence of the word "Timecoin" in documents he has disclosed as being precursor work to the Bitcoin White Paper and thus forming part of the story behind his claim to be Satoshi Nakamoto. Moreover, on the basis of his narrative, this is a detail which would have been known to him and to few, if any, others. [Wright 1 at 26, Wright 4 at 6.c.x.]
16. The document contains metadata that purports to pre-date the Bitcoin White Paper, indicating efforts at backdating to support Dr Wright's claim.
17. Dr Wright claims, in his chain of custody information, that only he drafted this document.
18. Dr Wright has stated in these proceedings that this was a draft of a document under the name TimeCoin which later became bitcoin. [Exhibit CSW-5]
19. Dr Wright has not disclosed the apparent intermediate document from which this document was created. [PM2 at 63]

ID_000258

“Economic Security.doc” (Reliance Document)

1. The document purports to be work associated with the development of Bitcoin. It refers to “BitCoin” in the future tense and is dated 5 to 7 November 2008.

Reasons for Allegation of Forgery

2. The document has been backdated, with signs of apparently contradictory metadata. [PM29 at 17-18]
3. The document is an altered version of a document actually published by Dr Wright in May 2019 (the “**Economic Security Medium Article**”). [PM29 at 10-15]
4. From the Economic Security Medium Article to ID_00258, the tense has been changed from past to future, to give the document the appearance of predating Bitcoin, contrary to fact. [PM29 at 14-15]
5. From the Economic Security Medium Article to ID_000258, the capitalisation of Bitcoin has been adapted to “BitCoin” (which would more closely align to Dr Wright’s account of his claim to be Satoshi Nakamoto and his use of terminology). [PM29 at 15]
6. The document contains hidden embedded text of previous edits. The hidden embedded text is adapted from the Economic Security Medium Article, and text sections are phrased in the present tense (as is the Economic Security Medium Article). The hidden embedded text does not appear on the face of the document. [PM29 at 15]
7. The Economic Security Medium Article has not been disclosed by Dr Wright. Further, no corresponding draft document or donor document has been disclosed by Dr Wright. [PM29 at 16]
8. The internal metadata records an anomalous edit time in excess of 57 days, despite a very short period between file created and last modified date, indicative of the use of clock manipulation techniques (1 day 19hrs 14 mins). [PM29 at 5]
9. The period of editing this document overlaps with a number of other documents in Dr Wright’s disclosure. [PM24 at 33-35]
10. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. The metadata of that zip file is also irregular. [ID_003934, PM29 at 2; PM26, 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

11. Dr Wright has positively asserted that ID_000258 is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
12. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work done privately by him and looking ahead to Bitcoin), contrary to fact.
13. The document is written in the first person from the perspective of Dr Wright.
14. Dr Wright is listed as the original author in the internal metadata of the file.
15. The Economic Security Medium Article was posted by Dr Wright on his own account on the website Medium.com.
16. Although the document metadata present Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright, and a copy sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file itself are also irregular. [ID_003934, PM29 at 2, PM26 at 25-38]
17. Dr Wright shared a document with identical content on social media on 16 January 2020, contemporaneously with the aforesaid email to Lynn Wright. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the request, Dr Wright has claimed to have lost access to the relevant social media account.
18. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.
19. Dr Wright has not disclosed associated relevant documents.

ID_000260

OpenOffice 2.4 document (Reliance Document)

1. The document purports to be a precursor to the Bitcoin White Paper and is presented as if written by Dr Wright. It is dated 8-9 March 2008 in its metadata and Dr Wright states it to be from 2008 in his evidence in these proceedings. [Exhibit CSw-14]

Reasons for Allegation of Forgery

2. The document contains language taken from the Bitcoin White Paper, but the document has been backdated as if to make it appear earlier than it is. [PM23 at 41-45]
3. The document purports to have been created on 8 March 2008 and last saved on 9 March 2008 using OpenOffice.org version 2.4 with internal version number 680m12\$Build-9286. However, this version of OpenOffice.org was not uploaded for use until 16 March 2008 and was not generally released until 27 March 2008, both of which post-date the purported date of ID_000260. [PM23 at 3, 6, 10, 24-34, 44]
4. Further, in addition to not being uploaded until 16 March 2008, the software in question (OpenOffice.org 2.4 680m12\$Build-9286) was not even in development until after 14 March 2008. [PM23 at 35-40]
5. The document contains content imported from an external document or documents. No external document has been disclosed. [PM23 at 41c]
6. The document has an implausible edit time, matching precisely the time between its created and last saved timestamp. [PM23 at 14-18]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

7. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting a precursor document to the Bitcoin White Paper, supposedly prepared in early 2008), contrary to fact.
8. Further, the document has been created using the same software (OpenOffice.org) and same version (version 2.4) as used by Satoshi Nakamoto to write all versions of the Bitcoin White Paper, indicating an intention to create a document within Dr Wright's possession with the appearance of being a predecessor. [PM3 at 23, 40, and 47]
9. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
10. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000367**"Block diffusion within bitcoin" (Reliance Document)**

1. The document purports to be precursor work to the Bitcoin White Paper relating to network theory and mentioning "bitcoin". It is dated to the period 15 August 2008 to 8 September 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM30 21-24]
3. The document contains content taken from a third-party source available online which was published not before 29 April 2012 (the "**2012 ResearchGate Article**"). [PM30 at 8-13]
4. The document includes a reference section that closely matches the 2012 ResearchGate Article. However, five references which would have been anachronistic to 2008 have been deleted from the document. Although the five references have been removed from the references section, the main body of the text still mentions 4 out of 5 of them. [PM30 at 14-18].
5. The document contains text formatted in fonts which are not typical for Microsoft Windows and MS Word documents, but which fonts are included in the 2012 ResearchGate Article. Not only the text, but also its font formatting, has been copied from the 2012 ResearchGate article. [PM30 at 19-20]
6. The document was created within 1 minute before ID_000371, another "Lynn Wright document" bearing independent indicia of tampering. [PM27 at 17b]
7. ID_00367 has an implausible edit time in excess of 24 days. During that time it was saved only once, implying that it was left unsaved for 34,881 minutes before being saved. [PM30 at 5-8]
8. The document contains passages of red text and placeholder brackets apparently indicating that the document was in the process of being edited with a view to changing the references, but without that process being finalised before disclosure. [PM30 at 24]
9. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. [ID_003930, PM30 at 1, PM 26 at 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
11. In his evidence in these proceedings, Dr Wright relies on purported work of the type referred to in this document as "foundational" for Bitcoin. [Wright 1 at 53-54]

12. The effect of the tampering is therefore to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work by Dr Wright on a subject of interest to him, but with reference to Bitcoin), contrary to fact.
13. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by work on networks as covered by this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 54]
14. Although the document metadata presents Lynn Wright to have been the only author, it was actually created by Dr Wright in the name of Lynn Wright after February 2013, and sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003930, PM30 at 1, PM26 at 25-38]
15. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000371

"Phase transitions in block propagation networks" (Reliance Document)

1. The document purports to be precursor work to the Bitcoin White Paper relating to network theory and mentioning "bitcoin". It is dated to 8 September 2008. Further, Dr Wright states it to be from 8 September 2008 in his evidence in these proceedings. [Exhibit CSW-14]

Reasons for Allegation of Forgery

2. The document has been backdated. [PM40 at 42]
3. Equations within ID_000371 were created with MathType software v6.9, a version dating from February 2013 which did not exist in 2008. [PM40 at 22-42]
4. The document was created within 1 minute after ID_000367, another "Lynn Wright document" bearing independent indicia of tampering. [PM27 at 17b]
5. The document was created in the same user session as ID_000396, another "Lynn Wright document" which contains common content as well as independent indicia of tampering.
6. The document was created by copying content from external, online sources. However, the content has been modified to appear to relate to bitcoin by inserting references to "bitcoin" into the source text. [PM27 21-25]
7. The document has an edit time of 1 minute, but the content within the document would have taken longer to create, indicating that the content was imported from a donor source [PM27 at 13-15] . No donor source document has been disclosed.
8. The document editing period overlaps with other similar documents in Dr Wright's disclosure. [PM27 at 32]
9. A hash-identical copy of the document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. [ID_003939, PM 27 at 7, PM26 at 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
11. In his evidence in these proceedings, Dr Wright relies on purported work of the type referred to in this document as "foundational" for Bitcoin. [Wright 1 at 53-54].

12. The effect of the tampering is therefore to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work by Dr Wright on a subject of interest to him, but with reference to Bitcoin), contrary to fact.
13. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by work on networks as covered by this document, including Game Theory. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 6, 20, 54]
14. Although the document metadata presents Lynn Wright to have been the only author, it was actually created by Dr Wright in the name of Lynn Wright after February 2013, and sent from Dr Wright to Lynn Wright by email (long after they were separated), contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003939, PM 27 at 7, PM26 at 25-38]
15. Dr Wright has not disclosed the donor document or intermediate source document from which the content of ID_000371 has been generated.
16. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000395

“Documentary Credits under the UCP 500” (Reliance Document)

1. The document purports to be work done by Dr Wright at Northumbria University in relation to his LLM course. It is dated 10 September 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM31 at 45-46]
3. It contains timestamped URL references embedded within the cited references which were copied from websites that did not exist in 2008, and which were not created before 23 November 2015. [PM31 at 22-41]
4. The content of ID_000395 has been copied from an internet archive copy of Dr Wright's blog (the "**Archived Blog**"), at a time later than 23 November 2015, and then incorporated into an MS Word document in a manner intended to make it appear to be part of his LLM study at Northumbria University (on which Dr Wright relies as part of his claim to be Satoshi Nakamoto). [PM31 at 31-41]
5. The document contains hidden, embedded Grammarly timestamps indicating its true date to be later than 22 August 2019 [PM31 at 42-44]
6. The Grammarly software did not exist in 2008 [Madden Report at 62c] but is contemporaneous for 2019. [Madden Report at 70-72]
7. The document was created within 3 minutes before ID_000396, another "Lynn Wright document" bearing independent indicia of tampering. [PM27 at 17.a.]
8. The title property indicated in the internal metadata is inherited from a previous document. It does not relate to the content of ID_000395 or any other document disclosed in Dr Wright's disclosure dataset but does apparently correlate to the content of a blog post published online by Dr Wright on 30 September 2018, an apparent precursor document. [PM31 at 18-21]
9. The date of the document is not contemporaneous to the events it purports to present. The purported date of the document is after the date of ID_000491.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
11. Dr Wright is recorded as an author in the metadata. The document contains Dr Wright's identifying information at the Northumbria University.

12. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by interest in law and economic theory as covered by this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 6, 22, 58, 66]
13. Dr Wright has also relied in these proceedings on his Northumbria University degree award transcript as being a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto [ID_000491]. In his evidence in these proceedings, Dr Wright also claims to have discussed the concepts behind the Bitcoin White Paper with teaching staff at the University of Northumbria. [Wright 4 at 52]
14. Dr Wright shared a link to the Archived Blog on social media contemporaneously with the date indicated in the hidden embedded Grammarly timestamp. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the Request, Dr Wright has claimed to have lost access to the relevant social media account.
15. The apparent precursor document referred to in the title metadata has not been disclosed by Dr Wright.
16. Dr Wright is a user of Grammarly software.
17. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000396**"Noncooperative finite games" (Reliance Document)**

1. The document purports to be precursor work to the Bitcoin White Paper relating to network theory and mentioning "bitcoin". It is dated to 10 September 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM27 at 38]
3. The document was created within 3 minutes after ID_000395, another "Lynn Wright document" bearing independent indicia of tampering. [PM27 at 17.a.]
4. The document was created in the same user session as ID_000371, another "Lynn Wright document" which contains common content as well as independent indicia of tampering.
5. Along with ID_000371, this document was created by copying content from an intermediate document deriving from a publicly available source document. [PM27 at 18-25]
6. The document contains a redundant reference section listing sources which do not relate to the main body content of the document. [PM27 at 20]
7. The document contains hidden, embedded text of previous editing history, including comments which have since been deleted from the document. Among the embedded text is a series of comments dating from 22 October 2008. However, that was some 6 weeks in the future at the purported Created and Last Modified date in the internal metadata of the file. [PM27 at 26-30]
8. The document has an edit time of 1 minute, but the content within the document would have taken longer to create, indicating that the content was imported from a donor source [PM27 at 13-15]. No donor source document has been disclosed.
9. The document was conducted by an unlikely sequence of saves between two authors in two minutes. [PM27 at 5-6].
10. The document editing period overlaps with other similar documents in Dr Wright's disclosure. [PM27 at 32]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

11. Dr Wright is recorded as an author within the metadata of this document.
12. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.

13. In his evidence in these proceedings, Dr Wright relies on purported work of the type referred to in this document as “foundational” for Bitcoin. [Wright 1 at 53-54]
14. The effect of the tampering is therefore to make the document appear to be supportive of Dr Wright’s claim to be Satoshi Nakamoto (suggesting work by Dr Wright on a subject of interest to him, but with reference to Bitcoin), contrary to fact.
15. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by work on networks as referred to in at least the references section of this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 54]
16. Dr Wright has not disclosed the donor document or intermediate source document from which the content of ID_000396 has been generated.
17. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000462

"Defining the possible graph structures" (Reliance Document)

1. The document purports to be precursor work to the Bitcoin White Paper relating to network theory and mentioning "BitCoin". It is dated to the period 14 July 2007 to 11 October 2008.

Reasons for Allegation of Forgery

2. The document contains inconsistent metadata which, taking into account the listed authors and revision numbers, is not replicable without either direct editing of metadata or switching user accounts on the same computer resulting in the appearance of an author change. [PM32 at 14 and 21d]
3. The document content has been sourced from a precursor donor file. No such donor file has been disclosed by Dr Wright. [PM32 at 15-20 and 21c]
4. The document has an implausible editing time in excess of 455 days. The editing time occupies the entire time between its created and last saved internal metadata timestamps. The document was saved once, or at most twice, during this period. [PM32 at 4-9]
5. The document editing period overlaps with other similar documents in Dr Wright's disclosure. [PM32 at 7, 10-11]
6. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. [ID_003932, PM32 at 1, PM26 at 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

7. Dr Wright is recorded as an author in the metadata of this document.
8. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
9. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as being a set of personal notes supporting his claim to have developed the Bitcoin system), contrary to fact.
10. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by work on networks as referred to in this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 54]
11. The document contains "Uni Newcastle" in its "Company" metadata information. In his evidence in these proceedings, Dr Wright relies on work done in connection with his MStat at

Newcastle University, as part of his claim to have been working on the concepts behind the Bitcoin White Paper. [Wright 1 at 95]

12. Although the document metadata purports Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright, and later sent from Dr Wright to Lynn Wright by email (long after they were separated), contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003932, PM32 at 1, PM26 at 25-38]
13. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000465**Email: "I need your help editing a paper I am going to release" (1)**

1. The document purports to be an email from Dr Wright to Dave Kleiman dated 12 March 2008 and referring in the future tense to Dr Wright's purported authorship of the Bitcoin White Paper.
2. This document shares content with the similar document referred to in COPA's Particulars of Claim at paragraphs 28-29.

Reasons for Allegation of Forgery

3. The document has been backdated and is inauthentic. [PM18 at 54, 57]
4. In his Defence in these proceedings, in public articles, and subsequently elsewhere, Dr Wright has offered and repeated a false technical explanation for the irregularities within documents connected to ID_000465. Dr Wright's proffered explanation is unsound. Even if it were accurate, the proffered explanation would not explain all of the irregularities discovered within it. [PM18 at 69 to 72]
5. The document is part of a series of manipulated emails, all of which carry similar content on their face, but which have been edited by degrees to display different timestamps, and different sender and recipient information [PM18 at 37-40]. The various documents in the set are inconsistent with each other but are consistent with a pattern of editing beginning with an artificial precursor email, and ending with a document which would be deployed as if it was original and authentic, in connection with Dr Wright's claim to be Satoshi Nakamoto.
6. The email was purportedly sent by Dr Wright from his email address at the domain "rcjbr.org". The date of the email is purportedly 12 March 2008. By that date however, the rcjbr.org domain name had not yet been registered by Dr Wright. It would not have been possible to send the forwarded email at the time recorded in the email message. [PM18 at 55-57, 84]
7. ID_000465 thus shares similar technical inconsistencies to ID_000464 as regards being sent from a domain name which was not yet registered to Dr Wright. [PM18 at 41-53]
8. The transmission header of ID_000465 is identical to that of ID_000464, although the documents have different content. The transmission header contains references to the domain rcjbr.org. The purported dates of those emails pre-date the date of registration of the domain name rcjbr.org, but would be contemporary for 2015. [PM18 at 55 to 57 and 63-67]
9. The document purports to be a private exchange between Dr Wright and Mr Dave Kleiman. It is among one of several documents (including ID_001318) that Dr Wright purports to have forwarded to Ira Kleiman in apparent support of his claim to be Satoshi.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. to create an email indicating that he was working on Bitcoin prior to the release of the Bitcoin White Paper), contrary to fact.
11. In his Defence in these proceedings, in public articles, and subsequently elsewhere, Dr Wright has offered and repeated a false technical explanation for the irregularities within ID_000465. Dr Wright's proffered explanation is unsound. Even if it were accurate, the proffered explanation would not explain all of the irregularities discovered within it. [PM18 at 69 to 72]
12. The document is written in the first person from the perspective of Dr Wright.
13. The document is an email sent by Dr Wright from his personal email address, craig@rcjbr.org.
14. The document contains content personal to Dr Wright.
15. In his Defence in these proceedings, Dr Wright claimed to have created the content of this document and maintained its authenticity.
16. In his evidence in these proceedings, Dr Wright relies on interactions with Mr Dave Kleiman in relation to his alleged Bitcoin project (including before the release of the Bitcoin White Paper) as part of his claim to be Satoshi Nakamoto. [Wright 1 at 89]
17. The document originates from a computer with the name "cwright" and from an IP address of Dr Wright, being the same IP address as is associated with several other documents identified as originating from Dr Wright. [PM18 at 10]
18. The document is part of a connected pattern of documents that have been edited from one another. Although the sender information changes with each edit, in each case Dr Wright is listed as the sender.

ID_000504

Non Sparse Random Graphs (Reliance Document)

1. The document purports to be precursor work to Bitcoin. It mentions "the bitcoin network" and purports to describe expectations of how it will operate in the future tense.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM28 at 56]
3. The document contains internal references to Microsoft schemas which did not yet exist in 2008 but which are contemporary for 2010 and later. [PM28 at 15-19]
4. ID_000504 records an impossible edit time in excess of 41 days. In percentage terms, the recorded MS Word Edit Time equates to more than 100% of the time difference between the Created and Last Saved dates. This is consistent with the use of clock manipulation techniques. [PM28 at 5-6]
5. The period of editing this document overlaps with a number of other documents in Dr Wright's disclosure. [PM28 at 9]
6. The content of the document was sourced from a precursor or donor file [PM28 at 14]. No such file has been disclosed.
7. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. [ID_003938, PM28 at 1, PM 26 at 25-38]
8. Equations and symbols within the document are embedded as picture files and not as native symbols, in a manner consistent with conversion from a less-readily editable precursor source in a different format into an editable format, and not consistent with ordinary drafting or creation. Much of the embedded information could simply have been typed on a keyboard. [PM28 at 10-14, 20-47]
9. The conversion process is consistent with conversion via Optical Character recognition (such as from PDF) into a DOCX file and then to a DOC file [PM28 at 48, 52-53].

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting precursor work by him in development of Bitcoin), contrary to fact.

11. The content introduced into the document, having the effect of making it appear to date from earlier than its true date, is phrased in the first person as a note from Dr Wright to himself.
12. Dr Wright is recorded in the metadata as the first author.
13. The metadata records "University of Newcastle" as the company from which the document was created. In his evidence in these proceedings, Dr Wright relies on work done in connection with his MStat at Newcastle University, as part of his claim to have been working on the concepts behind the Bitcoin White Paper. [Wright 1 at 95]
14. In his evidence in these proceedings, Dr Wright claims to have discussed the concepts behind the Bitcoin White Paper with teaching staff at the University of Newcastle. [Wright 4 at 52]
15. Dr Wright has not disclosed the precursor documents.
16. Although the document metadata present Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright after 11 April 2019, and later sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright primarily relies. The metadata of that zip file itself are also irregular. [ID_003938, PM28 at 1, PM 26 at 25-38]
17. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000525**"Bond Percolation in Timecoin.doc" (Reliance Document)**

1. The document purports to be precursor work to the Bitcoin White Paper dated 19 December 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. The document contains inauthentic metadata timestamps [PM33 at 31-32]. The document contains hidden, embedded Grammarly timestamps indicating its true date to be 16 January 2020 or later [PM33 at 20-22, 29-32].
3. The Grammarly software did not exist in 2008 [Madden report at 62c] but is contemporaneous for 2020. [Madden Report at 70-72]
4. The inconsistency between the metadata in the document and the Grammarly timestamp is probably indicative of the use of computer clock manipulation techniques [PM2 at 22].
5. The document has been created by importing content from a donor document. The donor document has not been disclosed. [PM33 at 20-22, 30]
6. The document contains equations and formulae which have been corrupted in a manner consistent with conversion from a more modern format to an older format. [PM33 at 13-16]
7. The period between metadata dates of creation and last saved is 525 days, while the MS Word edit time is recorded as just 5 minutes. This "Lynn Wright document" overlaps substantially with the creation of other documents in that category. [PM33 at 4-6, PM24 at 35]
8. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. [ID_003931, PM33 at 24-26, PM26 at 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

9. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as being a set of notes supporting his claim to be working on a "Timecoin" concept in advance of the release of Bitcoin), contrary to fact.
10. Dr Wright has positively asserted that ID_000525 is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
11. In his evidence in these proceedings, Dr Wright positively relies upon the presence of the word "Timecoin" in this document, as precursor work to the Bitcoin White Paper and thus forming part of the story behind his claim to be Satoshi Nakamoto. [Wright 1 26, Wright 4 at 6.c.x.]

12. Dr Wright shared a document with identical content on social media contemporaneously with the date indicated in the hidden embedded Grammarly timestamp. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the Request, Dr Wright has claimed to have lost access to the relevant social media account.

13. Although the document metadata purports Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright on 16 January 2020, and later sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003931, PM33 at 24-26, PM26 at 25-38]

14. Dr Wright is a user of Grammarly software.

15. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000536

Backdated White Paper PDF (1)

1. This document purports to be a PDF version of the White Paper with a creation timestamp of 24 January 2008 and a last modification on 21 May 2008. The document contains Dr Wright's contact details in place of those of Satoshi Nakamoto.

Reasons for Allegation of Forgery

2. Rather than being a precursor document to the Bitcoin White Paper as it purports to be, this document has been created from the Bitcoin White Paper subsequently, and edited in such a way that it appears as if it was precursor work. [PM3 at 127-128]
3. The metadata of this document has been edited in its year and month, so as to appear to date from over a year before the authentic Bitcoin White Paper. However, the timestamps otherwise match those of the authentic White Paper in their day, hour, minutes, and seconds. [PM3 at 91]
4. Further, the document contains embedded fonts bearing copyright statements from 2017. [PM3 at 100-101]
5. The document appears to be an edited version of document ID_000538. In particular, information present in ID_000538 (including 2018-2019 date stamps, and a URL contemporaneous to 2019) has apparently been deleted from this version. In the case of the URL, the deleted content has been replaced by a series of blank space characters precisely equivalent in length to the deleted URL. [PM3 at 152-155]
6. Although ID_000536 purports to be dated from the beginning of 2008, its content matches the March 2009 version of the authentic Bitcoin White Paper. The content does not however match the intervening, authentic drafts of the Bitcoin White Paper dating to October 2008 or November 2008, even though those are closer in time to the purported date of ID_000536. [PM3 at 92]
7. The document contains "Touchup_textedit" flags indicating that the document text has been edited in Adobe software [PM3 at 95-98].
8. The effect of the "Touchup_textedit" changes shown on the face of the document (referred to above) includes adding Dr Wright's name and contact details appear in place of those of Satoshi Nakamoto.
9. The document contains additional, hidden "Touchup_textedit" flags relating to changes which are not shown on the face of the document. The hidden changes are identical to those observed in ID_003732, suggesting that ID_000536 was created subsequently to the creation of ID_003732. ID_003732 dates from 22 May 2019. On that basis, ID_000536 could not have been created before 22 May 2019. [PM3 at 98-99]

10. The document contains four conflicting internal metadata streams, recording contradictory timestamps for different events, indicating the use of clock manipulation techniques or byte-level editing. [PM3 at 104-107]
11. The document purports to have been authored using XMP Core software that does not exist. The version referenced in the internal metadata is invalid and does not relate to any real-world versions, indicating content manipulation by byte-level editing. [PM3 at 108-114]
12. The date of the XMP Core version is given as October 2008. If this software were valid, which is denied, it would in any case post-date the purported date of authorship of the document. [PM3 at 115]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

13. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (presenting as a predecessor draft of the Bitcoin White Paper and supposedly written by him in early 2008), contrary to fact.
14. The document bears Dr Wright's name and contact details.
15. The contact details included refer to Charles Sturt University. In his evidence in these proceedings, Dr Wright has claimed to have drafted and shared versions of the Bitcoin White Paper while studying at Charles Sturt University, and to have discussed the concepts with teaching staff at Charles Sturt University. [Wright 1 at 87; Wright 4 at 52]
16. The document contains metadata that purports to pre-date the Bitcoin White Paper, indicating efforts at backdating to support Dr Wright's claim.
17. The document was created in 2019 in a British time zone, consistent with Dr Wright's location in London in 2019.
18. Dr Wright is recorded in the metadata as the author of the document.
19. In his evidence in these proceedings, Dr Wright has stated this to be an authentic document. [Exhibit CSW-5]
20. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000537

Backdated White Paper PDF (2)

1. This document purports to be a PDF version of the White Paper with the same Adobe properties as ID_000536, with a creation timestamp of 24 January 2008 and a last modification on 21 May 2008.
2. The original filename of this document is given as "SSRN-id3440802.pdf". This filename is understood by COPA to be related to the document referred to in COPA's Particulars of Claim at paragraphs 30-35 and in Dr Wright's Defence at paragraph 52. However, it is not in fact the same document.

Reasons for Allegation of Forgery

3. Rather than being a precursor document to the Bitcoin White Paper as it purports to be, this document has been created from the Bitcoin White Paper subsequently, and edited in such a way that it appears as if it was precursor work. [PM3 at 145]
4. The metadata of this document has been edited in its year and month, so as to appear to date from over a year before the authentic Bitcoin White Paper. However, the timestamps otherwise match in their day, hour, minutes, and seconds. [PM3 at 91]
5. The document includes a redundant metadata field listing the true creation date of 20090324113315-06'00', which is consistent with the date of the authentic Bitcoin White Paper. It is not consistent with the purported date of the document. [PM3 at 133]
6. The document contains "Touchup_textedit" flags indicating that the document text has been edited in Adobe software [PM3 at 95-98, 137].
7. The effect of the "Touchup_textedit" changes shown on the face of the document includes adding Dr Wright's name and contact details appear in place of those of Satoshi Nakamoto.
8. The document contains additional, hidden "Touchup_textedit" flags relating to changes which are not shown on the face of the document. The hidden changes are identical to those observed in ID_003732, indicating that ID_000537 was created subsequent to the creation of ID_003732. ID_003732 dates from 22 May 2019. On that basis, ID_000537 could not have been created before 22 May 2019. [PM3 at 98-99, 137]
9. The document purports to have been authored using a version of XMP Core that does not exist. The version referenced in the internal metadata is invalid and does not relate to any real-world versions, indicating content manipulation. [PM3 at 108-114 and 136]

10. The date of the XMP Core version is given as October 2008. If this format were valid, which is denied, it would in any case post-date the purported date of authorship of the document. [PM3 at 115]
11. ID_000537 contains a textual error, in that a hyphen is missing in the title. This textual error does not appear in the authentic versions of the Bitcoin White Paper. The same textual error does not appear in other similarly dated documents in Dr Wright's disclosure. [PM3 at 139-140]
12. This document is listed as having the same filename as the SSRN document to which COPA (in its Particulars of Claim) and Dr Wright (in his Defence) have both pleaded. However, the document is not the same document, and differs by electronic hash. [PM3 at 140-142]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

13. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (presenting as a predecessor draft of the Bitcoin White Paper and supposedly written by him in early 2008), contrary to fact.
14. The purpose of the tampering was apparently for upload to a public website, SSRN, in order to cause it to appear to the public that Dr Wright is the author of the Bitcoin White Paper, contrary to fact.
15. COPA's Particulars of Claim recited several of the indicia of tampering set out above, in respect of a document bearing an identical file name to the original filename of ID_000537. Dr Wright (in his Defence) then admitted that the document in question was not created at the time purported in its metadata, but actually created in 2019. Dr Wright has admitted that he uploaded the document to SSRN and that it was created for this purpose. Dr Wright has thus accepted that these documents are not true versions of the Bitcoin White Paper only after their veracity has been called into question.
16. Even while admitting the document to have been altered in 2019, Dr Wright declines to admit that the purported 2008 dates stated in its metadata are inauthentic "[p]ending a technical examination of the documents" [Defence at 59]. Following receipt of that technical examination in the form of the Madden Report, Dr Wright has not (to date) altered his position.
17. In his Defence, Dr Wright has provided an explanation for his creation of this document which not plausible. [Defence at 53-55]
18. The contact details included refer to Charles Sturt University. In his evidence in these proceedings, Dr Wright has claimed to have drafted and shared versions of the Bitcoin White Paper while studying at Charles Sturt University, and to have discussed the concepts with teaching staff at Charles Sturt University. [Wright 1 at 87; Wright 4 at 52]

19. In his evidence in these proceedings, Dr Wright has stated this to be an authentic document.
[Exhibit CSW-5]

ID_000538

Backdated White Paper PDF (3)

1. This document purports to be a PDF version of the White Paper that by visual comparison matches ID_000536.

Reasons for Allegation of Forgery

2. The document contains metadata irregularities, recording a creation date of 24 March 2009 but showing a recorded modified date of 21 May 2008, indicating the use of clock manipulation techniques. [PM3 at 149-150]
3. The document contains internal references to various 2018-2019 date stamps, and a URL contemporaneous to 2019. [PM3 at 152-155 and 158-159]
4. The timestamp for the search URL in the document is less than 1 minute before the last modified timestamp within document ID_003732, a document version of the White Paper also disclosed by Dr Wright. The content of ID_000538 has apparently been edited to create ID_000536. The close proximity in time and content is, in each case, consistent with an apparent chain of edits between false versions of the Bitcoin White Paper disclosed by Dr Wright. [PM3 at 152 to 159 (especially 156)]
5. The document indicates that it has been created by the use of XMP Core dating from 2008. The version of the format referred to does not exist. It is an edited version of a true XMP Core version dating to 2018. Although some digits in the version number and the year of the date have been altered, the timestamp is otherwise identical in its month, day, hour, minute, and second to the relevant 2018 version. [PM3 at 160-161]
6. The document contains "Touchup_textedit" flags indicating that the document text has been edited in Adobe software. [PM3 at 95-98, 166]
7. The effect of the "Touchup_textedit" changes shown on the face of the document includes adding Dr Wright's name and contact details appear in place of those of Satoshi Nakamoto.
8. The document contains additional, hidden "Touchup_textedit" flags relating to changes which are not shown on the face of the document. The hidden changes are identical to those observed in ID_003732, indicating that ID_000538 was created subsequent to the creation of ID_003732. ID_003732 dates from 22 May 2019. On that basis, ID_000538 cannot have been created before 22 May 2019. [PM3 at 98-99, 166-167]
9. Metadata has been edited so as to replace a reference to "Satoshi Nakamoto" with "Craig S. Wright." (including the trailing full-stop character). That full stop character is grammatically unnecessary. However, it has the technical effect of causing the edited text to occupy the same

number of bytes within the document file as the original text, "Satoshi Nakamoto". [PM3 at 164-165]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The document bears Dr Wright's name and contact details.
11. The timestamp for the search URL in the document is less than 1 minute before the last modified timestamp within document ID_003732, a document version of the White Paper also disclosed by Dr Wright. The content of ID_000538 has apparently later been edited to create ID_000536. The close proximity in time and content is, in each case, consistent with an apparent chain of edits between false versions of the Bitcoin White Paper disclosed by Dr Wright. [PM3 at 152 to 159]
12. The contact details included refer to Charles Sturt University. In his evidence in these proceedings, Dr Wright has claimed to have drafted and shared versions of the Bitcoin White Paper while studying at Charles Sturt University, and to have discussed the concepts with teaching staff at Charles Sturt University. [Wright 1 at 87; Wright 4 at 52]
13. The document contains metadata that purports to pre-date the Bitcoin White Paper, indicating efforts at backdating to support Dr Wright's claim.
14. Dr Wright is recorded in the metadata as the author of the document.
15. Dr Wright is recorded in an embedded metadata tags as the author of the document, including a trailing full-stop character indicative of byte-level editing.
16. In his evidence in these proceedings, Dr Wright has stated this to be an authentic document. [Exhibit CSW-5]
17. Dr Wright's name is on the document and he is recorded in the metadata as the author.

ID_000549

"Maths.doc" (Reliance Document)

1. This document purports to be a set of notes, including various mathematical formulae, making reference to Bitcoin and features of the Bitcoin system.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM34 at 34]
3. ID_000549 contains hidden, embedded traces of previous edits which do not appear on the face of the document. The hidden, embedded text makes reference to events that took place from 2011 to 2018 as if in the past tense. On the face-value content of the document, the year numbers "2011 to 2018" have been edited to the form "20xx to 20xx" with the effect of obscuring content which would otherwise have been anachronous to the purported date of the document. [PM34 at 19-24]
4. The hidden, embedded content of previous edits additionally refers to the fork between BTC and BCH, two versions of Bitcoin, an event which took place in 2017. [PM34 at 25-26]
5. Equations and symbols within the document are embedded as picture files and not as native symbols, in a manner consistent with conversion from a less-readily editable precursor source in a different format into an editable format, and not consistent with ordinary drafting or creation. Much of the embedded information could simply have been typed on a keyboard. [PM34 at 8-10]
6. Formulae in the document contain placeholder characters and misaligned characters, characteristic of errors introduced during conversion between filetypes. [PM34 at 10.d.]
7. The document has been created by importing the content of a donor DOCX file created in a later version of MS Word and saved in the older DOC format with an earlier version of MS Word. No donor file has been disclosed. [PM34 at 17, 30-31]
8. The document has an implausible edit time of 10 days overlapping with other documents in Dr Wright's disclosure with closely correlated characteristics. [PM34 at 4-7, 32]
9. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. [ID_003936, PM34 at 1, PM26 at 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. Dr Wright is recorded as an author in the metadata of this document.

11. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
12. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as being a set of personal notes supporting his claim to have developed the Bitcoin system), contrary to fact.
13. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by work on networks as referred to in this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 54]
14. Although the document metadata purports Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright, and later sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003936, PM34 at 1, PM26 at 25-38]
15. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000550

"BitCoin: SEIR-C Propagation models of block and transaction dissemination"
(Reliance Document)

1. The document purports to be precursor work to the Bitcoin White Paper dated 12 December 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. It is an altered version of a document actually published by Dr Wright in 2017 (the "2017 SSRN Paper"). [PM1 at 25-38 and 55]
3. The document contains hidden, embedded Grammarly timestamps indicating its true date to be 15 April 2017 or later. [PM1 at 48-53]
4. The Grammarly software did not exist in 2008 [Madden Report at 62c] but is contemporaneous for 2017. [Madden Report at 70-72]
5. ID_000550 contains hidden, embedded traces of the 2017 SSRN paper, indicating that both are derived from a common source document. [PM1 at 25-33]
6. The content referred to in the hidden, embedded traces of the 2017 SSRN paper includes news articles and government publications which did not yet exist in 2008 but which are contemporaneous for 2017. [PM1 at 19-21 and 55]
7. The document contains equations and formulae which have been corrupted in a manner consistent with conversion from a more modern format to an older format [PM1 at 34-45]. The document includes tampered content that apparently represents an attempt to explain away this problem as the result of using older equation-editing MathType software. However, analysis indicates that equations in the document were in fact authored with much later version of that software, which did not yet exist in 2008 but which are contemporaneous to 2017. [PM40 at 22-42]
8. The document contains references to Microsoft schemas which did not yet exist in 2008 but are contemporaneous to 2010 onwards (including 2017). [PM1 at 46-47]
9. The document includes anachronistic references to events that had not occurred by 2008 but which had occurred by 2017 [PM1 at 21-22].
10. The internal metadata records an anomalous edit time in excess of 70 days and the editing period of this document overlaps with several other documents in Dr Wright's disclosure, consistent with being created using clock manipulation techniques.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

11. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting academic work done by Dr Wright in his supposed development of Bitcoin), contrary to fact.
12. Dr Wright has positively asserted that ID_000550 is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
13. Dr Wright is recorded as an author of the metadata. The doctored content is phrased by Dr Wright in the first person: *"Note- I have released online as an anonymous programmer using the pseudonym "Satoshi Nakamoto"*.
14. Dr Wright is a user of Grammarly software.
15. ID_000550 contains hidden text embedded within the document which contradicts the information presented on the face of the document, a characteristic of manipulation of a series of MS Word .DOC files found throughout Dr Wright's disclosure in these proceedings.
16. The 2017 SSRN Paper is a version of the same document that was published on the SSRN website by Dr Wright himself, bearing a "date written" of 28 March 2017. The "date written" is contemporaneous with the hidden Grammarly timestamp in ID_000550 and not to the purported date of the document.
17. The metadata of the 2017 SSRN Paper lists "craig" as the creator of the document.
18. ID_000550 contains hidden, embedded traces of the 2017 SSRN paper, indicating that both are derived from a common source document.
19. Dr Wright has not disclosed the 2017 SSRN paper or the common source document.
20. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000551

"The study of Complex networks" (Reliance Document)

1. The document purports to be precursor work to the Bitcoin White Paper relating to network theory and mentioning "bitcoin". It is dated to the period 15 August 2008 to 21 December 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM35 at 28]
3. Significant portions of the content of the document were apparently copied from a textbook source available online ("**Hofstad**"). The Hofstad source from which the similar content originates cannot have dated from before 2014. The similar content originates from a version of the Hofstad source dating from 2016 or later. [PM35 at 15-28]
4. ID_000551 contains blank space where a formula is intended. The formula is present in the Hofstad source. [PM35 at 20 and 21a]
5. Various characteristics of the document indicate that its content was first created in an intervening donor document and imported into ID_000551, saved as a less modern format. No intervening donor document has been disclosed by Dr Wright. [PM35 at 6-14]
6. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. The metadata of that zip file is also irregular. [PM26 at 1, 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

7. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
8. In his evidence in these proceedings, Dr Wright relies on purported work of the type referred to in this document as "foundational" for Bitcoin. [Wright 1 at 53-54]
9. The effect of the tampering is therefore to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work by Dr Wright on a subject of interest to him, but with reference to Bitcoin), contrary to fact.
10. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by work on networks as covered by this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 54]
11. Although the document metadata presents Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright after 18 August 2019, and a copy of a similar document later sent from Dr Wright to Lynn Wright by email (long after they were separated),

contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003936, PM35 at 1, PM26 at 25-38]

12. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000554

Converted Code2Flow source code flowchart (Reliance Document)

1. The document is described by Dr Wright as maps of the Bitcoin source code. The document contains a date on its face of 9 June 2008, which is before the release of the Bitcoin White Paper or the Bitcoin Software by Satoshi Nakamoto.

Reasons for Allegation of Forgery

2. The document is a monochrome (pure black and white) picture file, in a format and encoding consistent with a fax transmission or low-quality scan of a physical document. However, the document has been electronically created by conversion from a PDF. [PM10 at 5-9]
3. ID_000554 has its origin in a PDF document, ID_000375. [PM10 at 10-21]
4. The document has been backdated. [PM10 at 74]
5. ID_000375, (the original document from which ID_000554 was created), reveals that the specific parts of the text required to support Dr Wright's claim to be Satoshi (title and year of creation) are encoded within the PDF metadata differently to the other parts of the text (page number, day, and month), consistent with having been added at a different time by different means [PM10 at 24-31]. This indication of tampering has been removed from Dr Wright's Reliance Document ID_000554 by the process of conversion to a low-quality picture file.
6. The internal, raw metadata content of ID_000375 contains embedded fonts bearing copyright statements dating them to 2015 or later. [PM10 at 34]
7. The internal metadata of ID_000375 contains hidden embedded metadata streams indicating that the original title of the file was "*code2flow – online interactive code to flowchart converter*" which was edited to read "bitcoin main.h". [PM10 at 36, 41]
8. The online Code2Flow software used to create these flowcharts did not exist in 2008 but was created at some time after 2012. [PM10 at 42-47]
9. The PDF document ID_000375 (the origin document for ID_000554) was created with XMP Core software which did not exist in 2008, and which dates the document to February 2016 or later. [PM10 at 39]
10. ID_000375 (the origin document for ID_000554) was created with a PDF Producer software "Acrobat Distiller 15.0 for Windows" which did not exist in 2008 but which date to November 2015 or later. [PM10 at 48-54]
11. The above indications of tampering were removed from Dr Wright's Reliance Document ID_000554 by means of converting it to a low-quality picture file.

12. The content of the manipulation and the origination of the timestamps in question is consistent with the use of clock manipulation. [PM10 at 71-74]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

13. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. a map of the Bitcoin source code supposedly prepared in June 2008 and in the possession of Dr Wright), contrary to fact.
14. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
15. Dr Wright has chosen to rely in these proceedings on this document, which is stripped of relevant metadata by reason of its creation process. Dr Wright has chosen not to rely on the equivalent PDF digital document which is the apparent predecessor, which contains clearer details and which contains both relevant metadata and reveals indicia of tampering.
16. ID_000554, Dr Wright's Reliance Document, contains no legible text or colour, and is blurred by conversion, rendering it impossible to relate to the underlying PDF by text searching or other means other than by visual comparison and subsequent corroboration. [PM10 at 10-13]
17. Dr Wright (craig.wright) is recorded as the author in the metadata of the document from which ID_000554 was created.
18. Although other documents in Dr Wright's disclosure bear similar hallmarks to ID_000554 (including ID_000553, another Reliance Document), Dr Wright has not disclosed their equivalent underlying PDFs.
19. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000568

"BITCOIN notes vs commodity" (Reliance Document)

1. The document purports to be precursor work to the Bitcoin White Paper relating to economic theory and law, and mentioning "BITCOIN" in its title. It is dated to 8 September 2008.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM36 at 27]
3. The document contains internal references to Microsoft schemas which did not yet exist in 2008 but which are contemporary for 2010, 2012 and later. [PM36 at 12, 21, 26.d.]
4. The document contains embedded references to fonts including Calibri Light and Nirmala UI [PM36 at 18-20, 26.e.]. Those fonts were not yet published in 2008 [Madden Report at 165]. Further, the designers of those fonts have given evidence relied on by COPA in these proceedings that the fonts were not yet conceived of or designed by the purported date of this document.
5. The document was created by importing donor content from a pre-existing file. No donor file has however been disclosed. [PM36 at 17 and 26.f]
6. The document was created and last saved immediately before ID_000569, another "Lynn Wright document" bearing independent indicia of tampering. [PM37 at 17]
7. An identical document, ID_000570, has also been disclosed but records an impossible edit time which is 90 minutes longer than the entire time between its created and last saved date. [PM36 at 26.b.]
8. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. [ID_003928, PM 36 at 1, PM26 at 25-38]
9. ID_000367 has an implausible edit time in excess of 21 days. During that time it was saved only once, implying that it was left unsaved for 61,676 minutes before being saved. [PM36 at 4-5]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
11. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. purporting to be notes relating to Bitcoin, before the publication of the Bitcoin White Paper by Satoshi Nakamoto, and indicative of work developing the Bitcoin system), contrary to fact.

12. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by interest in law and economic theory as covered by this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 6, 22, 58, 66]

13. Although the document metadata presents Lynn Wright to have been the only author, it was actually created by Dr Wright in the name of Lynn Wright after February 2013, and sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003928, PM 36 at 1, PM26 at 25-38]

14. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000569

"Bitcoin (law)" (Reliance Document)

1. The document presents as notes relating to "Bitcoin (law)". It contains less than 1 page of text but is dated to 23 October 2008 (i.e. before the publication of the Bitcoin White Paper by Satoshi Nakamoto).

Reasons for Allegation of Forgery

2. The document has been backdated. [PM37 at 30]
3. The document contains embedded references to the font Calibri Light, a font which was not yet published in 2008 [PM37 at 15-16], [PM25 at 20], [Madden Report at 165]. Further, the designer of that font has given evidence relied on by COPA in these proceedings that the font was not yet conceived of or designed by the purported date of this document.
4. The content of the document was imported from a donor document. However, no donor document was disclosed by Dr Wright. [PM37 at 4-14]
5. The document was created and last saved immediately after ID_000568, another "Lynn Wright document" bearing independent indicia of tampering. [PM37 at 17]
6. The likely donor source was a blog post titled "Bitcoin in Law", published by Dr Wright on 18 December 2018 (the "**Bitcoin Law blog post**"). The Bitcoin Law blog post was not disclosed by Dr Wright. [PM37 at 17-23, 32]
7. Comparison between the Bitcoin Law blog post and ID_000569 indicates that content that existed in the Bitcoin Law blog post has been altered in ID_000569 [PM37 at 23]. The altered content would have been anachronistic in 2008.
8. The document was emailed from Dr Wright to Lynn Wright on 18 January 2020. The email contains several manipulated documents purported to be in the custody of Lynn Wright. The metadata of that zip file is also irregular. [ID_003929, PM37 at 1, PM26 at 25-38]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

9. Dr Wright has positively asserted in these proceedings that ID_000199 is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. by presenting as a document showing precursor work on Bitcoin and a link between Dr Wright's legal studies and his purported development of Bitcoin, which is a common theme in his evidence), contrary to fact.

11. In these proceedings (and previously), Dr Wright has claimed that his development of Bitcoin was influenced by interest in law and economic theory as covered by this document. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 6, 22, 58, 66]
12. TheBitcoin Law blog post was published by Dr Wright on his own blog on 18 December 2018.
13. Although the document metadata presents Lynn Wright to have been an author, it was actually created by Dr Wright in the name of Lynn Wright, and a copy sent from Dr Wright to Lynn Wright by email long after they were separated, contained in a zip file along with many other files bearing evidence of backdating and tampering including several documents on which Dr Wright relies. The metadata of that zip file is itself also irregular. [ID_003929, PM37 at 1, PM26 at 25-38]
14. Dr Wright shared a document with identical content on social media, contemporaneously with the aforesaid email to Lynn Wright. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the request, Dr Wright has claimed to have lost access to the relevant social media account.
15. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000739

bitcoin.exe - hex-edited

1. The document purports to be a copy of *bitcoin.exe*, the Windows executable bitcoin software. Its purported date is 4 January 2009, i.e. before Satoshi Nakamoto released the Bitcoin software. Within its "About Bitcoin" dialog, the software displays the purported version "Version 0.0.8 Alpha" and the purported authorship information "*Copyright © 2008 Dr. Craig Wright.*"

Reasons for Allegation of Forgery

2. The document has been backdated. [PM12 at 49-50]
3. The document has been edited to cause changes to the text displayed within the "About Bitcoin" dialog box. The authentic "About Bitcoin" dialog box lists Satoshi Nakamoto as the author and copyright holder of the software. ID_000739 instead lists "Dr. Craig Wright" as the author and copyright holder of the software. [PM12 at 20a-b]
4. The document has been edited to cause changes to text relating to example bitcoin addresses and IP addresses shown within the software. [PM12 at 12]
5. The document is purportedly from 4 January 2009, but contains an internal embedded timestamp indicating that it is based on software that was compiled on 10 January 2010. [PM12 at 45-48]
6. Other than differences in human-readable text, the content of the document is otherwise identical to the authentic *bitcoin.exe* v0.1.1 released by Satoshi Nakamoto. [PM12 at 10-12]
7. The authentic *bitcoin.exe* v0.1.1 contains an internal checksum which validates that its content has not been altered. Such checksums are unique to the content of the file that bears them. The checksum of the authentic *bitcoin* v0.1.1 is valid. However, although ID_000739 (purported v0.0.8) contains different content, its internal checksum is a copy of the checksum for the authentic *bitcoin.exe* v0.1.0. In the case of ID_000739, the checksum is invalid: the calculated checksum for the file does not match the static stored checksum within it. The integrity of the file has been compromised after it was compiled into EXE format. [PM12 at 33 to 44 and 50]
8. The changes are consistent with hex-editing of a binary file by hand, in particular by editing solely bytes representing strings of text content (and not bytes which involved the binary operation of the software code itself), and by replacing previous text content with new text content of precisely the same length. [PM12 at 13, 24-26]
9. No source code file has been disclosed which corresponds to the purported 'version 0.0.8'. Certain source code files have been disclosed which purport to be contemporaneous to

ID_000739, but which match only approximately and do not match exactly in their relevant textual content. [PM12 at 28 to 32]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The document bears Dr Wright's name.
11. Dr Wright has relied on this document as evidence in previous litigation.
12. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. by presenting as a document showing Dr Wright's authorship and/or ownership of copyright in the bitcoin.exe software prior to the date of release of the authentic software by Satoshi Nakamoto), contrary to fact.
13. Dr Wright has disclosed two other related documents in these proceedings, being screenshots corresponding to the text displayed in the "About Bitcoin" dialog box (similar to those depicted in Appendix PM12 at 20a-b). ID_003948 is a photograph sent on WhatsApp with a date of 20 January 2020, displaying the authentic information corresponding to the authentic v0.1.1 software. ID_003951 is a photograph sent on WhatsApp with a date of 21 January 2020, one day later, displaying the inauthentic text corresponding to that of ID_000739 [Exhibit PM15.1]. COPA infers that Dr Wright created ID_000739 on 20 January 2020.
14. Dr Wright has not disclosed any WhatsApp chats relating to the files ID_003948 or ID_003951.
15. Following receipt of the Madden Report, Dr Wright has responded to a request to identify all copies of the Bitcoin software by list. ID_000739 (and all duplicates of it) have been omitted from Dr Wright's list. Dr Wright has thus accepted that these documents are not true versions of the Bitcoin software only once their veracity has been called into question. [Wright 4 at 46].
16. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_000848

Altered 'debug.log' text file

1. The document purports to be a debug.log file generated by the operation of bitcoin software. The purported document date is 10 January 2009.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM11 at 45]
3. The document has been disclosed with irregular metadata characteristics including a "created" date of 19 November 2015. [PM11 at 8, 22-26]
4. The content of the document is almost identical to the content of another document, ID_000840, but with edits resulting in changes including "WrightC" being added as the username of the account operating the software purportedly being logged. [PM11 at 12]
5. The document purports to log a failed connection attempt to an Internet Relay Chat server. It logs the use of a certain nickname to connect to that chat server. However, the logged error message refers to a similar but different username. The log is therefore internally inconsistent. [PM11 at 39-40]
6. The document purports to log failed attempts to connect to an IP address associated with the service "WhatIsMyIP.com" [PM11 at 27]. WhatIsMyIP.com was used by the authentic bitcoin software, and the authentic bitcoin software generates logs of this kind [PM12 at 14, 22-23]. The document ID_000848 records an error accessing the IP address for WhatIsMyIP.com. WhatIsMyIP.com was active in at least the period 2000-2011, but was inactive by 2013. [PM11 at 27-35]. The logged errors are therefore consistent with the logs being created on 19 November 2015 before being backdated.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

7. The document bears Dr Wright's name.
8. Dr Wright has relied on this document as evidence in previous litigation.
9. The document refers to a purported Internet Relay Chat server under the name of "ozemail.freenode.net". Dr Wright has claimed on social media that he used to manage an IRC server under the name OzEmail. Dr Wright made this claim in connection with claiming it to be related to "an error message from the original bitcoin". Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the Request, Dr Wright has claimed to have lost access to the relevant social media account.

10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. by inserting Dr Wright's name into the log, as the purported user of bitcoin software on 10 January 2009), contrary to fact.
11. Dr Wright has disclosed other similar documents in these proceedings, including ID_000840 from which ID_000848 appears to have been created.
12. In his first witness statement in these proceedings, Dr Wright lists this document as a document to which he has been referred when preparing his evidence.

ID_001317

Purported email from Dr Wright to David Kleiman

1. The document is an email chain between Dr Wright and Ira Kleiman, forwarding what purports to be an email from Dr Wright to Dave Kleiman, stating "I cannot do the Satoshi bit anymore". The purported email to Dave Kleiman is dated 10 September 2011.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM18 at 94]
3. The document is similar to a set of emails, including ID_001318, being a series of manipulated emails all of which carry similar content on their face, but which have been edited by degrees to display different timestamps, and different sender and recipient information [PM18 at 37-40]. The documents in the set are inconsistent with each other but are consistent with a pattern of editing beginning with an artificial precursor email and ending with a document which would be deployed as if it was original and authentic, in connection with Dr Wright's claim to be Satoshi Nakamoto.
4. The transmission header of the email contains a hidden, embedded timestamp indicating that a message earlier in the chain was sent on 1 March 2014, which contradicts the date of the purported forwarded content of the email (10 September 2011). [PM18 at 93]
5. The date embedded within the transmission header of the email (1 March 2014) refers to a conversation that purports to have taken place with Mr Dave Kleiman. However, Mr Dave Kleiman died on 26 April 2013 (and Dr Wright knew of his death well before March 2014). Thus, he cannot have been party to any email correspondence sent to Dr Wright on 1 March 2014.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

6. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as an email to an associate indicating that Dr Wright had been using the Satoshi persona, supposedly well before Dr Wright made a public claim to be Satoshi), contrary to fact.
7. The document is written in the first person from the perspective of Dr Wright.
8. The document is an email sent by Dr Wright from his personal email address, craig@rcjbr.org.
9. The document contains content personal to Dr Wright.
10. In his evidence in these proceedings, Dr Wright relies on interactions with Mr Dave Kleiman (both before and after the release of the Bitcoin White Paper) as part of his claim to be Satoshi Nakamoto. [Wright 1 at 89]

11. The document originates from a computer with the name "cwright" and from an IP address of Dr Wright, being the same IP address as is associated with several other documents identified as originating from Dr Wright. [PM18 at 10]

12. The document is part of a connected pattern of documents that have been edited from one another. Although the sender information changes with each edit, in each case Dr Wright is listed as the sender.

ID_001318

Email: "I need your help editing a paper I am going to release" (2)

1. The document is an email chain between Dr Wright and Ira Kleiman, forwarding what purports to be an email from Dr Wright to Dave Kleiman dated 12 March 2008 and referring in the future tense to Dr Wright's purported authorship of the Bitcoin White Paper.
2. This document shares the same content as the document referred to in COPA's Particulars of Claim at paragraphs 28-29.

Reasons for Allegation of Forgery

3. The document has been backdated and is inauthentic. [PM18 at 54, 57]
4. The document is part of a series of manipulated emails all of which carry similar content on their face, but which have been edited by degrees to display different timestamps, and different sender and recipient information [PM18 at 37-40]. The documents in the set are inconsistent with each other but are consistent with a pattern of editing beginning with an artificial precursor email and ending with a document which would be deployed as if it was original and authentic, in connection with Dr Wright's claim to be Satoshi Nakamoto.
5. The forwarded email within the chain was purportedly sent by Dr Wright from his email address craig.wright@information-defense.com. The date of that forwarded content is purportedly 12 March 2008. By that date however, the information-defense.com domain name had not yet been registered. It would not have been possible to send the forwarded email at the time recorded in the email message. [PM18 at 41-54, 84]
6. Other documents in the set from which ID_001318 was created purport to have been sent from Dr Wright's personal domain name via his email address craig@rcjbr.org. The purported dates of those emails pre-date the date of registration of the domain name rcjbr.org. [PM18 at 55 to 57]
7. The document is an email sent to Ira Kleiman, prior to Dr Wright's litigation against Ira Kleiman. The document purports to forward private exchanges between Dr Wright and Dave Kleiman (from another email address of Dr Wright). It is one of several documents (including ID_001318) that Dr Wright forwarded to Ira Kleiman in apparent support of his claim to be Satoshi.
8. None of the original emails purportedly being forwarded by Dr Wright under cover of ID_001318 (and the connected documents from which it was derived) was disclosed by Dr Wright. [PM18 at 59]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

9. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. to create an email indicating that he was working on Bitcoin prior to the release of the Bitcoin White Paper), contrary to fact.
10. The document is written in the first person from the perspective of Dr Wright.
11. The document is an email sent by Dr Wright from his personal email address, craig@rejbr.org.
12. The document contains content personal to Dr Wright.
13. In his Defence in these proceedings, Dr Wright claimed to have created the content of this document and maintained its authenticity.
14. In his evidence in these proceedings, Dr Wright relies on interactions with Mr Dave Kleiman in relation to his alleged Bitcoin project (including before the release of the Bitcoin White Paper) as part of his claim to be Satoshi Nakamoto. [Wright 1 at 89]
15. The document originates from a computer with the name "cwright" and from an IP address of Dr Wright, being the same IP address as is associated with several other documents identified as originating from Dr Wright. [PM18 at 10]
16. The document is part of a connected pattern of documents that have been edited from one another. Although the sender information changes with each edit, in each case Dr Wright is listed as the sender.

ID_001379

"Project BlackNet" paper (Reliance Document)

1. This document purports to be a copy of a "Project BlackNet" research paper dated on its face to 3 October 2002. The documents contains references to a "Stage 4 – Release Phase" and other textual amendments, referring to "Digital Cash", as well as other features of purported relevance to Bitcoin.
2. This document shares content with the similar document referred to in COPA's Particulars of Claim at paragraphs 26-27.

Reasons for Allegation of Forgery

3. The document has been backdated [PM8 at 60-61]. The document is dated on its face to 3 October 2002. However, the internal metadata for the document indicate that it was actually created on 17 February 2014. [PM8 at 15]
4. The document is an edited version on an earlier document, into which passages of text have been inserted using text from the Bitcoin White Paper. [PM8 at 23-33, 60.b.]
5. The document is apparently part of a series of documents, all of which carry similar content on their face, but which have been edited or are converted versions of the same file [PM8 at 3]. Some of those documents are consistent with a pattern of editing beginning with an earlier precursor document, and ending with a document which would be deployed as if it was original and authentic, in connection with Dr Wright's claim to be Satoshi Nakamoto. See in particular Mr Madden's discussion of ID_001016 as another backdated document in the sequence [PM8 at 34-50].
6. The metadata indicates that the file was created using Microsoft Word 2013 as the PDF Producer. Microsoft Word 2013 was not yet published in 2002 (the date on the face of the document) but is contemporaneous for 2014. [PM8 at 15]
7. The document was created in PDF form by printing to PDF from an underlying precursor DOC or .DOCX document on 17 February 2014 [PM8 at 16]. No such underlying precursor document has been disclosed by Dr Wright.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

8. Dr Wright is listed in the metadata as the author of the document.
9. Dr Wright is listed on the face of the document as its first author.
10. Dr Wright is listed as the sole author in the 'version control' section of the document on page 2.

11. The document contains Dr Wright's address and telephone number.
12. Dr Wright has positively asserted in these proceedings that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
13. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work done by him in 2002, elements of which then appeared in the Bitcoin White Paper), contrary to fact.
14. Dr Wright has posted screenshots of this document or a very similar document on Twitter, apparently in support of his claim to be Satoshi Nakamoto.
15. In his evidence in these proceedings, Dr Wright has claimed this to be a document related to the later Bitcoin White Paper and that it is original to the purported date on its face, contrary to fact. [Exhibit CSW 14]
16. Dr Wright has relied on this document, or documents with similar content, in previous proceedings and in public in support of his claim to be Satoshi Nakamoto.
17. The metadata records "DeMorgan" as the company from which the document was created. In his evidence in these proceedings, Dr Wright relies on his work on various projects from his time at DeMorgan, as part of his claim to have been working on the concepts behind the Bitcoin White Paper. [Wright 1 at 32-47]
18. The document was created in the time zone UTC+11, consistent with Dr Wright's location in Australia in February 2014, being the date of creation of the document. [PM8 at 18]
19. In his Defence in these proceedings, in public social media posts, and elsewhere, Dr Wright has repeatedly stated that the series of research papers (to which this document belongs) are related to the Bitcoin White Paper, and that later applications (submitted in 2009/2010) contained the abstract of the Bitcoin White Paper.

ID_001386

"Requested attached" Email

1. The document purports to be a PDF printout of an email from Mr Dave Kleiman to Dr Wright dated 17 October 2014.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM4 at 114]
3. The document has been manipulated to alter the content on its face. [PM4 at 111]
4. The internal metadata of the file indicates that the email was originally sent from Dr Wright "craig@panoptcrypt.com" to himself "craig@panoptcrypt.com". [PM14 at 8-9].
5. The document is a PDF printout of an email. The internal and external metadata suggest that the PDF was created several years before the purported date of the email printed out within it (7-12 July 2011, as opposed to 17 October 2014). [PM4 at 109-114, PM14 at 11-12]
6. The "from" address in the supposed email has been edited by direct editing of the PDF copy. The internal metadata of the file contains "Touchup_textedit" flags indicating that the sender identity "Dave Kleiman" was added by editing. [PM4 at 112, PM14 at 5]
7. The document contains several internally contradictory timestamps [PM14 at 11-12].
8. The document was created using XMP Core software from 2012 and Microsoft Outlook software from 2013. These were not available at the date of the PDF. [PM14 at 13]
9. Both features indicate use of either hex-editing techniques or backdating of the computer clock. [PM14 at 14-15]
10. The document contains embedded fonts carrying a copyright statement dated to 2014, which is inconsistent with the purported date of the document. [PM14 at 16]
11. This email contains an attachment called "Tulip Trust.pdf". Dr Wright has admitted that this document was created by him in the name of Mr Dave Kleiman.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

12. Dr Wright is the purported recipient of the document.
13. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (by supporting his narrative of creating and using the Tulip Trust to store assets), contrary to fact.

14. The document is a manipulated version of an email originally sent from Dr Wright to himself.
[PM14 at 8-9]
15. In his evidence in these proceedings, Dr Wright relies on interactions with Mr Dave Kleiman (both before and after release of the Bitcoin White Paper) as part of his claim to be Satoshi Nakamoto. [Wright 1 at 89]
16. The document records that it was sent from Dr Wright's personal email address.
17. Dr Wright has included an additional 36 documents in his disclosure that appear to relate to this document in various ways. [PM14 at 7]
18. Dr Wright has relied in other proceedings on the purported existence of the Tulip Trust and his ownership of associated bitcoin, a claim intrinsically linked with his claim to be Satoshi Nakamoto.

ID_001421

Touchup Textedit – purchase invoice for Tulip Trading Limited

1. The document purports to be an invoice from Abacus Seychelles relating to “Management and trust accounting Seychelles company” dated 17 October 2014.

Reasons for Allegation of Forgery

2. The document contains “Touchup_textedit” flags indicating that the document text has been edited in Adobe software. [PM4 at 1-17]
3. Alterations have been made to the narrative of the invoice. The text “Management and trust accounting” is inauthentic. [PM4 at 118-119]
4. The original text of the invoice referred to “Purchase of Seychelles 2011 shelf company”. [PM4 at 120-121]
5. The text was edited from the original document, ID_001397. The document ID_01421 has been created by taking a copy of ID_001397 and altering the content such that it makes reference to a different product or service. [PM4 at 120-121, PM14 at 54]
6. The document ID_001421 contains two different unique identifiers embedded in its internal metadata. The presence of two different such unique identifiers is a characteristic of editing a PDF. The original document ID_001397 does not display this characteristic. [PM14 at 45-46]
7. The narrative text on the face of ID_001421 has been input in two sections, using alternate PDF formatting, consistent with later editing. [PM14 at 48]
8. The document was originally created on 17 October 2014 in a time zone consistent with the Seychelles. The document was edited on 18 October 2014 in a time zone consistent with Australia. [PM14 at 49-51]
9. The original invoice from which this document was created was emailed to Dr Wright within document ID_001396, as an email attachment, before being edited. Dr Wright received it at his email address craig.wright@hotwirepe.com. The email that Dr Wright received has been disclosed in these proceedings. [PM14 at 52-55]
10. The subject line of the email to which the document was attached was “RE: Aged Shelf Company”. The subject line corresponds with the previous original content of this invoice. The subject line does not correspond with the edited content of the invoice.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

11. The invoice is made out to Dr Wright.
12. The effect of the tampering is to appear supportive of Dr Wright's claim to be Satoshi Nakamoto and the related claims he made (in other litigation) to be the beneficial owner of large quantities of Bitcoin through a trust (i.e. giving the appearance of Dr Wright having owned large quantities of bitcoin since before 2012, consistently with his claim to have mined bitcoin as Satoshi Nakamoto), contrary to fact.
13. In his evidence in these proceedings, Dr Wright relies on his purported mining operations in support of his claim to be Satoshi Nakamoto. [Wright 1 at 115-121]
14. The original document from which ID_001421 was created was also in Dr Wright's custody and control and was disclosed in these proceedings. [PM4 at 120-121]
15. The original invoice from which this document was created was emailed to Dr Wright within document ID_001396, as an email attachment before being edited. Dr Wright received it at his email address craig.wright@hotmail.com. The email that Dr Wright received has been disclosed in these proceedings. [PM14 at 52-55].
16. The email ID_001396 was sent by Denis Makaya. In his evidence in these proceedings, Dr Wright has relied on interactions with Denis Makaya in connection with his claim to be Satoshi Nakamoto. [Wright 1 at 57, 142]
17. The subject line of the ID_001396 email (to which the original invoice was attached) was "RE: Aged Shelf Company". The subject line corresponds with the previous original content of this invoice. The subject line does not correspond with the edited content of the invoice.
18. The email ID_001396 contains a thread of messages between Dr Wright and Abacus Seychelles discussing the purchase of a shelf company in which Dr Wright instructed and agreed to purchase the shelf company in question as an 'aged shelf company'.
19. The edit took place shortly after Dr Wright's receipt of the email. The original document was created and emailed to Dr Wright on 17 October 2014 by Abacus Seychelles. The document was subsequently edited on 18 October 2014.
20. The content of the email ID_001396 records that Dr Wright replied to the message prior to the edit taking place. [PM14 at 52]
21. The time zone recorded in relation to the document editing is consistent with Dr Wright's location in Australia, whereas the original document is consistent with being created in the Seychelles and not tampered with.

ID_001541

Touchup Textedit – purported email from Dave Kleiman

1. The document purports to be a PDF printout of an email from Mr Dave Kleiman to Dr Wright dated 10 December 2012.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM4 at 78-83]
3. The document contains “Touchup_textedit” flags indicating that the document text has been edited in Adobe software. [PM4 at 1-17]
4. The document has been altered twice. [PM4 at 81]
5. The first edit resulted in hidden internal content which does not appear on its face. That hidden internal content corresponds to the addition of an email header to the document, created from an email sent from Craig S Wright to himself, Craig S Wright, on 26 March 2014. The original of that document has not been disclosed. [PM4 at 79-81]
6. The header text was later edited again, such that it appears to be an email sent from Mr Dave Kleiman to Craig S Wright on 10 December 2012. [PM4 at 81-83]
7. The metadata of the document indicates that it was created and last modified in March 2014. The metadata is thus contemporary to the date recorded in the hidden internal content which does not display on the face of the document. The metadata is not consistent with the content on the face of the document. [PM4 at 83]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

8. The document is addressed to Dr Wright's email address.
9. The document is addressed to “Craig” in its content.
10. In his evidence in these proceedings, Dr Wright relies on interactions with Mr Dave Kleiman (both before and after the release of the Bitcoin White Paper) as part of his claim to be Satoshi Nakamoto. [Wright 1 at 89]
11. The effect of the tampering is to appear supportive of Dr Wright's claim to be Satoshi Nakamoto and the related claims he made (in other litigation) to be the beneficial owner of large quantities of Bitcoin through a trust (i.e. giving the appearance of Dr Wright having owned large quantities of bitcoin since before 2012, consistently with his claim to have mined bitcoin as Satoshi Nakamoto), contrary to fact.

12. In his evidence in these proceedings, Dr Wright relies on his purported mining operations in support of his claim to be Satoshi Nakamoto. [Wright 1 at 115-121]
13. The internal hidden content of the document records content sourced from an email sent by Craig S Wright to himself, Craig S Wright, on 26 March 2014.
14. The date embedded within the hidden content of the document is 26 March 2014. However, Mr Dave Kleiman died on 26 April 2013 (and Dr Wright knew of his death well before March 2014).

ID_001546

Spoofer email from Dr Wright in the name of Satoshi Nakamoto (1)

1. The document presents as an email sent in January 2014 from Satoshi Nakamoto to Dr Wright's collaborator (Uyen Nguyen), as if the writer was in fact Dr Wright making use of the email address Satoshi@vistomail.com.

Reasons for Allegation of Forgery

2. The document is an inauthentic, spoofed email. [PM21 at 32-34, 93]
3. The email was not sent from the account recorded as the sender. [PM21 at 94]
4. The email was not sent from a permitted source and did not authenticate with the purported Vistomail origin server. [PM21 at 20-34]
5. Email replies to this message would have been directed to Dr Wright at his email address craig.wright@hotwirepe.com. [PM21 at 9-13]
6. The document originates from a computer with the name "cwright" and from an IP address of Dr Wright, being the same IP address as is associated with several other documents identified as originating from Dr Wright. [PM21 at 14-18]
7. The document was recorded in its transmission header as being "for craig@rcjbr.org" and "Delivered to craig@rcjbr.org". It was not retrieved from the mailbox of Satoshi Nakamoto, but a received item from within Dr Wright's personal email inbox consistent with him being included as a blind copy (BCC) recipient. [PM21 at 18-19]
8. No equivalent sent item has been disclosed by Dr Wright. [PM21 at 35]
9. This email is not authentically from the controller of the email account "satoshi@vistomail.com". [PM21 at 34]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as suggesting that he was using a Satoshi vistomail account in 2014), contrary to fact.
11. The document is an email sent in Dr Wright's style of language using Dr Wright's personal and hotwirepe email addresses.
12. The document is an email sent to a collaborator of Dr Wright.
13. The text of the document discourages its recipient from showing the content of the email to others.

14. The document was recorded in its transmission header as being "for craig@rcjbr.org" and "Delivered to craig@rcjbr.org". It was not retrieved from the mailbox of Satoshi Nakamoto, but a received item from within Dr Wright's personal email inbox consistent with him being included as a blind copy (BCC) recipient. [PM21 at 18-19]

15. No equivalent sent item has been disclosed by Dr Wright. [PM21 at 35]

ID_001919

"Company and Trust memo"

1. The document purports to be a "Company and Trust memo" dated 23 July 2011 recording that Mr Dave Kleiman had transferred control of over 1 million Bitcoin to the company Tulip Trading Ltd.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM14 at 102]
3. The document bears a date of 23 July 2011 on its face. The metadata of the document indicates that it was created on 23 November 2015. [PM14 at 99-100]
4. The document is a PDF file created by printing a DOCX file, signing the print-out, and scanning the signed page. The DOCX file from which it was printed, ID_001904, was created on 23 November 2015. [PM14 at 95-96]
5. The document refers to a transfer of Bitcoin to "Tulip Trading Ltd". Tulip Trading Ltd was not owned by Dr Wright in 2011. It was purchased by Dr Wright in 2014 as an 'aged shelf company'. It would not have been possible for Dr Wright to take minutes referring to corporate activities concerning Tulip Trading Ltd in July 2011.
6. The document also refers to a transfer of software to "Wright International Ltd". This is understood to be a reference to Wright International Investments Ltd. Wright International Investments Ltd was not owned by Dr Wright in 2011. It was purchased by Dr Wright in 2014 as an 'aged shelf company'. It would not have been possible for Dr Wright to take minutes referring to corporate activities concerning Wright International Investments Ltd in July 2011.
7. The date on which the document was typed and scanned was 23 November 2015 [PM14 at 101]. Although it refers to a discussion that is purported to have taken place with Mr Dave Kleiman, Mr Dave Kleiman died on 26 April 2013 (and Dr Wright knew of his death well before November 2015). Thus, he cannot have been party to any discussion with Dr Wright on that date.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

8. The document bears Dr Wright's handwritten signature.
9. The document was typed in the form of a DOCX file registering "Craig S Wright" as its author, in its internal metadata.
10. The effect of the tampering is to make it appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. that Dr Wright was carrying out 'electronic currency research' before 23

July 2011, and that Dr Wright had been in possession of large quantities of Bitcoin prior to June 2011, consistently with his claim to have mined bitcoin as Satoshi Nakamoto), contrary to fact.

11. In his evidence in these proceedings, Dr Wright relies on interactions with Mr Dave Kleiman in relation to his alleged Bitcoin project (both before and after the release of the Bitcoin White Paper) as part of his claim to be Satoshi Nakamoto. [Wright 1 at 89]
12. In his evidence in these proceedings, Dr Wright relies on his purported mining operations in support of his claim to be Satoshi Nakamoto. [Wright 1 at 115-121]
13. The document refers to the transfer of “gaming software” from Dr Wright. In his evidence in these proceedings, Dr Wright relies on e.g. “software I had developed in collaboration with Global Gaming Services” [Wright 1 at 43] and other claimed software development in the gaming and gambling sector, in connection with his claim to be Satoshi Nakamoto.
14. Three versions of the scanned document have been disclosed by Dr Wright. All three bear dates of creation of 23-24 November 2015. [PM4 at 99-101]

ID_001925

Declaration of Trust

1. The document purports to be a declaration of trust dated 21 July 2011 relating to Tulip Trading Ltd.

Reasons for Allegation of Forgery

2. The document has been backdated. [PM14 at 147]
3. The document contains internal metadata recording an "editedScannedDoc" action indicating that it was first scanned from hard copy and then digitally edited. The edit took place on 24 November 2015. [PM14 at 132-133 and 135]
4. Dr Wright sent this document as an attachment to an email later on the same date the edit took place, 24 November 2015. [PM14 at 108]
5. The document contains graphical artefacts indicating that it has been edited by replacing text in the document after it was scanned and converted to editable form. The graphical artefacts are invisible or nearly invisible in standard conditions and can be made out only when the contrast of the document is increased. [PM14 at 117-133]
6. The document is apparently an edited form of ID_001530. The created date of ID_00001530 is 23 October 2014. The document ID_001925 contains two different unique identifiers embedded in its internal metadata. The presence of two different such unique identifiers is a characteristic of editing a PDF. The document from which it was apparently created, ID_001530, does not display this characteristic. [PM14 at 137-143]
7. Dr Wright has disclosed what appears to be an intermediate document within the same chain of editing. ID_001323 is a PDF created from a DOC file. The date of ID_001323 is 8 November 2014. The author of ID_001323 is given in its internal metadata as 'craig.wright'. [PM14 at 144-146]
8. The document refers to a trust declared in the name of "Tulip Trading Ltd". Tulip Trading Ltd was not owned by Dr Wright in 2011. It was purchased by Dr Wright in 2014 as an 'aged shelf company'. It would not have been possible for a trust to be declared in respect of Tulip Trading Ltd in July 2011.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

9. The document bears Dr Wright's name.
10. The document bears Dr Wright's passport number.

11. Dr Wright has disclosed three versions of this document bearing identical handwritten signatures but different, edited content.
12. The edits were done on the same day and in a similar manner as the edits made to ID_001930.
13. The effect of the tampering is to appear supportive of Dr Wright's claim to be Satoshi Nakamoto and the related claims he has made (in other litigation) to be the beneficial owner of large quantities of Bitcoin through a trust (i.e. giving the appearance of Dr Wright having owned large quantities of bitcoin since before 2012, consistently with his claim to have mined bitcoin as Satoshi Nakamoto), contrary to fact.
14. In his evidence in these proceedings, Dr Wright relies on his purported mining operations in support of his claim to be Satoshi Nakamoto. [Wright 1 at 115-121]
15. The document originates from a DOC file in which Dr Wright is recorded as the author.
16. Dr Wright sent this document as an attachment to an email on the same date that the edit took place, on 24 November 2015. [PM14 at 108]
17. The document is derived from a PDF file that records its author as "craig.wright". That document itself is created from a precursor DOC file. No precursor DOC file has been disclosed in these proceedings.
18. ID_001930 was created by scanning with a Toshiba e-STUDIO2555C scanner. The same scanner was used to create a large number of documents disclosed by Dr Wright in these proceedings, including ID_001925, ID_001930 and all of documents ID_001936 to 1957 inclusive [PM14 at 173-175, 177, 192]. Of those documents, several bear independent indicia of tampering, and 13 of them bear Dr Wright's handwritten signature.

ID_001930

Incorporation Form

1. The document presents as a scanned hard-copy version of a company incorporation form dated 21 July 2011, referring to a potential company name of Tulip Trading Ltd, and bearing Dr Wright's signature.

Reasons for Allegation of Forgery

2. The document has been edited and backdated. [PM14 at 160-161]
3. The document contains internal metadata recording an "editedScannedDoc" action indicating that it was first scanned from hard copy and then digitally edited. The edits took place on 24 November 2015. Edits were made to three pages. [PM14 at 150-161]
4. Extracting embedded images from the PDF reveals graphical artefacts indicating that the "ultimate beneficial owner" set out on the form was altered so as to appear to specify Dr Wright as beneficial owner. [PM14 at 152-155]
5. Similar graphical artefacts indicate that the directors' details set out on the form were changed to appear to specify Savannah Ltd as the sole director. [PM14 at 156].
6. Similar graphical artefacts indicate that the "accounting records address" set out on the form was altered so as to appear to specify Dr Wright's former address as the place where accounting records would be held. [PM14 at 157]
7. Similar graphical artefacts indicate that the address for dispatch of corporate documents was altered to appear to specify Dr Wright's former address. [PM14 at 158]
8. Similar graphical artefacts indicate that the contact details of the person who completed the form were altered so as to appear to specify contact details for Craig Wright. [PM14 at 159]
9. The presence of ID_001395 (an unedited version of the incorporation form) and ID_001394 (an email to Dr Wright to which ID_001395 is attached) in the disclosure set corroborates the edits that were made to ID_001930. [PM14 at 162-168]
10. Comparison with ID_001395 reveals the document signature to have been backdated from the original date (17 Oct 2014) to an earlier date (21 Jul 2011). [PM14 at 165]
11. The document ID_001930 contains two different unique identifiers embedded in its internal metadata. The presence of two different such unique identifiers is a characteristic of editing a PDF. The original document ID_001395 does not display this characteristic. [PM14 at 166-167]

12. The document refers to the incorporation of "Tulip Trading Ltd". Tulip Trading Ltd was not incorporated by Dr Wright in 2011. It was purchased by Dr Wright in 2014 as an 'aged shelf company'.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

13. The document is a company incorporation form in Dr Wright's name.
14. The form (in this edited version) bears Dr Wright's handwritten signature.
15. The handwritten signature is affixed to a declaration that the content is true to the best of the signing person's knowledge and belief. The evident purpose of alteration was to change the content of a form certified as true by Dr Wright.
16. The effect of the tampering is to appear supportive of Dr Wright's claim to be Satoshi Nakamoto and the related claims he has made (in other litigation) to be the beneficial owner of large quantities of Bitcoin through a trust (i.e. giving the appearance of Dr Wright having owned large quantities of bitcoin since before 2012, consistently with his claim to have mined bitcoin as Satoshi Nakamoto), contrary to fact.
17. In his evidence in these proceedings, Dr Wright relies on his purported mining operations in support of his claim to be Satoshi Nakamoto. [Wright 1 at 115-121]
18. The edits include acts of adding or modifying personal email and postal address details for Dr Wright.
19. The editing process caused a gap to appear within the handwritten signature. A copy of the same document has been disclosed in these proceedings as document ID_001932 in which the gaps in the signature have been filled in with disjointed lines inserted with the effect of masking that artefact. [PM14 at 174]
20. ID_001930 was created by scanning with a Toshiba e-STUDIO2555C scanner [PM14 at 110]. The same scanner was used to create a large number of documents disclosed by Dr Wright in these proceedings, including ID_001932 and all of documents ID_001935 to 1957 inclusive [PM14 at 149, 163, 172, 192]. Of those documents, several bear independent indicia of tampering, and 13 of them bear Dr Wright's handwritten signature.
21. The original document (prior to editing) was emailed by Dr Wright to Mr Denis Makaya on 17 October 2014 [PM14 at 162]. The date it was emailed is consistent with the original date of signature of the document (17 October 2014). The date it was emailed is not consistent with the edited date of the document (21 Jul 2011).
22. The edits were done on the same day and in a similar manner as the edits made to ID_001925. [PM14 at 108-135]

ID_002586

Spoofed email from Dr Wright in the name of Satoshi Nakamoto (1)

1. The document purports to be an email sent to a person called "Michele Seven", in June 2015, from Satoshi Nakamoto but signed with the name "Craig".

Reasons for Allegation of Forgery

2. The document is an inauthentic, spoofed email. [PM21 at 54, 93]
3. The email was not sent from the account recorded as the sender. [PM21 at 94]
4. The email was not sent from a permitted source and did not authenticate with the purported vistomail origin server. [PM21 at 53-54]
5. Replies to the email would have been sent to the email address satoshin@anonymousspeech.com. This is notably similar to an authentic email address used by Satoshi Nakamoto, but is different. [PM21 at 43-44]
6. The document is recorded in its transmission header as being sent via a route corresponding to other emails in Dr Wright's disclosure sent by Dr Wright from his email address @hotwirepe.com. [PM21 at 46-53]
7. The document was recorded in its transmission header as being "to craig.wright@hotwirepe.com" and "Delivered to craig.wright:hotwirepe.com". It was not retrieved from the mailbox of Satoshi Nakamoto, but a received item from within Dr Wright's email inbox consistent with him being included as recipient. [PM21 at 42-45]
8. No equivalent sent item has been disclosed by Dr Wright. [PM21 at 45]
9. This email is not authentically from the controller of the email account "satoshi@vistomail.com". [PM21 at 34]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as suggesting that he was using a Satoshi vistomail account in 2015), contrary to fact.
11. The document is an email sent in Dr Wright's style of language using Dr Wright's personal and hotwirepe email addresses.
12. The text of the document discourages its recipient from showing the content of the email to others.
13. The document is an email sent to a collaborator of Dr Wright.

14. The document was recorded in its transmission header as being “to craig.wright@hotwirepe.com” and “Delivered to craig.wright:hotwirepe.com”. It was not retrieved from the mailbox of Satoshi Nakamoto, but a received item from within Dr Wright’s email inbox consistent with him being included as recipient. [PM21 at 42-45]

15. No equivalent sent item has been disclosed by Dr Wright. [PM21 at 35]

ID_003330 and ID_004011

Coffee-stained printout of Bitcoin White Paper (two Reliance Documents)

1. ID_003330 purports to be a photograph of the front page of a printout of the Bitcoin White Paper with Dr Wright's name and contact details at the top and a note in Dr Wright's own handwriting. The document is stapled and bears coffee stains. Dr Wright claims the original date of the document to be 3 October 2008 in his Chain of Custody information.
2. ID_004011 is a scan of the same document, also showing Dr Wright's name and contact details at the top and the note seen on ID_003300, but with further manuscript amendments added by Dr Wright in his own handwriting which were not present in ID_003330.

Reasons for Allegation of Forgery

3. ID_003330 and ID_004011 bear the same coffee stain and other physical characteristics. They are plainly two records of the same hard-copy document at different points in time (the '**Coffee-Stained Printout**').
4. ID_004011 has additional handwritten annotations which do not appear in ID_003330.
5. The Coffee-Stained Printout is a copy of an A4-size printout of the Bitcoin White Paper said to date from 3 October 2008. It bears Dr Wright's name and contact details at Charles Sturt University, in a manner identical to ID_000536, ID_000537, and ID_000538, and those details in those other documents are otherwise identical to this document's face-value content [PM3 at 10: Style 4 in relation to ID_000536 to ID_000538, and Style 8 in relation to ID_004011].
6. The Coffee Stained Printout is a printout of a digital document. When imaged (whether as ID_003330 or as ID_004011), it carries no internal metadata for forensic examination of its original content. [PM15 at 1, 8; PM3 at 245].
7. No underlying digital document has been identified by Dr Wright. However, the title of the Coffee-Stained Printout contains the same hyphenation error as present in the title of ID_000537 (a native PDF), which reads "Peer-toPeer" [PM3 at 138-139]. That hyphenation error does not appear in any other versions of the Bitcoin White Paper, or any other documents, in Dr Wright's disclosure. It is to be inferred that the Coffee Stained Printout is a printout of an edited version of ID_000537.
8. The Reasons for Allegation of Forgery relating to ID_000537 (above) are therefore repeated.
9. As explained above in relation to ID_000537, that document could not have been created before 22 August 2019. On that basis, the Coffee-Stained Printout could not have been created before that date.

10. ID_003330 has been disclosed with external metadata indicating that it was created and/or sent by WhatsApp on 4 September 2019 [P15 at 6-10]. Taking this point with those above, Dr Wright's handwritten annotations visible on the face of ID_003330 (the "**Initial Handwritten Annotations**") date from the period 22 August 2019 to 4 September 2019.
11. ID_004011 was created by scanning using a Canon Multifunction Scanner/Printer device on 10 September 2019 [PM3 at 245]. Dr Wright's further handwritten annotations, visible on the face of ID_004011 (the "**Further Handwritten Annotations**"), do not appear on the face of ID_003330. The Further Handwritten Annotations therefore date from the period between 4 September 2019 and 10 September 2019.
12. In each case, the Initial Handwritten Annotations and the Further Handwritten Annotations are of a nature tending to present the document and the annotations as if it was a printout of a draft of the Bitcoin White Paper containing annotations from 2008, contrary to fact.
13. In addition to the handwritten annotations, the Coffee-Stained Printout (as seen in ID_003330) contains physical characteristics including tears, marks, warped paper, and the prominent presence of a coffee stain. These characteristics are of a nature tending to present the document as if it was an aged document, contrary to fact. In fact, for the aforesaid reasons, the Coffee-Stained Printout was not two weeks old by the date that the photograph ID_003330 was taken. It is to be inferred that these indicia of age were added during that period, in an attempt to make the document to appear to be older than it was.
14. Following receipt of the Madden Report, Dr Wright has accepted in his Chain of Custody information that ID_003330 was taken using his Samsung Galaxy S10 Plus Mobile Phone, a device that was not released until 2019, and he has said that some annotations in red ink were added between 2017 and 2020. This account is implausible. COPA contends that the document itself, including all the annotations, are inauthentic to their purported date in 2008.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

15. Dr Wright has positively asserted that both of these documents are documents on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
16. Dr Wright has chosen to rely in these proceedings on two copies of the Coffee-Stained Printout (ID_004011 and ID_003330) both of which are stripped of metadata by reason of their creation process, but he has not relied on or disclosed any underlying digital document that contains relevant metadata.
17. The documents both contain notes in Dr Wright's own handwriting.
18. Dr Wright accepts that he deliberately altered the Coffee-Stained Printout in his own handwriting at some time during 2017-2020.

19. Dr Wright accepts that the photograph ID_003330 was taken on his own mobile phone.
20. The effect of the creation of Coffee-Stained Printout in the way described is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as a predecessor version of the Bitcoin White Paper, recorded for posterity), contrary to fact.
21. Dr Wright refused to provide information about the dating of his Reliance Documents, including these, when requested. Only following service of the Madden Report did he provide an alternative account of the origin of these documents. As noted above, his account is implausible.
22. The effect of the alterations has been to introduce annotations referring to matters on which Dr Wright relies in his evidence in these proceedings.
23. The document bears Dr Wright's name and contact details.
24. The contact details included refer to Charles Sturt University. In his evidence in these proceedings, Dr Wright has claimed to have drafted and shared versions of the Bitcoin White Paper while studying at Charles Sturt University, and to have discussed the concepts with teaching staff at Charles Sturt University. [Wright 1 at 87; Wright 4 at 52]
25. Dr Wright claims, in his Chain of Custody information, to have drafted this document.

ID_003455

False NAB Account Records

1. The document presents as an email sent from Dr Wright to a collaborator, Jimmy Nguyen, in which he presents screenshots of banking records from his personal bank account and explains the relationship of the information in those screenshots to his claim to be Satoshi Nakamoto.

Reasons for Allegation of Forgery

2. The banking record in the email has been admitted by Dr Wright to be a false document.
3. Dr Wright did not admit that record to be false until after service of the Madden Report.
4. The filenames of the images embedded within the email indicate that the email was edited through an unusual process by which 6 images were embedded into the email, and the email was saved as a draft. However all but two of these images were deleted before sending. [PM17 at 14-15]
5. The missing images from the email editing process have not themselves been disclosed. [PM17 at 16]
6. The content of the screenshots indicates that they were taken in 2018 or afterwards. [PM17 at 18-28]
7. Native format exports of the documents would have been available to Dr Wright but were not provided in disclosure. [PM17 at 11]
8. Taking into account the transactions shown in the document, it would not have been possible to take authentic screenshots using the software indicated in the screenshots themselves. By the time that software was released (2018), the transactions shown were from a date which was 10 years or more in the past. The bank in question stores records for online access for no more than 2 years. [PM17 at 29-35]
9. The content of web page screenshots is freely manipulable in Google Chrome, being the software shown as being used in the screenshots. [PM17 at 36-40]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. The false screenshots in the document are taken from Dr Wright's own personal bank account.
11. The false screenshots in the document include a screenshot of the account holder details specifically identifying Dr Wright as the account holder.
12. Dr Wright must have known that the screenshots in question were false when he sent the email (as indeed he now admits he did).

13. Dr Wright did not admit the documents to be false until after service of the Madden Report.
14. Dr Wright is and at all material times has been in possession of documents that prove this document to be false (in the form of authentic, contemporaneous bank statements for the same account in question, but which do not bear the transaction information on which he relies).
15. Dr Wright did not disclose the authentic bank statements in accordance with his duties of disclosure. Instead, Dr Wright disclosed the false screenshots.
16. Dr Wright has publicly asserted (notably in his "Evidence and Law Article") that he was in control of records of the kind shown in this document, which he purported to be decisively probative by way of evidence of his claim to be Satoshi Nakamoto. Such public assertions were made at a time contemporaneous to the date of this document being created.
17. Dr Wright's attempts to explain the records as false documents supplied to him by an unknown person over Reddit, and to explain his email as intended to check the falsity of the documents, are highly implausible. Dr Wright's attempted explanations rely on information being purportedly passed to him by his previous legal representative who has died, and are unsupported by disclosure.
18. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as proving his purchase of a domain associated with Satoshi), contrary to fact.
19. The document is sent from Dr Wright to a collaborator of Dr Wright's and contains text written by Dr Wright apparently intended to persuade the recipient that the information is supportive of his claim to be Satoshi Nakamoto.

ID_003702

LLM Dissertation Proposal 3

1. The document is identical in content to ID_00217. It is attached to an email dated 18 September 2019.

Reasons for Allegation of Forgery

2. The content of ID_003702 is identical to that of ID_000217. The paragraphs above relating to ID_000217 are thus repeated.
3. The email to which ID_003702 was attached refers to it as "Fyi. The start of bitcoin". [PM25 at 14]
4. The document does not authentically date from the origins of Bitcoin. [PM25 at 16]
5. The email to which ID_003702 was attached is dated 18 September 2019. That is contemporary to the hidden embedded Grammarly timestamps in the document (dated 1 month earlier) but not to the purported date of the document. [PM25 at 14]
6. Although the metadata of the document date it to 18 September 2019, the content of the document purports to originate from the time that Dr Wright was studying his LLM.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

7. The content of ID_003702 is identical to that of ID_000217. The paragraphs above relating to ID_000217 are thus repeated.
8. ID_003702 was sent from Dr Wright by way of a personal email by Dr Wright to Ms Julianne Archer (also known as Julie Laimer).
9. Ms Archer is understood by COPA to be Dr Wright's mother.
10. ID_003702 was emailed from Dr Wright's personal email address.
11. The subject of the email is in the first person "*I am sharing 'LLM_ProposalA.doc' with you*". The signature of the email is "Shared from Word for Android". This is consistent with the email being sent by Dr Wright from his personal Android mobile device in 2019, an Android-based Samsung Mobile phone.

ID_003732

Bitcoin White Paper – Edited to include Dr Wright's Leicester contact details

1. The document purports to be a copy of the Bitcoin White Paper bearing Dr Wright's name and email address at Leicester University, and the company name "nChain Ltd".

Reasons for Allegation of Forgery

2. The document is a copy of the Bitcoin White Paper, which has been edited to add Dr Wright's name and contact details in place of Satoshi Nakamoto's. [PM3 at 75-88]
3. The document bears a "last modified" timestamp of 22 May 2019. [PM3 at 76]
4. The author name "Craig Steven Wright" and the keywords "law", "smart contract" and "immutable" have been added to the metadata of the document, which were not present in the original version of the Bitcoin White Paper published by Satoshi Nakamoto. [PM3 at 76, 84-85]
5. The document contains an embedded font containing a copyright statement dating to 2017. [PM3 at 78-80]
6. The document contains internal hidden content streams indicating the addition, in 2019, of content relating to Dr Wright into the original Bitcoin White Paper. [PM3 at 81]
7. The document was authored using a version of Adobe software dating to 2018. [PM3 at 81-83]
8. The document was edited in the time zone UTC+1, consistent with Dr Wright's local time zone in May 2019 (British Summer Time). [PM3 at 82]
9. The document contains "Touchup_textedit" tags indicating editing by later software to add Dr Wright's name and contact details. [PM3 at 86-87]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. Dr Wright's name and contact information are on the face of the document.
11. Dr Wright's name appears in the metadata of the document as its author. [PM3 at 76, 84-85]
12. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as purporting to be a copy of the Bitcoin White Paper bearing Dr Wright's contact information in place of that of Satoshi Nakamoto), contrary to fact.
13. The keywords "law", "smart contract" and "immutable" which have been added to the document's metadata align with Dr Wright's claim to the superiority of "his" vision of Bitcoin, via the competing cryptocurrency BSV.

14. Dr Wright has chosen to rely on non-native and/or multiply-converted versions of the Bitcoin White Paper. Dr Wright has not chosen to rely on any original native versions of the Bitcoin White Paper which might otherwise have relevant metadata attached.

15. Dr Wright shared a hash-identical copy of this document on social media within 49 seconds of its last modified timestamp. Upon request in these proceedings, Dr Wright has repeatedly declined to disclose a copy of his posts to social media accounts. Since the date of the Request, Dr Wright has claimed to have lost access to the relevant social media account.

ID_004010

Bitcoin White Paper, Coffee stained, rusty staples (Reliance Document)

1. The document purports to be an aged copy of the Bitcoin White Paper. It is held together with a staple that is rusty and has a coffee ring on the front page.

Reasons for Allegation of Forgery

2. The document is a scan of a print-out of the Bitcoin White Paper. [PM3 at 192]
3. Based on its format and the signs of editing referred to below, the document has undergone several steps of conversion (conversion from PDF to editable form, printing into hard copy, and then scanning back into PDF) [PM3 at 203]. The process of conversion has erased relevant metadata. [PM3 at 193]
4. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto and to have used that pseudonym between 2008 and 2012. However, the document cannot have been created before August 2012. [PM3 at 204, notably 204.f.]
5. The document contains placeholder font characters indicative of being created by imperfect conversion from the published Bitcoin White Paper (PDF) into an editable format. [PM3 at 193-203]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

6. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
7. Dr Wright relied on this document in the similar proceedings in Oslo, Norway (the Granath litigation) as a document on which he relied as supporting his claim to be Satoshi Nakamoto.
8. Dr Wright has chosen to rely on non-native and/or multiply-converted versions of the Bitcoin White Paper. Dr Wright has not chosen to rely on any original native versions of the Bitcoin White Paper which might otherwise have relevant metadata attached.
9. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. to create a document appearing to be a version of the Bitcoin White Paper in Dr Wright's possession which accords with his narrative of writing the White Paper), contrary to fact.

ID_004013

Handwritten BDO Minutes (Reliance Document)

1. The document presents as a set of minutes of a meeting attended by Dr Wright and Alan Granger, dated "Aug 07", at BDO. It refers to "timechain", "P2p ecash", and "write paper", as connected concepts to Dr Wright's purported creation of Bitcoin, and presents as if it concerns planning for work to be done by Dr Wright and Mr Granger throughout 2007 and 2008.

Reasons for Allegation of Forgery

2. The document is handwritten on a pre-printed pad that was manufactured in China. Bird & Bird has obtained a copy of the original PDF print proof document of the pad directly from the manufacturer. The copy of the original PDF proof document is an authentic document. [PM5 at 3-17 and 25]
3. The handwritten document ID_004013 perfectly matches the pre-printed template in the version of the PDF print proofs known as Exhibit MS1 (the first proof of the relevant notepad product). [PM5 at 17-25]
4. The PDF print proofs known as Exhibit MS1, which this document matches, date from no earlier than 6 November to 9 November 2009. [PM5 at 3-17 and 25]
5. The face-value date of August 2007 is therefore false and misleading.
6. Further, the purported notes of planning for work to be done throughout 2007 and 2008 are also therefore false and misleading.

Reasons for Inference of Dr Wright's Knowledge / Responsibility

7. Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
8. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as creating a document which suggests that Dr Wright was developing Bitcoin in 2007 and had shared details of his work with Mr Granger), contrary to fact.
9. Dr Wright has relied on this document in previous proceedings, including on oath.
10. The document is in Dr Wright's own handwriting.
11. In the document, Dr Wright has named himself as present at the purported meeting, in his own handwriting.

12. Dr Wright purports to have attended a meeting and taken these minutes himself. Dr Wright must know from his own experience that the meeting, and the purported minutes of the meeting, are false.
13. In his evidence in these proceedings, Dr Wright relies on a purported discussion of Bitcoin between him and Alan Granger, among other work done with Alan Granger around 2007. [Wright 1 at 48-52]
14. In his chain of custody information in these proceedings, Dr Wright claims to have drafted this document himself.
15. When disclosing this document, Dr Wright did not specify a date for the document. When requested to provide a date for this document, Dr Wright refused to do so.

ID_004019

Tominaka Nakamoto: Monumenta Nipponica

1. The document presents as a printout of a journal article concerning a historical figure called "Nakamoto", purportedly downloaded on 5 January 2008, and annotated by Dr Wright by hand in his own handwriting in terms associating himself with that historical figure "Nakamoto".

Reasons for Allegation of Forgery

2. The document has been backdated. [PM6 at 55]. The timestamp at the top of the document has been altered, with the digits of the hour and of the year entered in different font to the rest of the timestamp. [PM6 at 3]
3. The document is a hand-annotated printout of a digital document [PM6 at 5]. The underlying digital document has not been disclosed.
4. The original source of the document was discovered by searching on the internet. [PM6 at 27-30]
5. The genuine date of the source document is not 2008, but 2015. The document remains available online now. [PM6 at 27-32]
6. The original document was downloaded from the academic repository website JSTOR. By inspection of the footer against a comparator data set of over 180 other documents downloaded from JSTOR, it is possible to identify 7 epochs during which the design of the footer of JSTOR documents changed in the decade between January 2007 and December 2016. The dates of changes of design can be pinpointed to six specific days in that decade. By comparison of the footer of ID_004019 to that data set, it is possible to establish that the footer is contemporary to the period between 19 March 2013 and 22 March 2016. [PM6 at 33-47]
7. Further, by comparison with 10 other independently-downloaded documents dated 5 Jan 2008 within that dataset, it can be established that the footer of the ID_004019 is notably different from those on documents from 2008, and therefore is not contemporaneous with such documents from 2008. [PM6 at 48-51]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

8. The underlying digital document has not been disclosed.
9. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. by suggesting that he had read a paper about Tominaga Nakamoto before he coined the pseudonym Satoshi Nakamoto), contrary to fact.

10. In his evidence in these proceedings, Dr Wright claims that the name "Satoshi Nakamoto" was chosen due to his 'admiration for the philosopher Tominaga Nakamoto'. It is to be inferred that this forgery was done to support that aspect of his claim. [Wright 1 at 66]
11. Dr Wright has publicly asserted this document to be supportive of his claim.
12. Dr Wright has publicly maintained the authenticity of this document in social media posts.
13. This document was photographed by Dr Wright for transmission via WhatsApp [PM6 at 7]. The photograph was taken around 1 week before this document was scanned into PDF form. This is consistent with other examples within disclosure where Dr Wright has photographed other documents bearing indicia of tampering, for sending via WhatsApp, before they were scanned and disclosed.

ID_004077, ID_004078, and ID_004079

MYOB accounting screenshots (Reliance Documents)

1. The documents present as series of screenshots from an MYOB accounting database apparently recording a series of transactions of Dr Wright, dated to 2009, connected to mining bitcoin and accounting for it in relation to Wright International Investments Limited, Seychelles.

Reasons for Allegation of Forgery

2. The accounting entries have been backdated. MYOB software allows accounting records to be created with any date selected by the user. It is possible, and has at all times been possible, to create identical records to those shown in these Reliance Documents by simple entry and manual backdating, and freely to populate information within the record system. [PM7 at 33-45]
3. The accounts are dated as if from 2009-2010 [PM9 at 23]. However, the accounting entries ascribe high monetary values to bitcoin which are not consistent with the actual value of bitcoin at the purported date of the entries.
4. The relevant accounting audit logs demonstrate that the entries were inputted on 6-7 March 2020 and edited during that time, so that they are not authentic to their purported dates. [PM21 at 59-65]
5. The accounting records refer to an invalid ABN (Australian Business Number). [PM7 at 50-55]
6. The documents are screenshots of information contained within an accounting database that was included incidentally with Dr Wright's disclosure by reason of being embedded within a zip file containing other documents. It was not disclosed with its own ID number.
7. Each version of the accounting software in which these records were created is freely downloadable from the MYOB website. [PM7 at 17]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

8. Each of these documents is a document Dr Wright has positively asserted that this is a document on which he primarily relies as supporting his claim to be Satoshi Nakamoto.
9. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as supposedly evidencing transactions featuring within his narrative), contrary to fact.
10. The session audit logs indicate that the person using the database attempted to log in with the usernames "Administrator" and craig@panopticopt.com in quick succession. Craig@panopticopt.com is Dr Wright. [PM7 at 64]

11. Dr Wright has chosen to rely on non-native screenshot versions of his accounting database. Dr Wright has not chosen to rely on native documents.
12. The only corresponding native document disclosed in these proceedings is a file that has been backdated.
13. The backdated native document was not disclosed as part of Dr Wright's list, nor was it described or given a date. It was disclosed incidentally, buried within a zip file within a zip file within an attachment to an otherwise blank email [Madden main report, paragraph 166.d.]. It is to be inferred that Dr Wright did not intend to disclose the native file, but intended for the native file to remain unavailable.
14. The documents were created in the course of litigation between Dr Wright and others to be deployed in that litigation in support of his claims, as they have been deployed in this litigation.
15. The company Wright International Investments Limited was an inactive shelf company which did not operate before 2014 when it was purchased by Dr Wright. It could not therefore have been responsible for the accounts entered into these records, as Dr Wright must have known.
16. Since service of the Madden Report, Dr Wright has altered his position in respect of these documents and has put forward an explanation by way of references to purported facts that are implausible and do not explain the indicia of tampering.

ID_004515

Email to Lynn Wright

1. The document is an email from Dr Wright to Lynn Wright purportedly dated 27 March 2011 and attaching ID_004516.

Reasons for Allegation of Forgery

2. ID_004515 has been backdated. The email was sent using Microsoft Outlook 16. Microsoft Outlook 16 was not published until September 2015, several years after the date of the document (2011). [PM9 at 25, 30]
3. The document contains metadata features consistent with editing of the message using the "Edit Message" function of Microsoft Outlook after it was sent and received. [PM9 at 31-34]
4. The document attaches ID_004516, which is a backdated document actually created after 2016.
5. The document purports to have been sent by Craig Wright "on behalf of" himself. It is irregular for an email to contain the same sender email address in both its delegated 'from' and 'on behalf of' fields. The transmission header of the document records that it was sent with Microsoft Outlook. Microsoft Outlook does not permit emails to be configured in this way. [PM9 at 10-12]
6. The document contains an improperly formatted "From" field, having an appearance of a properly-formatted email address but in fact being constructed from typed text. The sender address has been edited. [PM9 at 6-9]
7. The document contains an improperly formatted recipient field, having an appearance of a properly-formatted email address but in fact being constructed from typed text. The recipient display name has been edited. [PM9 at 13-18].
8. Although the document purports on its face to have been sent from "*Craig S Wright <Craig S Wright <craig.wright@information-defense.com>> on behalf of Craig S Wright <Craig S Wright <craig.wright@information-defense.com>>*" to "*lynn.wright@information-defense.com*", the internal metadata indicates that the original email was sent by Dr Wright to himself at the email address "*craig@rcjbr.org*". [PM9 at 19-20]
9. The transmission header of the document contains references to earlier emails, including an apparent reference to the name "mitchieshadie" in relation to an email pertinent to this document. The name Michael Shehadie appears in other documents in the disclosure dataset, but does not appear on the face of this document. [PM9 at 29]
10. The internal metadata of the document indicates that it was apparently edited on 22 July 2020. [PM9 at 21-22]

11. The metadata of the email lists the attachment as having been created on 17 July 2020. This is significantly later than the purported authorship of the email (27 March 2011) and cannot be explained by handling errors. [PM9 at 57-59].

Reasons for Inference of Dr Wright's Knowledge / Responsibility

12. The email lists Dr Wright as the sender.
13. The email lists Dr Wright as the original recipient.
14. The effect of the forgery is to create a document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (i.e. as supposedly evidencing Dr Wright sending his wife in 2011 a document the content of which was intended to support his claim), contrary to fact.
15. Dr Wright has disclosed a second version of the same email, in which certain indications of tampering have been corrected. Other indicia of tampering have been added or included. Both copies were in Dr Wright's possession or control. It is to be inferred that Dr Wright first created a poor forgery, and then sought to refine it.
16. The document contains no body content other than the attachment ID_004516. ID_004516 is a backdated document. The reasons set out below in relation to ID_004516 are relied upon herein in relation to ID_004516.

ID_004516

"Project Spyder"

1. This document purports to be a copy of a "Project Spyder" research paper dated on its face to 3 October 2002. The document contains references to a "Stage 4 – Release Phase" and other textual amendments, referring to "Digital Cash", as well as other features of purported relevance to Bitcoin. It is dated on its face to 9 November 2002.

Reasons for Allegation of Forgery

2. The document has been backdated [PM9 at 94, 137-138]. The document contains hidden, embedded Grammarly timestamps indicating its true date to be later than 2 June 2016 07:16:23 UTC. [PM9 at 78-79]
3. The Grammarly software did not exist in 2002 [Madden Report at 62c] but is contemporaneous for 2016. [Madden Report at 70-72]
4. The document contains an impossible edit time of *minus* 13 years, 7 months and 4 days [PM9 at 70]. That negative edit time is an approximate match for time between the true date of creation (being 2016, corresponding to the Grammarly timestamp) and the false, purported date of creation (said to be 2002) [PM9 at 82-83].
5. The document has been created by importing content from a DOCX file. The DOCX file format was not yet available in 2002, but is contemporaneous to 2016. [PM9 at 72]
6. The document contains embedded internal references to Microsoft schema not yet published in 2001 but which are contemporary to 2006, 2012, and later. [PM9 at 73-74]
7. The document contains embedded references to fonts including Calibri Light and Nirmala UI [PM9 at 75]. Those fonts were not yet published in 2008 [Madden Report at 165]. Further, the designers of those fonts have given evidence relied on by COPA in these proceedings that the fonts were not yet conceived of or designed by the purported date of this document.
8. The document was attached to an email [ID_004515] which itself contains significant irregularities and is not authentic. [PM9 at 134]
9. The document is part of a series of manipulated documents, all of which carry similar content on their face, but which have been edited or are converted versions of the same file. Several of those documents are consistent with a pattern of editing beginning with an earlier precursor document, and ending with a document which would be deployed as if it was original and authentic, in connection with Dr Wright's claim to be Satoshi Nakamoto. [PM8 as a whole, especially at 1-3, 30-33, 60-61; PM9 as a whole, especially at 1-2; 93; 131; 137-142]

Reasons for Inference of Dr Wright's Knowledge / Responsibility

10. Dr Wright is listed in the metadata as the author of the document.
 11. Dr Wright is listed on the face of the document as its first author.
 12. The document contains Dr Wright's address and telephone number.
 13. Dr Wright is listed as the "person giving approval" on page 6 of the document.
 14. Dr Wright is listed as the "Project Manager" on page 7 of the document.
 15. Dr Wright is listed as the first and last author in the 'version control' section of the document on page 2.
 16. The document was attached to an email sent from Dr Wright's email address.
 17. The effect of the tampering is to make the document appear to be supportive of Dr Wright's claim to be Satoshi Nakamoto (suggesting work done by him in 2002, elements of which then appeared in the Bitcoin White Paper), contrary to fact.
18. Dr Wright has relied on this document, or documents with similar content, in previous proceedings and in public in support of his claim to be Satoshi Nakamoto.
19. In his Defence in these proceedings, in public social media posts, and elsewhere, Dr Wright has repeatedly stated that the series of research papers (to which this document belongs) are related to the Bitcoin White Paper, and that later applications (submitted in 2009/2010) contained the abstract of the Bitcoin White Paper.
20. Dr Wright is a user of Grammarly software.

Appendix: List of file hashes

File	MD5Hash	SHA2-256Hash
ID_000073.DOC	603af311aa3a9aafb27c5b5a11de0d53	665efe0ee7ee3c5de0b4d5732bf8b6c2cfceble9eabe3f0827462c953b7b7f43
ID_000199.DOC	541053d6b0dfaa15675aaf839d7e88d1	2601f07fe774808c36990f40e4a7a2bed739e2c51965fb544931f4ff19453acb
ID_000217.DOC	06ab50d379e2e65efdfb4a82449add9	04bdf7a2d9cdf124ccc72cb49aa0a94856b23f64c8a67b455b24301cbfbd209
ID_000227.DOC	1b5d8af01176aed9334989e09ff32513	0b2e703c4886abe733a09721f15ae5e21d6616af13a5fd8f7a7cd76d7a04b664
ID_000254.ODT	7f8befdd723ff197f461f7fba21b32fb	ab570587717e09027e862b3af93355304939401d796481ee90289fc91dc191c4
ID_000258.DOC	f18700dfc7fa423bf7a3f7cdfa558bce	aeaa137435a9efc7a787a63961bfcc0a16a24c17d3cfacfaecb40b6b74e7e95f
ID_000260.ODT	d2c6ebf465ec3f1e8aa73ec04e55e893	52c8a7edc91e266019cd4056763d542dc40fe1d4f8e133af36f25caba7cabf97
ID_000367.DOC	4a99ca294ad3acdd9a727aeaadd92324	986af603fd1aaea33c6d373a58ed2beac3c8e46ee16fe187577fd36a024874b3
ID_000371.DOC	775898f4818c5701d8cade5721256e16	60246de11f63ee1310b3580780d36103c198cb69677b15b6705335a1cfa5c19d
ID_000395.DOC	6ed656044838840b54d31952f45d1923	b67dfb8a23ba956a4875b277e6a94e760d83c1d410cdc78f38a9592001d2f859
ID_000396.DOC	b7f0ff0b17f1aa3febc3ff0aec6da153	f6cc72e78cea143322769e88d6124c7c2d0f0ebfc2633c67c642cec5097fc9bb
ID_000462.DOC	4b02bdd00c2909c3b8085201b0eaa598	3ab8111a7c543413358cb8b84a2128cc12e00e1bd5c90fc10dd082dd342ea0a6
ID_000465.MSG	e287fbf5ce20e6d5bd05e4cee5e1d50f	0308458fa4a230106d4ed832a9e1902495b62b7a5f6c7cfead3de83c51c873f5
ID_000504.DOC	13c7ec0d246ff6dd1519e2b0bbabff67	5441063a15329eff1d583fecc68d83d4c78c9be909f0692fafe5ad3834b32315
ID_000525.DOC	226e77bb9759596e548174fcd13f180e	0dd96fa812aaf268ecc916c5ef80bcfabad63a35eac03eb39b85373d396f318b
ID_000536.PDF	42fa5efcd463e895c4a1aa7f5612f02f	5d71d5065e9d97f25cdb1ef94e6e279eaac2c8069c6be6924a48bf91022e0b6b
ID_000537.PDF	5e210ce3003ffaed204b7b2076c2fc92	9f18d696b6f25a2ec98663bc646207659ee24bc6cfe126bf702928539f296343
ID_000538.PDF	feb0ccfdb96c96939e539812ba9e4abb	de129a5ed7ef4981ff251e19bfe238a0cd7c6cbbc460eaeb8e0aa7978b838ac7
ID_000549.DOC	94a145071f0c339c12925aa10a3c81f0	f4ab35bb725f457580f54909ffa7508ac5eddf6c1d395203707b8478ad72c745
ID_000550.DOC	bdfa5bc49501608a6436156df104fcbc	9fbbae8ca6fbd22b8c2b8df07f1c72f1cd06b670d792d755752e55ad874a0725
ID_000551.DOC	95672f2748702a7daee65d219546c2bc	564cf174d9f867067591355c910b988fbde2ecb204aade201bd10a910c0676d
ID_000554.TIF	49d03aa0f320de2e9711e5a3986195d6	638afb0b7d953e79c916aa477765dbd94ab7c8a600f5fd68f84e82245f7c163a
ID_000568.DOC	080a98f16eeda8defbd15e2b4fac7f2	5cc4fcc25913f24dd719d6e0e3eb255fd6bf04e03451f41dd475cac10c1aa3e0
ID_000569.DOC	4128db5c270060e1464b9d516b3de8ea	6c7910b8991f15902abf32b94d61b7be9e8b8c17512bb4f20d31f1cd609faba4
ID_000739.EXE	e5e1190c5237c0ecbc77c7c25a86b1ef	19df8cde34a381a9949a48111a6508b195279bf4742c1d1a6b851bdcdfe9d97e
ID_000848.LOG	3a42a21a889a84a5dabaaf51a6a2d992	be716c29a2c7f4d85f66d1206a63a6c2bafc01447cd7537e9784ebce36a19f8d

File	MD5Hash	SHA2-256Hash
ID_001317.MSG	eb65312240ac27dbd021cbbb9165fe1d	ea393675e7fbcae3079be8b19c9f344e1cc90d9617328bbb0ebe95c14a2329c9
ID_001318.MSG	2b1332b193b48b6d729b17a66a9cfef0	d60d7fd855cb5d87bc67d3923df71747b574d31b3e09c155485ea0f07b8ca315
ID_001379.PDF	3919d33aa69ece7ff393416f0478ad08	f3bb5a3b92eb5cdaacfe04b0b5e0dd5d45241fa43c6a903c03113f34ecf5775d
ID_001386.PDF	d7d47f603ae5f6fb1015cf0e691dd2eb	fc2854b7c8e5147147f0dc8ca122217910bd7fbc8a79fad744409b87b296df3b
ID_001421.PDF	389c151e55067de2ac21e952d0f1be3e	706f48e10e657786a6ff15dfde56e1ba50fdb304437fe7e55112798f9fb4b24d
ID_001541.PDF	a0c9f0e6d65557238707b4160d997731	106276a6efdb3a18a3749c4b3b45897858d0b99c9562e14c518fb45e85094b0d
ID_001546.MSG	9e7e765f2d07ecbb41bd3edd1974053a	26654fd6ea81882648a6c085cecbf34f1a9e63ecdabaa314278fc3c9fb2f4c74
ID_001919.PDF	7203d9d4e2268baa13bf2fd6b4255cca	d2204d32b08ac762e467769a62213b876a810019b543d045db69f9691ae8a242
ID_001925.PDF	ba5cf051dcc7659939f9252d8ee67329	7664acc42f83161ee5fa96279fbfb30b291c1dd8f666488d9f6f16fac97e08ae
ID_001930.PDF	2aed9026e8909d592420435cef539d52	450be3e2c4ddd97be895d8c71063e015038ab1341df75bada61a31a3abcd45e
ID_002586.MSG	1e0ccd9323eae7817254d6d1914f1902	244e80a3af08a59ce25dbc191fc47dd7bb01513fc5f94bbb2465c324bc5fd3d3
ID_003330.JPG	dd472d49a756752ee68f09ac59892926	60606fe9869486597ee7c13d44a594fe6e08f3eb97b95eba657e417efd6ebabf
ID_003455.MSG	55867ddb209b989c3a8bd3a673a14f95	8fbe9d111d0cdd50d41de14e76a1e67ca078d32b6bec4bcf271cd76d75090248
ID_003702.DOC	a00a753aff1d53dbe33a2cf97fdda30b	28bbe27349471c91dc7f08a42b4eba270834dbacd76a45940e70a04f237d6179
ID_003732.PDF	7c8f5c69eb4ccf9821656860f77e6773	ec6095d7a815eeb48cb9cf71cd374b8d1bba65fe16a67cd216172472e092bdd0
ID_004010.PDF	8408769f3720b76e24f54b05716dcbc5	90350418963e7dd908a011b493110c14131914a5921b6f846b91fb2c25281626
ID_004011.PDF	11f8bdcb8cd21fa037e2fe17e727cc62	1be648fbb4e53000936918ba30f8697078140f12cc623f7bb0b51c3f2e92173c
ID_004013.PDF	71ce1d59067745a639ee4006253539ef	aa02808704996402d4361dd57686a676287f981a63106066640278969f0585d6
ID_004019.PDF	457785a0691cee2915ef34d932d9ce2d	3a33ada5a2d61bcacf79332094f7c1315cb9327ddef17b41656b5716559886282
ID_004077.PDF	1775098700883d968cfef7d3bd5d4cb	0b39e394863a6b50025f349cf44c8ecd1bb148ef1b5420402bcbb3ed8250ced0
ID_004078.PDF	be21f43cc249ea521a6767fb12ba9498	8fc4b6930a50556a43d41d6fc0ef65d9e85d3e23acb8b25287ed49e853f361e4
ID_004079.PDF	98797110cef7e180595b1cd890c0dc55	f70eb8bb48fe4be4cc9833c84b380e9dc3d1b36c10b7373a76c2dd3373a2a551
ID_004515.MSG	afb5a85f0009246c1252bbb1f2bcd8f	e9982879bbfcae1314cf440ae8a55beb9ecfc6991f9d04f8d76da309f9442a8c
ID_004516.DOC	cd0fe44f2a4794d63712fc308b63b96e	ca2af5ba99970565e1622cf336837dbdcbda4be974471cd75acefc0b83e46978