

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

IRA KLEIMAN, as the personal representative  
of the Estate of David Kleiman, and W&K Info  
Defense Research, LLC

Plaintiffs,

v.

CRAIG WRIGHT

Defendant.

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

**NOTICE OF SUPPLEMENTAL EVIDENCE SUPPORTING PLAINTIFFS' OMNIBUS  
MOTION FOR SANCTIONS ECF No. [507]**

Plaintiffs' file this supplement to notify the Court of new evidence that further proves the "CSW Filed List" is not a list of Wright's bitcoin public addresses but is instead a purposeful fabrication by him.

After this Court ordered the parties to confer on redactions to Plaintiffs' Sanctions Motion, Plaintiffs' counsel's office mistakenly filed Exhibit 7 (the CSW Filed List) on the public docket.<sup>1</sup>

On May 24, 2020, someone anonymously posted a message at this link <https://paste.debian.net/plain/1148565>. The message said:

*Craig Steven Wright is a liar and a fraud. He doesn't have the keys used to sign this message . . . We are all Satoshi*

**The message was notable, however, because the author signed it with the private keys to 145 of the bitcoin addresses appearing on the CSW Filed List. See Declaration of Andreas**

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<sup>1</sup> On a prior meet and confer, the parties agreed Defendant would provide slip sheets stating "fully redacted" for any exhibit he believed should be fully withheld. Unfortunately, that did not happen. Instead, Defendant sent redacted exhibits to file, authorized the filing of others, and asked for Exhibit 7 to remain under seal. Without this slip sheet, and despite Plaintiffs' attempt to ensure the filing was being properly submitted, Exhibit 7 was inadvertently included in a public filing. On being notified of this error, multiple members of Roche Cyrulnik Freedman LLP immediately called the clerk to have the list sealed; Plaintiffs then filed an emergency motion to seal (ECF No. [513]) which was granted by this Court. In total, the document was public for under 45 minutes. In that time, however, the Courtlistener website obtained a copy of the document which remains publicly available.

Antonopoulos ¶ 1 (attached as Exhibit 1). All 145 signatures are valid. *Id.* at ¶3. As explained in the attached declaration of Andreas Antonopoulos, whomever authored the message unequivocally possesses the private keys to the 145 bitcoin addresses. *Id.* at ¶4. You cannot sign a message in this way unless you have the private key to those addresses. *Id.* at ¶3. However, Wright swore that each of these addresses were his own, and that the private keys for each are locked in a trust, and inaccessible even to him. *See* ECF No. [512], 6-8 (citing Wright’s sworn declarations and testimony). Plaintiffs Sanctions Motion had already demonstrated that the CSW Filed List was a forgery intended to deceive Plaintiffs and this Court, and that Wright created it to avoid sanctions pursuant to this Court’s Order. ECF No. [373] (“[i]n the event the bonded courier does not arrive, and the Plaintiffs are not given access to this information . . . the Court will inform the jury of the Defendant’s failure to disclose the information sought by the Plaintiffs.”). But this message further proves that the list is not an accurate listing of Wright’s bitcoin, and that he is still hiding the true list from Plaintiffs and the Court.<sup>2</sup>

Said simply, Wright represented these 145 addresses were part of his bitcoin holdings and were locked in an inaccessible encrypted file. This week, the person that *actually* controls the private keys to those addresses used those private keys to declare that “Craig Steven Wright is a liar and a fraud” and “doesn't have the keys” for those addresses — thus proving the addresses do not belong to Wright.<sup>3</sup>

Dated: May 27, 2020

Respectfully submitted,

*s/ Velvel (Devin) Freedman*  
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<sup>2</sup> This has been widely reported beyond Plaintiffs’ expert’s declaration, *e.g.*, <https://finance.yahoo.com/news/craig-wright-called-fraud-message-144414280.html>

<sup>3</sup> Notably, these signatures come from addresses controlling ~\$65 million worth of bitcoin.

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*Counsel to Plaintiffs Ira Kleiman as  
Personal Representative of the Estate of  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 27, 2020, a true and correct copy of the foregoing was filed with CM/ECF, which caused a copy to be served on all counsel of record.

/s/ Velvel (Devin) Freedman  
Velvel (Devin) Freedman