



IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

MEDIA AND COMMUNICATIONS LIST

BETWEEN:

DR CRAIG STEVEN WRIGHT

Claimant

and

MAGNUS GRANATH

Defendant

AMENDED PARTICULARS OF CLAIM

Parties and background

1. The Claimant is a computer scientist and businessman ~~based in England and Wales~~. He is highly active within the cryptocurrency sphere, running a number of cryptocurrency and blockchain businesses. The Claimant's centre of interests is England:



- a. The Claimant is habitually resident in England. He immigrated to England with his family in 2015 and has lived here ever since. He has applied for permanent residency, having recently become eligible to do so and intends to apply for British citizenship when he is eligible.
 - b. The Claimant spends the overwhelming majority of his time in England. He works here and is employed by a UK company, nChain Ltd. He is currently enrolled in a PhD program in England, at the University of Exeter.
 - c. The Claimant pays both local and national taxes in England.
2. The Defendant publishes a Twitter feed under the Twitter handle 'Hodlonaut' ("the Hodlonaut feed").

The Publication Complained Of

3. On 17 March 2019, on the Hodlonaut feed, the Defendant tweeted and published the following words defamatory of the Claimant ("the Tweet"):

"The forensics to CSW's first attempt to fraudulently 'prove' he is Satoshi. Enabled by @gavinandresen. Never forget. #CraigWrightIsAFraud"

4. Readers of the Hodlonaut feed would have understood the words complained of to refer to the Claimant:
 - a. The Claimant was named in the Twitter hashtag handle '#CraigWrightisafraud' ("the Hashtag") which is tagged in the words complained of;



- b. The initials 'CSW' would have been understood to refer to the Claimant, given the very numerous references to the Claimant in other tweets on or around 17 March 2019 by the Defendant on the Hodlonaut feed, namely:
- i. A tweet on March 16: "*Craig Wright is a very sad and pathetic scammer. Clearly mentally ill. Everything about him induces deep cringe. I suffer from obviousness fatigue after still having to read posts arguing why he isn't Satoshi.*"
 - ii. A tweet on March 17: "*As a tribute to Craig Wright being a fraud, I'm going to make next week 'Craig Wright is a fraud week', and tag all my tweets with #CraigWrightIsAFraud Feel free to join the celebration 🎉*".
 - iii. A tweet on March 17: "*#CraigWrightIsAFraud The chain goes strong*"
5. By way of innuendo the words complained of meant and were understood to mean that the Claimant had fraudulently claimed to be Satoshi Nakamoto, that is to say the person, or one of the group of people, who developed the ~~crypto~~ cryptocurrency Bitcoin.

PARTICULARS OF RELEVANT EXTRANEous FACTS PURSUANT TO CPR 53PD 2.3(2)



- a. 'Satoshi' is a pseudonym for the person or the group of people, who developed the ~~crypto~~ ~~cryptocurrency~~ Bitcoin, authored the Bitcoin white paper ('Bitcoin: A Peer-to-Peer ~~an~~ Electronic ~~e~~Cash ~~s~~System') in 2008 , and created and deployed Bitcoin's original reference implementation. 'Satoshi' is also known as 'Satoshi Nakamoto'. The true identity of 'Satoshi' has for many years been a matter of considerable speculation amongst those with an interest in ~~crypto~~ ~~cryptocurrency~~.
 - b. These matters are very well known to readers of the Hodlonaut feed, who are mostly individuals with an interest in ~~crypto~~ ~~cryptocurrency~~.
6. The publication of the words complained of caused serious harm to the Claimant's reputation in this jurisdiction:
- a. The defamatory allegation complained of is very grave.
 - b. The ~~#~~Tweet was published to, at least, the Defendant's 8,878 followers on the Hodlonaut feed. It is to be inferred that a substantial proportion of the Defendant's followers, as well as others who read the words complained of, were in this jurisdiction.
 - c. In the following paragraphs, the following definitions are used:
 - (i) "Engagements" refers to user interaction with a tweet: retweeting, liking, replying, expanding a tweet, clicking on hyperlinks, hashtags or



usernames or following the tweeter. The numbers of some Engagements – retweets, replies and likes – are recorded on the public face of a tweet. The number of other Engagements are not publicly available, but are available to the Twitter account user through the Twitter Analytics service.

- (ii) "Impressions" refers to the number of Twitter users' screens a tweet appears on. Again, this information is only available through the Twitter Analytics service.

- d. The Defendant deactivated his Twitter account on or around 10 April 2019. Accordingly, the Twitter Analytics relating to the Tweet are not available, and the Claimant cannot identify the full reach of the Tweet, including by referring to all retweets, likes and comments for the full period of its availability to the world at large. However it is strongly to be inferred that the Tweet was published very extensively, including to an audience far beyond the Defendant's Twitter followers. It is further to be inferred that a very large number of these publishees were within this jurisdiction. The Claimant will rely in support of this inference on the following facts and matters.

- (i) The Tweet was published at or around 2.53pm. The tweet set out at paragraph 4.b.ii above was published at or around 1.06pm on the same day and by 28 March 2019 had already been retweeted at least 62 times and liked at least 569 times ("the 1.06pm tweet"). The total number of Engagements on the 1.06pm tweet is, it is to be inferred, substantially greater than this, given it remained available for an additional 13 days, in the circumstances described in paragraphs 6(d)(ii) to (iv) below. As Impressions are likely to be very substantially larger than Engagements, the total number of publishees of the 1.06pm tweet was likely to be very substantial indeed.



- (ii) It is to be inferred that a substantial proportion, if not all, of the publishees of the 1.06pm tweet would also have read the Tweet, either because:
- They were Twitter followers of the Defendant and would also have read the Tweet which was published within 2 hours of the 1.06pm tweet; or
 - They were not Twitter followers of the Defendant, but read the 1.06pm tweet and then accessed the Tweet by either clicking on the Defendant's user name or on the Hashtag (which would have led them to view the Tweet).
- (iii) Further, as pleaded at 8a below, the Tweet was part of a vigorous campaign that the Defendant pursued against the Claimant. That campaign resulted in the Defendant (under the guise of @hodlonaut) becoming extremely well known in the immediate aftermath of publication of the Tweet, particularly within the cryptocurrency communities. It is to be inferred that the Defendant's widespread celebrity as a campaigner would have prompted Twitter users who were not followers of the Defendant to go to the Defendant's profile and to read the Tweet in the Hodlonaut feed.
- (iv) In support of this contention, the Claimant relies on the conduct of Peter McCormack, as follows. Mr McCormack is a podcaster and blogger (based within this jurisdiction) who specialises in publishing content about news and other developments in Bitcoin and cryptocurrencies. In March 2019 Mr McCormack's Twitter account had around 57,500 Twitter followers (a substantial proportion of whom, were in this jurisdiction). Mr McCormack began a tireless campaign against the Claimant on or around 29 March 2019 to publicise threats which had been made by the Claimant to sue the Defendant ("the



McCormack Campaign") over the Defendant's tweets. It is to be inferred that Mr McCormack drove a substantial number of Twitter users (including a substantial number of Mr McCormack's Twitter followers) to the Defendant's profile and consequently to read the Tweet on the Hodlonaut feed.

7. The publication of the words complained of has caused the Claimant to suffer injury to his feelings.
8. In support of his claim for damages the Claimant will rely upon the following facts and matters:
 - a. The words complained of were published as part of a campaign on the part of the Defendant to cause damage and distress to the Claimant. The Itweet was one of a sequence of tweets on the Hodlonaut feed which the Defendant published in order to mock and abuse the Claimant. Paragraph 4(b) above is repeated. The Claimant will also refer in this regard to the following tweets by the Defendant on the Hodlonaut feed:
 - i. A tweet on March 17, 2019, in which the Defendant described how he enjoyed provoking the Claimant by calling him a fraud: "*Eric says giving attention to frauds is wrong. Which is often correct. But sometimes that can also end up enabling their scams. Making people aware that this man is a fraud is important, many new people coming in unaware. Also, I think it triggers him, which is a bonus.*"
 - ii. A tweet on March 18, 2019: "*Happy #CraigWrightIsAFraud week everyone! 🎉*".



iii. A tweet on March 18, 2019: "#CraigWright's ~~land~~ week gets off to a flying start with the fraud himself disappearing from twitter on day 1.

Double taco rations tonight ".

- b. The Defendant was motivated to harm and abuse the Claimant because he is an active supporter and promoter of the Bitcoin Core protocol, which is a rival to the protocol promoted by the Claimant, namely Bitcoin SV.
9. Unless restrained by this honourable court, the Defendant will further publish the words complained of. For the avoidance of doubt, the Claimant's claim for an injunction, including an injunction in respect of online publication, is limited to England and Wales (the claim being brought on the basis of the Claimant's centre of interests rather than the mosaic principle).
- AND the Claimant claims:
- (1) Damages, including aggravated damages, for libel published in this jurisdiction;
 - (2) An injunction to restrain the Defendant whether by himself, his agents, servants or otherwise howsoever from further publishing, causing, authorising or procuring the publications of the allegations complained of or similar allegations defamatory of the Claimant;
 - (3) An order under Section 12 of the Defamation Act 2013 that the Defendant publishes a summary of the judgment in the proceedings.



ADAM WOLANSKI QC

VICTORIA JOLLIFFE

STATEMENT OF TRUTH

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

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

Full name: Craig Steven Wright

Signed:

Date:

A handwritten signature in black ink, appearing to read 'Craig Steven Wright'.

Full name: Craig Steven Wright

Signed:

Date: June 2019