

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

IRA KLEIMAN, as the personal)
representative of the Estate)
of David Kleiman, and W&K) Case No:
Info Defense Research, LLC,) 9:18-cv-80176-BB/BR
Plaintiffs,)
v.)
CRAIG WRIGHT,)
Defendant.)

- - - - -

CONFIDENTIAL

VIDEOTAPED DEPOSITION
JAMIE R. WILSON

Friday, November 8, 2019

Plaintiffs' Designations

Reported by: Lori J. Goodin, RPR, CLR, CRR, RSA
California CSR #13959
Assignment No. 528739

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

The deposition of JAMIE WILSON was convened on Friday, November 8, 2019, commencing at 8:36 a.m., at the offices of

BOIES SCHILLER FLEXNER LLP
1410 New York Avenue, Northwest
Washington, D.C. 20005

before Lori J. Goodin, Registered Professional Reporter, Certified LiveNote Reporter, Certified Realtime Reporter, Realtime Systems Administrator, California CSR #13959, and Notary Public in and for the District of Columbia.

1 APPEARANCES

2 For Plaintiffs:

3 VELVEL FREEDMAN, Esquire
4 ROCHE FREEDMAN
5 200 South Biscayne Boulevard
6 Suite 5500
7 Miami, Florida 33131
8 305-357-3861
9 vel@rochefreedman.com

6

And Co-counsel:

7 KYLE ROCHE, Esquire (via telephone)
8 ROCHE FREEDMAN
9 185 Wythe Avenue, F2
10 Brooklyn, New York 11249
11 929-457-0050
12 kyle@rochefreedman.com

10

And Co-counsel:

11 ANDREW S. BRENNER, Esquire
12 BOIES SCHILLER FLEXNER LLP
13 11401 New York Avenue, Northwest
14 Washington, D.C. 20005
15 202-237-2727
16 abrenner@bsfllp.com

14

15 For Defendant:

16 ZALMAN KASS, Esquire
17 BRYAN L. PASCHAL, Esquire
18 JULIO PEREZ, Esquire (via video link)
19 RIVERO MESTRE
20 565 Fifth Avenue
21 7th Floor
22 New York, New York 10017
zkass@riveromestre.com
bpaschal@riveromestre.com
jperez@riveromestre.com

21 ALSO PRESENT:

22 David Campbell, videographer

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CONTENTS

EXAMINATION BY	PAGE
Mr. Freedman	8, 168
Mr. Paschal	84

EXHIBITS

WILSON

EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 1	Mr. Wilson's resignation letters 10/23/2013 Defense Australia 108905-108908	18
Exhibit 2	E-mail from Wilson to Wright 9/20/2013, Defense 45496	24
Exhibit 3	Exhibit to Plaintiffs' complaint Document 83-5	32
Exhibit 4	E-mail, Wright to Wilson 6/26/2013, Defense 28015	41
Exhibit 5	E-mail, Wright, cc Wilson 7/2/2013, Defense 266797	42
Exhibit 6	E-mail, Wright to Hardy, cc Wilson, 10/9/2013 Defense 25094	44
Exhibit 7	E-mail, Wright, cc: Wilson 10/2/2013 Defense Australia 553926	52

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

EXHIBITS CONTINUED

WILSON

EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 8	E-mail, Wright, cc: Wilson 10/12/2013, Defense 45457	54
Exhibit 9	E-mail, Wright to Italia cc: Wilson, 10/6/2013 Defense 46093	57
Exhibit 10	E-mail, Wright to Manu, Wilson 9/23/2013 Defense Australia 113043	59
Exhibit 11	E-mail, Wright to Dempster, cc: Wilson, 7/18/2013 Defense 30127	62
Exhibit 12	E-mail, Wright to Italia cc: Wilson, 10/6/2013 Defense 46098	64
Exhibit 13	E-mail, Lipke to Wright, Wilson 9/27/2013, Defense 467687	65
Exhibit 14	Affidavit submitted by Wright to Supreme Court of New South Wales Document 83-4	68

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

EXHIBITS CONTINUED

WILSON

EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 15	E-mail, Wilson to Wright and Watts, 8/11/2013, Defense 43726	74
Exhibit 16	E-mail, Wright to Wilson, Watts 7/2/2013, Defense 31588	75
Exhibit 17	E-mail, Wright to Alastair cc: Wilson, 8/8/2013 Defense 267325	80
Exhibit 18	MYOB Program Defense 262775	82
Exhibit 19	Jamie Wilson's business card	92
Exhibit 20	Employee Remuneration Schedule 10/29/2013	100
Exhibit 21	Jamie Wilson's LinkedIn profile	111
Exhibit 22	U.S. Patent 14354359 by Wilson	156

(Original Exhibits attached to the original transcript.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

PROCEEDINGS

* * *

THE VIDEOGRAPHER: We are now on the record. This begins Media Unit Number 1 in the deposition of Jamie Wilson.

This is in the matter of Ira Kleiman as the personal representative of the estate of David Kleiman and W&K Info Defense Research LLC, versus Craig Wright.

This is in the United States District Court, Southern District of Florida. Case Number 918 CV 80176 B/BR.

Today is November 8, 2019, and the time is 8:36 a.m.

This deposition is being taken at the Washington, D.C. offices of Boies Schiller.

The videographer today is David Campbell of Magna Legal Services and the court reporter is Lori Goodin of Magna Legal Services.

1 Counsel will you please identify
2 yourselves for the record and then the
3 witness will be sworn in and we can proceed.

4 MR. FREEDMAN: Vel Freedman of Roche
5 Freedman for the plaintiff.

6 MR. BRENNER: Andrew Brenner from
7 Boies Schiller for the plaintiff.

8 MR. PASCHAL: Bryan Paschal for
9 Dr. Craig Wright.

10 MR. KASS: Zalman Kass for Dr. Craig
11 Wright. And from our team we also have Julio
12 Perez who is on video link.

13 * * *

14 JAMIE R. WILSON,
15 a witness called for examination, having been
16 first duly sworn, testified as follows:

17 * * *

18 EXAMINATION

19 BY MR. FREEDMAN:

20 Q. Good morning, Mr. Wilson.

21 A. Good morning.

22 Q. My name is Vel Freedman, we have met

1 and spoken a few times before.

2 This is your deposition. You have
3 just told us earlier that you have never taken a
4 deposition before. Is that correct?

5 A. That's correct.

6 Q. I will go through a little bit of
7 the ground rules here for you and then we can get
8 started. But before that, lets just take care of
9 a little housekeeping.

10 Can you please state your full name
11 and date of birth for the record?

12 A. Jamie Robert Wilson, 15th of June,
13 1980.

14 Q. And your home address?

15 A. 361 Westlake Drive, Queensland,
16 Australia.

17 Q. And your work address?

18 A. 11420 George Street, Queensland,
19 Brisbane.

20 Q. All in Australia?

21 A. All in Australia.

22 Q. So you understand that you are under

1 oath today and you are sworn to tell the truth?

2 A. Yes.

3 Q. And your examination is now being
4 recorded and may be shown to a jury at some
5 point.

6 Along those lines of the ground
7 rules, the court reporter is taking down
8 everything you say. And so it might be
9 counterintuitive, but you need to try to audibly
10 respond. So yes or no. If you shake your head
11 yes or if you shake your head no, she won't get
12 it.

13 A. Okay.

14 Q. I will try to remind you to speak
15 audibly, but try to do your best also.

16 A. I understand.

17 Q. Are you taking any medication today
18 that might affect your ability to tell the truth?

19 A. No, I'm not.

20 Q. Or to recollect anything?

21 A. No.

22 Q. Is there anything that would impair

1 your ability to tell the truth at this deposition
2 today?

3 A. No.

4 Q. Okay. If I ask you a question and
5 you don't understand it, please ask me to explain
6 or repeat it.

7 A. Will do.

8 Q. If you don't, I will assume that you
9 understood the question, and I will rely on your
10 answer, okay?

11 A. Okay.

12 MR. PASCHAL: Just one second, but
13 mine is working, but --

14 MR. FREEDMAN: Go off the record.

15 THE VIDEOGRAPHER: Off the record at
16 8:38.

17 (Whereupon, a discussion off the
18 record took place.)

19 THE VIDEOGRAPHER: We are back on
20 the record at 8:39.

21 BY MR. FREEDMAN:

22 Q. And finally, if you need a bathroom

1 break or you just need a break, stretch your
2 legs, take a second. Let me know. This is not a
3 marathon.

4 A. Will do, okay.

5 Q. Okay. So, Mr. Wilson, you were born
6 in Australia?

7 A. Yes.

8 Q. Did you go to college or university?

9 A. Yes.

10 Q. Where did you go?

11 A. Queensland University of Technology.

12 Q. Did you attain any degrees there?

13 A. Bachelor of Commerce.

14 Q. And what year did you get the
15 Bachelor of Commerce?

16 A. 2006.

17 Q. Did you ever become a CPA or go to
18 graduate school?

19 A. No.

20 Q. Okay. Have you been an accountant?

21 A. Yes, but not a tax accountant.

22 Q. And did you take any training to

1 become an accountant?

2 A. Yes.

3 Q. Where?

4 A. At JW Schubert & Co, located in
5 Springwood in Logan, in Queensland.

6 Q. When did that program start?

7 A. It would have -- 2004 to 2008.

8 Q. Okay. Was that your undergraduate
9 in commerce also?

10 A. It was.

11 Q. And then after, and you graduated in
12 2008?

13 A. Yes.

14 Q. And then did you begin working as an
15 accountant?

16 A. Yes, I did.

17 Q. In 2008?

18 A. I started from 2004.

19 Q. 2004 you were working as an
20 accountant?

21 A. That's right.

22 Q. And how long did you continue

1 working as an accountant?

2 A. Up to 2010.

3 Q. Okay. Did you ever work as an
4 accountant after 2010?

5 A. I, well only on the projects that I
6 was looking after full-time.

7 Q. Got it. So you weren't --

8 A. So, not outside, where my interests
9 weren't involved.

10 Q. Got it. When did you first learn
11 about Bitcoin?

12 A. Bitcoin, 2011.

13 Q. Okay. And how did you learn about
14 Bitcoin?

15 A. It was part of my travels around the
16 world where I was cross-examining a whole lot of
17 cybersecurity experts looking for a solution that
18 I have built today in the market.

19 Q. Okay. So, can you tell me when you
20 first met -- well, do you know Craig Wright?

21 A. Yes, I do.

22 Q. Can you tell me when you first met

1 Craig Wright?

2 A. Craig Wright I would have met in
3 2012.

4 Q. And how did you come to meet him?

5 A. Through working and cross examining
6 a whole lot of cybersecurity experts to build a
7 stronger solution.

8 Q. And tell me about the solution that
9 you have now built.

10 Is that your digital file?

11 A. That's correct. So, our technology
12 is called Cryptoloc which is a cryptographic
13 solution and we've got global patents which have
14 an escrow in a point of difference on a global
15 stage.

16 Q. And you first spoke with Dr. Wright
17 to help you build this technology?

18 A. That's correct, yes.

19 Q. Along with a bunch of other --

20 A. So, I already had started in 2012.

21 Q. Okay.

22 A. So, it would have been like '12,

1 early '13 that I actually physically met Craig.

2 Q. Okay.

3 A. And from there we did bring Craig in
4 as a, the expert cybersecurity to be able to
5 oversee the development of the product.

6 Q. Got it. And did, similarly did
7 Craig involve you in his companies at that point?

8 A. No, no. It was after that period of
9 time.

10 Q. Approximately when did Craig involve
11 you in his companies?

12 A. It would be 2014. Around about June
13 or July of 2014.

14 Q. Okay. Do you recall what capacity
15 he, Dr. Wright involved you in his companies?

16 A. Because we were working on the
17 Cryptoloc Solution for Your Digital File, he
18 liked the way I was building the culture of the
19 team. And, he said to me Jamie, I want to start
20 a new project would you come on as a director.

21 And also with my background you
22 would become the CFO.

1 Q. Got it. So, he, Dr. Wright listed
2 you as a director of various companies.

3 A. That's correct.

4 Q. Were you a director of Coin
5 Exchange?

6 A. Yes.

7 Q. Were you a director of Integers?

8 A. Yes.

9 MR. PASCHAL: Objection, form.

10 BY MR. FREEDMAN:

11 Q. Were you a director of -- do you
12 remember all of the companies you were director
13 of?

14 A. No, I don't.

15 Q. Were you a director of
16 Interconnected Research Pty?

17 A. I would have to have a look at the
18 ASX Register.

19 Q. Were you a director of Hotwire
20 Preemptive Intelligence Pty?

21 A. Yes.

22 Q. Were you also a shareholder in some

1 of these companies?

2 A. Craig did gift me shares.

3 Q. Okay.

4 A. But when I resigned, it was removed.

5 Q. Okay. Were you, do you recall if

6 you became a shareholder of Coin Exchange Pty?

7 A. I'm positive I did, yes.

8 Q. Okay. And were you also the CFO for

9 Coin Exchange?

10 A. I was. So, for all companies I

11 would have been the CFO.

12 Q. Okay. And bear with me here.

13 Since, we had some printing trouble earlier so

14 I'm trying to pull these up electronically.

15 Let me e-mail these to you guys.

16 I'm going to hand you what has been

17 produced in this litigation as Defense Australia

18 108905 through 108908.

19 And we will mark it as Plaintiffs

20 Exhibit 1.

21 (Wilson Exhibit Number 1

22 marked for identification.)

1 BY MR. FREEDMAN:

2 Q. If you could start at the top and go
3 forward. You guys should have it in your e-mail.

4 A. The resignation letters.

5 Q. Correct. So, if you take a look at
6 the date at the top for me, Mr. Wilson.

7 A. 23rd of October, 2013.

8 Q. So, does that help you potentially
9 remember when you started working and when you
10 ended working for Dr. Wright?

11 A. It would have been, so, Craig would
12 have come in, I would have to have a look at my
13 records. It would have been the end of 2011 and
14 2012.

15 Q. Okay. And then you would have
16 resigned in October of 2013?

17 A. Yes, I did, yes. After I returned
18 from New York.

19 Q. Okay. And if you take a look for me
20 at the page that is marked at the bottom 108907,
21 it is the third down.

22 A. Yep.

1 Q. Do you see where it says--

2 A. 907, Interconnected Research Pty.

3 Q. Does that help you remember if you
4 were the director of Interconnected Research Pty?

5 A. Yes, this one here was a company
6 that I was set up when I was in New York which
7 would have been September or October, which Craig
8 signed me up as a director without my consent.

9 Q. Okay. Did you -- thank you,
10 Mr. Wilson.

11 Did you ever help -- well, you know
12 what, before I take these back from you, do you
13 recall writing these resignation letters?

14 A. Absolutely. And I physically handed
15 it to Craig as well.

16 Q. And these are the resignation
17 letters that you handed to Craig?

18 A. That's right. And e-mailed.

19 Q. Okay. Did you ever help Craig set
20 up a trust?

21 A. No. One of our lawyers, who was
22 also on the board of Your Digital File, called

1 Diane Pinder, was the one who looked after the
2 trust.

3 Q. Okay. And then as we have just seen
4 you have resigned in October of 2013.

5 A. Yes.

6 Q. Can you tell me why you resigned?

7 A. The reason for it is that I wasn't
8 feeling comfortable with the position of what was
9 happening and not understanding everything behind
10 the documentation and the accounts. That was the
11 purpose of it.

12 And also at the same time my ex-wife
13 had medical issues as well.

14 Q. Okay. Can you explain to me a
15 little bit more what you meant, what you mean by
16 you weren't comfortable with what was going on in
17 the documentation.

18 A. Well, in, the lead up to my
19 resignation, and it would have been over a
20 12-month period, Craig did set up these
21 companies. And I was working with Craig, prior
22 being on the board of White Ear and as an advisor

1 to us in regards to development.

2 But, my trouble was, and it was
3 exciting moving in with him to start working on
4 the new projects.

5 But, where I didn't feel comfortable
6 is Craig's change of attitude from a developer
7 that would be in hoodies and, you know, very low
8 key and working with, to one that, that is it,
9 I've got to be the man, I've got to be the CEO,
10 new flash suits, ties, and it was just a massive
11 change from where he was conservative to right
12 out there.

13 Also I didn't agree on the
14 employment of the staff and the buildup of these
15 companies without understanding, the full
16 understanding, of where the funding was coming
17 from.

18 So, I know there was a lot of
19 Bitcoin there. However, when I started to have a
20 look at the R&D and the claiming of the R&D,
21 research and development, for the Australia
22 federal government I didn't feel comfortable when

1 I noticed that these amounts were from a U.S.,
2 and at that time and I am still not aware if the
3 money actually was funded by the U.S. government.

4 And I thought, well hang on, the
5 Supreme Court of Australia has turned around and
6 brought this IP into Australia, and now Craig is
7 turning around and claiming the R&D on this
8 money, that was paid by the U.S. government.

9 And I thought, this to me looks
10 fraud. And, I want nothing to do with it.

11 Q. So, you resigned?

12 A. I resigned. And since then I have
13 had many times with the Australia taxation
14 office, coming and investigate where I had to
15 give evidence and the breakdown of it, purely
16 because of, they put me under a microscope, the
17 ATO.

18 Q. And has the ATO found that you did
19 anything wrong?

20 A. No, no.

21 Q. Okay. I am, and ATO is the
22 Australia Tax Office?

1 A. Taxation Office.

2 Q. Okay.

3 (Wilson Exhibit Number 2
4 marked for identification.)

5 MR. FREEDMAN: I have just sent
6 e-mails to you, counsel.

7 BY MR. FREEDMAN:

8 Q. But Mr. Wilson, I'm going to hand
9 you what has been produced in this litigation as
10 Defense 45496. And if you can take a look at it
11 for a second, specifically under the line is, it
12 appears to be an e-mail from you to Craig. Do
13 you see that?

14 A. Yep.

15 Q. Do you remember sending this e-mail?
16 You can take a second to familiarize yourself
17 with the document.

18 MR. PASCHAL: You going to be
19 e-mailing us documents or do you have
20 physicals.

21 MR. FREEDMAN: We are waiting for
22 them to print. But I will e-mail them to you

1 in the meantime.

2 MR. PASCHAL: If you are e-mailing,
3 it takes a second to get to us, so let us
4 look at it before you show it to him.

5 THE WITNESS: That's correct.

6 BY MR. FREEDMAN:

7 Q. So, you recognize this document?

8 A. Yes. And I did send it.

9 Q. Okay. And, can you tell me a little
10 bit about what happened in this e-mail?

11 A. Okay. So, the reason for it was
12 that Craig wanted to increase his holdings within
13 YDF, with --

14 Q. This is your company?

15 A. That's correct. It was called the
16 Digital Filing Company Pty Ltd which no longer
17 holds, in operation.

18 The reason, I wasn't aware that the
19 transfer in these amounts had been done and, nor
20 the capitalization of these accounts with the
21 listed on ASIC, hence why I did do the e-mail
22 just so that it was down on paper.

1 Q. Let me break this down for you. The
2 capitalization of the accounts. Can you explain
3 that a little bit to the jury?

4 A. This is what the issue was. I
5 didn't see the physical cash in the bank; it was
6 done by Bitcoin.

7 Q. There was a capitalization of, I'm
8 looking at your e-mail, looking at a
9 capitalization of eight and a half million
10 dollars?

11 A. Correct.

12 Q. \$40 million?

13 A. That's right.

14 Q. \$30 million.

15 A. That's right.

16 Q. Suffice to say 10s and 10s of
17 millions of Bitcoin?

18 A. Oh, absolutely. And "Craig I see
19 you have issued shares to me personally and I'm
20 not aware this was done already. This needs to
21 be fully accounted for as we are dealing with a
22 publically listed company." And that was Rubik

1 over in Australia.

2 They also were investigated by the
3 Australia Taxation Office in regards to the
4 matter with Craig.

5 Q. Got it. And did you ever sit down
6 with Craig and discuss this e-mail with him?

7 A. I can't recall.

8 Q. Okay.

9 A. But the response is there from
10 Craig, too, it doesn't allow this right now, but
11 we have the following, oh, capitalization, that,
12 why didn't Xero do it? Because it didn't have
13 Bitcoin at that stage of the currency.

14 Q. Got it. What happened to all of
15 your shares in these businesses after you
16 resigned, Jamie?

17 A. Oh, they were just removed.

18 Q. Okay. During the time that you
19 worked for, or with Dr. Wright, so that would be
20 from about 2011 to 2000 -- October of 2013.

21 A. '13.

22 Q. Did you ever --

1 MR. PASCHAL: Objection, form.

2 BY MR. FREEDMAN:

3 Q. Did you ever talk or e-mail with
4 Dave Kleiman?

5 A. No. Not me personally, no.

6 Q. Had you heard of Dave Kleiman?

7 A. Yes, I had.

8 Q. Okay. How did you hear of Dave
9 Kleiman?

10 A. Through Craig, saying it was his
11 best mate and that they had been working on
12 projects together.

13 Q. Okay. Did he describe him as his
14 partner?

15 A. He, no, a good mate.

16 Q. I don't mean a romantic partner, I
17 mean like a business partner?

18 A. No, no, no. A business partner.

19 Q. Did he describe him as a business
20 partner?

21 A. Yes.

22 Q. And somebody he was working with on

1 projects with?

2 A. That's right.

3 Q. Did you understand that to be
4 intellectual property projects?

5 A. No.

6 Q. What type of projects did you
7 understand it to be?

8 A. I only understood later on, when I
9 was going through the paperwork to do the R&D,
10 that all of the material of the break up of the
11 money that Dave Kleiman was actually on all of
12 these applications, all of the grants for the
13 federal, the U.S. government.

14 So, that is how I started to become
15 aware of it.

16 Craig is not forthcoming with
17 information. It is a very slow feed. But, the
18 longer I was there, the more I started to realize
19 that this is not correct way of doing business.

20 Q. I see. So you don't have much
21 details about what they worked on.

22 You just know that they worked on it

1 together. Is that fair?

2 A. That's correct.

3 MR. PASCHAL: Objection, form.

4 BY MR. FREEDMAN:

5 Q. Okay. Do you have a lot of details
6 about what they worked on together?

7 A. No.

8 Q. There may be times when opposing
9 counsel lodges an objection to the way I'm asking
10 you a question.

11 So you may hear me ask a question
12 more than once.

13 If you could just answer it again.

14 A. Okay.

15 Q. Did Craig ever talk to you about
16 Dave Kleiman's intent about anything?

17 A. No.

18 Q. Okay. Bear with me one second.

19 So, Mr. Wilson, I think you told me
20 before that you were Director of Coin Exchange;
21 is that correct?

22 A. Correct.

1 MR. PASCHAL: Objection, form.

2 BY MR. FREEDMAN:

3 Q. You also were a shareholder of Coin
4 Exchange or were you, were you or were you not a
5 shareholder of Coin Exchange?

6 MR. PASCHAL: Objection, form.

7 THE WITNESS: I was given shares.

8 BY MR. FREEDMAN:

9 Q. Sorry, go ahead.

10 A. I was given shares by, gifted shares
11 by Craig.

12 Q. Did you serve as its CFO?

13 A. Yes.

14 MR. PASCHAL: Objection, form.

15 BY MR. FREEDMAN:

16 Q. Were you, did you handle the
17 accounts for Coin Exchange?

18 A. No. And what is strange is I didn't
19 actually handle the accounts for any of it.
20 There was a bookkeeper that was involved.

21 So, although I had the title of the
22 CFO, Chief Financial Officer, my capacity as an

1 accountant, I was not given full control, nor did
2 I even have access to zero.

3 Q. Okay. So, during the time you were
4 director and shareholder and the CFO of Coin
5 Exchange, did Craig ever tell you that Dave
6 Kleiman was also a shareholder of Coin Exchange?

7 A. No.

8 (Wilson Exhibit Number 3
9 marked for identification.)

10 BY MR. FREEDMAN:

11 Q. Mr. Wilson, I'm handing you what we
12 are going to mark as Plaintiffs Exhibit 3? And
13 it is a Document 83-5. It is an exhibit to the
14 plaintiff's complaint.

15 Can you take a look at this document
16 and let me know if you have ever seen it before?

17 A. No, I haven't.

18 Q. Okay. Do you see -- if you go to
19 Page 1 of 9 for me. Or 3 of 11 at the top.

20 A. 3 of 11.

21 Q. Do you see that?

22 A. Yes.

1 Q. It says The agreement is between
2 Dave Kleiman of W&K Info Defense Florida. Are
3 you familiar with this Florida company W&K Info
4 Defense LLC?

5 A. I became aware of it when I was done
6 the R&D and realized that the W&K Info Defense
7 LLC was a part of it. That is why I started
8 questioning a lot.

9 Q. Were you ever a director of W&K Info
10 Defense LLC?

11 A. No.

12 Q. Were you ever a shareholder of W&K
13 Info Defense LLC?

14 A. No.

15 Q. Were you ever an officer of W&K LLC?

16 A. No. I wasn't even aware of it.

17 Q. Did you ever have anything to do
18 with -- strike that.

19 If you turn to Page 5 of 11 at the
20 top. You will see Paragraph 4B.

21 A. Yes.

22 Q. And it says, "Except the vendor's"

1 and the vendor is on Page 3, the vendor is Dave
2 Kleiman of W&K Defense Info Research, "So accept
3 Dave Kleiman's 323,000 remaining mined Bitcoin as
4 a 49.5 percent stake in a new venture to be
5 formed in Australia to be called Coin Exchange
6 Pty Ltd."

7 Do you see that?

8 A. I do. But if you have a look at the
9 ASX registers it will turn around and advise you
10 of the history of the directors of the company.

11 Q. So you were never aware of this
12 agreement or --

13 A. No, this is the first time I have
14 seen it.

15 MR. PASCHAL: Objection to form.

16 BY MR. FREEDMAN:

17 Q. Were you ever aware of this
18 agreement?

19 A. No.

20 MR. PASCHAL: Objection to form.

21 BY MR. FREEDMAN:

22 Q. Were you ever aware that Dave had

1 reportedly bought an interest in Coin Exchange?

2 MR. PASCHAL: Objection to form.

3 THE WITNESS: No. This is

4 April 2013.

5 BY MR. FREEDMAN:

6 Q. So, you were the CFO, in April of
7 2013 -- strike that.

8 What positions did you hold in Coin
9 Exchange in April of 2013?

10 A. I'm not too sure when I, when it was
11 kicked off and when I was added as a director. I
12 would have to go through the ASX Register.

13 Q. Okay. Thank you.

14 A. That previous -- oh, not to worry.

15 Q. Okay. Mr. Wilson, were you aware
16 that Dave Kleiman died in April of 2013?

17 A. Yes.

18 Q. How did you know that Dave died?

19 A. Craig said to me a good mate of his
20 just passed away, and I believe he came over to
21 Florida.

22 Q. Okay.

1 A. Or he did fly to the States.

2 Q. Did you notice a change in Craig
3 from before and after Dave died?

4 MR. PASCHAL: Objection, form.

5 THE WITNESS: Yes.

6 BY MR. FREEDMAN:

7 Q. Okay. Can you expand on what that
8 change was?

9 A. The change was from Craig, as I
10 stated before, being a developer, security,
11 hoodie, you know, very much --

12 MR. FREEDMAN: Sorry.

13 THE WITNESS: You know, wearing
14 hoodies and things like that, when I would
15 have meetings down in Sydney, he would turn
16 up and we'd go to a little cafe shop and
17 things like that where the train station was.

18 Once Dave had passed away and things
19 started to get kicked off with these new
20 companies, there was a matter of all of a
21 sudden he had to dress in flash suits, you
22 know, wear the best watches, shoes,

1 fascination with socks.

2 Even down to vehicles. He moved
3 from his normal Subaru which was beaten up
4 and went and got a brand new car. It was
5 just a massive change in lifestyle. It
6 wasn't the Craig I originally met.

7 BY MR. FREEDMAN:

8 Q. So, I want to drill down on that a
9 little bit more.

10 Before Dave died you said Craig
11 dressed in hoodies?

12 A. Yes.

13 Q. Can you expand a little bit more?

14 A. Yes, tee shirts, normal sort of
15 developer sort of clothes. You could tell -- I
16 mean Craig is a very bright, very smart man.

17 Q. Right.

18 A. As I have said before, one of the
19 greater futurists I have actually come across.

20 But it was just disappointing to see
21 the way the business was handled moving forward.
22 And his arrogance, believing that he has got to

1 change himself, I think just caused him a lot of
2 problems.

3 Q. Beyond the physical change of going
4 from hoodies to suits and expensive watches, did
5 you see a change in his attitude at all?

6 MR. PASCHAL: Objection, form.

7 THE WITNESS: Yes.

8 BY MR. FREEDMAN:

9 Q. Did he suddenly have confidence?
10 What was the change?

11 A. Oh, the confidence went through the
12 roof. It was a matter of I'm the man, I'm going
13 to do this, this is the way I'm going to go about
14 it.

15 Whereas a lot more humble prior to
16 Dave's passing.

17 Q. And, how quickly after Dave's
18 passing did this happen?

19 A. I would have said June/July.

20 Q. Did you understand, did you ever
21 come to have an understanding of why there was
22 this sudden shift in his personality?

1 Did it have to do with money or any,
2 I mean, tell me, did you see any -- strike that.

3 Did you ever come to have an
4 understanding of why there was a sudden, a
5 massive shift in Craig's outward appearance?

6 MR. PASCHAL: Objection, form.

7 THE WITNESS: No.

8 BY MR. FREEDMAN:

9 Q. Okay.

10 A. It was only when time has gone by.

11 Q. Beyond flashy watches, suits, new
12 cars, did you see any other sudden displays of
13 wealth?

14 MR. PASCHAL: Objection, form.

15 THE WITNESS: Yes.

16 BY MR. FREEDMAN:

17 Q. Can you expand on that?

18 A. I did have a Christmas party and
19 Craig and Ramona joined us at the event that
20 night.

21 I mean, Craig was very much, you
22 know, the best of the Champagne, top shelf, and

1 out of a team of around about ten, there was
2 about \$15,000 spent on the evening, all paid by
3 Craig.

4 Q. Was that something Craig would have
5 done prior? Is that something you had seen Craig
6 do prior to Dave's death?

7 A. No, absolutely not. I mean, prior
8 to Dave's passing, I was the one buying the
9 coffees and spending the money travelling back
10 and forward.

11 Q. And then thereafter?

12 A. It was a matter of he would even fly
13 his team up to Brisbane. We would all go out
14 together. Craig would actually pay for everyone
15 who came along.

16 Q. Did it appear to you that after Dave
17 died, Craig had access to massive amounts of
18 assets that he did not previously have before?

19 MR. PASCHAL: Objection to form.

20 THE WITNESS: The money came from
21 somewhere.

22 BY MR. FREEDMAN:

1 Q. Sorry, go ahead?

2 A. I believe that there was a change,
3 and overnight he had a lot of wealth.

4 Q. Okay.

5 A. But, at the same time I know that he
6 was in the very early stages of Bitcoin as well.

7 MR. FREEDMAN: Can we take a, let's
8 go off the record for a minute.

9 THE VIDEOGRAPHER: Off the record at
10 9:07.

11 (Recess taken -- 9:07 a.m.)

12 (After recess -- 9:12 a.m.)

13 THE VIDEOGRAPHER: We are back on
14 the record at 9:12.

15 BY MR. FREEDMAN:

16 Q. Mr. Wilson, I'm handing you what has
17 been marked as Wilson 4, and it is, it was
18 produced in this litigation as Defense 28015.

19 (Wilson Exhibit Number 4
20 marked for identification.)

21 BY MR. FREEDMAN:

22 Q. Mr. Wilson, do you recognize this

1 e-mail as an e-mail from Craig to you?

2 A. Yes.

3 Q. Do you recall this e-mail?

4 A. Yes, I do.

5 Q. And in it it says, "This is where
6 this started. All of this started to move much
7 faster now. Dave passed a couple of months ago
8 so I'm no longer waiting for him to get better."

9 A. Correct.

10 Q. Did you ever talk to Craig about
11 what he meant by this e-mail?

12 A. No.

13 Q. Do you know why he sent it to you?

14 MR. PASCHAL: Objection, form.

15 THE WITNESS: I think it was all
16 mainly to deal with the attachments and all
17 of the files.

18 BY MR. FREEDMAN:

19 Q. Okay.

20 A. And it was more about let's get
21 going.

22 (Wilson Exhibit Number 5

1 marked for identification.)

2 BY MR. FREEDMAN:

3 Q. Okay. Mr. Wilson, I'm handing you
4 an exhibit marked as Wilson 5. It was marked in
5 this litigation, it has been produced in this
6 litigation as Defense 266797.

7 If you can take a look at this
8 e-mail. Do you recognize it as an e-mail from
9 Craig with a cc: to you?

10 A. Yes.

11 Q. And in it, Craig says, "Hello Love."
12 I'm assuming that is addressed to Ramona.

13 A. Correct.

14 Q. "Well I said I would be doing
15 something with that money. And there is a link,
16 Jamie is on board."

17 Do you know what money he is
18 referring to?

19 MR. PASCHAL: Objection, form.

20 THE WITNESS: Well, yes.

21 BY MR. FREEDMAN:

22 Q. Which money?

1 A. It would be the money that he had
2 from Bitcoin.

3 Q. Okay.

4 MR. PASCHAL: What was that marked
5 as?

6 THE REPORTER: Five.

7 MR. ROCHE: This is Kyle Roche, is
8 there any way we can move the mic closer to
9 Mr. Wilson?

10 MR. FREEDMAN: Kyle, we are not sure
11 how to work the system here, so ...

12 MR. ROCHE: Okay.

13 (Wilson Exhibit Number 6
14 marked for identification.)

15 BY MR. FREEDMAN:

16 Q. Mr. Wilson, I am handing you what
17 has been marked as Wilson 6. It has been
18 produced in this litigation as Defense 25094.

19 Can you take a moment to review this
20 e-mail, Mr. Wilson, and let me know if you
21 recognize it as an e-mail from Craig Wright to
22 you?

1 A. Yes, I do.

2 Q. Okay. This e-mail is also addressed
3 to Michael Hardy at the Australia Tax Office; is
4 that correct?

5 MR. PASCHAL: Objection, form.

6 BY MR. FREEDMAN:

7 Q. Mr. Wilson?

8 A. I'm not sure if Michael was the one
9 from the ATO.

10 Q. Okay. Do you remember getting this
11 e-mail from Craig?

12 A. Yes, I do.

13 Q. In this e-mail, Mr. Wilson, Craig
14 says that "The main addresses we control as a
15 group include the following ones listed below."
16 Do you see that?

17 A. It is in the middle.

18 Q. Yes, right at the top the first
19 sentence, the main address that we control as a
20 group?

21 MR. PASCHAL: Where are you reading
22 from?

1 BY MR. FREEDMAN:

2 Q. It says, "Hello Michael, as we noted
3 there are a couple of recent transactions."

4 At the end of that sentence, it
5 says, "The main addresses we control as a group
6 include the following ones listed below."

7 Do you see that?

8 A. Yes.

9 Q. And then do you see, if you go to
10 the paragraph that starts, "The addresses are in
11 my control."

12 A. Yes.

13 Q. It says, "The addresses are in my
14 control now."

15 Did, and then, sorry, "The addresses
16 are in my control now as a matter of fate and
17 other circumstances."

18 Do you see that?

19 A. Yes.

20 Q. "David Reese and David Kleiman have
21 both been a central part of this project."

22 A. Yes.

1 Q. And then, right above the little
2 graphic he says, "The addresses are," and there
3 is a list of addresses. Do you see that?

4 A. Yes, correct.

5 Q. Do you see where it says balance
6 XBT?

7 A. Yes.

8 Q. That is the Bitcoin balance?

9 MR. PASCHAL: Objection, form.

10 BY MR. FREEDMAN:

11 Q. Do you recognize that as a Bitcoin
12 balance?

13 A. Yes.

14 Q. And it says Australia dollars and
15 there is figures underneath that?

16 A. Correct.

17 Q. And then there is some additional
18 wallets, addresses listed below that under the
19 title Coin and Other?

20 A. That's right.

21 Q. Did Craig lead you to believe that
22 he had the ability to access this Bitcoin?

1 MR. PASCHAL: Objection, form.

2 THE WITNESS: Yes. 100 percent.

3 BY MR. FREEDMAN:

4 Q. Did Craig ever tell you that these
5 Bitcoin were locked in a file that he could not
6 access?

7 A. No, he could access them.

8 Q. Okay. This was in -- so, let's go
9 back here where it says, "These addresses are in
10 my control through fate and other circumstances.

11 "David Reese and David Kleiman have
12 both been central parts of this project.

13 "Both of these gentlemen, who I had
14 the good fortune to call friends, passed away
15 this year. David Reese was a friend of my
16 grandfather before he died of Parkinson's. Dave
17 Kleiman was my best friend."

18 Do you know what he means by fate
19 and other circumstances?

20 MR. PASCHAL: Objection, form.

21 THE WITNESS: No.

22 BY MR. FREEDMAN:

1 Q. Let me rephrase that. Did you ever
2 come to understand what he meant by fate and
3 other circumstances?

4 A. No.

5 MR. PASCHAL: Objection, form.

6 BY MR. FREEDMAN:

7 Q. Did he ever tell you what fate and
8 other circumstances meant?

9 A. No. And I didn't ask the question
10 either.

11 Q. Did he ever give you any more -- did
12 Craig -- strike that.

13 Did Craig ever give you any more
14 color or explanation on what he meant by Dave was
15 a "an essential part of this project"?

16 MR. PASCHAL: Objection, form.

17 THE WITNESS: Yes. In that they
18 worked together.

19 Now, I believed that Dave was the
20 original start. He started looking on the
21 Blockchain. And then later on Craig joined
22 it; it was a joint thing together, though.

1 BY MR. FREEDMAN:

2 Q. And did you form that belief through
3 statements Craig made to you?

4 A. Yes.

5 Q. Okay. When he refers to "this
6 project," did you take that to mean the mining of
7 all of this Bitcoin?

8 A. Yes.

9 MR. PASCHAL: Objection, form.

10 BY MR. FREEDMAN:

11 Q. How did you take the project to mean
12 when he said Dave was an essential part of this,
13 of the, of this project? How did you take "this
14 project" to mean?

15 MR. PASCHAL: Objection, form.

16 THE WITNESS: It was the mining.

17 BY MR. FREEDMAN:

18 Q. The mining of?

19 A. Bitcoin.

20 Q. Okay. Thank you.

21 Do you see if you turn the page over
22 to Defense 25095, do you see there is a graphic

1 down there?

2 A. Yes.

3 Q. And if you look 1, 2, 3, 4, 5, about
4 six up from the top, from the bottom, do you see
5 where it says CSW-Dave K-DV?

6 A. That's correct.

7 Q. Do you know what this wallet was?

8 A. No.

9 MR. PASCHAL: Objection, form.

10 BY MR. FREEDMAN:

11 Q. Do you know why there is a redaction
12 of the address?

13 A. No.

14 Q. Do you see at the top of the graphic
15 it says Bitcoin Wallet?

16 A. Yes.

17 Q. Did you take, when you received this
18 e-mail, did you understand it to be a snapshot of
19 wallets that Craig, Bitcoin wallets that --

20 MR. FREEDMAN: It is tough. I know
21 you know where I'm going, but for purposes of
22 the court reporter --

1 THE WITNESS: Right.

2 MR. FREEDMAN: -- try to let me
3 finish.

4 MR. PASCHAL: And I object, form, to
5 all of that.

6 BY MR. FREEDMAN:

7 Q. So, when you received this e-mail,
8 were you under the impression that this was a
9 snapshot of Bitcoin wallets that Craig had access
10 to?

11 MR. PASCHAL: Objection, form.

12 THE WITNESS: Yes.

13 BY MR. FREEDMAN:

14 Q. Thank you.

15 (Wilson Exhibit Number 7
16 marked for identification.)

17 BY MR. FREEDMAN:

18 Q. Okay. Mr. Wilson, I'm handing you
19 what has been marked as Wilson 7. It has been
20 produced in this litigation as Defense Australia
21 553926.

22 Mr. Wilson, do you recognize this

1 e-mail as an e-mail Craig sent to you, with a cc:
2 to you, rather?

3 A. Yes.

4 Q. And it was sent on October 2nd,
5 2013?

6 A. Yes.

7 Q. And it is also sent to Jenna Spears
8 at the Australia Tax Office and Michael Hardy at
9 the Australia Tax Office?

10 A. Yes.

11 Q. Do you recall receiving this e-mail?

12 A. Yes.

13 Q. In this e-mail do you see where
14 Craig says in the second paragraph, "The group I
15 head has a holding of over 100 million Australian
16 dollars in XBT Bitcoin"?

17 A. Yes.

18 Q. Did you ever talk to Craig about
19 this e-mail?

20 A. No. This was in regards to -- so,
21 Michael Hardy, now it does -- I do remember.

22 This was in regards to the tax returns and also

1 the R&D, research and development.

2 Q. Did Craig lead you to believe
3 through this e-mail that he had the control over
4 \$100 million in Bitcoin?

5 A. Yes.

6 MR. PASCHAL: Objection, form.

7 BY MR. FREEDMAN:

8 Q. Did he ever tell you that this
9 \$100 million in Bitcoin was locked in a file that
10 he could not access?

11 MR. PASCHAL: Objection, form.

12 THE WITNESS: No.

13 BY MR. FREEDMAN:

14 Q. Did he ever tell you it was locked
15 in a -- strike that.

16 (Wilson Exhibit Number 8
17 marked for identification.)

18 BY MR. FREEDMAN:

19 Q. Mr. Wilson, I am handing you what
20 has been marked as Wilson 8. It has been
21 produced in this litigation as Defense 45457.

22 A. Thank you.

1 Q. Take a look at this e-mail for me,
2 Mr. Wilson, and tell me do you recognize this as
3 an e-mail that Craig sent with a cc: to you?

4 A. Yes.

5 Q. This e-mail was also sent to Michael
6 Hardy of the ATO; is that correct?

7 A. Correct.

8 Q. And Mark Italia of the ATO?

9 A. Yes.

10 Q. Do you see where he says, "I have
11 also attached a stat dec." Is that a statutory
12 declaration? "From our solicitors validating the
13 control of a number of Bitcoin-based addresses."

14 A. Yes.

15 Q. "You can validate the amount held in
16 these publicly. For instance," and there is a
17 link with the block Explorer with the Bitcoin
18 address that begins 1933?

19 A. Yes.

20 Q. Do you see that?

21 A. Yes.

22 Q. And then the next paragraph. "With

1 a holding in excess of 111,114 Bitcoin. The
2 above address we have confirmed control of is
3 valued at market, on market at Australian
4 \$16.4 million."

5 A. Yes.

6 Q. Did you take this e-mail, did you
7 understand from this e-mail that Craig had
8 control over a Bitcoin address with over 111,000
9 Bitcoin in it?

10 A. Yes.

11 MR. PASCHAL: Objection, form.

12 BY MR. FREEDMAN:

13 Q. Did you ask Craig what he meant by
14 we have confirmed control over it?

15 A. No. I was aware that he did have
16 control of it.

17 Q. Okay. Did he ever tell you that
18 this Bitcoin was locked in a file that he could
19 not access?

20 MR. PASCHAL: Objection, form.

21 THE WITNESS: When we talk about is
22 it locked, all of them are locked and Craig,

1 my understanding, did have access to them.

2 BY MR. FREEDMAN:

3 Q. So, let me rephrase that.

4 Did he ever tell you that it was
5 locked in a file that Craig could not access
6 himself?

7 A. No.

8 (Wilson Exhibit Number 9
9 marked for identification.)

10 BY MR. FREEDMAN:

11 Q. Okay. Mr. Wilson, I am handing you
12 what has been marked as Wilson 9, it was produced
13 in this litigation as Defense Force 46093.

14 Mr. Wilson, do you recognize this
15 e-mail as an e-mail that Craig sent with a cc: to
16 you?

17 A. Yes.

18 Q. It was also sent to Mark Italia of
19 the ATO?

20 A. Yes.

21 Q. And Michael Hardy of the ATO?

22 A. Yes.

1 Q. With a cc: to Ramona Watts?

2 A. Yes.

3 Q. Do you see where it says about
4 midway through that e-mail, "Our funding comes as
5 we are the group that controls 5 percent of the
6 global Bitcoin market"?

7 A. Yes.

8 Q. Do you remember receiving this
9 e-mail?

10 A. Yes.

11 Q. Did you ever ask Craig about how he
12 came to control 5 percent of the global Bitcoin
13 market?

14 A. My understanding is that he was the
15 founder.

16 Q. Okay. Did he ever tell you, did he
17 lead you to believe that he had control over the
18 5 percent of the Bitcoin?

19 A. Yes.

20 MR. PASCHAL: Objection, form.

21 Mischaracterizes the document.

22 BY MR. FREEDMAN:

1 Q. Did he ever tell you that this
2 5 percent of Bitcoin that he had control of was
3 locked in a file that he could not access?

4 A. No.

5 MR. PASCHAL: Objection,
6 mischaracterizes the document and his
7 testimony.

8 MR. FREEDMAN: Mr. Paschal, I have
9 an e-mail from Mr. Kass specifically asking
10 me to limit my objections to form in depos.

11 I would request that you do the
12 same.

13 MR. KASS: I would like to see that
14 e-mail if you've got it. We've had
15 discussions.

16 MR. FREEDMAN: Please keep your
17 objection to form.

18 (Wilson Exhibit Number 10
19 marked for identification.)

20 BY MR. FREEDMAN:

21 Q. Mr. Wilson, I am handing you what
22 has been marked as defense, sorry, as Wilson

1 Exhibit 10. It was produced in this litigation
2 as Defense Australia 113043.

3 If you take a look, do you see the
4 e-mail at the top of the page, this is a -- do
5 you recognize this as an e-mail that Craig sent
6 to you?

7 A. Yes.

8 Q. It also went to Roger Manu of Rubik?

9 A. Correct.

10 Q. In it Craig says, "XBT Bitcoin has a
11 currency. There are 11 million Bitcoin. Look at
12 the exchange rate in XE.com." And then, "We
13 control what is, all up, a little over 1 million
14 Bitcoin."

15 Do you see that?

16 A. Correct.

17 Q. Do you recall receiving this e-mail?

18 A. Yes.

19 Q. Did you believe by receiving this
20 e-mail that Craig controlled over 1 million
21 Bitcoin?

22 A. Yes.

1 MR. PASCHAL: Objection to form.

2 BY MR. FREEDMAN:

3 Q. Was this statement that he
4 controlled, all up, a little over 1 million
5 Bitcoin consistent with other statements that
6 Craig had told you?

7 MR. PASCHAL: Objection, form.

8 THE WITNESS: Yes.

9 BY MR. FREEDMAN:

10 Q. Did Craig ever tell you that this
11 over 1 million Bitcoin was locked in a file that
12 he could not access?

13 MR. PASCHAL: Objection, form.

14 THE WITNESS: No.

15 MR. FREEDMAN: As a mechanics issue,
16 if I ask the question, take a beat before you
17 answer and give Mr. Paschal a chance to
18 object.

19 THE WITNESS: Okay.

20 MR. PASCHAL: Otherwise we are
21 talking over each other.

22 THE WITNESS: Done.

1 BY MR. FREEDMAN:

2 Q. Mr. Wilson, I'm handing you what has
3 been marked as Wilson 11.

4 (Wilson Exhibit Number 11
5 marked for identification.)

6 BY MR. FREEDMAN:

7 Q. It was produced in this litigation
8 as Defense 30127.

9 Do you recognize this e-mail as an
10 e-mail Craig sent to -- with a cc: to you?

11 A. Yes.

12 Q. It is also sent to Mr. Dempster at
13 the ATO?

14 A. Yes.

15 Q. And the subject is Evidence?

16 A. Yes.

17 Q. And in it there is a listing of
18 companies, a Coin Exchange and CSW Personal?

19 A. Yes.

20 Q. With the Bitcoin holdings of 438,000
21 and 57,000?

22 A. Yes.

1 Q. The value of those Bitcoin on
2 Mt. Gox which totals to 53.8 million.

3 A. Correct.

4 MR. PASCHAL: Objection, form.

5 BY MR. FREEDMAN:

6 Q. Okay. And then, "My wallet is
7 listed below."

8 Do you see that?

9 A. Yes.

10 Q. Did you take this e-mail to -- did
11 you take this e-mail to tell you that -- sorry,
12 strike that.

13 Did you understand from this e-mail
14 that Craig owned, controlled and owned and
15 controlled over \$53 million worth of Bitcoin?

16 MR. PASCHAL: Objection, form.

17 THE WITNESS: Yes.

18 BY MR. FREEDMAN:

19 Q. In fact, close to 500,000 Bitcoin?

20 A. Yes.

21 Q. Do you remember receiving this
22 e-mail?

1 A. Yes.

2 Q. Did you ever talk to Craig about
3 this e-mail?

4 A. It was ongoing conversations.

5 Q. Okay. All consistent with the story
6 that, what?

7 A. All of these Bitcoin holdings.

8 Q. Okay. Did he ever tell you that
9 this Bitcoin was locked in an inaccessible file
10 to him?

11 A. No.

12 Q. Thank you, Mr. Wilson.

13 So I can stop asking the question a
14 million times, Mr. Wilson, did Craig ever tell
15 you that Bitcoin he owned or controlled was
16 locked in a file that he could not access?

17 MR. PASCHAL: Objection, form.

18 THE WITNESS: No.

19 (Wilson Exhibit Number 12
20 marked for identification.)

21 BY MR. FREEDMAN:

22 Q. Mr. Wilson, I'm handing you what has

1 been marked as Wilson 12. It was produced in
2 this litigation as Defense 46098.

3 Do you recognize this as an e-mail
4 Craig sent with a cc: to you?

5 A. Yes.

6 Q. Do you remember receiving it?

7 A. Yes.

8 Q. Do you see about halfway down the
9 sentence says, "We control 165 million in XBT
10 Bitcoin"?

11 A. Yes.

12 Q. Did you understand this e-mail to
13 tell you that Craig controlled over 165 -- sorry,
14 strike that.

15 Did you take this e-mail -- strike
16 that.

17 Did you understand this e-mail to
18 say that Craig controlled \$165 million worth of
19 Bitcoin?

20 MR. PASCHAL: Objection, form.

21 THE WITNESS: Yes.

22 (Wilson Exhibit Number 13

1 marked for identification.)

2 BY MR. FREEDMAN:

3 Q. Mr. Wilson, I'm handing you what has
4 been marked as Wilson 13.

5 It was produced in this litigation
6 as Defense 467687.

7 Do you recognize, and if you look at
8 the second e-mail on the page, do you recognize
9 this as an e-mail from Craig addressed to you and
10 other individuals at Hotwire?

11 A. Yes.

12 Q. Do you remember receiving it?

13 A. Yes.

14 Q. If you look at the last sentence of
15 the first paragraph it says, "A \$5 million
16 Bitcoin fund was world news and TV globally. We
17 make this look like a mom and pop operation from
18 the Winkly Bros."

19 Do you see that?

20 A. Yes.

21 Q. What did you understand that
22 sentence to say?

1 MR. PASCHAL: Objection, form.

2 THE WITNESS: That Craig's holding
3 is a lot greater than the small amount that
4 the Winkler Brothers was trying to set up the
5 fund.

6 BY MR. FREEDMAN:

7 Q. Mr. Wilson, when you finally did
8 have access to some of the books in the company,
9 did you see specific and identifiable wallet
10 addresses?

11 A. Yes. Craig showed me, like on
12 screen.

13 Q. Okay. Outside of the e-mails we
14 have just looked at, did Craig lead you to
15 believe that he had a massive amount of Bitcoin?

16 A. Yes.

17 MR. PASCHAL: Objection, form.

18 BY MR. FREEDMAN:

19 Q. Did Craig lead you to believe that
20 he was incredibly wealthy?

21 MR. PASCHAL: Objection, form.

22 THE WITNESS: Yes. And that I was

1 extremely wealthy myself from the holdings
2 and the gifting of the Bitcoin to myself.

3 (Wilson Exhibit Number 14
4 marked for identification.)

5 BY MR. FREEDMAN:

6 Q. Mr. Wilson, I'm handing you what has
7 been marked as Wilson 14. It is Document 83-4.

8 If you open that up Mr. Wilson and
9 take a look, do you recognize this as an
10 affidavit Craig Wright submitted to the Supreme
11 Court of New South Wales?

12 A. Yes.

13 Q. Can you turn to Paragraph 23?

14 A. Yes.

15 Q. In it Craig writes, "On first of
16 August 2013 a shareholder's meeting was called
17 for W&K Info Defense LLC to be held on the 16th
18 of August 2013.

19 "The meeting was e-mailed to the
20 company address as well as sent to the address of
21 the shareholders and company.

22 "The shareholding of W&K Info

1 Defense LLC was Craig S. Wright 50 percent; David
2 A. Kleiman 50 percent. "

3 And in Paragraph 24, "The meeting
4 from Point 23, the meeting was held on the 16th
5 of August 2013.

6 "The following people were present.
7 Jamie Wilson, Craig S. Wright." Do you see that?

8 A. Yes.

9 Q. Did this meeting ever occur?

10 A. Yes.

11 Q. What happened at that meeting?

12 A. Craig said to me that with David's
13 passing that we needed to do the paperwork for
14 him to turn around and take full control and
15 resolve the issue of David being on the, as a
16 shareholder.

17 To be honest, at that stage I had
18 no, I didn't have the knowledge or understanding
19 of what it all meant, because the motions were
20 already happening with the Supreme Court of New
21 South Wales.

22 Q. So, if you look at the next page,

1 "The following points were moved at the meeting:

2 "One, Jamie Wilson will act as a
3 director for purposes of consenting to orders and
4 the company to be wound down. The vote was Craig
5 Wright yes; no other parties. It was agreed that
6 filing the motion to accept the debt owned by
7 company W&K Info Defense LLC would be closed."

8 Do you recall this happening?

9 A. This is my first knowledge that I
10 was acting as a director of the U.S. company.

11 Q. So, this is the first time -- so,
12 let me break that down a little bit.

13 You do recall the meeting happening;
14 is that correct?

15 A. It was part of our meeting that day
16 and it was around Hotwire PE.

17 Q. Okay.

18 A. Not so much WK.

19 Q. So, you remember the meeting
20 happening.

21 Is it accurate to say that you
22 remember the meeting happening, but you don't

1 remember being made a director of W&K?

2 A. Absolutely.

3 Q. Okay. So then you would agree with
4 the characterization in 24, Paragraph 24 that
5 there was a meeting. Present, Jamie Wilson and
6 Craig S. Wright were there?

7 A. Yes.

8 Q. But is it accurate to say you would
9 disagree with what happened in Paragraph 26?

10 A. Yes. This is my first that I am
11 being made aware that I was a director of the LLC
12 company.

13 Q. LLC is a Limited Liability Company.
14 The LLC meaning W&K Info Defense Research?

15 A. Yes.

16 Q. Mr. Wilson, can you talk to me about
17 the type of intellectual property that Craig was
18 developing in 2013?

19 MR. PASCHAL: Objection, form.

20 MR. FREEDMAN: What is the basis?

21 MR. PASCHAL: Well, you can't do it
22 both ways. I'm going to give you every

1 single basis or do you want it just form.

2 MR. FREEDMAN: I can ask you the
3 basis when I want.

4 MR. PASCHAL: You said keep it to
5 form.

6 MR. FREEDMAN: Yes, keep it to form
7 unless I ask you. How am I supposed to know
8 what your objection is? Normally I
9 understand what your objection is. If I
10 don't understand what it is, I will ask you.

11 So what is the basis of your
12 objection?

13 MR. PASCHAL: So, you have limited
14 time in this deposition. Get through what
15 you need to. Because I have questions.

16 MR. FREEDMAN: I have seven hours,
17 I'm good.

18 MR. PASCHAL: No you have three and
19 a half.

20 MR. FREEDMAN: Are you not going to
21 state the basis of your objection?

22 MR. PASCHAL: I said form.

1 MR. BRENNER: Mr. Paschal, you know
2 better. Counsel is allowed to ask you --

3 MR. PASCHAL: I'm not doing this.

4 MR. BRENNER: You are not going to
5 answer the form, okay. Good, then it is
6 waived.

7 MR. PASCHAL: It is not waived.

8 MR. BRENNER: Okay, go ahead.

9 BY MR. FREEDMAN:

10 Q. Can you talk to me about the type of
11 intellectual property Craig was developing in
12 2013?

13 MR. PASCHAL: Objection, form.

14 BY MR. FREEDMAN:

15 Q. Please go ahead.

16 A. So, we set up Hotwire PE and it was
17 all about setting up a banking platform, working
18 with Rubik out of Sydney.

19 The challenges were that it went to
20 a decimal six spaces instead of what we have
21 today being four. So unfortunately it couldn't
22 go ahead.

1 At the time of October, so we
2 started that around about June/July of 2013. And
3 by October I actually had finished and resigned.

4 All projects were related to Bitcoin
5 also setting up exchanges.

6 Q. Okay. So, was Craig involved in
7 Bitcoin related intellectual property development
8 in 2013?

9 A. Yes.

10 (Wilson Exhibit Number 15
11 marked for identification.)

12 BY MR. FREEDMAN:

13 Q. Mr. Wilson, I'm handing you what has
14 been marked as Wilson 15.

15 It was produced in this litigation
16 as Defense 43726.

17 Take a moment. Do you recognize
18 this as an e-mail you sent to Craig and Ramona
19 Watts?

20 A. Yes.

21 Q. Can you explain to me what this
22 e-mail is?

1 A. These were all of the projects that
2 Craig wanted to work on. 5/5, Hotwire and the
3 increase in staff in a short period of time.

4 Q. So, these were all intellectual
5 property projects?

6 A. Yes.

7 Q. And they all related to Bitcoin?

8 MR. PASCHAL: Objection, form.

9 BY MR. FREEDMAN:

10 Q. What did they relate to? What did
11 all of the projects relate to -- strike that.

12 Was there a common theme between all
13 of these projects?

14 A. Yes.

15 Q. What was the common theme between
16 all of the intellectual property projects that
17 Hotwire was working on?

18 A. It was Bitcoin.

19 (Wilson Exhibit Number 16

20 marked for identification.)

21 BY MR. FREEDMAN:

22 Q. Mr. Wilson, I'm handing you what has

1 been marked as Wilson 16.

2 It was produced in this litigation
3 as Defense 31588.

4 Do you recognize this as an e-mail
5 Craig sent to you and Ramona Watts?

6 A. Yes.

7 Q. Can you take a moment to familiarize
8 yourself with it.

9 A. Yes.

10 Q. Can you tell me what was happening
11 in this e-mail? What is Craig telling you?

12 A. It was a purchase, a license
13 agreement between the two companies.

14 Q. Which two companies?

15 A. And -- there was an agreement
16 between, well it would have been the W&K Defense,
17 the U.S. company, and the sale for the license to
18 the Australian company. And this here was a cost
19 that they were picking up to be able to claim for
20 the R&D.

21 Q. And do you see the last sentence in
22 the e-mail, "We just need to ensure that the

1 court judgment is completed by August 30th."

2 A. And it was.

3 Q. Do you know why it needed to be
4 completed by August 30th?

5 MR. PASCHAL: Objection, form.

6 THE WITNESS: To be able to launch
7 the R&D and have the tax returns completed.

8 BY MR. FREEDMAN:

9 Q. If the court judgment wasn't
10 completed by August 30th, what would have
11 happened?

12 MR. PASCHAL: Objection, form.

13 THE WITNESS: It would have had to
14 fall through to the following financial year.

15 BY MR. FREEDMAN:

16 Q. So, is it accurate to say Craig was
17 under a lot of time pressure to make sure the
18 judgment finished by August 30th?

19 MR. PASCHAL: Objection, form.

20 THE WITNESS: Yes.

21 BY MR. FREEDMAN:

22 Q. Okay. When Craig told you that he

1 worked with Dave Kleiman, did you understand that
2 to mean that he worked -- in projects that were
3 based in Florida?

4 A. Yes.

5 Q. Did you understand that he worked --
6 strike that.

7 Why don't we take ten minutes. Can
8 we go off the record?

9 THE VIDEOGRAPHER: Off the record at
10 9:49.

11 (Recess taken -- 9:49 a.m.)

12 (After recess -- 10:01 a.m.)

13 THE VIDEOGRAPHER: We are back on
14 the record at 10:01.

15 BY MR. FREEDMAN:

16 Q. Mr. Wilson, earlier I asked you if
17 the you were a shareholder of W&K and you said
18 no.

19 But, I recall that W&K is an LLC, a
20 limited liability company. It doesn't have
21 shareholders, it has members.

22 So, I'm going to rephrase --

1 MR. PASCHAL: Objection, form.

2 MR. FREEDMAN: I'm going to rephrase
3 my question. Would you like to object?

4 MR. PASCHAL: Yes, objection, form.
5 There was no question.

6 BY MR. FREEDMAN:

7 Q. Mr. Wilson, did you have any
8 membership interest in W&K?

9 A. No.

10 Q. Mr. Wilson, earlier you told me that
11 the common theme of the intellectual property
12 that Dr. Wright was working on in Hotwire was
13 Bitcoin. Do you recall that?

14 A. Yes.

15 Q. Dr. Wright had other companies that
16 you were also the director and shareholder of.

17 Was there a common theme to those
18 company's intellectual property development as
19 well?

20 A. Yes.

21 Q. What was that common theme?

22 A. All related to Bitcoin.

1 Q. Okay. Mr. Wilson, did Craig ever
2 tell you that his e-mails were hacked?

3 A. No.

4 Q. Did he ever tell you his company
5 documents were hacked?

6 A. No.

7 (Wilson Exhibit Number 17
8 marked for identification.)

9 BY MR. FREEDMAN:

10 Q. Mr. Wilson, I am handing you what
11 has been marked as Wilson 17. It was produced in
12 this litigation as Defense 267325.

13 Do you recognize the top e-mail as
14 an e-mail Craig sent with a cc: to you?

15 A. Yes.

16 Q. In it Craig says, "I own both
17 companies."

18 Do you see that?

19 A. Yes.

20 Q. And did you take that as a reference
21 to PanOptiCrypt and Hotwire in the e-mail below
22 that?

1 A. Yes.

2 MR. FREEDMAN: Counsel, up until
3 this point every document Mr. Wilson has been
4 handed he was a recipient of.

5 MR. PASCHAL: Actually, no. Your
6 computer screen is still on that TV.

7 MR. FREEDMAN: This document he is
8 not technically a recipient of it.

9 If you can get him to execute the
10 confidentiality order, but I really don't
11 think this is a confidential e-mail.

12 So, if you are willing to waive the
13 confidentiality designation on it we can
14 avoid that process.

15 MR. PASCHAL: We can discuss it
16 after the depo.

17 MR. FREEDMAN: Okay. So, can you --

18 MR. PASCHAL: Send me an e-mail with
19 the document.

20 MR. FREEDMAN: I've got to hand it
21 to the witness now.

22 MR. PASCHAL: That is fine. If we

1 keep it, we will mark this part confidential.

2 MR. FREEDMAN: If you hand it to
3 him. I'll give you the unmarked copy.

4 MR. PASCHAL: Okay.

5 (Wilson Exhibit Number 18
6 marked for identification.)

7 BY MR. FREEDMAN:

8 Q. I have just handed you what has been
9 marked as Wilson 18, it has been produced as
10 Defense 262775.

11 I'm not sure if you have ever seen
12 this before Mr. Wilson, but if you could take a
13 minute to familiarize yourself with it.

14 Are you familiar with what this is,
15 Mr. Wilson?

16 A. It is a MYOB program. M-Y-O-B. It
17 is an accounting package. I am positive it was
18 only Xero we were using as an accounting package.

19 Q. So you don't ever recall using MYOB?

20 A. No, not for Craig's work, no. Not
21 at all.

22 Q. Okay. It references a company

1 Information Defense. Do you see that?

2 A. Yes.

3 Q. Do you recall, do you recall what
4 that company was?

5 A. It was part of the group of
6 companies that Craig had set up for R&D.

7 Q. And did you, were you involved with
8 that company at all?

9 MR. PASCHAL: Objection, form.

10 BY MR. FREEDMAN:

11 Q. Were you involved with that company?

12 A. I can't remember it.

13 Q. Okay.

14 MR. FREEDMAN: We have no further
15 questions.

16 MR. PASCHAL: Let's take a break and
17 we will have some questions.

18 THE VIDEOGRAPHER: Off the record
19 at 10:07.

20 (Recess taken -- 10:07 a.m.)

21 (After recess -- 10:14 a.m.)

22 THE VIDEOGRAPHER: We are back on

1 the record at 10:14.

2 EXAMINATION

3 BY MR. PASCHAL:

4 Q. Good morning, Mr. Wilson. I am
5 Bryan Paschal. I represent Dr. Craig Wright in
6 the matter that you have just testified with
7 Mr. Freedman.

8 A. Good morning.

9 Q. Do you recall when you came in this
10 room today?

11 A. Yes.

12 Q. Did you speak with that lawyer?

13 A. No. Well, when I came into this
14 room and you were here and present as well, at
15 the same time.

16 Q. And that is Vel Freedman, right?

17 A. That's correct.

18 Q. And what did you say to
19 Mr. Freedman?

20 A. Good morning. Good morning to all.

21 Q. Did you say anything else to
22 Mr. Freedman?

1 A. No. That was it. You were present
2 when I walked in.

3 Q. Did you say, "Mr. Freedman, it is
4 finally good to meet you in person"?

5 A. Yes.

6 Q. How many times have you spoken to
7 Mr. Freedman?

8 A. Three, four times.

9 Q. When was the first time you spoke to
10 Mr. Freedman?

11 A. Oh, maybe July.

12 Q. July of this year?

13 A. Or August of this year, maybe.

14 Q. How -- this year, right?

15 A. That's correct. It might have been
16 August.

17 Q. Okay. And how did you speak with
18 Mr. Freedman?

19 A. By phone. By phone call.

20 Q. You have never e-mailed
21 Mr. Freedman?

22 A. Originally I did an e-mail. And he

1 said Jamie, we have been looking for you, can you
2 give me a call.

3 Q. You said you sent an e-mail?

4 A. I physically sent an e-mail.

5 Q. To say?

6 A. To say congratulations or something
7 like that on the case of Craig Wright.

8 Q. So, in July or August of this year,
9 you sent an e-mail to Mr. Freedman congratulating
10 him on this case?

11 A. That's correct.

12 Q. And when did Mr. Freedman respond to
13 you?

14 A. Within a 24-hour period.

15 Q. Okay. Let me go back to your first
16 e-mail.

17 Was there anything else other than
18 you congratulating him for this case, was there
19 anything else that you said to Mr. Freedman in
20 that e-mail?

21 A. No. I mean I could give you a copy
22 of the e-mail.

1 Q. Yes, I would like a copy of the
2 e-mail.

3 A. Sure.

4 Q. And what did Mr. Freedman respond to
5 you and say?

6 A. Can we talk? It was a phone call
7 after that.

8 Q. Was that all that Mr. Freedman said
9 to you in that e-mail?

10 A. Yes there wasn't much in it at all.

11 Q. So, I just want to be clear. You
12 congratulate him and he says I want to talk to
13 you. That is it?

14 A. Yes, it was very simple with a
15 reply.

16 Q. Okay. Are those the only e-mails
17 that you had with Mr. Freedman?

18 A. Yes, I'm more than happy to supply
19 the e-mails to you.

20 Q. Do you have any text messages with
21 Mr. Freedman?

22 A. No, only that can you write or can

1 you give me a call. I want to book my flights.

2 I want to make sure that I don't stand him up and
3 to make sure that I'm here present.

4 Q. Okay. Let me get into that. So you
5 booked your flight to come here for what purpose?

6 A. No. So, I do have an office in New
7 York, a physical office on Madison Avenue.

8 Q. Yes.

9 A. I travel back and forward out of the
10 U.S. on a regular basis.

11 This, while I am here in Washington,
12 was for the CINet Conference, which is a whole
13 lot of leading CISOs nationally in the U.S. that
14 we all to get together.

15 Q. So, if I were to say that you don't
16 travel to the US that frequently, would that be a
17 false statement?

18 A. That's correct. And you can tell by
19 my passport and the amount of time that I enter
20 America.

21 Q. When did Mr. Freedman arrange for
22 you to meet or have this deposition?

1 A. When he found out that I was coming
2 to the States.

3 Q. When did he find out that you were
4 coming to the States?

5 A. About two weeks ago. Or a week ago.

6 Q. Okay. And how did you, how did you
7 communicate that?

8 A. E-mail.

9 Q. By e-mail?

10 A. Yep.

11 Q. Okay. So there is a third e-mail
12 then?

13 A. Yes, there would be a couple of
14 e-mails back and forth.

15 Q. There is a chain of e-mails.

16 A. That's right.

17 Q. Okay. Did Mr. Freedman ask you to
18 come or did you tell him that you were coming?

19 A. No, no. I was coming. I mean I
20 have had my conference here for the last couple
21 of days. Physically here.

22 Q. And when -- I'm sorry, when did you

1 tell him that you were coming?

2 A. About two weeks ago.

3 Q. About two weeks ago. Okay. Did
4 Mr. Freedman, when you reached out to him in July
5 or August of this year, did he ever ask you to
6 come here for any other reason?

7 A. No, not at all.

8 Q. Okay. Did you ever get any filings
9 in this case? Did Mr. Freedman ever send you any
10 filings in this case?

11 A. No, not at all.

12 Q. Did he ever send you any documents
13 in this case?

14 A. Absolutely zero.

15 Q. Did he ever ask you for any
16 documents?

17 A. Yes.

18 Q. You sent him documents.

19 A. Yes.

20 Q. How many documents did you send him?

21 A. Oh, my resignation letters.

22 Oh, there was an e-mail or a social

1 media from Craig Wright making out that I was a
2 liar and deceitful and things like that, which
3 was posted.

4 And I thought well, you know what,
5 if that is the case, then I will give the
6 evidence that I actually did physically resign.
7 And these were the sequence of events.

8 I am more than happy to share what I
9 did share.

10 Q. Okay. And, are you represented by
11 counsel?

12 A. No.

13 Q. Okay. And if I needed to get in
14 contact with you, how would I get in contact with
15 you?

16 A. I'm more than happy to give you my
17 details.

18 Q. What is your e-mail address?

19 A. Jamie.wilson@cryptoloc,
20 C-R-Y-P-T-O-L-O-C.com.

21 Q. And what is your phone number?

22 A. Plus 61-416-176-816.

1 Q. Is that a cell phone or a land line?

2 A. No, my mobile number. And I will
3 give you my card as well.

4 MR. PASCHAL: I guess we have to
5 mark this, can you mark this?

6 (Wilson Exhibit Number 19
7 marked for identification.)

8 BY MR. PASCHAL:

9 Q. And just, my colleague reminded me,
10 what is your addresses for the offices in U.S.?

11 A. So the one in New York is 261
12 Madison Avenue, Level 9.

13 Q. Okay. And then you said, do you
14 have another one? I can't remember?

15 A. No, just the one.

16 Q. Okay. So I just, I don't want to
17 mischaracterize anything you have said.

18 So, you reached out to Mr. Freedman
19 to congratulate him, correct?

20 A. Yes.

21 Q. And then you also reached out to him
22 two weeks ago to let him know you were coming

1 here, right?

2 A. Yes.

3 Q. He did not reach out to you,
4 correct?

5 A. No. He did.

6 Q. He being Mr. Freedman?

7 A. Mr. Freedman asked me when was the
8 next time I'm coming to the U.S.

9 Q. I'm sorry, did you ever receive a
10 subpoena to show up at this deposition today?

11 A. No.

12 Q. Did you ever ask for a subpoena to
13 be at this deposition today?

14 A. No.

15 Q. Are you here voluntarily?

16 A. Yes.

17 Q. Okay. Now you also testified a
18 moment ago with Mr. Freedman that -- you said
19 things changed with Dr. Wright some time between,
20 or after Dave's death, right?

21 A. Correct.

22 Q. Okay. And Dave died in April

1 of 2013, correct?

2 A. Yes.

3 Q. And you also testified that after
4 Dave's death Craig showed some wealth, right?

5 A. Yes.

6 Q. In fact you were able to tell me the
7 exact amount that Craig spent for champagne with
8 his wife, correct?

9 A. Yes, for a Christmas party.

10 Q. For a Christmas party. And that
11 Christmas party was in 2013?

12 A. Yes.

13 Q. I'm going to break that down.

14 So --

15 A. I don't even know if it was a
16 Christmas party. But it was a get together,
17 anyway, a celebration.

18 Q. Was it around Christmastime?

19 A. I would have to go back and have a
20 look. But it --

21 Q. So you remember the amount he spent
22 for champagne, but you don't know --

1 A. No, it wasn't champagne; it was
2 dinner. It was a 15,000; it was top end, not
3 champagne, had a big top range wine as well.

4 Q. Were you responsible for the check
5 for dinner?

6 MR. FREEDMAN: Let the witness
7 finish his answer, Mr. Paschal, before you
8 continue.

9 THE WITNESS: No.

10 BY MR. PASCHAL:

11 Q. But you remember the exact amount
12 for the bill?

13 A. Yes.

14 Q. Now I'm just going to address this
15 in parts, so ...

16 A. Sure.

17 Q. You knew of Dave, right?

18 A. Yes. Of him.

19 Q. Dave Kleiman, I should clarify?

20 A. Yes.

21 Q. And you have heard people talk about
22 Dave Kleiman, right?

1 A. Yes.

2 Q. Did you know that Dave Kleiman lived
3 in the VA Hospital for the last two years of his
4 life?

5 A. No.

6 Q. Did you know that Mr. Dave Kleiman
7 could not afford to pay his cell phone bill
8 during that time, so his phone was disconnected?

9 A. No.

10 Q. Did you ever that his friends had to
11 lend him money to pay his cell phone bill so that
12 he could use his cell phone?

13 A. No.

14 Q. Did you know that Mr. Kleiman could
15 not afford his internet or cable and XFINITY
16 actually had to disconnect his account?

17 A. No.

18 Q. Did you know that the day that
19 Mr. Kleiman passed, or about the day that he
20 passed or the day before he passed, his credit
21 report showed that he had applied for a Payday
22 loan and was denied?

1 A. No.

2 Q. Did you ever know Dave Kleiman to
3 have a considerable amount of wealth?

4 A. No.

5 Q. Did you ever see Dave Kleiman
6 develop any intellectual property?

7 A. I never met Dave Kleiman.

8 Q. But just answer my question: You
9 never knew of him developing any intellectual
10 property?

11 A. Only with Craig being Blockchain or
12 Bitcoin.

13 Q. I'm going to get into that in a
14 second. So that is the only way that you know
15 that?

16 A. Absolutely yes.

17 Q. And did Craig tell you that?

18 A. Yes.

19 Q. And on how many occasions did Craig
20 tell you that?

21 A. Well that is how he started

22 Blockchain or Bitcoin. And it was a matter of I

1 did it with Dave Kleiman.

2 So, that is how I knew of Dave
3 Kleiman was purely because of the relationship
4 between the two.

5 Q. Just to clarify, you said I did it
6 with Dave Kleiman? You did it with --

7 A. No. No. Craig.

8 Q. So Craig told you that.

9 A. Yes.

10 Q. And that is how you formed your
11 belief that Dave created intellectual property?

12 A. Together with Craig.

13 Q. Together with Craig?

14 A. That's right. But I had no
15 understanding that --

16 Q. So, based on that statement -- --
17 I'm sorry, go ahead.

18 A. That he was in financial ruin.

19 Q. Who was in financial ruin?

20 A. David Kleiman.

21 Q. Okay. Now, you said that there was
22 a change in Craig. He started wearing suits,

1 right?

2 A. Yes.

3 Q. You just have to answer for the
4 record.

5 A. Yes.

6 Q. You mentioned fancy watches.

7 A. Yes.

8 Q. You said that he was showing that he
9 had money.

10 A. Yes.

11 Q. That he had bought a new car?

12 A. Yes.

13 Q. And to you that made you
14 uncomfortable?

15 A. No. What made me uncomfortable was
16 the change in habits and also the way that he was
17 going about his business.

18 So, that was only a small effect
19 versus how he would actually run the business and
20 on-board staff and new projects.

21 Q. Okay.

22 A. So there is a bigger picture here.

1 They are the smaller elements of the bigger
2 picture.

3 Q. But this started in Dave's, after
4 Dave died?

5 A. Yes.

6 Q. So, he didn't exhibit this before
7 Dave died?

8 A. No.

9 Q. Okay. And Dave died in April of
10 2013?

11 A. Yes.

12 Q. I'm going to show you --

13 MR. KASS: It will be Exhibit 20.

14 (Wilson Exhibit Number 20

15 marked for identification.)

16 BY MR. PASCHAL:

17 Q. So, I'm showing you an employee
18 remuneration.

19 A. Yes.

20 Q. But you are familiar with this
21 document, correct?

22 A. Yes, I am.

1 Q. Have you done this -- how are you
2 familiar with this document?

3 A. The reason for it is that I never
4 got paid, never received a cent. And as I have
5 stated to the Australia Taxation Office, I never
6 received any money whatsoever from Craig Wright
7 and why should I have to pay tax.

8 Q. Okay.

9 A. So, I got a tax bill for money I
10 never received.

11 Q. So, going to my question, that is
12 how you remember a document like this?

13 A. Yes.

14 Q. Okay. So, I want to just go through
15 this with you.

16 Your name is on here under Employee,
17 right?

18 A. Yes.

19 Q. And it does say Start Date:
20 August 1, 2013, correct?

21 A. Yes.

22 Q. Then it says October 11, 2013,

1 Termination, right?

2 A. Correct.

3 Q. That is when you resigned?

4 A. Yes.

5 Q. You could take a second. But can
6 you look at Annual Salary?

7 A. Yes.

8 Q. And you could look at them all.

9 Are you the second highest paid
10 person for this company?

11 MR. FREEDMAN: Objection, form.

12 THE WITNESS: Yes.

13 BY MR. PASCHAL:

14 Q. And how many employees are there on
15 that list? More than 12?

16 A. Yes.

17 Q. More than 14?

18 A. Yes.

19 Q. So it is a significant amount of
20 employees for this company? Correct.

21 A. Yes.

22 Q. And you are the second highest paid

1 person?

2 A. Yes.

3 MR. FREEDMAN: Objection to form.

4 BY MR. PASCHAL:

5 Q. And you started in August of 2013,
6 right?

7 A. No, no. I didn't. If you have a
8 look it was January, 8 of January, 2013.

9 So that Christmas party that we
10 asked before --

11 Q. Hold on, go ahead.

12 A. That would have been in December.
13 So that does work out.

14 Q. So, the date on this, this goes, the
15 date then the month then the year?

16 A. Yes.

17 Q. So, why is your resignation say here
18 then November 10, 2013, if you resigned in
19 October?

20 A. That would have been Craig or who,
21 or his bookkeeper who looked after the accounts.
22 I would not have processed my own termination pay

1 because I never received the payment.

2 Q. Okay. But you were scheduled to be
3 one of the highest employees, paid employees of
4 this company, correct?

5 A. Yes.

6 Q. So, it is January, you are saying
7 that you were employed January 8th of 2013.

8 A. Yes.

9 Q. And how many people started the
10 company, well I guess with you?

11 A. Well Ramona Watts. His wife.
12 Myself and Craig.

13 Q. Okay.

14 A. And then I would live in Brisbane;
15 Craig lives in Sydney. All of the business was
16 done out of Sydney. I was flying back and
17 forward. Craig was then on-boarding other people
18 around him to start up Hotwire PE.

19 Q. Okay. So, for nine months -- strike
20 that.

21 So in April Dave dies?

22 A. Yes.

1 Q. You stay on with Hotwire in May,
2 right?

3 A. Yes.

4 Q. You stay on in June, right? You
5 stay on in July. You stay on all of the way
6 until October or November?

7 A. 23rd of October my resignation.

8 Q. Okay. And at no time -- well are
9 there any documents where you express concern to
10 Craig that his demeanor has suddenly changed?

11 A. No.

12 Q. Are there any documents that any of
13 their employees where you say Craig suddenly
14 changed, something is wrong?

15 A. But you -- the difference is I
16 actually knew Craig prior to him on-boarding
17 staff.

18 I worked with Craig for quite some
19 period of time with the technology of YDF.

20 So, the advisory board that I had
21 around me, and to one of them being our lawyer,
22 Diane Pinder, would be one that would be able to

1 say, who is an attorney herself, that his
2 demeanor did change over that period of time as
3 well as Dr. Allen, I can't remember his surname.

4 Q. I just want to go back to my
5 question.

6 Are there any e-mails or
7 communications where you expressed to anyone
8 during this 9 month or 10 month or 11 month
9 period that Craig's demeanor suddenly changed
10 when Dave died?

11 A. No.

12 Q. Did you ever express any concern
13 when you served as CFO of Hotwire?

14 A. No.

15 Q. As a CFO, and I guess there is a
16 difference between CFO -- well does CFO involve
17 tax duties?

18 A. It does. It can be, but we had a
19 external party, BDO, who would look after the
20 taxation part of it.

21 Q. What is BDO?

22 A. It is one of the larger, well middle

1 tier accounting firms in Australia, equivalent to
2 like an Ernst & Young here.

3 Q. So it is a prestigious company?

4 A. Yes.

5 Q. And as CFO -- and your being an
6 accounting CFO role for the company of Hotwire,
7 right?

8 A. That's right.

9 Q. Not Craig Wright?

10 A. No.

11 Q. So, you owed some duties to the
12 company, correct?

13 A. Absolutely.

14 Q. And in this entire period there is
15 not a single e-mail or communication where you
16 said I am concerned because Craig Wright's
17 demeanor has suddenly changed.

18 A. No, because he had the money to turn
19 around and back it, as per his Bitcoin wallets.

20 So I knew, it was all a very new
21 thing for me and to understand Bitcoin as well.

22 And so I thought well, I can see why

1 he has got the money to be on board and he has
2 got the confidence to be able to bring these
3 people on.

4 This was very new for me. I had
5 never had a background in technology. So, this
6 is the first start. It was, I was leading Craig
7 and following to understand how do you turn
8 around and make something. For what he was
9 doing, wanting to achieve.

10 I mean some of the plans with the
11 company were out of my depth with what he was
12 wanting to achieve.

13 So, it was interesting for me. I
14 mean, he's a great futurist, so I could
15 understand where he was going and what he wanted
16 to do.

17 But doing it the right way, and
18 trying to put the right people around is where
19 the challenge was for Craig.

20 Q. Okay. You mentioned that you were
21 CFO but there was a bookkeeper?

22 A. Yes.

1 Q. Who was the bookkeeper?

2 A. I can't remember her name.

3 Q. Okay. You can't remember her name.

4 But what were her duties?

5 A. She looked after the accounts on a
6 daily basis and reported directly to Craig.

7 Q. You testified earlier that that was
8 unusual for you?

9 A. To not do --

10 Q. To not do that as the CFO?

11 A. Normally I would have full access to
12 the accounts and have a Xero access. Xero being
13 the accounting package, that is.

14 Q. Okay.

15 A. In this case, no. But then we are
16 at the early days before we were on-boarding a
17 whole lot of staff.

18 So I knew that over a period of
19 time, that the duties would increase. But, I
20 didn't need to work in a full-time capacity. It
21 was the early stages. It was a startup.

22 Q. So, for the nine months that you

1 were CFO, 9, 10, 11 months you were CFO, did you
2 ever express any concerns that there was a
3 bookkeeper?

4 A. No, I wouldn't express concerns of a
5 bookkeeper. That makes total sense for the
6 everyday expenditure to be taken up by someone to
7 look after it.

8 Q. So, that is completely okay then for
9 you?

10 A. I have no problems with that. It
11 makes total sense.

12 Q. Okay. And what were your duties as
13 CFO?

14 A. Ours was working through the cash
15 flow. For me, it was, and why Craig brought me
16 on, was the way that I had the discipline to be
17 able to build YDF, and the culture around it.

18 What Craig wanted was exactly
19 similar to what we had. But the difference is on
20 a greater scale, and he had a huge amount of
21 money behind him to be able to back it, to be
22 able to do it.

1 Q. Okay. I'm showing you -- what am I
2 on?

3 MR. KASS: You are on 21.

4 (Wilson Exhibit Number 21
5 marked for identification.)

6 BY MR. PASCHAL:

7 Q. I am showing you what we are going
8 to mark as 21?

9 What am I showing you?

10 A. My LinkedIn profile.

11 Q. Okay. When was the last time you
12 updated this profile?

13 A. Recently.

14 Q. Did you draft this profile?

15 A. No, my marketing, but I approved it.
16 My marketing staff would have drafted it and then
17 I signed off on it.

18 Q. Who is your marketing staff?

19 A. Nadine.

20 Q. Could you spell her name, please?

21 A. N-A-D-I-N-E.

22 Q. What is her last name?

1 A. Scott.

2 Q. And can you spell that, too?

3 A. S-C-O-T-T.

4 Q. Is she here in your office in New
5 York or Australia?

6 A. Australia.

7 Q. Okay. And if I wanted to get in
8 contact with her, how would I do that?

9 A. I could pass you her contact
10 details.

11 Q. What is her e-mail address?

12 A. If you let me know by e-mail, send
13 me an e-mail, and then I would be able to put the
14 two of you connected together.

15 Q. Okay. Now, if you turn to Page 3,
16 can you look at the bottom where it says
17 Education?

18 A. Education.

19 Q. Well let me ask you first --

20 A. Here, Queensland University of
21 Technology.

22 Q. So, let me ask you. You have a

1 marketing person looking at your LinkedIn, you
2 take this seriously, right?

3 A. Yes, the LinkedIn.

4 Q. And you hold this out because people
5 might use your company and want to look over
6 information about you. Correct?

7 A. That's correct.

8 Q. So you would want to make sure this
9 is accurate. Right?

10 A. Yes.

11 Q. You wouldn't put anything false in
12 here, right?

13 A. No.

14 Q. And you wouldn't leave out any
15 important information, would you?

16 A. No.

17 Q. Okay. Education, where it says
18 Queensland University of Technology.

19 A. Yes, QUT.

20 Q. Accounting and finance was your
21 degree?

22 A. Correct.

1 Q. Did you take any classes in
2 cybersecurity?

3 A. No.

4 Q. Did you take any classes related to
5 the Blockchain?

6 A. No.

7 Q. Did you take any classes related to
8 Bitcoin?

9 A. No.

10 Q. Did you take any classes related to
11 cryptocurrency?

12 A. No.

13 Q. Did you take any classes related to
14 cryptography?

15 A. No. And I never make out that I
16 have an IT background.

17 Q. Okay. And then you go in from, I
18 guess right after education you go into
19 laboratory assisted patient accounts, correct?

20 A. Correct.

21 Q. You didn't have any background
22 with --

1 A. I have had no background whatsoever.
2 It was only after my dad passing that I started
3 to take an increase and understanding in cyber
4 security.

5 But even today, I do not read code.
6 I have experts there in my office, and I do have
7 a CISO, with a great background in cyber
8 security.

9 (Reporter requests clarification.)

10 THE WITNESS: Ah. CISO, chief
11 information security officer.

12 Q. What is the name of your chief
13 information security officer?

14 A. Mark McPherson.

15 Q. Is that the only person that you
16 have in that capacity?

17 A. Yes.

18 Q. Do you have any computer scientists
19 working for you?

20 A. Yes, I have a data scientist as
21 well.

22 Q. What is that person's name?

1 A. Melissa Crossman.

2 Q. And do you know their e-mail
3 addresses?

4 A. Yes, I do.

5 Q. What is their e-mail address?

6 A. Melissa.crossman@cryptoloc.com and
7 mark.mcpherson@cryptoloc.com.

8 Q. Okay. Can you go to the first page.
9 So you say, "I took a fierce interest in cyber
10 security solutions after two devastating events
11 in my life." Right?

12 A. Correct.

13 Q. Would that be when you first had a
14 passion for cyber security?

15 A. After the loss of my father, yes.

16 Q. And your father passed in 2011?

17 A. Ten, so in October 2010, my father
18 passed away. And it was through this process
19 when I was trying to find a solution in the event
20 that one dies, that you can find the will, the
21 life insurance superannuation.

22 Q. I'm sorry, I need to ask you

1 questions. So that was an important -- strike
2 that.

3 When your father passed, it was
4 important that you were able to find documents
5 about him?

6 A. Well it was. We were fortunate to
7 have dad for a 12-month period when he was
8 terminal with cancer.

9 And through that stage it was a
10 challenge to find all of those important
11 documents. And it was through that, that I had
12 seen, I even said to dad it was lucky that he was
13 alive, otherwise we never would have been able to
14 find the information.

15 Q. Okay. And I just want to ask you
16 then, so, when he, and I know it is difficult to
17 talk about some of this stuff, but I just want to
18 know.

19 A. Uh-huh.

20 Q. You were able to get documents from
21 him before he died because you had a window,
22 right?

1 A. Yes, he was alive and we could use
2 him to find the information.

3 Q. But you, were you able to find
4 documents?

5 A. Yes, because he was alive.

6 Q. Would it strike you as odd if
7 somebody were to destroy documents after a family
8 member passed away?

9 A. Well, I suppose if they don't know
10 the importance of it or a filing cabinet.

11 I mean, hence why I created YDF was
12 purely in event that I drop dead that my family
13 and my two children would know where the
14 information was.

15 Being an accountant at that stage, I
16 had a filing cabinet with a whole lot of
17 strategies of clientele.

18 Q. Yes.

19 A. And I thought what a mess it would
20 be that they would never receive their paperwork.

21 So I wanted to make sure that in the
22 event that I passed away, that everyone receives

1 the information, and that it would stand up in
2 court.

3 So hence why I created the
4 technology and went on this road and journey to
5 build it.

6 Q. That is a noble process. I mean,
7 that is important for people that you are doing
8 that for, right?

9 A. It is.

10 Q. Because it is important that if
11 somebody passes they could get access to
12 important documents. Right?

13 A. Yes.

14 Q. So, would it be odd to you if
15 somebody were to throw away in the trash every
16 piece of paper that their family member had?
17 Without looking at them?

18 A. Probably not. It depends on who the
19 individual is.

20 Q. Let's say it was your, I mean --

21 A. For me it is different. Like I
22 would actually go through it.

1 It depends on the capability of the
2 individual as well and the circumstances that
3 they grew up in.

4 Q. So, if they erased hard drives and
5 threw out papers, that would be --

6 A. That would be strange.

7 Q. Okay. Just to clarify, I'm going to
8 show you a place on your -- actually, you said
9 you became engaged in cyber security after your
10 father passed in 2011, right?

11 A. Yes.

12 Q. Okay.

13 A. '10.

14 Q. On your LinkedIn, I don't know if it
15 was just -- but it says 2010 is when you got
16 involved with cyber security.

17 A. Correct. So dad passed away in
18 October of 2010.

19 Q. Okay.

20 A. And I even spoke to dad prior to him
21 passing about it.

22 Q. Okay. I got it. I'm sorry, if you

1 wanted to keep --

2 A. No, go ahead. I understand.

3 Q. Can you take a look at what was
4 Plaintiffs 15?

5 A. Yes, with the projects.

6 Q. Mr. Freedman asked you if there was
7 a common theme between all of these things in
8 this e-mail, right?

9 A. Yes.

10 Q. The live feed here says you took
11 about 20 seconds to read this e-mail, right?

12 A. Yes.

13 Q. Was that, and this is a two-page
14 single space e-mail, right? Or one page? It is
15 two pages, right?

16 A. Yes.

17 Q. -- let me go through here.

18 Do you see the -- let's go to the
19 fourth category.

20 MR. FREEDMAN: Excuse me, counsel.

21 Could you tell me the Bates label on the
22 bottom of the page?

1 MR. PASCHAL: Yes. It is 0043726.

2 MR. FREEDMAN: Thank you.

3 MR. PASCHAL: Let me know when you
4 have it.

5 MR. FREEDMAN: Go ahead.

6 BY MR. PASCHAL:

7 Q. So, if you go down to the fourth
8 where it says Video System.

9 A. Yes.

10 Q. Replacement for Adobe and
11 GoToMeeting.

12 A. Yes.

13 Q. What does that have to do with
14 Bitcoin?

15 A. What he was trying to set up, Craig
16 Wright, is the ability for, where you could go
17 into an environment, be able to negotiate and
18 then you would be able to use Blockchain, pay in
19 Bitcoin for the end of an agreement. So, of a
20 party.

21 Mainly if there was a legal problem.
22 And that as long as everyone was happy with the

1 outcome of it, then the money would be
2 transferred.

3 If not it would stay as an escrow
4 and then other legal professions would be able to
5 come in and voice their opinion and the money
6 would be dispersed at a certain percentage.

7 Q. Okay. But going back to my
8 question, though.

9 How is that related to Adobe or
10 GoToMeeting?

11 A. It was an improvement of what Adobe
12 and GoToMeeting is.

13 It is the ability to be able to use
14 Blockchain to be able to escrow or escrow the
15 money with the Bitcoin and to be able to have a
16 background so you could actually track it all
17 back from those meetings.

18 Q. So, the process of Adobe and
19 GoToMeeting could be similar or, or Bitcoin, let
20 me say.

21 A. Yes.

22 Q. Could be similar or the same as

1 GoToMeeting or Adobe?

2 A. It would be new technology. But,
3 you would be able to put it on the Blockchain.

4 Q. Was that technology ever developed?

5 A. I left in October 2013. This is
6 August 2013. These were projects where he was
7 scaling his staff to be able to deliver.

8 Q. Okay. So -- hold on. So, the
9 Reputation Systems, think LinkedIn, do you see
10 that?

11 A. Yes.

12 Q. But with the tracking against
13 training?

14 A. Yes.

15 Q. That is related to Bitcoin?

16 A. Blockchain.

17 Q. Let's say Bitcoin first.

18 A. All of these projects here are
19 Blockchain-related, which then could turn around
20 and have Bitcoin as well.

21 So when you are looking at the
22 LinkedIn, turning around and putting to

1 qualifications, et cetera, you run it off the
2 Blockchain.

3 However you are able to send
4 information and be able to be paid in
5 remuneration with the Bitcoin.

6 Q. So, I want to clarify this
7 Mr. Wilson, because earlier you said the common
8 point is Bitcoin?

9 A. Secondary is Bitcoin.

10 Q. So, the common theme is Blockchain?

11 A. Blockchain is all of this. All of
12 it is Blockchain as we understand. Blockchain is
13 the underlying technology of Bitcoin.

14 So, all of this does come back into
15 receiving money and funds.

16 Q. Okay. But there is a lot of
17 different technologies that stemmed from
18 Blockchain, correct?

19 A. Absolutely.

20 Q. Is the technology used at YDF, is
21 that Blockchain?

22 A. Absolutely not.

1 Q. Do you think it is better than
2 Blockchain?

3 A. Yes, I do.

4 Q. Is that based on your cyber security
5 experts, data scientists, and developers?

6 A. Yes.

7 Q. And that --

8 A. When we, the reason for it is in
9 regards to privacy.

10 Blockchain doesn't give you the
11 privacy, and that is, it is a public ledger, and
12 that you can track all of the transactions,
13 understand what an individual is doing, be able
14 to do a 51 percent of tech.

15 There is plenty of information now
16 from the MIT which has come out and said we
17 realize that there is problems with scaling and
18 also the privacy around Blockchain.

19 Q. Okay.

20 A. I have done a closed ledger, you
21 know, with cryptography with an escrow being our
22 point of difference which we have patents on a

1 global stage as well.

2 We actually could run a digital
3 currency off our Cryptoloc technology if we
4 wished and it would be a lot quicker and give the
5 privacy. But we would work with law enforcement
6 as well.

7 Q. Would that put you in competition
8 with Bitcoin?

9 A. Would it put us in competition? It
10 would if I did want to run out a digital
11 currency, but it is not on my agenda.

12 Q. Oh, and do you have any
13 communications with Diane Pinder?

14 A. Not recently.

15 Q. Can you tell me the substance of
16 your communication was Diane Pinder?

17 A. Diane Pinder was an advisory board
18 member with YDF in the early days.

19 And since then, so, many years now.

20 Q. Uh-huh.

21 A. Probably 2014, 2016 -- it would have
22 been 2014.

1 It is the same year after I resigned
2 Diane finished up at Lloyd solicitors in a
3 capacity as one of the principal lawyers.

4 And then I haven't remained
5 connected to Diane.

6 Q. Can you go back to your LinkedIn
7 page?

8 A. Yes.

9 Q. Earlier you testified you would make
10 sure that this information was accurate.

11 Correct?

12 A. Yes.

13 Q. And you would make sure that
14 everything is in here that is necessary.

15 Correct?

16 A. Yes.

17 Q. And you wouldn't leave out anything
18 that was important?

19 A. I could leave out something.

20 Q. Earlier you testified that you would
21 not leave out anything important. I am
22 clarifying your testimony.

1 A. Well, only sensitive information
2 such as the clientele that I was looking after.
3 It is not relevant to a LinkedIn profile.

4 Q. So it wasn't relevant that you were
5 involved with Hotwire?

6 A. No, and I didn't turn around and add
7 Hotwire PE or any of the group of companies at
8 all to my LinkedIn profile.

9 Mind you, back in those days I
10 really didn't use LinkedIn.

11 Q. You said you were CFO and
12 shareholder of several companies with Craig
13 Wright, right?

14 A. Yes. The group of his companies he
15 appointed me as CFO and director.

16 Q. And none of these are on your
17 LinkedIn. Are they?

18 A. No.

19 Q. And those companies had issues with
20 the ATO, correct?

21 A. Yes.

22 Q. And you were copied on e-mails with

1 the ATO?

2 A. Yes.

3 Q. And you left all of them off of your
4 experience, correct?

5 A. Yes, because I wasn't -- Craig ran
6 the matters himself.

7 It would be different if I ran the
8 matters.

9 I'm not going to turn around and put
10 myself out as the CFO when he is looking after
11 all of the matters.

12 Q. And again you were CFO for nine
13 months, right?

14 A. Yes. Well --

15 Q. And during that nine months did you
16 ever e-mail the ATO and say something is wrong?

17 A. No, why would I?

18 Information was only supplied as we
19 were doing the R&D and the Australia Taxation
20 Office trying to come up with the numbers.

21 Q. And earlier you said -- I just want
22 to make sure I get it right. You said that after

1 Dave died, you were uncomfortable with the
2 documentations for the companies?

3 A. That's correct. And when did I
4 receive the documentation, and the accounts, it
5 all started coming through from beginning of July
6 when our end of financial period was ended on the
7 30th of June.

8 And then when I had to start putting
9 the tax returns and the R&D forms all together
10 and Craig actually even did the numbers himself
11 and then would hand them to me.

12 So, even down to legal work. Craig
13 looked after a lot of his legal work, he would
14 look after his accounts and then it would be
15 handed over to me and then I would have to go
16 through them. And then I would ask questions and
17 then we would try to work it out.

18 And then that is when I turned
19 around and said I don't feel comfortable.

20 Q. Okay.

21 A. And that is why I never lodged them.
22 And Craig actually lodged them himself.

1 Q. So, from January to July I guess
2 there weren't any documents that you were looking
3 at, because you didn't get them until July?

4 A. That's right.

5 Q. So, what were you doing from January
6 to July with Hotwire?

7 A. Trying to have a look at okay, what
8 is the best way moving forward. How do we turn
9 around and increase the staffing, because things
10 don't happen that quickly anyway.

11 And the staff, if you have a look,
12 they were really only started in May, June, June.
13 It was late. It wasn't --

14 Q. So, what were you doing to complete
15 those tasks that you have just mentioned?

16 A. Well that was my issue. I didn't
17 have enough information, nor a whole lot of task.

18 It was all about the projects that
19 Craig was involved in and his background with
20 Bitcoin and understanding the knowledge of
21 Blockchain.

22 Q. Okay. So from January to July you

1 had an issue, because you didn't have -- could
2 you clarify what was it that you didn't have?

3 A. There was no accounts that were
4 required to be done or completed.

5 Q. Okay.

6 A. All of it was to do with the
7 transfer of information and license agreements
8 and things like that.

9 So, it was more of a legal over an
10 accounting.

11 Q. Okay. And so, did you, are there
12 any e-mails or documents or, did you have any
13 communications where you expressed concerns that
14 you weren't doing anything for the seven-month
15 period?

16 A. There was no work to be done. As in
17 there was nothing from the accounting point
18 because the bookkeeper was there. So a lot of
19 mine was strategy with Craig and sitting and
20 understanding, okay, how do we actually structure
21 this to be able to move forward.

22 Q. So, Hotwire agreed to make you the

1 second highest paid employee and you did nothing
2 for seven months?

3 A. I never got a cent anyway.

4 Q. Okay.

5 A. But I still had to pay tax on the
6 money. And if you go and have a look at the
7 records, I also put the down deposit down for the
8 rental property that Craig never paid me back as
9 well. And all of the travel back and forward out
10 of Sydney and accommodation expense and
11 expenditure was never reimbursed as well.

12 Q. Are you upset about that?

13 A. I think it is unethical.

14 Q. Okay.

15 A. You would do the right thing. If
16 you are delivering and you are working and doing
17 your duties, and your jobs and you want to be
18 part of a project, well then you should pay.

19 Q. Were you monitoring this case?
20 Monitoring?

21 A. No. It actually was Steve Lipke who
22 made me aware of it.

1 Q. And then you reached out and
2 congratulated Mr. Freedman?

3 A. Yes, I did. And the same reason I
4 never got paid, that team down in Sydney did not
5 get paid. They were loaning money off family and
6 loved ones to be able to afford to pay their rent
7 and keep afloat.

8 They were in quite a state. And
9 still have not recovered.

10 Q. And you said that when you were, you
11 resigned your shares were just taken from you,
12 right?

13 A. That's correct.

14 Q. How did you feel about that?

15 A. No, acceptable. I never argued. I
16 didn't dispute. I, I was only wanting what I was
17 entitled to and that was the money, the physical
18 cash that I was out of pocket with.

19 But then the lawyers got involved
20 down in Sydney as part of the administration, and
21 said no, that is an individual matter for Craig.
22 We are not paying you anything.

1 Q. And, were any other the lawyers that
2 you spoke with other than Mr. Freedman?

3 A. No.

4 Q. You said the ATO is asking you to
5 pay taxes on income that you would have made at
6 Hotwire, right?

7 A. That's correct.

8 Q. But you are saying you did not make
9 income --

10 A. I did not receive one cent. And you
11 can go through all the bank accounts and you will
12 notice that I never received one. It was only me
13 sending money to Craig and never being
14 reimbursed.

15 Q. And in January did you complain that
16 you hadn't been paid your salary?

17 A. In January?

18 Q. Of 2013.

19 A. No.

20 Q. And in February of 2013, did you
21 complain that you hadn't received your salary?

22 A. To be honest I didn't expect to

1 receive a salary. And I didn't even, wasn't
2 aware of the Document 20, this here, that I
3 believe is what you received from the
4 administrators, of when they were looking after
5 and winding up the company.

6 That's the only way, reason I've got
7 knowledge of it as well.

8 Prior to that it was with the
9 payment summary that came in, and the ATO said I
10 received money and I said no, I didn't.

11 But, that is how this documentation
12 also was supplied to me.

13 Q. Okay.

14 A. So, no, I didn't expect to receive
15 any money. Otherwise it would be strange if I
16 turned around and said no I didn't take any
17 money.

18 Q. Okay. So, your payment, what was
19 your payment for being CFO? What was your
20 expected payment? What, were you getting out of
21 being CFO.

22 A. It was supposed to be an annual

1 salary of what is here, 150. But it never
2 commenced.

3 But, I wasn't worried anyway.

4 The issue is, I wasn't concerned,
5 because we were in the stages of doing a setup, a
6 startup.

7 Q. Okay.

8 A. During that period of time, I didn't
9 understand the whole, you know, the Bitcoin, the
10 wallets, and how much money.

11 So, I had to get all of that
12 training. So, I was happy to turn around and
13 spend the time and learning, purely because of my
14 history with Craig, and being an advisory board
15 member of YDF and the relationship there.

16 So that's why I was more than happy
17 to turn around and wear it. Once the companies
18 got money, then I would get paid but then my
19 duties would increase. But we never got there.

20 Q. So, earlier, earlier Mr. Freedman
21 asked you about whether or not you knew that
22 Dr. Wright's Bitcoin was locked up in an

1 encrypted file. Do you recall that line of
2 questioning?

3 A. Yes.

4 Q. And he asked you several times?

5 A. And was he able to get, and was he
6 not able to get access to it.

7 Q. Let me break that down.

8 Do you know how Craig Wright
9 obtained Bitcoin?

10 A. Through mining. With Dave Kleiman,
11 that was my understanding.

12 Q. What is your understanding based on?

13 A. From Craig saying that it was
14 working with a great mate who was in the U.S.,
15 Dave. And they set up Bitcoin and that it was
16 Hitoshi --

17 Q. Were those the statements to you,
18 were there any other statements that you recall
19 right now?

20 A. No. No.

21 Q. So, from those statements, you --
22 well, let me back up.

1 Craig Wright never told you that he
2 mined with Dave?

3 A. Yes, he did.

4 MR. FREEDMAN: Object to form.

5 BY MR. PASCHAL:

6 Q. Well, when did he tell you that?

7 A. Well that is how I knew all about
8 the Bitcoin and his wallets.

9 Q. Mr. Wilson, I asked you a second ago
10 what were all of the statements that Mr. Craig
11 Wright made to you to make you think that.

12 You did not say that Craig Wright
13 said I mined Bitcoin with Dave.

14 MR. FREEDMAN: Object to form. You
15 are mischaracterizing.

16 MR. PASCHAL: He did not say that.
17 That is why the live feed is helpful.

18 THE WITNESS: You know, Dave, not
19 Dave, Craig, had been mining it for quite
20 some time.

21 BY MR. PASCHAL:

22 Q. Well, let me ask you -- I'm sorry,

1 are you finished?

2 A. Yes.

3 Q. Okay. If Craig purchased Bitcoin,
4 would you have known that he purchased it?

5 A. Well you could track it back,
6 absolutely, through the ledger. I mean there is
7 a history, there is an audit trail.

8 Q. Do you know if -- well, do you know
9 if Craig Wright purchased Bitcoin?

10 A. No, I don't.

11 Q. So, if he purchases Bitcoin, you
12 wouldn't know if it came, that could be his
13 Bitcoin holding, correct?

14 A. Correct.

15 Q. So, you are not sure if he mined
16 that Bitcoin then, am I --

17 A. Oh, no, he definitely mined it. He
18 even got new servers, et cetera, that ran in his
19 garage.

20 Q. Okay. But let's say his garage was
21 closed down and he removed all of his equipment.

22 A. Right.

1 MR. FREEDMAN: Object to form.

2 BY MR. PASCHAL:

3 Q. Would he have been mining anywhere
4 else.

5 A. Absolutely you can.

6 Q. Well not anyone can, he can?

7 A. He has the ability to be able to do
8 it on a mobile device.

9 I mean, it might blow the phone up
10 but you still have many other options of being
11 able to mine the Bitcoin.

12 Q. Do you think he was mining on a
13 mobile device?

14 A. No.

15 Q. Okay.

16 A. But if your question was do you
17 think that he had been doing -- mining Bitcoin,
18 absolutely.

19 Q. But I'm going to go back to my
20 question. Do you know, other than his garage,
21 was he mining Bitcoin?

22 A. Yes.

1 Q. And how do you know that?

2 A. Because he told me so.

3 Q. Okay. And when he told you, was he
4 saying that this is the Bitcoin that I mined in
5 my garage, do you know?

6 A. No. But that is not relevant, is
7 it?

8 Q. Well, I'm asking you --

9 A. Well, I don't think --

10 Q. Did he say he was mining in his
11 garage and you don't know?

12 A. No.

13 Q. So, if he purchased Bitcoin
14 afterwards, you wouldn't know?

15 A. No.

16 Q. Okay. And do you know how much he
17 mined, exactly?

18 A. No. Because he already had a huge
19 amount of Bitcoin as per the wallets.

20 And when Craig said to me this is
21 where my wallets are and this is the amount of
22 Bitcoin that I have mined it, well then, I mean

1 it was all new to me. So I would have to break
2 it down.

3 But, the wallets are there. Craig
4 has e-mailed them through.

5 Q. Okay.

6 A. And I can't see Craig having that
7 sort of wealth to buy the Bitcoin when he was
8 driving around in hoodies and also, you know, in
9 a, in a very cheap car. And a rental property.

10 Q. Did you have access to any of
11 Dr. Craig Wright's financial records when he had
12 a hoodie?

13 A. No.

14 Q. Did you see his bank account
15 statements?

16 A. No.

17 Q. Did you see what he was spending to
18 buy computers?

19 A. No.

20 Q. Okay. And let me ask you, when did
21 you stop speaking to Craig Wright? Or did you
22 stop speaking to Craig Wright?

1 A. It is years ago.

2 Q. Huh?

3 A. Years ago.

4 Q. Can you give me a date? A year?

5 A. Two, three.

6 Q. Two, three years ago?

7 A. Yes.

8 Q. And what made you stop speaking with
9 Craig Wright?

10 A. I didn't like the way he went about
11 business. The ethics and morals.

12 Q. Okay.

13 A. The way he treats people.

14 Q. Did he treat you bad?

15 A. No. No. He was pretty good with
16 me.

17 Q. Okay. And when Craig Wright, you
18 saw these Bitcoin wallets, did you ever see Craig
19 Wright transfer Bitcoin to anyone?

20 A. No. See, I, I have never seen any
21 Bitcoin transfer at all. All I have ever seen is
22 the wallets on a screen, or the ones that he has

1 e-mailed through. That is it.

2 Q. So, if Craig Wright had his Bitcoin
3 encrypted, and you never saw any transfers, how
4 would you be able to say that they weren't
5 encrypted? Is it just that he said he never told
6 you that?

7 A. Craig would log into them. So, I
8 know that he could access them.

9 Q. Okay. And when did you see Craig
10 log into Bitcoin?

11 A. Oh, several times at his home
12 address.

13 Q. Okay. And what would you see?

14 A. Oh, the accounts, his wallets, and
15 then he showed me how it works.

16 Q. And what computer, was it a computer
17 that he was showing you it on?

18 A. Yes.

19 Q. Was it like a laptop?

20 A. Oh, I can't remember.

21 Q. Okay.

22 A. It was at his home.

1 Q. And how many years ago was that?

2 A. Oh, that would have been 2013.

3 Q. And in what home was that?

4 A. At Howard Street at North Rye, I
5 think it was.

6 Q. But you did not see him transfer
7 Bitcoin or move Bitcoin?

8 A. No, but there was no reason for him
9 to do that in front of me.

10 Q. Okay. So, if you could log into the
11 screen, right, you could see Bitcoin.

12 A. Yes.

13 Q. But, if it was encrypted, then he
14 couldn't move them. You wouldn't know that,
15 right?

16 A. Well, once you log-in and you've got
17 access to it, you would be able to send money,
18 receive money.

19 Q. Did you see the private keys that
20 Craig Wright had?

21 A. Only what was on the screen. But,
22 they are not -- no, the wallets only.

1 Q. So you never saw a private key?

2 A. No.

3 MR. PASCHAL: We are going to take a
4 break for a second.

5 THE VIDEOGRAPHER: Off the record at
6 11:04.

7 (Recess taken -- 11:04 a.m.)

8 (After recess -- 11:20 a.m.)

9 THE VIDEOGRAPHER: We are back on
10 the record at 11:20.

11 BY MR. PASCHAL:

12 Q. Mr. Wilson, what did you discuss on
13 the phone with Mr. Freedman?

14 A. When I was travelling back into the
15 U.S., would I be available to catch up.

16 Q. Well, how many phone conversations
17 did you have with Mr. Freedman?

18 A. Around about three.

19 Q. Okay. And they were three separate
20 e-mails, also?

21 A. Well, yes, there were e-mails going
22 back and forward. But some of them are very

1 short. I am happy to supply them.

2 Q. Just focusing on the phone
3 conversations.

4 A. Uh-huh.

5 Q. What did you discuss with
6 Mr. Freedman?

7 A. In regards to the social media posts
8 that Craig put up about myself, talking ill of
9 me, did I have any supporting documents? And I
10 said yes I would share them with you.

11 Q. What did you say about the posts
12 that Dr. Wright said about you?

13 A. I wasn't aware of it. I actually
14 had to go and search it myself.

15 Q. Okay.

16 A. I wasn't aware at all.

17 I actually wasn't even aware of the
18 case until Steven Lipke made me aware.

19 Q. Who was Steven Lipke?

20 A. He was one of the operations
21 managers for Craig Wright out of Sydney.

22 Q. Okay. For --

1 A. I mean, even now, for today's
2 meeting, somehow it has been also on, there is an
3 article about it, that I was coming in and he
4 made me aware of it, too.

5 Q. Steven Lipke did?

6 A. Steven Lipke did, yes.

7 Q. And where does Steven Lipke work
8 now?

9 A. I'm not sure.

10 Q. How does he communicate with you?

11 A. He will send me a phone call, he
12 will send me an e-mail.

13 Q. What is his e-mail address?

14 A. I couldn't tell you. I would have
15 to look it up. It is not someone I go back and
16 forward.

17 Now and then he would just sort of
18 pop up and, I mean, I haven't even caught up with
19 Steve in, well, for quite some time.

20 Q. And where does he live?

21 A. In Sydney.

22 Q. Do you know his phone number?

1 A. I would have to look it up for you,
2 I don't.

3 Q. Where would you look up his phone
4 number?

5 A. Out of my cell.

6 Q. Do you have your cell on you now?

7 A. Yes.

8 Q. Can you please look at his number?

9 A. Yes.

10 MR. BRENNER: For the record,
11 Mr. Freedman is dealing with a personal issue
12 so I just stepped in.

13 THE WITNESS: Okay he was the
14 project manager.

15 BY MR. PASCHAL:

16 Q. And what is his phone number?

17 A. Plus 61-417-261-542.

18 Q. Does your contact info also show his
19 e-mail address?

20 A. Yes, it does.

21 Q. Can you please provide that tome?

22 A. Lipke_s@hotmail.com.

1 Q. And have you ever spoken to Ira
2 Kleiman?

3 A. No.

4 Q. Have you ever looked up any
5 information about Ira Kleiman?

6 A. No. Oh, yes. And I had an e-mail
7 that she was originally involved right at the
8 early days of it.

9 Q. What e-mail?

10 A. I would have to have a look.

11 Q. Who was the e-mail between?

12 A. Craig Wright.

13 Q. And who else?

14 A. Myself. And probably Ramona Watts.

15 Q. And it discussed Ira Kleiman?

16 A. Ira was involved in the e-mail.

17 Q. He was a recipient or was he
18 discussed in the e-mail?

19 A. No, no, no, no. A recipient of the
20 e-mail.

21 Q. And what did the e-mail discuss?

22 A. It was just general information.

1 The only reason I'm aware of it,
2 because it came up and said we have never met
3 Ira. I actually thought it was a -- wait, is
4 that Kleiman?

5 Q. Ira Kleiman.

6 A. No, no, I had no correspondence
7 whatsoever.

8 Q. Okay.

9 A. There was another person that Craig
10 was involved with, and it was a lady. I can't
11 remember her name, though.

12 Q. But her name was Ira?

13 A. No, no. It was a Chinese name. Or
14 an Asian name.

15 Q. Okay.

16 A. I have had no correspondence
17 whatsoever from the Kleiman family.

18 Q. Could you just spell Lipke, the
19 e-mail address that you had in your phone?

20 A. L-I-P-K-E_S@hotmail.com.

21 Q. And when did you start working with
22 Craig Wright?

1 A. It would have been the end of 2011,
2 2012.

3 Q. Okay. And did you develop a patent
4 with Craig Wright?

5 A. I already started the process
6 because I came up with the concept in 2010. So,
7 the patents was already underway.

8 And, then Craig, I got Craig
9 involved and said --

10 Q. Let me just ask you -- so, how did
11 you start the process?

12 A. Because I --

13 MR. BRENNER: Object to the form.

14 THE WITNESS: Because when I was
15 looking for the solution, and I couldn't find
16 it. So I went to a patent attorney, from my
17 commercial lawyers. He said go to a patent
18 attorney and see if you can find it.

19 And they said Jamie, there is
20 nothing out there on a global stage. And I
21 said you've got to be kidding, I mean it
22 makes sense to me.

1 BY MR. PASCHAL:

2 Q. Just to clarify, what was the stage,
3 for what?

4 A. In the event of losing a loved one
5 that between an escrow and a cloud provider that
6 the information would be released.

7 So I already started the process.

8 Q. So when you say the process, do you
9 refer to the idea?

10 A. The concept, yes.

11 Q. But you didn't actually start the
12 whole programming and putting together and coding
13 or anything?

14 A. Yeah, I did before Craig come along.

15 Q. But you didn't?

16 A. Physically, no. As I said, I don't
17 write code. I don't have an IT background. I
18 make it very clear, I do not have an IT
19 background. I do not develop.

20 Q. Who did that for you?

21 A. Drew Nicholas.

22 Q. Can you spell that for me, please?

1 A. D-R-E-W, and Nicholas,
2 N-I-C-H-O-L-A-S.

3 Q. Okay. And how did you know Mr. Drew
4 Nicholas?

5 A. I was looking for an IT company with
6 developers to be able to develop it.

7 Q. And do you still talk to
8 Mr. Nicholas today?

9 A. Yes, I do.

10 Q. Did Mr. Nicholas meet Craig Wright?

11 A. Yes.

12 Q. Did they work together?

13 A. Craig was only advisor. Craig never
14 got involved in code.

15 Q. Okay.

16 A. Craig wasn't involved in any of the
17 coding or development of it.

18 (Wilson Exhibit Number 22
19 marked for identification.)

20 BY MR. PASCHAL:

21 Q. I'm showing you what we are marking
22 as 22.

1 So is this one of the patents that
2 you and Craig Wright put together?

3 A. Correct.

4 Q. Okay. And it was registered in
5 2011?

6 A. That's correct.

7 Q. October 28, 2011?

8 A. Yes.

9 Q. Okay. So, when did Craig come on
10 board with this patent?

11 A. Craig was only added as a name. I
12 had to change all of the documentation.

13 So Craig came on around about 2012.

14 Q. So, you were just using his name for
15 the patent?

16 A. No, no, no. Because Craig said to
17 me, well, I needed a local and I wanted to make
18 sure that I had all of the I's dotted and the T's
19 crossed.

20 Q. Uh-huh.

21 A. So, Craig was even paid handsomely
22 for his time as well to oversee it, which was

1 wrong, and I still had to get my patents
2 attorneys to go through it.

3 So, Davies Collison & Cave were the
4 ones who actually looked after the patents as
5 well.

6 And Craig, and naturally because he
7 was paid, it was my concept, the process already
8 started, he had to sign, make sure that we got a
9 signoff that he had no rights to it?

10 Q. So, when you list Craig Wright and
11 you as the inventor, is that incorrect?

12 A. No. Because Craig was also an
13 advisor. Same with my lawyers and people like
14 that.

15 Q. Well, would your lawyers be listed
16 as an inventor?

17 A. Well that was from the legal point.
18 Craig being IT and that this documentation was in
19 regards to the IT side, that is why it was
20 listed.

21 Q. Why isn't Mr. Drew, why isn't Drew
22 listed on here as an inventor?

1 A. Drew was a developer. It was, well
2 my concept. Originally, it was just my name on
3 all of the documentation.

4 Then Craig wanted to get more
5 involved in it and I said well you should be
6 probably listed as an inventor as well. And that
7 is how he got his name on it.

8 Q. But you said he did some advising to
9 get this, right?

10 A. He was involved, we had already done
11 all of the paperwork and all of the knowledge and
12 how it worked system-wise.

13 And then Craig came on later on down
14 the track.

15 And then I wanted Craig as a
16 director and an advisor to ensure that we were
17 moving in the right direction.

18 So, his expertise is what I was
19 using to ensure that the I's were dotted and the
20 T's were crossed.

21 Q. Good memory.

22 Was Dave involved, Dave Kleiman

1 involved in any way in this patent?

2 A. No. Not at all.

3 Q. Do you use any of this patent today?

4 A. This is my technology. Cryptoloc.

5 Q. This is your technology?

6 A. Yes. Cryptoloc, absolutely.

7 Q. And it involves cryptography?

8 A. That's correct.

9 Q. And would it be wrong to say that
10 Dave is entitled to half of this?

11 A. How could he be entitled to half of
12 it? How could Craig be entitled to half of it.

13 Q. I'm just asking. Would it be wrong
14 to say that Dave Kleiman is entitled to half of
15 this, your property right now, your intellectual
16 property.

17 A. Absolutely not.

18 MR. FREEDMAN: Objection to form.

19 MR. PASCHAL: It would be correct?

20 THE WITNESS: No, he is not entitled
21 to it at all.

22 MR. FREEDMAN: Objection to form.

1 THE WITNESS: Nor is Craig Wright
2 entitled to it.

3 BY MR. PASCHAL:

4 Q. Okay. So, if you were to -- I just
5 want to -- have you ever amended the information
6 on this patent?

7 A. Why would I?

8 Q. To remove Craig Wright as inventor.

9 A. No, Craig Wright signed off all of
10 his rights to be able to take any claim against
11 it.

12 Q. Okay. And --

13 A. And that is all done under Davies
14 Collison & Cave; they are patent attorneys.

15 Q. Okay. And when did Craig Wright
16 sign that document?

17 A. Oh, I'm not sure. Davies Collison &
18 Cave would have the date. It was at the
19 beginning stages, because Craig was paid,
20 physically paid money to it.

21 Q. It couldn't have been early 2011,
22 right?

1 A. No, it wasn't. It was '12. I
2 already started the process with the patents
3 before Craig came along.

4 Q. Okay.

5 A. So, if you go and have a look at the
6 history of it, you would notice that I was the
7 only inventor.

8 Q. But, so you are saying that Craig
9 wouldn't have interest in it because he signed
10 over any of his rights?

11 A. That's correct. Well he didn't have
12 the concept. It was me who came up with the
13 concept.

14 Q. Okay. So I just want to clarify,
15 though --

16 A. Craig --

17 Q. -- would you think that it would
18 have been an accurate statement to say that Dave
19 Kleiman, the estate of Dave Kleiman is entitled
20 to half of this?

21 MR. FREEDMAN: Objection to form.

22 THE WITNESS: Why would you think

1 that, though?

2 BY MR. PASCHAL:

3 Q. I'm just asking the question.

4 A. Well if you think about it, I
5 started the process. I had the concept. The
6 patent was lodged prior to them coming on board.
7 Well, prior to Craig even being involved in the
8 business.

9 So, how could Dave, who I didn't
10 even know, and Craig Wright, who I didn't even
11 know at that stage, be involved or entitled to
12 the patent.

13 BY MR. PASCHAL:

14 Q. Could Dave have been working on this
15 with -- could Craig have been working on this
16 with Dave without your knowledge? The task that
17 you told them?

18 A. They had no access to them. They
19 never had access to the source code.

20 Q. So, how was Craig making sure that
21 all of your T's were crossed and your I's were
22 dotted?

1 A. It was through the lawyers and it
2 was just paperwork. It wasn't technology.

3 It was documentation.

4 Q. So, you hired Craig Wright to be, to
5 look at this?

6 A. Yes.

7 Q. As -- well, let me -- so, Craig
8 Wright at this time he is wearing his hoodies?

9 A. Yes.

10 Q. He is into his IT?

11 A. Yes.

12 Q. He is into his developer?

13 A. Yes.

14 Q. So, you wouldn't hire him as a
15 lawyer?

16 A. No, Craig Wright as an expert in, a
17 cyber security expert.

18 Q. And that is why his name was on here
19 as an inventor?

20 A. That's right.

21 Q. As inventor --

22 A. Okay then, as an inventor.

1 Q. Okay. And, there is a document, I
2 haven't seen it, but he has signed, you said he
3 waived his rights to this?

4 A. Absolutely.

5 Q. In 2012?

6 A. Before we even started, or I got
7 Craig involved.

8 I mean naturally I'm not going to
9 turn around and hand a concept over and have
10 people like you look at me and try to take half
11 of the technology.

12 Q. It wouldn't be me.

13 A. I know where you are trying to go,
14 though.

15 Q. I don't think you do.

16 And so, just to be clear, if you
17 look on, if you look at the document on the
18 right-hand side of application U.S. 14/354359
19 events, nowhere in here does it say that Craig
20 Wright, or did you amend this patent to remove
21 Craig Wright, correct?

22 A. Did I -- there was movement back and

1 forward with Davies Collison & Cave. So, Davies
2 Collison & Cave would have the history and the
3 documentation, et cetera, that was needed to be
4 done in the process.

5 Q. And let's say in his advisory role
6 Craig Wright, as the inventor, as an IT guy
7 wearing his hoodie had conversations with Dave
8 Kleiman to develop this intellectual property or
9 to do anything with it. I mean let's say Craig
10 didn't tell you. Well first did Craig ever tell
11 you that?

12 A. No. It was all done in-house. I
13 mean, Craig may have had conversations with many
14 people about it.

15 But, it was all done in-house; it
16 wasn't --

17 Q. Did you ever get a document from
18 Dave Kleiman saying he would waive any of his
19 interests to this patent?

20 A. I don't see how Dave could be
21 involved in it.

22 Q. Let's assume that a court ordered

1 that that intellectual property belonged --

2 A. It wouldn't be involved.

3 MR. FREEDMAN: Objection to form.

4 BY MR. PASCHAL:

5 Q. You didn't get a waiver from Dave
6 Kleiman, did you?

7 A. No. I don't need to.

8 Q. Okay. So, Mr. Freedman asked you
9 about hacking earlier?

10 A. With Craig Wright, the e-mails being
11 hacked.

12 Q. So, hacking can happen, do people
13 know exactly when a hack happens?

14 A. Not -- no. Not thoroughly.

15 Q. I mean part of that, I mean the
16 hacking could be something that, in fact, I don't
17 know if I need to pull it, but on your website
18 you expressed that hacking could be something you
19 learn of much later. Right?

20 A. That's correct and it is public
21 knowledge.

22 Q. And it is something even savvy

1 people need protection, because hacking can
2 happen?

3 A. And your e-mails are one of the
4 weakest links.

5 Q. And so if Craig Wright were hacked,
6 and he just, is there some foolproof way that he
7 would know right away?

8 A. No.

9 Q. Okay. And if he learned many years
10 later, is that something that you see as uncommon
11 in your line of work?

12 A. No.

13 Q. Okay. And, I think I am pretty
14 much -- just one second.

15 MR. PASCHAL: I think we are good.

16 That is it.

17 FURTHER EXAMINATION

18 BY MR. FREEDMAN:

19 Q. I have five questions for you, well
20 maybe a little more, but we will get you out of
21 here.

22 Did you ever respond to an e-mail

1 from Craig and receive back an e-mail, I don't
2 know what you are talking about, I didn't send
3 this e-mail?

4 A. I don't know what you mean.

5 MR. PASCHAL: Objection to form.

6 BY MR. FREEDMAN:

7 Q. Well we were talking about whether
8 or not the e-mails were hacked.

9 My question is, did you ever respond
10 to an e-mail from Craig, either orally or via
11 e-mail and receive a response from Craig saying I
12 didn't send that e-mail. It is a hacked e-mail?

13 A. No, I didn't even know he was
14 hacked.

15 Q. Mr. Wilson, can you take a look at
16 Plaintiffs Exhibit 1 for me, or Wilson 1 for me.

17 And, those are the resignation
18 letters?

19 A. Yes.

20 Q. Can you read the companies you
21 resigned from?

22 A. Coin Exchange, Hotwire Preemptive

1 Intelligence, Interconnect Research and Integers.

2 Q. I noticed that, and actually you
3 noticed, Mr. Wilson, during a break you mentioned
4 this to us, that there was missing W&K was
5 missing from the resignation.

6 A. That's correct.

7 Q. Why is that?

8 A. Because I didn't even know I was a
9 director.

10 MR. FREEDMAN: No further questions.

11 MR. PASCHAL: No further questions.

12 All right, I think we are done.

13 MR. FREEDMAN: You have a right to
14 read your deposition and you can correct
15 inaccuracies that you believe are there, or
16 you can trust the court reporter did her job.

17 Do you elect to read it or do you
18 waive your right to read it.

19 THE WITNESS: I will waive my right.

20 THE VIDEOGRAPHER: All right, if
21 this is everything, we are off the record at
22 November 8, 2019, at 11:39.

1 (Whereupon, signature having been waived,
2 the deposition concluded at 11:39 a.m.)

3 * * *

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

1 CERTIFICATE OF COURT REPORTER

2 UNITED STATES OF AMERICA)

3 DISTRICT OF COLUMBIA)

4 I, LORI J. GOODIN, RPR, CLR, CRR, the
5 reporter before whom the foregoing deposition was
6 taken, do hereby certify that the witness whose
7 testimony appears in the foregoing deposition was
8 sworn by me; that the testimony of said witness
9 was taken by me in machine shorthand and
10 thereafter transcribed by computer-aided
11 transcription; that said deposition is a true
12 record of the testimony given by said witness;
13 that I am neither counsel for, related to, nor
14 employed by any of the parties to the action in
15 which this deposition was taken; and, further,
16 that I am not a relative or employee of any
17 attorney or counsel employed by the parties
18 hereto, or financially or otherwise interested
19 in the outcome of this action.

20

LORI J. GOODIN, RPR, CLR, CRR, RSA
Notary Public in and for the
District of Columbia

22 My Commission expires: May 14, 2021

A				
ability 10:18 11:1 47:22 122:16 123:13 142:7	accounting 82:17 82:18 107:1,6 109:13 113:20 133:10,17	advisory 105:20 127:17 138:14 166:5	61:17 73:5 95:7 97:8 99:3	attached 6:19 55:11
able 16:4 76:19 94:6 105:22 108:2 110:17,21,22 112:13 117:4,13 117:20 118:3 122:17,18 123:4 123:13,14,15 124:3,7 125:3,4 126:13 133:21 135:6 139:5,6 142:7,11 146:4 147:17 156:6 161:10	accounts 21:10 25:20 26:2 31:17 31:19 103:21 109:5,12 114:19 131:4,14 133:3 136:11 146:14	affect 10:18 affidavit 5:20 68:10 afford 96:7,15 135:6 afloat 135:7 age 77:6 agenda 127:11 ago 42:7 89:5,5 90:2,3 92:22 93:18 140:9 145:1 145:3,6 147:1	anyway 94:17 132:10 134:3 138:3 appear 40:16 appearance 39:5 APPEARANCES 3:1 appears 24:12 172:7 application 165:18 applications 29:12 applied 96:21 appointed 129:15 approved 111:15 Approximately 16:10 April 35:4,6,9,16 93:22 100:9 104:21	attain 12:12 attitude 22:6 38:5 attorney 106:1 154:16,18 172:17 attorneys 158:2 161:14 audibly 10:9,15 audit 141:7 August 68:16,18 69:5 77:1,4,10,18 85:13,16 86:8 90:5 101:20 103:5 124:6 Australia 4:8,22 5:11 9:16,20,21 12:6 18:17 22:21 23:5,6,13,22 27:1 27:3 34:5 45:3 47:14 52:20 53:8 53:9 60:2 101:5 107:1 112:5,6 130:19
abrenner@bsflp... 3:13 absolutely 20:14 26:18 40:7 71:2 90:14 97:16 107:13 125:19,22 141:6 142:5,18 160:6,17 165:4 accept 34:2 70:6 acceptable 135:15 access 32:2 40:17 47:22 48:6,7 52:9 54:10 56:19 57:1 57:5 59:3 61:12 64:16 67:8 109:11 109:12 119:11 139:6 144:10 146:8 147:17 163:18,19 accommodation 134:10 account 96:16 144:14 accountant 12:20 12:21 13:1,15,20 14:1,4 32:1 118:15 accounted 26:21	accurate 70:21 71:8 77:16 113:9 128:10 162:18 achieve 108:9,12 act 70:2 acting 70:10 action 172:14,19 add 129:6 added 35:11 157:11 additional 47:17 address 9:14,17 45:19 51:12 55:18 56:2,8 68:20,20 91:18 95:14 112:11 116:5 146:12 150:13 151:19 153:19 addressed 43:12 45:2 66:9 addresses 45:14 46:5,10,13,15 47:2,3,18 48:9 55:13 67:10 92:10 116:3 administration 135:20 Administrator 2:13 administrators 137:4 Adobe 122:10 123:9,11,18 124:1 advise 34:9 advising 159:8 advisor 21:22 156:13 158:13 159:16	agreements 133:7 Ah 115:10 ahead 31:9 41:1 73:8,15,22 98:17 103:11 121:2 122:5 Alastair 6:8 alive 117:13 118:1 118:5 Allen 106:3 allow 27:10 allowed 73:2 amend 165:20 amended 161:5 America 88:20 172:2 amount 55:15 67:3 67:15 88:19 94:7 94:21 95:11 97:3 102:19 110:20 143:19,21 amounts 23:1 25:19 40:17 Andrew 3:11 8:6 annual 102:6 137:22 answer 11:10 30:13	argued 135:15 arrange 88:21 arrogance 37:22 article 150:3 Asian 153:14 ASIC 25:21 asked 78:16 93:7 103:10 121:6 138:21 139:4 140:9 167:8 asking 30:9 59:9 64:13 136:4 143:8 160:13 163:3 assets 40:18 Assignment 1:22 assisted 114:19 assume 11:8 166:22 assuming 43:12 ASX 17:18 34:9 35:12 ATO 23:17,18,21 45:9 55:6,8 57:19 57:21 62:13 129:20 130:1,16 136:4 137:9	Australian 53:15 56:3 76:18 available 148:15 Avenue 2:8 3:8,12 3:17 88:7 92:12 avoid 81:14 aware 23:2 25:18 26:20 29:15 33:5 33:16 34:11,17,22 35:15 56:15 71:11 134:22 137:2 149:13,16,17,18 150:4 153:1 a.m 2:5 7:15 41:11 41:12 78:11,12 83:20,21 148:7,8 171:2
				B
				Bachelor 12:13,15 back 11:19 20:12

40:9 41:13 48:9 78:13 83:22 86:15 88:9 89:14 94:19 104:16 106:4 107:19 110:21 123:7,17 125:14 128:6 129:9 134:8 134:9 139:22 141:5 142:19 148:9,14,22 150:15 165:22 169:1 background 16:21 108:5 114:16,21 115:1,7 123:16 132:19 155:17,19 bad 145:14 balance 47:5,8,12 bank 26:5 136:11 144:14 banking 73:17 based 78:3 98:16 126:4 139:12 basis 71:20 72:1,3 72:11,21 88:10 109:6 Bates 121:21 bathroom 11:22 BDO 106:19,21 bear 18:12 30:18 beat 61:16 beaten 37:3 beginning 131:5 161:19 begins 7:5 55:18 belief 50:2 98:11 believe 35:20 41:2 47:21 54:2 58:17 60:19 67:15,19 137:3 170:15 believed 49:19 believing 37:22 belonged 167:1 best 10:15 28:11 36:22 39:22 48:17 132:8	better 42:8 73:2 126:1 Beyond 38:3 39:11 big 95:3 bigger 99:22 100:1 bill 95:12 96:7,11 101:9 birth 9:11 Biscayne 3:3 bit 9:6 21:15 25:10 26:3 37:9,13 70:12 Bitcoin 14:11,12,14 22:19 26:6,17 27:13 34:3 41:6 44:2 47:8,11,22 48:5 50:7,19 51:15,19 52:9 53:16 54:4,9 55:17 56:1,8,9,18 58:6,12,18 59:2 60:10,11,14,21 61:5,11 62:20 63:1,15,19 64:7,9 64:15 65:10,19 66:16 67:15 68:2 74:4,7 75:7,18 79:13,22 97:12,22 107:19,21 114:8 122:14,19 123:15 123:19 124:15,17 124:20 125:5,8,9 125:13 127:8 132:20 138:9,22 139:9,15 140:8,13 141:3,9,11,13,16 142:11,17,21 143:4,13,19,22 144:7 145:18,19 145:21 146:2,10 147:7,7,11 Bitcoin-based 55:13 block 55:17 Blockchain 49:21 97:11,22 114:5	122:18 123:14 124:3,16 125:2,10 125:11,12,12,18 125:21 126:2,10 126:18 132:21 Blockchain-related 124:19 blow 142:9 board 20:22 21:22 43:16 105:20 108:1 127:17 138:14 157:10 163:6 Boies 2:7 3:11 7:17 8:7 book 88:1 booked 88:5 bookkeeper 31:20 103:21 108:21 109:1 110:3,5 133:18 books 67:8 born 12:5 bottom 19:20 51:4 112:16 121:22 bought 35:1 99:11 Boulevard 3:3 bpaschal@rivero... 3:19 brand 37:4 break 12:1,1 26:1 29:10 70:12 83:16 94:13 139:7 144:1 148:4 170:3 breakdown 23:15 Brenner 3:11 8:6,6 73:1,4,8 151:10 154:13 bright 37:16 bring 16:3 108:2 Brisbane 9:19 40:13 104:14 Brooklyn 3:8 Bros 66:18 Brothers 67:4 brought 23:6	110:15 Bryan 3:16 8:8 84:5 build 15:6,17 110:17 119:5 building 16:18 buildup 22:14 built 14:18 15:9 bunch 15:19 business 6:13 28:17 28:18,19 29:19 37:21 99:17,19 104:15 145:11 163:8 businesses 27:15 buy 144:7,18 buying 40:8 B/BR 7:13 <hr/> C <hr/> cabinet 118:10,16 cable 96:15 cafe 36:16 California 1:21 2:14 call 48:14 85:19 86:2 87:6 88:1 150:11 called 8:15 15:12 20:22 25:15 34:5 68:16 Campbell 3:22 7:20 cancer 117:8 capability 120:1 capacity 16:14 31:22 109:20 115:16 128:3 capitalization 25:20 26:2,7,9 27:11 car 37:4 99:11 144:9 card 6:13 92:3 care 9:8 cars 39:12	case 1:4 7:13 86:7 86:10,18 90:9,10 90:13 91:5 109:15 134:19 149:18 cash 26:5 110:14 135:18 catch 148:15 category 121:19 caught 150:18 caused 38:1 Cave 158:3 161:14 161:18 166:1,2 cc 4:15,18,20 5:4,7 5:13,16 6:9 43:9 53:1 55:3 57:15 58:1 62:10 65:4 80:14 celebration 94:17 cell 92:1 96:7,11,12 151:5,6 cent 101:4 134:3 136:10 central 46:21 48:12 CEO 22:9 certain 123:6 CERTIFICATE 172:1 Certified 2:12,12 certify 172:6 cetera 125:1 141:18 166:3 CFO 16:22 18:8,11 31:12,22 32:4 35:6 106:13,15,16 106:16 107:5,6 108:21 109:10 110:1,1,13 129:11 129:15 130:10,12 137:19,21 chain 89:15 challenge 108:19 117:10 challenges 73:19 champagne 39:22 94:7,22 95:1,3 chance 61:17
--	---	---	---	--

<p>change 22:6,11 36:2,8,9 37:5 38:1 38:3,5,10 41:2 98:22 99:16 106:2 157:12</p> <p>changed 93:19 105:10,14 106:9 107:17</p> <p>characterization 71:4</p> <p>cheap 144:9</p> <p>check 95:4</p> <p>chief 31:22 115:10 115:12</p> <p>children 118:13</p> <p>Chinese 153:13</p> <p>Christmas 39:18 94:9,10,11,16 103:9</p> <p>Christmastime 94:18</p> <p>CINet 88:12</p> <p>circumstances 46:17 48:10,19 49:3,8 120:2</p> <p>CISO 115:7,10</p> <p>CISOs 88:13</p> <p>claim 76:19 161:10</p> <p>claiming 22:20 23:7</p> <p>clarification 115:9</p> <p>clarify 95:19 98:5 120:7 125:6 133:2 155:2 162:14</p> <p>clarifying 128:22</p> <p>classes 114:1,4,7,10 114:13</p> <p>clear 87:11 155:18 165:16</p> <p>clienteles 118:17 129:2</p> <p>close 63:19</p> <p>closed 70:7 126:20 141:21</p> <p>closer 44:8</p> <p>clothes 37:15</p>	<p>cloud 155:5</p> <p>CLR 1:20 172:4,20</p> <p>code 115:5 155:17 156:14 163:19</p> <p>coding 155:12 156:17</p> <p>coffees 40:9</p> <p>Coin 17:4 18:6,9 30:20 31:3,5,17 32:4,6 34:5 35:1,8 47:19 62:18 169:22</p> <p>colleague 92:9</p> <p>college 12:8</p> <p>Collison 158:3 161:14,17 166:1,2</p> <p>color 49:14</p> <p>Columbia 2:15 172:3,21</p> <p>come 15:4 16:20 19:12 37:19 38:21 39:3 49:2 88:5 89:18 90:6 123:5 125:14 126:16 130:20 155:14 157:9</p> <p>comes 58:4</p> <p>comfortable 21:8 21:16 22:5,22 131:19</p> <p>coming 22:16 23:14 89:1,4,18,19 90:1 92:22 93:8 131:5 150:3 163:6</p> <p>commenced 138:2</p> <p>commencing 2:4</p> <p>commerce 12:13,15 13:9</p> <p>commercial 154:17</p> <p>Commission 172:22</p> <p>common 75:12,15 79:11,17,21 121:7 125:7,10</p> <p>communicate 89:7 150:10</p>	<p>communication 107:15 127:16</p> <p>communications 106:7 127:13 133:13</p> <p>companies 16:7,11 16:15 17:2,12 18:1,10 21:21 22:15 36:20 62:18 76:13,14 79:15 80:17 83:6 129:7 129:12,14,19 131:2 138:17 169:20</p> <p>company 20:5 25:14,16 26:22 33:3 34:10 67:8 68:20,21 70:4,7 70:10 71:12,13 76:17,18 78:20 80:4 82:22 83:4,8 83:11 102:10,20 104:4,10 107:3,6 107:12 108:11 113:5 137:5 156:5</p> <p>company's 79:18</p> <p>competition 127:7 127:9</p> <p>complain 136:15 136:21</p> <p>complaint 4:11 32:14</p> <p>complete 132:14</p> <p>completed 77:1,4,7 77:10 133:4</p> <p>completely 110:8</p> <p>computer 81:6 115:18 146:16,16</p> <p>computers 144:18</p> <p>computer-aided 172:10</p> <p>concept 154:6 155:10 158:7 159:2 162:12,13 163:5 165:9</p> <p>concern 105:9</p>	<p>106:12</p> <p>concerned 107:16 138:4</p> <p>concerns 110:2,4 133:13</p> <p>concluded 171:2</p> <p>conference 88:12 89:20</p> <p>confidence 38:9,11 108:2</p> <p>confidential 1:9 81:11 82:1</p> <p>confidentiality 81:10,13</p> <p>confirmed 56:2,14</p> <p>congratulate 87:12 92:19</p> <p>congratulated 135:2</p> <p>congratulating 86:9,18</p> <p>congratulations 86:6</p> <p>connected 112:14 128:5</p> <p>consent 20:8</p> <p>consenting 70:3</p> <p>conservative 22:11</p> <p>considerable 97:3</p> <p>consistent 61:5 64:5</p> <p>contact 91:14,14 112:8,9 151:18</p> <p>CONTENTS 4:1</p> <p>continue 13:22 95:8</p> <p>CONTINUED 5:1 6:1</p> <p>control 32:1 45:14 45:19 46:5,11,14 46:16 48:10 54:3 55:13 56:2,8,14 56:16 58:12,17 59:2 60:13 65:9 69:14</p> <p>controlled 60:20</p>	<p>61:4 63:14,15 64:15 65:13,18</p> <p>controls 58:5</p> <p>convened 2:4</p> <p>conversations 64:4 148:16 149:3 166:7,13</p> <p>copied 129:22</p> <p>copy 82:3 86:21 87:1</p> <p>correct 9:4,5 15:11 15:18 17:3 19:5 25:5,15 26:11 29:19 30:2,21,22 42:9 43:13 45:4 47:4,16 51:6 55:6 55:7 60:9,16 63:3 70:14 84:17 85:15 86:11 88:18 92:19 93:4,21 94:1,8 100:21 101:20 102:2,20 104:4 107:12 113:6,7,22 114:19,20 116:12 120:17 125:18 128:11,15 129:20 130:4 131:3 135:13 136:7 141:13,14 157:3,6 160:8,19 162:11 165:21 167:20 170:6,14</p> <p>correspondence 153:6,16</p> <p>cost 76:18</p> <p>counsel 8:1 24:6 30:9 73:2 81:2 91:11 121:20 172:13,17</p> <p>counterintuitive 10:9</p> <p>couple 42:7 46:3 89:13,20</p> <p>court 1:1 5:21 7:12 7:21 10:7 23:5 51:22 68:11 69:20</p>
---	--	---	--	--

77:1,9 119:2 166:22 170:16 172:1 Co-counsel 3:6,10 CPA 12:17 Craig 1:6 7:10 8:9 8:10 14:20 15:1,2 16:1,3,7,10 18:2 19:11 20:7,15,17 20:19 21:20,21 23:6 24:12 25:12 26:18 27:4,6,10 28:10 29:16 30:15 31:11 32:5 35:19 36:2,9 37:6,10,16 39:19,21 40:3,4,5 40:14,17 42:1,10 43:9,11 44:21 45:11,13 47:21 48:4 49:12,13,21 50:3 51:19 52:9 53:1,14,18 54:2 55:3 56:7,13,22 57:5,15 58:11 60:5,10,20 61:6 61:10 62:10 63:14 64:2,14 65:4,13 65:18 66:9 67:11 67:14,19 68:10,15 69:1,7,12 70:4 71:6,17 73:11 74:6,18 75:2 76:5 76:11 77:16,22 80:1,14,16 83:6 84:5 86:7 91:1 94:4,7 97:11,17 97:19 98:7,8,12 98:13,22 101:6 103:20 104:12,15 104:17 105:10,13 105:16,18 107:9 107:16 108:6,19 109:6 110:15,18 122:15 129:12 130:5 131:10,12 131:22 132:19	133:19 134:8 135:21 136:13 138:14 139:8,13 140:1,10,12,19 141:3,9 143:20 144:3,6,11,21,22 145:9,17,18 146:2 146:7,9 147:20 149:8,21 152:12 153:9,22 154:4,8 154:8 155:14 156:10,13,13,16 157:2,9,11,13,16 157:21 158:6,10 158:12,18 159:4 159:13,15 160:12 161:1,8,9,15,19 162:3,8,16 163:7 163:10,15,20 164:4,7,16 165:7 165:19,21 166:6,9 166:10,13 167:10 168:5 169:1,10,11 Craig's 22:6 39:5 67:2 82:20 106:9 created 98:11 118:11 119:3 credit 96:20 cross 15:5 crossed 157:19 159:20 163:21 Crossman 116:1 cross-examining 14:16 CRR 1:20 172:4,20 cryptocurrency 114:11 cryptographic 15:12 cryptography 114:14 126:21 160:7 Cryptoloc 15:12 16:17 127:3 160:4 160:6 CSR 1:21 2:14	CSW 62:18 CSW-Dave 51:5 culture 16:18 110:17 currency 27:13 60:11 127:3,11 CV 7:13 cyber 115:3,7 116:9 116:14 120:9,16 126:4 164:17 cybersecurity 14:17 15:6 16:4 114:2 C-R-Y-P-T-O-L-... 91:20 <hr/> D <hr/> dad 115:2 117:7,12 120:17,20 daily 109:6 data 115:20 126:5 date 9:11 19:6 101:19 103:14,15 145:4 161:18 Dave 28:4,6,8 29:11 30:16 32:5 33:2 34:1,3,22 35:16,18 36:3,18 37:10 40:16 42:7 48:16 49:14,19 50:12 78:1 93:22 95:17,19,22 96:2 96:6 97:2,5,7 98:1 98:2,6,11 100:4,7 100:9 104:21 106:10 131:1 139:10,15 140:2 140:13,18,19 159:22,22 160:10 160:14 162:18,19 163:9,14,16 166:7 166:18,20 167:5 Dave's 38:16,17 40:6,8 93:20 94:4 100:3 David 1:4 3:22 7:9	7:19 46:20,20 48:11,11,15 69:1 69:15 98:20 David's 69:12 Davies 158:3 161:13,17 166:1,1 day 70:15 96:18,19 96:20 days 89:21 109:16 127:18 129:9 152:8 dead 118:12 deal 42:16 dealing 26:21 151:11 death 40:6 93:20 94:4 debt 70:6 dec 55:11 deceitful 91:2 December 103:12 decimal 73:20 declaration 55:12 Defendant 1:6 3:15 defense 1:4 4:8,10 4:14,16,19,22 5:5 5:8,11,14,17,19 6:5,7,10,12 7:9 18:17 24:10 33:2 33:4,6,10,13 34:2 41:18 43:6 44:18 50:22 52:20 54:21 57:13 59:22 60:2 62:8 65:2 66:6 68:17 69:1 70:7 71:14 74:16 76:3 76:16 80:12 82:10 83:1 definitely 141:17 degree 113:21 degrees 12:12 deliver 124:7 delivering 134:16 demeanor 105:10 106:2,9 107:17 Dempster 5:12	62:12 denied 96:22 depends 119:18 120:1 depo 81:16 depos 59:10 deposit 134:7 deposition 1:11 2:3 7:6,16 9:2,4 11:1 72:14 88:22 93:10 93:13 170:14 171:2 172:5,7,11 172:15 depth 108:11 describe 28:13,19 DESCRIPTION 4:5 5:3 6:3 designation 81:13 destroy 118:7 details 29:21 30:5 91:17 112:10 devastating 116:10 develop 97:6 154:3 155:19 156:6 166:8 developed 124:4 developer 22:6 36:10 37:15 159:1 164:12 developers 126:5 156:6 developing 71:18 73:11 97:9 development 16:5 22:1,21 54:1 74:7 79:18 156:17 device 142:8,13 Diane 21:1 105:22 127:13,16,17 128:2,5 died 35:16,18 36:3 37:10 40:17 48:16 93:22 100:4,7,9 106:10 117:21 131:1 dies 104:21 116:20
--	---	--	---	---

<p>difference 15:14 105:15 106:16 110:19 126:22 different 119:21 125:17 130:7 difficult 117:16 digital 15:10 16:17 20:22 25:16 127:2 127:10 dinner 95:2,5 direction 159:17 directly 109:6 director 16:20 17:2 17:4,7,11,12,15 17:19 20:4,8 30:20 32:4 33:9 35:11 70:3,10 71:1,11 79:16 129:15 159:16 170:9 directors 34:10 disagree 71:9 disappointing 37:20 discipline 110:16 disconnect 96:16 disconnected 96:8 discuss 27:6 81:15 148:12 149:5 152:21 discussed 152:15 152:18 discussion 11:17 discussions 59:15 dispersed 123:6 displays 39:12 dispute 135:16 District 1:1,2 2:15 7:12,12 172:3,21 document 4:12 5:22 24:17 25:7 32:13,15 58:21 59:6 68:7 81:3,7 81:19 100:21 101:2,12 137:2 161:16 165:1,17</p>	<p>166:17 documentation 21:10,17 131:4 137:11 157:12 158:18 159:3 164:3 166:3 documentations 131:2 documents 24:19 80:5 90:12,16,18 90:20 105:9,12 117:4,11,20 118:4 118:7 119:12 132:2 133:12 149:9 doing 29:19 43:14 73:3 108:9,17 119:7 126:13 130:19 132:5,14 133:14 134:16 138:5 142:17 dollars 26:10 47:14 53:16 dotted 157:18 159:19 163:22 Dr 8:9,10 15:16 16:15 17:1 19:10 27:19 79:12,15 84:5 93:19 106:3 138:22 144:11 149:12 draft 111:14 drafted 111:16 dress 36:21 dressed 37:11 Drew 155:21 156:3 158:21,21 159:1 drill 37:8 Drive 9:15 drives 120:4 driving 144:8 drop 118:12 duly 8:16 duties 106:17 107:11 109:4,19 110:12 134:17</p>	<p>138:19 D-R-E-W 156:1 D.C 2:9 3:12 7:17 <hr/>E<hr/>Ear 21:22 earlier 9:3 18:13 78:16 79:10 109:7 125:7 128:9,20 130:21 138:20,20 167:9 early 16:1 41:6 109:16,21 127:18 152:8 161:21 education 112:17 112:18 113:17 114:18 effect 99:18 eight 26:9 either 49:10 169:10 elect 170:17 electronically 18:14 elements 100:1 employed 104:7 172:14,17 employee 6:14 100:17 101:16 134:1 172:16 employees 102:14 102:20 104:3,3 105:13 employment 22:14 encrypted 139:1 146:3,5 147:13 ended 19:10 131:6 enforcement 127:5 engaged 120:9 ensure 76:22 159:16,19 enter 88:19 entire 107:14 entitled 135:17 160:10,11,12,14 160:20 161:2 162:19 163:11</p>	<p>environment 122:17 equipment 141:21 equivalent 107:1 erased 120:4 Ernst 107:2 escrow 15:14 123:3 123:14,14 126:21 155:5 Esquire 3:2,7,11,15 3:16,16 essential 49:15 50:12 estate 1:3 7:8 162:19 et 125:1 141:18 166:3 ethics 145:11 evening 40:2 event 39:19 116:19 118:12,22 155:4 events 91:7 116:10 165:19 everyday 110:6 evidence 23:15 62:15 91:6 exact 94:7 95:11 exactly 110:18 143:17 167:13 examination 4:1 8:15,18 10:3 84:2 168:17 examining 15:5 excess 56:1 exchange 17:5 18:6 18:9 30:20 31:4,5 31:17 32:5,6 34:5 35:1,9 60:12 62:18 169:22 exchanges 74:5 exciting 22:3 Excuse 121:20 execute 81:9 exhibit 4:5,6,9,11 4:11,13,15,17,20 5:3,4,6,9,12,15,18</p>	<p>5:20 6:3,4,6,8,11 6:13,14,16,17 18:20,21 24:3 32:8,12,13 41:19 42:22 43:4 44:13 52:15 54:16 57:8 59:18 60:1 62:4 64:19 65:22 68:3 74:10 75:19 80:7 82:5 92:6 100:6 100:13,14 111:4 156:18 169:16 Exhibits 4:4 5:1 6:1 6:19 expand 36:7 37:13 39:17 expect 136:22 137:14 expected 137:20 expenditure 110:6 134:11 expense 134:10 expensive 38:4 experience 130:4 expert 16:4 164:16 164:17 expertise 159:18 experts 14:17 15:6 115:6 126:5 expires 172:22 explain 11:5 21:14 26:2 74:21 explanation 49:14 Explorer 55:17 express 105:9 106:12 110:2,4 expressed 106:7 133:13 167:18 external 106:19 extremely 68:1 ex-wife 21:12 e-mail 4:9,13,15,17 4:20 5:4,6,9,12,15 5:18 6:4,6,8 18:15 19:3 24:12,15,22 25:10,21 26:8</p>
---	--	---	--	--

27:6 28:3 42:1,1,3 42:11 43:8,8 44:20,21 45:2,11 45:13 51:18 52:7 53:1,1,11,13,19 54:3 55:1,3,5 56:6 56:7 57:15,15 58:4,9 59:9,14 60:4,5,17,20 62:9 62:10 63:10,11,13 63:22 64:3 65:3 65:12,15,17 66:8 66:9 74:18,22 76:4,11,22 80:13 80:14,21 81:11,18 85:22 86:3,4,9,16 86:20,22 87:2,9 89:8,9,11 90:22 91:18 107:15 112:11,12,13 116:2,5 121:8,11 121:14 130:16 150:12,13 151:19 152:6,9,11,16,18 152:20,21 153:19 168:22 169:1,3,10 169:11,12,12 e-mailed 20:18 68:19 85:20 144:4 146:1 e-mailing 24:19 25:2 e-mails 24:6 67:13 80:2 87:16,19 89:14,15 106:6 129:22 133:12 148:20,21 167:10 168:3 169:8	100:20 101:2 familiarize 24:16 76:7 82:13 family 118:7,12 119:16 135:5 153:17 fancy 99:6 fascination 37:1 faster 42:7 fate 46:16 48:10,18 49:2,7 father 116:15,16,17 117:3 120:10 February 136:20 federal 22:22 29:13 feed 29:17 121:10 140:17 feel 22:5,22 131:19 135:14 feeling 21:8 fierce 116:9 Fifth 3:17 figures 47:15 file 15:10 16:17 20:22 48:5 54:9 56:18 57:5 59:3 61:11 64:9,16 139:1 files 42:17 filing 25:16 70:6 118:10,16 filings 90:8,10 finally 11:22 67:7 85:4 finance 113:20 financial 31:22 77:14 98:18,19 131:6 144:11 financially 172:18 find 89:3 116:19,20 117:4,10,14 118:2 118:3 154:15,18 fine 81:22 finish 52:3 95:7 finished 74:3 77:18 128:2 141:1	firms 107:1 first 8:16 14:10,20 14:22 15:16 34:13 45:18 66:15 68:15 70:9,11 71:10 85:9 86:15 108:6 112:19 116:8,13 124:17 166:10 five 44:6 168:19 flash 22:10 36:21 flashy 39:11 FLEXNER 2:7 3:11 flight 88:5 flights 88:1 Floor 3:18 Florida 1:2 3:4 7:12 33:2,3 35:21 78:3 flow 110:15 fly 36:1 40:12 flying 104:16 focusing 149:2 following 27:11 45:15 46:6 69:6 70:1 77:14 108:7 follows 8:16 foolproof 168:6 Force 57:13 foregoing 172:5,7 form 17:9 28:1 30:3 31:1,6,14 34:15 34:20 35:2 36:4 38:6 39:6,14 40:19 42:14 43:19 45:5 47:9 48:1,20 49:5,16 50:2,9,15 51:9 52:4,11 54:6 54:11 56:11,20 58:20 59:10,17 61:1,7,13 63:4,16 64:17 65:20 67:1 67:17,21 71:19 72:1,5,6,22 73:5 73:13 75:8 77:5 77:12,19 79:1,4	83:9 102:11 103:3 140:4,14 142:1 154:13 160:18,22 162:21 167:3 169:5 formed 34:5 98:10 forms 131:9 forth 89:14 forthcoming 29:16 fortunate 117:6 fortune 48:14 forward 19:3 37:21 40:10 88:9 104:17 132:8 133:21 134:9 148:22 150:16 166:1 found 23:18 89:1 founder 58:15 four 73:21 85:8 fourth 121:19 122:7 fraud 23:10 Freedman 3:2,3,7 4:2 8:4,4,5,19,22 11:14,21 17:10 19:1 24:5,7,21 25:6 28:2 30:4 31:2,8,15 32:10 34:16,21 35:5 36:6,12 37:7 38:8 39:8,16 40:22 41:7,15,21 42:18 43:2,21 44:10,15 45:6 46:1 47:10 48:3,22 49:6 50:1 50:10,17 51:10,20 52:2,6,13,17 54:7 54:13,18 56:12 57:2,10 58:22 59:8,16,20 61:2,9 61:15 62:1,6 63:5 63:18 64:21 66:2 67:6,18 68:5 71:20 72:2,6,16 72:20 73:9,14 74:12 75:9,21	77:8,15,21 78:15 79:2,6 80:9 81:2,7 81:17,20 82:2,7 83:10,14 84:7,16 84:19,22 85:3,7 85:10,18,21 86:9 86:12,19 87:4,8 87:17,21 88:21 89:17 90:4,9 92:18 93:6,7,18 95:6 102:11 103:3 121:6,20 122:2,5 135:2 136:2 138:20 140:4,14 142:1 148:13,17 149:6 151:11 160:18,22 162:21 167:3,8 168:18 169:6 170:10,13 frequently 88:16 Friday 1:15 2:4 friend 48:15,17 friends 48:14 96:10 front 147:9 full 9:10 22:15 32:1 69:14 109:11 fully 26:21 full-time 14:6 109:20 fund 66:16 67:5 funded 23:3 funding 22:16 58:4 funds 125:15 further 83:14 168:17 170:10,11 172:15 futurist 108:14 futurists 37:19 F2 3:8
F		G		
fact 63:19 94:6 167:16 fair 30:1 fall 77:14 false 88:17 113:11 familiar 33:3 82:14			garage 141:19,20 142:20 143:5,11 general 152:22 gentlemen 48:13 George 9:18	

<p>getting 45:10 137:20 gift 18:2 gifted 31:10 gifting 68:2 give 23:15 49:11,13 61:17 71:22 82:3 86:2,21 88:1 91:5 91:16 92:3 126:10 127:4 145:4 given 31:7,10 32:1 172:12 global 15:13,14 58:6,12 127:1 154:20 globally 66:16 go 9:6 11:14 12:8 12:10,17 19:2 31:9 32:18 35:12 36:16 38:13 40:13 41:1,8 46:9 48:8 73:8,15,22 78:8 86:15 94:19 98:17 101:14 103:11 106:4 114:17,18 116:8 119:22 121:2,17,18 122:5 122:7,16 128:6 131:15 134:6 136:11 142:19 149:14 150:15 154:17 158:2 162:5 165:13 goes 103:14 going 18:16 21:16 24:8,18 29:9 32:12 38:3,12,13 42:21 51:21 71:22 72:20 73:4 78:22 79:2 94:13 95:14 97:13 99:17 100:12 101:11 108:15 111:7 120:7 123:7 130:9 142:19 148:3,21 165:8</p>	<p>good 8:20,21 28:15 35:19 48:14 72:17 73:5 84:4,8,20,20 85:4 145:15 159:21 168:15 Goodin 1:20 2:11 7:21 172:4,20 GoToMeeting 122:11 123:10,12 123:19 124:1 government 22:22 23:3,8 29:13 Gox 63:2 graduate 12:18 graduated 13:11 grandfather 48:16 grants 29:12 graphic 47:2 50:22 51:14 great 108:14 115:7 139:14 greater 37:19 67:3 110:20 grew 120:3 ground 9:7 10:6 group 45:15,20 46:5 53:14 58:5 83:5 129:7,14 guess 92:4 104:10 106:15 114:18 132:1 guy 166:6 guys 18:15 19:3</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>habits 99:16 hack 167:13 hacked 80:2,5 167:11 168:5 169:8,12,14 hacking 167:9,12 167:16,18 168:1 half 26:9 72:19 160:10,11,12,14 162:20 165:10 halfway 65:8</p>	<p>hand 18:16 24:8 81:20 82:2 131:11 165:9 handed 20:14,17 81:4 82:8 131:15 handing 32:11 41:16 43:3 44:16 52:18 54:19 57:11 59:21 62:2 64:22 66:3 68:6 74:13 75:22 80:10 handle 31:16,19 handled 37:21 handsomely 157:21 hang 23:4 happen 38:18 132:10 167:12 168:2 happened 25:10 27:14 69:11 71:9 77:11 happening 21:9 69:20 70:8,13,20 70:22 76:10 happens 167:13 happy 87:18 91:8 91:16 122:22 138:12,16 149:1 hard 120:4 Hardy 4:17 45:3 53:8,21 55:6 57:21 head 10:10,11 53:15 hear 28:8 30:11 heard 28:6 95:21 held 55:15 68:17 69:4 Hello 43:11 46:2 help 15:17 19:8 20:3,11,19 helpful 140:17 hereto 172:18 highest 102:9,22 104:3 134:1 hire 164:14</p>	<p>hired 164:4 history 34:10 138:14 141:7 162:6 166:2 Hitoshi 139:16 hold 35:8 103:11 113:4 124:8 holding 53:15 56:1 67:2 141:13 holdings 25:12 62:20 64:7 68:1 holds 25:17 home 9:14 146:11 146:22 147:3 honest 69:17 136:22 hoodie 36:11 144:12 166:7 hoodies 22:7 36:14 37:11 38:4 144:8 164:8 Hospital 96:3 Hotwire 17:19 66:10 70:16 73:16 75:2,17 79:12 80:21 104:18 105:1 106:13 107:6 129:5,7 132:6 133:22 136:6 169:22 hours 72:16 housekeeping 9:9 Howard 147:4 huge 110:20 143:18 Huh 145:2 humble 38:15</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>idea 155:9 identifiable 67:9 identification 18:22 24:4 32:9 41:20 43:1 44:14 52:16 54:17 57:9 59:19 62:5 64:20 66:1 68:4 74:11 75:20</p>	<p>80:8 82:6 92:7 100:15 111:5 156:19 identify 8:1 ill 149:8 impair 10:22 importance 118:10 important 113:15 117:1,4,10 119:7 119:10,12 128:18 128:21 impression 52:8 improvement 123:11 inaccessible 64:9 inaccuracies 170:15 include 45:15 46:6 income 136:5,9 incorrect 158:11 increase 25:12 75:3 109:19 115:3 132:9 138:19 incredibly 67:20 individual 119:19 120:2 126:13 135:21 individuals 66:10 info 1:4 7:9 33:2,3 33:6,9,13 34:2 68:17,22 70:7 71:14 151:18 information 29:17 83:1 113:6,15 115:11,13 117:14 118:2,14 119:1 125:4 126:15 128:10 129:1 130:18 132:17 133:7 152:5,22 155:6 161:5 instance 55:16 insurance 116:21 Integers 17:7 170:1 intellectual 29:4 71:17 73:11 74:7</p>
---	---	--	---	--

75:4,16 79:11,18 97:6,9 98:11 160:15 166:8 167:1 Intelligence 17:20 170:1 intent 30:16 Interconnect 170:1 Interconnected 17:16 20:2,4 interest 35:1 79:8 116:9 162:9 interested 172:18 interesting 108:13 interests 14:8 166:19 internet 96:15 inventor 158:11,16 158:22 159:6 161:8 162:7 164:19,21,22 166:6 investigate 23:14 investigated 27:2 involve 16:7,10 106:16 involved 14:9 16:15 31:20 74:6 83:7 83:11 120:16 129:5 132:19 135:19 152:7,16 153:10 154:9 156:14,16 159:5 159:10,22 160:1 163:7,11 165:7 166:21 167:2 involves 160:7 in-house 166:12,15 IP 23:6 Ira 1:3 7:7 152:1,5 152:15,16 153:3,5 153:12 issue 26:4 61:15 69:15 132:16 133:1 138:4 151:11	issued 26:19 issues 21:13 129:19 Italia 5:6,15 55:8 57:18 I's 157:18 159:19 163:21 <hr/> J J 1:20 2:11 172:4 172:20 Jamie 1:12 2:3 6:13 6:16 7:6 8:14 9:12 16:19 27:16 43:16 69:7 70:2 71:5 86:1 154:19 Jamie.wilson@cr... 91:19 January 103:8,8 104:6,7 132:1,5 132:22 136:15,17 Jenna 53:7 job 170:16 jobs 134:17 joined 39:19 49:21 joint 49:22 journey 119:4 jperez@riverom... 3:20 judgment 77:1,9,18 Julio 3:16 8:11 July 16:13 85:11,12 86:8 90:4 105:5 131:5 132:1,3,6 132:22 June 9:12 16:12 105:4 131:7 132:12,12 June/July 38:19 74:2 jury 10:4 26:3 JW 13:4 <hr/> K Kass 3:15 8:10,10 59:9,13 100:13 111:3	keep 59:16 72:4,6 82:1 121:1 135:7 key 22:8 148:1 keys 147:19 kicked 35:11 36:19 kidding 154:21 Kleiman 1:3,4 7:7 7:9 28:4,6,9 29:11 32:6 33:2 34:2 35:16 46:20 48:11 48:17 69:2 78:1 95:19,22 96:2,6 96:14,19 97:2,5,7 98:1,3,6,20 139:10 152:2,5,15 153:4,5,17 159:22 160:14 162:19,19 166:8,18 167:6 Kleiman's 30:16 34:3 knew 95:17 97:9 98:2 105:16 107:20 109:18 138:21 140:7 know 12:2 14:20 20:11 22:7,18 29:22 32:16 35:18 36:11,13,22 39:22 41:5 42:13 43:17 44:20 48:18 51:7 51:11,20,21 72:7 73:1 77:3 91:4 92:22 94:15,22 96:2,6,14,18 97:2 97:14 112:12 116:2 117:16,18 118:9,13 120:14 122:3 126:21 138:9 139:8 140:18 141:8,8,12 142:20 143:1,5,11 143:14,16 144:8 146:8 147:14 150:22 156:3 163:10,11 165:13 167:13,17 168:7	169:2,4,13 170:8 knowledge 69:18 70:9 132:20 137:7 159:11 163:16 167:21 known 141:4 Kyle 3:7 44:7,10 kyle@rochefreed... 3:9 K-DV 51:5 <hr/> L L 3:16 label 121:21 laboratory 114:19 lady 153:10 land 92:1 laptop 146:19 larger 106:22 late 132:13 launch 77:6 law 127:5 lawyer 84:12 105:21 164:15 lawyers 20:21 128:3 135:19 136:1 154:17 158:13,15 164:1 lead 21:18 47:21 54:2 58:17 67:14 67:19 leading 88:13 108:6 learn 14:10,13 167:19 learned 168:9 learning 138:13 leave 113:14 128:17,19,21 ledger 126:11,20 141:6 left 124:5 130:3 legal 7:20,21 122:21 123:4 131:12,13 133:9 158:17 legs 12:2	lend 96:11 letters 4:6 19:4 20:13,17 90:21 169:18 let's 41:7 42:20 48:8 83:16 119:20 121:18 124:17 141:20 166:5,9,22 Level 92:12 liability 71:13 78:20 liar 91:2 license 76:12,17 133:7 life 96:4 116:11,21 lifestyle 37:5 liked 16:18 limit 59:10 limited 71:13 72:13 78:20 line 24:11 92:1 139:1 168:11 lines 10:6 link 3:16 8:12 43:15 55:17 LinkedIn 6:16 111:10 113:1,3 120:14 124:9,22 128:6 129:3,8,10 129:17 links 168:4 Lipke 5:18 134:21 149:18,19 150:5,6 150:7 153:18 Lipke_s@hotmail... 151:22 list 47:3 102:15 158:10 listed 17:1 25:21 26:22 45:15 46:6 47:18 63:7 158:15 158:20,22 159:6 listing 62:17 litigation 18:17 24:9 41:18 43:5,6 44:18 52:20 54:21
---	--	---	--	---

57:13 60:1 62:7 65:2 66:5 74:15 76:2 80:12 little 9:6,9 21:15 25:9 26:3 36:16 37:9,13 47:1 60:13 61:4 70:12 168:20 live 104:14 121:10 140:17 150:20 lived 96:2 LiveNote 2:12 lives 104:15 LLC 1:4 7:10 33:4 33:7,10,13,15 68:17 69:1 70:7 71:11,13,14 78:19 Lloyd 128:2 LLP 2:7 3:11 loan 96:22 loaning 135:5 local 157:17 located 13:4 locked 48:5 54:9,14 56:18,22,22 57:5 59:3 61:11 64:9 64:16 138:22 lodged 131:21,22 163:6 lodges 30:9 log 146:7,10 147:10 Logan 13:5 log-in 147:16 long 13:22 122:22 longer 25:16 29:18 42:8 look 17:17 19:5,12 19:19 22:20 24:10 25:4 32:15 34:8 43:7 51:3 55:1 60:3,11 66:7,14 66:17 68:9 69:22 94:20 102:6,8 103:8 106:19 110:7 112:16 113:5 121:3	131:14 132:7,11 134:6 150:15 151:1,3,8 152:10 162:5 164:5 165:10,17,17 169:15 looked 21:1 67:14 103:21 109:5 131:13 152:4 158:4 looking 14:6,17 26:8,8 49:20 86:1 113:1 119:17 124:21 129:2 130:10 132:2 137:4 154:15 156:5 looks 23:9 Lori 1:20 2:11 7:21 172:4,20 losing 155:4 loss 116:15 lot 14:16 15:6 22:18 30:5 33:8 38:1,15 41:3 67:3 77:17 88:13 109:17 118:16 125:16 127:4 131:13 132:17 133:18 Love 43:11 loved 135:6 155:4 low 22:7 lucky 117:12 L-I-P-K-E_S@h... 153:20	manager 151:14 managers 149:21 Manu 5:9 60:8 marathon 12:3 mark 18:19 32:12 55:8 57:18 82:1 92:5,5 111:8 115:14 marked 18:22 19:20 24:4 32:9 41:17,20 43:1,4,4 44:4,14,17 52:16 52:19 54:17,20 57:9,12 59:19,22 62:3,5 64:20 65:1 66:1,4 68:4,7 74:11,14 75:20 76:1 80:8,11 82:6 82:9 92:7 100:15 111:5 156:19 market 14:18 56:3 56:3 58:6,13 marketing 111:15 111:16,18 113:1 marking 156:21 mark.mcperson... 116:7 massive 22:10 37:5 39:5 40:17 67:15 mate 28:11,15 35:19 139:14 material 29:10 matter 7:7 27:4 36:20 38:12 40:12 46:16 84:6 97:22 135:21 matters 130:6,8,11 McPherson 115:14 mean 21:15 28:16 28:17 37:16 39:2 39:21 40:7 50:6 50:11,14 78:2 86:21 89:19 108:10,14 118:11 119:6,20 141:6 142:9 143:22	150:1,18 154:21 165:8 166:9,13 167:15,15 169:4 meaning 71:14 means 48:18 meant 21:15 42:11 49:2,8,14 56:13 69:19 mechanics 61:15 media 7:5 91:1 149:7 medical 21:13 medication 10:17 meet 15:4 85:4 88:22 156:10 meeting 68:16,19 69:3,4,9,11 70:1 70:13,15,19,22 71:5 150:2 meetings 36:15 123:17 Melissa 116:1 Melissa.crossma... 116:6 member 118:8 119:16 127:18 138:15 members 78:21 membership 79:8 memory 159:21 mentioned 99:6 108:20 132:15 170:3 mess 118:19 messages 87:20 MESTRE 3:17 met 8:22 14:20,22 15:2 16:1 37:6 97:7 153:2 Miami 3:4 mic 44:8 Michael 45:3,8 46:2 53:8,21 55:5 57:21 microscope 23:16 middle 45:17	106:22 midway 58:4 million 26:9,12,14 53:15 54:4,9 56:4 60:11,13,20 61:4 61:11 63:2,15 64:14 65:9,18 66:15 millions 26:17 Mind 129:9 mine 11:13 133:19 142:11 mined 34:3 140:2 140:13 141:15,17 143:4,17,22 mining 50:6,16,18 139:10 140:19 142:3,12,17,21 143:10 minute 41:8 82:13 minutes 78:7 mischaracterize 92:17 mischaracterizes 58:21 59:6 mischaracterizing 140:15 missing 170:4,5 MIT 126:16 mobile 92:2 142:8 142:13 mom 66:17 moment 44:19 74:17 76:7 93:18 money 23:3,8 29:11 39:1 40:9,20 43:15,17,22 44:1 96:11 99:9 101:6 101:9 107:18 108:1 110:21 123:1,5,15 125:15 134:6 135:5,17 136:13 137:10,15 137:17 138:10,18 147:17,18 161:20 monitoring 134:19
--	--	---	--	---

134:20 month 103:15 106:8,8,8 months 42:7 104:19 109:22 110:1 130:13,15 134:2 morals 145:11 morning 8:20,21 84:4,8,20,20 motion 70:6 motions 69:19 move 42:6 44:8 133:21 147:7,14 moved 37:2 70:1 movement 165:22 moving 22:3 37:21 132:8 159:17 Mt 63:2 MYOB 6:11 82:16 82:19 M-Y-O-B 82:16	never 9:3 34:11 85:20 97:7,9 101:3,4,5,10 104:1 108:5 114:15 117:13 118:20 131:21 134:3,8,11 135:4 135:15 136:12,13 138:1,19 140:1 145:20 146:3,5 148:1 153:2 156:13 163:19 new 2:8 3:8,12,18 3:18 5:21 16:20 19:18 20:6 22:4 22:10 34:4 36:19 37:4 39:11 68:11 69:20 88:6 92:11 99:11,20 107:20 108:4 112:4 124:2 141:18 144:1 news 66:16 Nicholas 155:21 156:1,4,8,10 night 39:20 nine 104:19 109:22 130:12,15 noble 119:6 normal 37:3,14 Normally 72:8 109:11 North 147:4 Northwest 2:8 3:12 Notary 2:14 172:21 noted 46:2 notice 36:2 136:12 162:6 noticed 23:1 170:2 170:3 November 1:15 2:4 7:14 103:18 105:6 170:22 number 7:5,13 18:21 24:3 32:8 41:19 42:22 44:13 52:15 54:16 55:13	57:8 59:18 62:4 64:19 65:22 68:3 74:10 75:19 80:7 82:5 91:21 92:2,6 100:14 111:4 150:22 151:4,8,16 156:18 numbers 130:20 131:10 N-A-D-I-N-E 111:21 N-I-C-H-O-L-A-S 156:2	105:6,7 116:17 120:18 124:5 157:7 odd 118:6 119:14 office 23:14,22 24:1 27:3 45:3 53:8,9 88:6,7 101:5 112:4 115:6 130:20 officer 31:22 33:15 115:11,13 offices 2:5 7:17 92:10 oh 26:18 27:11,17 35:14 38:11 85:11 90:21,22 127:12 141:17 146:11,14 146:20 147:2 152:6 161:17 okay 10:13 11:4,10 11:11 12:4,5,20 13:8 14:3,13,19 15:21 16:2,14 18:3,5,8,12 19:15 19:19 20:9,19 21:3,14 23:21 24:2 25:9,11 27:8 27:18 28:8,13 30:5,14,18 32:3 32:18 35:13,15,22 36:7 39:9 41:4 42:19 43:3 44:3 44:12 45:2,10 48:8 50:5,20 52:18 56:17 57:11 58:16 61:19 63:6 64:5,8 67:13 70:17 71:3 73:5,8 74:6 77:22 80:1 81:17 82:4,22 83:13 85:17 86:15 87:16 88:4 89:6 89:11,17 90:3,8 91:10,13 92:13,16 93:17,22 98:21 99:21 100:9 101:8	101:14 104:2,13 104:19 105:8 108:20 109:3,14 110:8,12 111:1,11 112:7,15 113:17 114:17 116:8 117:15 120:7,12 120:19,22 123:7 124:8 125:16 126:19 131:20 132:7,22 133:5,11 133:20 134:4,14 137:13,18 138:7 141:3,20 142:15 143:3,16 144:5,20 145:12,17 146:9 146:13,21 147:10 148:19 149:15,22 151:13 153:8,15 154:3 156:3,15 157:4,9 161:4,12 161:15 162:4,14 164:22 165:1 167:8 168:9,13 once 30:12 36:18 138:17 147:16 ones 45:15 46:6 135:6 145:22 158:4 ongoing 64:4 on-board 99:20 on-boarding 104:17 105:16 109:16 open 68:8 operation 25:17 66:17 operations 149:20 opinion 123:5 opposing 30:8 options 142:10 orally 169:10 order 81:10 ordered 166:22 orders 70:3 original 6:19,20
<hr/> N <hr/>				
Nadine 111:19 name 8:22 9:10 101:16 109:2,3 111:20,22 115:12 115:22 153:11,12 153:13,14 157:11 157:14 159:2,7 164:18 nationally 88:13 naturally 158:6 165:8 necessary 128:14 need 10:9 11:22 12:1 72:15 76:22 109:20 116:22 167:7,17 168:1 needed 69:13 77:3 91:13 157:17 166:3 needs 26:20 negotiate 122:17 neither 172:13	news 66:16 Nicholas 155:21 156:1,4,8,10 night 39:20 nine 104:19 109:22 130:12,15 noble 119:6 normal 37:3,14 Normally 72:8 109:11 North 147:4 Northwest 2:8 3:12 Notary 2:14 172:21 noted 46:2 notice 36:2 136:12 162:6 noticed 23:1 170:2 170:3 November 1:15 2:4 7:14 103:18 105:6 170:22 number 7:5,13 18:21 24:3 32:8 41:19 42:22 44:13 52:15 54:16 55:13	oath 10:1 object 52:4 61:18 79:3 140:4,14 142:1 154:13 objection 17:9 28:1 30:3,9 31:1,6,14 34:15,20 35:2 36:4 38:6 39:6,14 40:19 42:14 43:19 45:5 47:9 48:1,20 49:5,16 50:9,15 51:9 52:11 54:6 54:11 56:11,20 58:20 59:5,17 61:1,7,13 63:4,16 64:17 65:20 67:1 67:17,21 71:19 72:8,9,12,21 73:13 75:8 77:5 77:12,19 79:1,4 83:9 102:11 103:3 160:18,22 162:21 167:3 169:5 objections 59:10 obtained 139:9 occasions 97:19 occur 69:9 October 19:7,16 20:7 21:4 27:20 53:4 74:1,3 101:22 103:19	105:6,7 116:17 120:18 124:5 157:7 odd 118:6 119:14 office 23:14,22 24:1 27:3 45:3 53:8,9 88:6,7 101:5 112:4 115:6 130:20 officer 31:22 33:15 115:11,13 offices 2:5 7:17 92:10 oh 26:18 27:11,17 35:14 38:11 85:11 90:21,22 127:12 141:17 146:11,14 146:20 147:2 152:6 161:17 okay 10:13 11:4,10 11:11 12:4,5,20 13:8 14:3,13,19 15:21 16:2,14 18:3,5,8,12 19:15 19:19 20:9,19 21:3,14 23:21 24:2 25:9,11 27:8 27:18 28:8,13 30:5,14,18 32:3 32:18 35:13,15,22 36:7 39:9 41:4 42:19 43:3 44:3 44:12 45:2,10 48:8 50:5,20 52:18 56:17 57:11 58:16 61:19 63:6 64:5,8 67:13 70:17 71:3 73:5,8 74:6 77:22 80:1 81:17 82:4,22 83:13 85:17 86:15 87:16 88:4 89:6 89:11,17 90:3,8 91:10,13 92:13,16 93:17,22 98:21 99:21 100:9 101:8	101:14 104:2,13 104:19 105:8 108:20 109:3,14 110:8,12 111:1,11 112:7,15 113:17 114:17 116:8 117:15 120:7,12 120:19,22 123:7 124:8 125:16 126:19 131:20 132:7,22 133:5,11 133:20 134:4,14 137:13,18 138:7 141:3,20 142:15 143:3,16 144:5,20 145:12,17 146:9 146:13,21 147:10 148:19 149:15,22 151:13 153:8,15 154:3 156:3,15 157:4,9 161:4,12 161:15 162:4,14 164:22 165:1 167:8 168:9,13 once 30:12 36:18 138:17 147:16 ones 45:15 46:6 135:6 145:22 158:4 ongoing 64:4 on-board 99:20 on-boarding 104:17 105:16 109:16 open 68:8 operation 25:17 66:17 operations 149:20 opinion 123:5 opposing 30:8 options 142:10 orally 169:10 order 81:10 ordered 166:22 orders 70:3 original 6:19,20

49:20 originally 37:6 85:22 152:7 159:2 outcome 123:1 172:19 outside 14:8 67:13 outward 39:5 overnight 41:3 oversee 16:5 157:22 owed 107:11 owned 63:14,14 64:15 70:6	106:20 134:18 135:20 167:15 parties 70:5 172:14 172:17 partner 28:14,16 28:17,18,20 parts 48:12 95:15 party 39:18 94:9,10 94:11,16 103:9 106:19 122:20 Paschal 3:16 4:2 8:8,8 11:12 17:9 24:18 25:2 28:1 30:3 31:1,6,14 34:15,20 35:2 36:4 38:6 39:6,14 40:19 42:14 43:19 44:4 45:5,21 47:9 48:1,20 49:5,16 50:9,15 51:9 52:4 52:11 54:6,11 56:11,20 58:20 59:5,8 61:1,7,13 61:17,20 63:4,16 64:17 65:20 67:1 67:17,21 71:19,21 72:4,13,18,22 73:1,3,7,13 75:8 77:5,12,19 79:1,4 81:5,15,18,22 82:4 83:9,16 84:3 84:5 92:4,8 95:7 95:10 100:16 102:13 103:4 111:6 122:1,3,6 140:5,16,21 142:2 148:3,11 151:15 155:1 156:20 160:19 161:3 163:2,13 167:4 168:15 169:5 170:11 pass 112:9 passed 35:20 36:18 42:7 48:14 96:19 96:20,20 116:16	116:18 117:3 118:8,22 120:10 120:17 passes 119:11 passing 38:16,18 40:8 69:13 115:2 120:21 passion 116:14 passport 88:19 patent 6:17 154:3 154:16,17 157:10 157:15 160:1,3 161:6,14 163:6,12 165:20 166:19 patents 15:13 126:22 154:7 157:1 158:1,4 162:2 patient 114:19 pay 40:14 96:7,11 101:7 103:22 122:18 134:5,18 135:6 136:5 Payday 96:21 paying 135:22 payment 104:1 137:9,18,19,20 PE 70:16 73:16 104:18 129:7 people 69:6 95:21 104:9,17 108:3,18 113:4 119:7 145:13 158:13 165:10 166:14 167:12 168:1 percent 34:4 48:2 58:5,12,18 59:2 69:1,2 126:14 percentage 123:6 Perez 3:16 8:12 period 16:8 21:20 75:3 86:14 105:19 106:2,9 107:14 109:18 117:7 131:6 133:15 138:8	person 85:4 102:10 103:1 113:1 115:15 153:9 personal 1:3 7:8 62:18 151:11 personality 38:22 personally 26:19 28:5 person's 115:22 phone 85:19,19 87:6 91:21 92:1 96:7,8,11,12 142:9 148:13,16 149:2 150:11,22 151:3,16 153:19 physical 26:5 38:3 88:7 135:17 physically 16:1 20:14 86:4 89:21 91:6 155:16 161:20 physicals 24:20 picking 76:19 picture 99:22 100:2 piece 119:16 Pinder 21:1 105:22 127:13,16,17 place 11:18 120:8 plaintiff 8:5,7 Plaintiffs 1:5 3:2 4:11 18:19 32:12 121:4 169:16 plaintiff's 32:14 plans 108:10 platform 73:17 please 8:1 9:10 11:5 59:16 73:15 111:20 151:8,21 155:22 plenty 126:15 Plus 91:22 151:17 pocket 135:18 point 10:5 15:14 16:7 69:4 81:3 125:8 126:22 133:17 158:17	points 70:1 pop 66:17 150:18 position 21:8 positions 35:8 positive 18:7 82:17 posted 91:3 posts 149:7,11 potentially 19:8 Preemptive 17:20 169:22 present 3:21 69:6 71:5 84:14 85:1 88:3 pressure 77:17 prestigious 107:3 pretty 145:15 168:13 previous 35:14 previously 40:18 principal 128:3 print 24:22 printing 18:13 prior 21:21 38:15 40:5,6,7 105:16 120:20 137:8 163:6,7 privacy 126:9,11 126:18 127:5 private 147:19 148:1 probably 119:18 127:21 152:14 159:6 problem 122:21 problems 38:2 110:10 126:17 proceed 8:3 PROCEEDINGS 7:1 process 81:14 116:18 119:6 123:18 154:5,11 155:7,8 158:7 162:2 163:5 166:4 processed 103:22 produced 18:17
P				
package 82:17,18 109:13 page 4:1,5 5:3 6:3 19:20 32:19 33:19 34:1 50:21 60:4 66:8 69:22 112:15 116:8 121:14,22 128:7 pages 121:15 paid 23:8 40:2 101:4 102:9,22 104:3 125:4 134:1 134:8 135:4,5 136:16 138:18 157:21 158:7 161:19,20 PanOptiCrypt 80:21 paper 25:22 119:16 papers 120:5 paperwork 29:9 69:13 118:20 159:11 164:2 paragraph 33:20 46:10 53:14 55:22 66:15 68:13 69:3 71:4,9 Parkinson's 48:16 part 14:15 33:7 46:21 49:15 50:12 70:15 82:1 83:5				

<p>24:9 41:18 43:5 44:18 52:20 54:21 57:12 60:1 62:7 65:1 66:5 74:15 76:2 80:11 82:9 product 16:5 Professional 2:11 professions 123:4 profile 6:16 111:10 111:12,14 129:3,8 program 6:11 13:6 82:16 programming 155:12 project 16:20 46:21 48:12 49:15 50:6 50:11,13,14 134:18 151:14 projects 14:5 22:4 28:12 29:1,4,6 74:4 75:1,5,11,13 75:16 78:2 99:20 121:5 124:6,18 132:18 property 29:4 71:17 73:11 74:7 75:5,16 79:11,18 97:6,10 98:11 134:8 144:9 160:15,16 166:8 167:1 protection 168:1 provide 151:21 provider 155:5 Pty 17:16,20 18:6 20:2,4 25:16 34:6 public 2:14 126:11 167:20 172:21 publically 26:22 publicly 55:16 pull 18:14 167:17 purchase 76:12 purchased 141:3,4 141:9 143:13 purchases 141:11 purely 23:15 98:3</p>	<p>118:12 138:13 purpose 21:11 88:5 purposes 51:21 70:3 put 23:16 108:18 112:13 113:11 124:3 127:7,9 130:9 134:7 149:8 157:2 putting 124:22 131:8 155:12</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualifications 125:1 Queensland 9:15 9:18 12:11 13:5 112:20 113:18 question 11:4,9 30:10,11 49:9 61:16 64:13 79:3 79:5 97:8 101:11 106:5 123:8 142:16,20 163:3 169:9 questioning 33:8 139:2 questions 72:15 83:15,17 117:1 131:16 168:19 170:10,11 quicker 127:4 quickly 38:17 132:10 quite 105:18 135:8 140:19 150:19 QUT 113:19</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>R 1:12 8:14 Ramona 39:19 43:12 58:1 74:18 76:5 104:11 152:14 ran 130:5,7 141:18 range 95:3</p>	<p>rate 60:12 reach 93:3 reached 90:4 92:18 92:21 135:1 read 115:5 121:11 169:20 170:14,17 170:18 reading 45:21 realize 29:18 126:17 realized 33:6 really 81:10 129:10 132:12 Realtime 2:13,13 reason 21:7 25:11 25:18 90:6 101:3 126:8 135:3 137:6 147:8 153:1 recall 16:14 18:5 20:13 27:7 42:3 53:11 60:17 70:8 70:13 78:19 79:13 82:19 83:3,3 84:9 139:1,18 receive 93:9 118:20 131:4 136:10 137:1,14 147:18 169:1,11 received 51:17 52:7 101:4,6,10 104:1 136:12,21 137:3 137:10 receives 118:22 receiving 53:11 58:8 60:17,19 63:21 65:6 66:12 125:15 recess 41:11,12 78:11,12 83:20,21 148:7,8 recipient 81:4,8 152:17,19 recognize 25:7 41:22 43:8 44:21 47:11 52:22 55:2 57:14 60:5 62:9</p>	<p>65:3 66:7,8 68:9 74:17 76:4 80:13 recollect 10:20 record 7:5 8:2 9:11 11:14,15,18,20 41:8,9,14 78:8,9 78:14 83:18 84:1 99:4 148:5,10 151:10 170:21 172:12 recorded 10:4 records 19:13 134:7 144:11 recovered 135:9 redaction 51:11 Reese 46:20 48:11 48:15 refer 155:9 reference 80:20 references 82:22 referring 43:18 refers 50:5 regards 22:1 27:3 53:20,22 126:9 149:7 158:19 Register 17:18 35:12 registered 2:11 157:4 registers 34:9 regular 88:10 reimbursed 134:11 136:14 relate 75:10,11 related 74:4,7 75:7 79:22 114:4,7,10 114:13 123:9 124:15 172:13 relationship 98:3 138:15 relative 172:16 released 155:6 relevant 129:3,4 143:6 rely 11:9 remained 128:4</p>	<p>remaining 34:3 remember 17:12 19:9 20:3 24:15 45:10 53:21 58:8 63:21 65:6 66:12 70:19,22 71:1 83:12 92:14 94:21 95:11 101:12 106:3 109:2,3 146:20 153:11 remind 10:14 reminded 92:9 remove 161:8 165:20 removed 18:4 27:17 141:21 remuneration 6:14 100:18 125:5 rent 135:6 rental 134:8 144:9 repeat 11:6 rephrase 49:1 57:3 78:22 79:2 Replacement 122:10 reply 87:15 report 96:21 reported 1:20 109:6 reportedly 35:1 reporter 2:12,12,13 7:21 10:7 44:6 51:22 115:9 170:16 172:1,5 represent 84:5 representative 1:3 7:8 represented 91:10 Reputation 124:9 request 59:11 requests 115:9 required 133:4 research 1:4 7:10 17:16 20:2,4 22:21 34:2 54:1 71:14 170:1</p>
--	--	---	---	--

<p>resign 91:6 resignation 4:6 19:4 20:13,16 21:19 90:21 103:17 105:7 169:17 170:5 resigned 18:4 19:16 21:4,6 23:11,12 27:16 74:3 102:3 103:18 128:1 135:11 169:21 resolve 69:15 respond 10:10 86:12 87:4 168:22 169:9 response 27:9 169:11 responsible 95:4 returned 19:17 returns 53:22 77:7 131:9 review 44:19 right 13:21 20:18 22:11 26:13,15 27:10 29:2 37:17 45:18 47:1,20 52:1 84:16 85:14 89:16 93:1,20 94:4 95:17,22 98:14 99:1 101:17 102:1 103:6 105:2 105:4 107:7,8 108:17,18 113:2,9 113:12 114:18 116:11 117:22 119:8,12 120:10 121:8,11,14,15 129:13 130:13,22 132:4 134:15 135:12 136:6 139:19 141:22 147:11,15 152:7 159:9,17 160:15 161:22 164:20 167:19 168:7 170:12,13,18,19</p>	<p>170:20 rights 158:9 161:10 162:10 165:3 right-hand 165:18 RIVERO 3:17 road 119:4 Robert 9:12 Roche 3:3,7,7 8:4 44:7,7,12 Roger 60:8 role 107:6 166:5 romantic 28:16 roof 38:12 room 84:10,14 RPR 1:20 172:4,20 RSA 1:20 172:20 Rubik 26:22 60:8 73:18 ruin 98:18,19 rules 9:7 10:7 run 99:19 125:1 127:2,10 Rye 147:4 R&D 22:20,20 23:7 29:9 33:6 54:1 76:20 77:7 83:6 130:19 131:9</p> <hr/> <p style="text-align: center;">S</p> <p>S 3:11 69:1,7 71:6 salary 102:6 136:16 136:21 137:1 138:1 sale 76:17 savvy 167:22 saw 145:18 146:3 148:1 saying 28:10 104:6 136:8 139:13 143:4 162:8 166:18 169:11 says 20:1 33:1,22 42:5 43:11 45:14 46:2,5,13 47:2,5 47:14 48:9 51:5 51:15 53:14 55:10</p>	<p>58:3 60:10 65:9 66:15 80:16 87:12 101:22 112:16 113:17 120:15 121:10 122:8 scale 110:20 scaling 124:7 126:17 Schedule 6:14 scheduled 104:2 Schiller 2:7 3:11 7:18 8:7 school 12:18 Schubert 13:4 scientist 115:20 scientists 115:18 126:5 Scott 112:1 screen 67:12 81:6 145:22 147:11,21 search 149:14 second 11:12 12:2 24:11,16 25:3 30:18 53:14 66:8 97:14 102:5,9,22 134:1 140:9 148:4 168:14 Secondary 125:9 seconds 121:11 security 36:10 115:4,8,11,13 116:10,14 120:9 120:16 126:4 164:17 see 20:1 24:13 26:5 26:18 29:20 32:18 32:21 33:20 34:7 37:20 38:5 39:2 39:12 45:16 46:7 46:9,18 47:3,5 50:21,22 51:4,14 53:13 55:10,20 58:3 59:13 60:3 60:15 63:8 65:8 66:19 67:9 69:7 76:21 80:18 83:1</p>	<p>97:5 107:22 121:18 124:9 144:6,14,17 145:18,20 146:9 146:13 147:6,11 147:19 154:18 166:20 168:10 seen 21:3 32:16 34:14 40:5 82:11 117:12 145:20,21 165:2 send 25:8 81:18 90:9,12,20 112:12 125:3 147:17 150:11,12 169:2 169:12 sending 24:15 136:13 sense 110:5,11 154:22 sensitive 129:1 sent 24:5 42:13 53:1,4,7 55:3,5 57:15,18 60:5 62:10,12 65:4 68:20 74:18 76:5 80:14 86:3,4,9 90:18 sentence 45:19 46:4 65:9 66:14,22 76:21 separate 148:19 September 20:7 sequence 91:7 seriously 113:2 serve 31:12 served 106:13 servers 141:18 Services 7:20,22 set 20:6,19 21:20 67:4 73:16 83:6 122:15 139:15 setting 73:17 74:5 setup 138:5 seven 72:16 134:2 seven-month</p>	<p>133:14 shake 10:10,11 share 91:8,9 149:10 shareholder 17:22 18:6 31:3,5 32:4,6 33:12 69:16 78:17 79:16 129:12 shareholders 68:21 78:21 shareholder's 68:16 shareholding 68:22 shares 18:2 26:19 27:15 31:7,10,10 135:11 shelf 39:22 shift 38:22 39:5 shirts 37:14 shoes 36:22 shop 36:16 short 75:3 149:1 shorthand 172:9 show 25:4 93:10 100:12 120:8 151:18 showed 67:11 94:4 96:21 146:15 showing 99:8 100:17 111:1,7,9 146:17 156:21 shown 10:4 side 158:19 165:18 sign 158:8 161:16 signature 171:1 signed 20:8 111:17 161:9 162:9 165:2 significant 102:19 signoff 158:9 similar 110:19 123:19,22 similarly 16:6 simple 87:14 single 72:1 107:15 121:14 sit 27:5 sitting 133:19</p>
---	--	--	---	---

<p>six 51:4 73:20 slow 29:17 small 67:3 99:18 smaller 100:1 smart 37:16 snapshot 51:18 52:9 social 90:22 149:7 socks 37:1 solicitors 55:12 128:2 solution 14:17 15:7 15:8,13 16:17 116:19 154:15 solutions 116:10 somebody 28:22 118:7 119:11,15 sorry 31:9 36:12 41:1 46:15 59:22 63:11 65:13 89:22 93:9 98:17 116:22 120:22 140:22 sort 37:14,15 144:7 150:17 source 163:19 South 3:3 5:21 68:11 69:21 Southern 1:2 7:12 space 121:14 spaces 73:20 speak 10:14 84:12 85:17 speaking 144:21,22 145:8 Spears 53:7 specific 67:9 specifically 24:11 59:9 spell 111:20 112:2 153:18 155:22 spend 138:13 spending 40:9 144:17 spent 40:2 94:7,21 spoke 15:16 85:9 120:20 136:2</p>	<p>spoken 9:1 85:6 152:1 Springwood 13:5 staff 22:14 75:3 99:20 105:17 109:17 111:16,18 124:7 132:11 staffing 132:9 stage 15:15 27:13 69:17 117:9 118:15 127:1 154:20 155:2 163:11 stages 41:6 109:21 138:5 161:19 stake 34:4 stand 88:2 119:1 start 13:6 16:19 19:2 22:3 49:20 101:19 104:18 108:6 131:8 153:21 154:11 155:11 started 9:8 13:18 15:20 19:9 22:19 29:14,18 33:7 36:19 42:6,6 49:20 74:2 97:21 98:22 100:3 103:5 104:9 115:2 131:5 132:12 154:5 155:7 158:8 162:2 163:5 165:6 starts 46:10 startup 109:21 138:6 stat 55:11 state 9:10 72:21 135:8 stated 36:10 101:5 statement 61:3 88:17 98:16 162:18 statements 50:3 61:5 139:17,18,21 140:10 144:15</p>	<p>States 1:1 7:11 36:1 89:2,4 172:2 station 36:17 statutory 55:11 stay 105:1,4,5,5 123:3 stemmed 125:17 stepped 151:12 Steve 134:21 150:19 Steven 149:18,19 150:5,6,7 stop 64:13 144:21 144:22 145:8 story 64:5 strange 31:18 120:6 137:15 strategies 118:17 strategy 133:19 Street 9:18 147:4 stretch 12:1 strike 33:18 35:7 39:2 49:12 54:15 63:12 65:14,15 75:11 78:6 104:19 117:1 118:6 stronger 15:7 structure 133:20 stuff 117:17 Subaru 37:3 subject 62:15 submitted 5:20 68:10 subpoena 93:10,12 substance 127:15 sudden 36:21 38:22 39:4,12 suddenly 38:9 105:10,13 106:9 107:17 Suffice 26:16 Suite 3:4 suits 22:10 36:21 38:4 39:11 98:22 summary 137:9 superannuation</p>	<p>116:21 supplied 130:18 137:12 supply 87:18 149:1 supporting 149:9 suppose 118:9 supposed 72:7 137:22 Supreme 5:21 23:5 68:10 69:20 sure 35:10 44:10 45:8 77:17 82:11 87:3 88:2,3 95:16 113:8 118:21 128:10,13 130:22 141:15 150:9 157:18 158:8 161:17 163:20 surname 106:3 sworn 8:3,16 10:1 172:8 Sydney 36:15 73:18 104:15,16 134:10 135:4,20 149:21 150:21 system 44:11 122:8 Systems 2:13 124:9 system-wise 159:12 S-C-O-T-T 112:3</p>	<p>169:15 taken 7:16 9:3 41:11 78:11 83:20 110:6 135:11 148:7 172:6,9,15 takes 25:3 talk 28:3 30:15 42:10 53:18 56:21 64:2 71:16 73:10 87:6,12 95:21 117:17 156:7 talking 61:21 149:8 169:2,7 task 132:17 163:16 tasks 132:15 tax 12:21 23:22 45:3 53:8,9,22 77:7 101:7,9 106:17 131:9 134:5 taxation 23:13 24:1 27:3 101:5 106:20 130:19 taxes 136:5 team 8:11 16:19 40:1,13 135:4 tech 126:14 technically 81:8 technologies 125:17 technology 12:11 15:11,17 105:19 108:5 112:21 113:18 119:4 124:2,4 125:13,20 127:3 160:4,5 164:2 165:11 tee 37:14 telephone 3:7 tell 10:1,18 11:1 14:19,22 15:8 21:6 25:9 32:5 37:15 39:2 48:4 49:7 54:8,14 55:2 56:17 57:4 58:16 59:1 61:10 63:11</p>
---	---	--	---	---

64:8,14 65:13 76:10 80:2,4 88:18 89:18 90:1 94:6 97:17,20 121:21 127:15 140:6 150:14 166:10,10 telling 76:11 ten 40:1 78:7 116:17 terminal 117:8 termination 102:1 103:22 testified 8:16 84:6 93:17 94:3 109:7 128:9,20 testimony 59:7 128:22 172:7,8,12 text 87:20 thank 20:9 35:13 50:20 52:14 54:22 64:12 122:2 theme 75:12,15 79:11,17,21 121:7 125:10 thing 49:22 107:21 134:15 things 36:14,17,18 91:2 93:19 121:7 132:9 133:8 think 30:19 38:1 42:15 81:11 124:9 126:1 134:13 140:11 142:12,17 143:9 147:5 162:17,22 163:4 165:15 168:13,15 170:12 third 19:21 89:11 thoroughly 167:14 thought 23:4,9 91:4 107:22 118:19 153:3 three 72:18 85:8 145:5,6 148:18,19 threw 120:5	throw 119:15 tier 107:1 ties 22:10 time 7:15 16:9 21:12 23:2 27:18 32:3 34:13 39:10 41:5 70:11 72:14 74:1 75:3 77:17 84:15 85:9 88:19 93:8,19 96:8 105:8,19 106:2 109:19 111:11 138:8,13 140:20 150:19 157:22 164:8 times 9:1 23:13 30:8 64:14 85:6,8 139:4 146:11 title 31:21 47:19 today 7:14,19 10:1 10:17 11:2 14:18 73:21 84:10 93:10 93:13 115:5 156:8 160:3 today's 150:1 told 9:3 30:19 61:6 77:22 79:10 98:8 140:1 143:2,3 146:5 163:17 tome 151:21 top 19:2,6 32:19 33:20 39:22 45:18 51:4,14 60:4 80:13 95:2,3 total 110:5,11 totals 63:2 tough 51:20 track 123:16 126:12 141:5 159:14 tracking 124:12 trail 141:7 train 36:17 training 12:22 124:13 138:12 transactions 46:3	126:12 transcribed 172:10 transcript 6:20 transcription 172:11 transfer 25:19 133:7 145:19,21 147:6 transferred 123:2 transfers 146:3 trash 119:15 travel 88:9,16 134:9 travelling 40:9 148:14 travels 14:15 treat 145:14 treats 145:13 trouble 18:13 22:2 true 172:11 trust 20:20 21:2 170:16 truth 10:1,18 11:1 try 10:9,14,15 52:2 131:17 165:10 trying 18:14 67:4 108:18 116:19 122:15 130:20 132:7 165:13 turn 33:19 34:9 36:15 50:21 68:13 69:14 107:18 108:7 112:15 124:19 129:6 130:9 132:8 138:12,17 165:9 turned 23:5 131:18 137:16 turning 23:7 124:22 TV 66:16 81:6 two 76:13,14 89:5 90:2,3 92:22 96:3 98:4 112:14 116:10 118:13 121:15 145:5,6	two-page 121:13 type 29:6 71:17 73:10 T's 157:18 159:20 163:21 <hr/> U <hr/> Uh-huh 117:19 127:20 149:4 157:20 uncomfortable 99:14,15 131:1 uncommon 168:10 undergraduate 13:8 underlying 125:13 underneath 47:15 understand 9:22 10:16 11:5 29:3,7 38:20 49:2 51:18 56:7 63:13 65:12 65:17 66:21 72:9 72:10 78:1,5 107:21 108:7,15 121:2 125:12 126:13 138:9 understanding 21:9 22:15,16 38:21 39:4 57:1 58:14 69:18 98:15 115:3 132:20 133:20 139:11,12 understood 11:9 29:8 underway 154:7 unethical 134:13 unfortunately 73:21 Unit 7:5 United 1:1 7:11 172:2 university 12:8,11 112:20 113:18 unmarked 82:3 unusual 109:8 updated 111:12	upset 134:12 use 96:12 113:5 118:1 122:18 123:13 129:10 160:3 U.S 6:17 23:1,3,8 29:13 70:10 76:17 88:10,13 92:10 93:8 139:14 148:15 165:18 <hr/> V <hr/> v 1:5 VA 96:3 validate 55:15 validating 55:12 value 63:1 valued 56:3 various 17:2 vehicles 37:2 Vel 8:4,22 84:16 VELVEL 3:2 vel@rochefreed... 3:5 vendor 34:1,1 vendor's 33:22 venture 34:4 versus 7:10 99:19 video 3:16 8:12 122:8 videographer 3:22 7:4,19 11:15,19 41:9,13 78:9,13 83:18,22 148:5,9 170:20 VIDEOTAPED 1:11 voice 123:5 voluntarily 93:15 vote 70:4 <hr/> W <hr/> wait 153:3 waiting 24:21 42:8 waive 81:12 166:18 170:18,19
--	---	--	--	---

waived 73:6,7 165:3 171:1	30:9 37:21 38:13 44:8 97:14 99:16	62:3,4 64:12,14 64:19,22 65:1,22	worked 27:19 29:21,22 30:6	165:20,21 166:6 167:10 168:5
waiver 167:5	105:5 108:17	66:3,4 67:7 68:3,6	49:18 78:1,2,5	Wright's 107:16
Wales 5:21 68:11 69:21	110:16 132:8	68:7,8 69:7 70:2	105:18 159:12	138:22 144:11
walked 85:2	137:6 145:10,13	71:5,16 74:10,13	working 11:13	write 87:22 155:17
wallet 51:7,15 63:6 67:9	160:1 168:6	74:14 75:19,22	13:14,19 14:1	writes 68:15
wallets 47:18 51:19 51:19 52:9 107:19	ways 71:22	76:1 78:16 79:7	15:5 16:16 19:9	writing 20:13
138:10 140:8	weakest 168:4	79:10 80:1,7,10	19:10 21:21 22:3	wrong 23:19
143:19,21 144:3	wealth 39:13 41:3	80:11 81:3 82:5,9	22:8 28:11,22	105:14 130:16
145:18,22 146:14 147:22	94:4 97:3 144:7	82:12,15 84:4	73:17 75:17 79:12	158:1 160:9,13
want 16:19 23:10 37:8 72:1,3 87:11	wealthy 67:20 68:1	92:6 100:14 111:4	110:14 115:19	Wythe 3:8
87:12 88:1,2	wear 36:22 138:17	125:7 140:9	134:16 139:14	W&K 1:4 7:9 33:2
92:16 101:14	wearing 36:13	148:12 156:18	153:21 163:14,15	33:3,6,9,12,15
106:4 113:5,8	98:22 164:8 166:7	169:15,16 170:3	works 146:15	34:2 68:17,22
117:15,17 125:6	website 167:17	Wilson's 4:6 6:13	world 14:16 66:16	70:7 71:1,14
127:10 130:21	week 89:5	6:16	worried 138:3	76:16 78:17,19
134:17 161:5	weeks 89:5 90:2,3	winding 137:5	worry 35:14	79:8 170:4
162:14	92:22	window 117:21	worth 63:15 65:18	
wanted 25:12 75:2 108:15 110:18	went 37:4 38:11	wine 95:3	wouldn't 110:4	X
112:7 118:21	60:8 73:19 119:4	Winkler 67:4	113:11,14 128:17	XBT 47:6 53:16
121:1 157:17	145:10 154:16	Winkly 66:18	141:12 143:14	60:10 65:9
159:4,15	weren't 14:7,9	wished 127:4	147:14 162:9	Xero 27:12 82:18
wanting 108:9,12 135:16	21:16 132:2	witness 8:3,15 25:5	164:14 165:12	109:12,12
Washington 2:9 3:12 7:17 88:11	133:14 146:4	31:7 35:3 36:5,13	167:2	XE.com 60:12
wasn't 21:7 25:18 33:16 37:6 77:9	Westlake 9:15	38:7 39:7,15	wound 70:4	XFINITY 96:15
87:10 95:1 129:4	we've 15:13 59:14	40:20 42:15 43:20	Wright 1:6 4:9,13	Y
130:5 132:13	whatsoever 101:6	48:2,21 49:17	4:15,17,20 5:4,6,9	YDF 25:13 105:19
137:1 138:3,4	115:1 153:7,17	50:16 52:1,12	5:12,15,18,20 6:4	110:17 118:11
149:13,16,17	White 21:22	54:12 56:21 61:8	6:6,8 7:10 8:9,11	125:20 127:18
156:16 162:1	wife 94:8 104:11	61:14,19,22 63:17	14:20 15:1,2,16	138:15
164:2 166:16	willing 81:12	64:18 65:21 67:2	16:15 17:1 19:10	Yeah 155:14
watches 36:22 38:4 39:11 99:6	Wilson 1:12 2:3 4:4	67:22 77:6,13,20	27:19 44:21 68:10	year 12:14 48:15
Watts 6:5,6 58:1 74:19 76:5 104:11	4:9,13,15,18,20	81:21 95:6,9	69:1,7 70:5 71:6	77:14 85:12,13,14
152:14	5:2,4,7,9,13,16,18	102:12 115:10	79:12,15 84:5	86:8 90:5 103:15
way 16:18 29:19	6:2,4,6,9,17 7:6	140:18 151:13	86:7 91:1 93:19	128:1 145:4
	8:14,20 9:12 12:5	154:14 160:20	101:6 107:9	years 96:3 127:19
	18:21 19:6 20:10	161:1 162:22	122:16 129:13	145:1,3,6 147:1
	24:3,8 30:19 32:8	170:19 172:6,8,12	139:8 140:1,11,12	168:9
	32:11 35:15 41:16	WK 70:18	141:9 144:21,22	Yep 19:22 24:14
	41:17,19,22 42:22	work 9:17 14:3	145:9,17,19 146:2	89:10
	43:3,4 44:9,13,16	44:11 75:2 82:20	147:20 149:12,21	York 2:8 3:8,12,18
	44:17,20 45:7,13	103:13 109:20	152:12 153:22	3:18 19:18 20:6
	52:15,18,19,22	127:5 131:12,13	154:4 156:10	88:7 92:11 112:5
	54:16,19,20 55:2	131:17 133:16	157:2 158:10	Young 107:2
	57:8,11,12,14	150:7 156:12	161:1,8,9,15	
	59:18,21,22 62:2	168:11	163:10 164:4,8,16	

<p style="text-align: center;">Z</p> <p>Zalman 3:15 8:10 zero 32:2 90:14 zkass@riverome... 3:19</p> <hr/> <p style="text-align: center;">\$</p> <p>\$100 54:4,9 \$15,000 40:2 \$16.4 56:4 \$165 65:18 \$30 26:14 \$40 26:12 \$5 66:15 \$53 63:15</p> <hr/> <p style="text-align: center;">#</p> <p>#13959 1:21 2:14</p> <hr/> <p style="text-align: center;">0</p> <p>0043726 122:1</p> <hr/> <p style="text-align: center;">1</p> <p>1 4:6 7:5 18:20,21 32:19 51:3 60:13 60:20 61:4,11 101:20 169:16,16 10 5:9 59:18 60:1 103:18 106:8 110:1 120:13 10s 26:16,16 10/12/2013 5:5 10/2/2013 4:21 10/23/2013 4:7 10/29/2013 6:15 10/6/2013 5:7,16 10/9/2013 4:18 10:01 78:12,14 10:07 83:19,20 10:14 83:21 84:1 100 6:14 48:2 53:15 10017 3:18 108905 18:18 108905-108908 4:8 108907 19:20 108908 18:18</p>	<p>11 5:12 32:19,20 33:19 60:11 62:3 62:4 101:22 106:8 110:1 11:04 148:6,7 11:20 148:8,10 11:39 170:22 171:2 111 6:16 111,000 56:8 111,114 56:1 11249 3:8 113043 5:11 60:2 11401 3:12 11420 9:18 12 5:15 15:22 64:19 65:1 102:15 162:1 12-month 21:20 117:7 13 5:18 16:1 27:21 65:22 66:4 14 5:20 68:3,7 102:17 172:22 14/354359 165:18 1410 2:8 14354359 6:17 15 6:4 74:10,14 121:4 15th 9:12 15,000 95:2 150 138:1 156 6:17 16 6:6 75:19 76:1 16th 68:17 69:4 165 65:9,13 168 4:2 17 6:8 80:7,11 18 4:6 6:11 82:5,9 185 3:8 19 6:13 92:6 1933 55:18 1980 9:13</p> <hr/> <p style="text-align: center;">2</p> <p>2 4:9 24:3 51:3 2nd 53:4 20 6:14 100:13,14</p>	<p>121:11 137:2 200 3:3 2000 27:20 20005 2:9 3:12 2004 13:7,18,19 2006 12:16 2008 13:7,12,17 2010 14:2,4 116:17 120:15,18 154:6 2011 14:12 19:13 27:20 116:16 120:10 154:1 157:5,7 161:21 2012 15:3,20 19:14 154:2 157:13 165:5 2013 19:7,16 21:4 27:20 35:4,7,9,16 53:5 68:16,18 69:5 71:18 73:12 74:2,8 94:1,11 100:10 101:20,22 103:5,8,18 104:7 124:5,6 136:18,20 147:2 2014 16:12,13 127:21,22 2016 127:21 2019 1:15 2:4 7:14 170:22 202-237-2727 3:13 2021 172:22 21 6:16 111:3,4,8 22 6:17 156:18,22 23 68:13 69:4 23rd 19:7 105:7 24 4:9 69:3 71:4,4 24-hour 86:14 25094 4:19 44:18 25095 50:22 26 71:9 261 92:11 262775 6:12 82:10 266797 4:16 43:6 267325 6:10 80:12 28 157:7</p>	<p>28015 4:14 41:18</p> <hr/> <p style="text-align: center;">3</p> <p>3 4:11 32:8,12,19 32:20 34:1 51:3 112:15 30th 77:1,4,10,18 131:7 30127 5:14 62:8 305-357-3861 3:5 31588 6:7 76:3 32 4:11 323,000 34:3 33131 3:4 361 9:15</p> <hr/> <p style="text-align: center;">4</p> <p>4 4:13 41:17,19 51:3 4B 33:20 41 4:13 42 4:15 43726 6:5 74:16 438,000 62:20 44 4:17 45457 5:5 54:21 45496 4:10 24:10 46093 5:8 57:13 46098 5:17 65:2 467687 5:19 66:6 49.5 34:4</p> <hr/> <p style="text-align: center;">5</p> <p>5 4:15 33:19 42:22 43:4 51:3 58:5,12 58:18 59:2 5/5 75:2 50 69:1,2 500,000 63:19 51 126:14 52 4:20 528739 1:22 53.8 63:2 54 5:4 5500 3:4 553926 4:22 52:21</p>	<p>565 3:17 57 5:6 57,000 62:21 59 5:9</p> <hr/> <p style="text-align: center;">6</p> <p>6 4:17 44:13,17 6/26/2013 4:14 61-416-176-816 91:22 61-417-261-542 151:17 62 5:12 64 5:15 65 5:18 68 5:20</p> <hr/> <p style="text-align: center;">7</p> <p>7 4:20 52:15,19 7th 3:18 7/18/2013 5:13 7/2/2013 4:16 6:7 74 6:4 75 6:6</p> <hr/> <p style="text-align: center;">8</p> <p>8 1:15 2:4 4:2 5:4 7:14 54:16,20 103:8 170:22 8th 104:7 8/11/2013 6:5 8/8/2013 6:9 8:36 2:5 7:15 8:38 11:16 8:39 11:20 80 6:8 80176 7:13 82 6:11 83-4 5:22 68:7 83-5 4:12 32:13 84 4:2</p> <hr/> <p style="text-align: center;">9</p> <p>9 5:6 32:19 57:8,12 92:12 106:8 110:1 9/20/2013 4:10</p>
---	---	---	--	--

9/23/2013 5:10				
9/27/2013 5:19				
9:07 41:10,11				
9:12 41:12,14				
9:18-cv-80176-B...				
1:4				
9:49 78:10,11				
907 20:2				
918 7:13				
92 6:13				
929-457-0050 3:9				