

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1-21-cv-01382-NYW

**FILED  
UNITED STATES DISTRICT COURT  
DENVER, COLORADO  
AUG 9 2021  
JEFFREY P. COLWELL, CLERK**

ANDREW SCHOBBER,

Plaintiff,

v.

BENEDICT THOMPSON, OLIVER READ,  
EDWARD J. THOMPSON, CLAIRE L. THOMPSON,  
PAUL READ, AND HAZEL DAVINA WELLS,

Defendants.

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**PLAINTIFF'S INITIAL DISCLOSURES UNDER  
F.R.C.P. 26(a)(1)**

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I Pro Se Defendant Hazel Davina Wells, hereby submit these Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1), as follows:

**List of Individuals**

<b>Name of Individual With Information</b>	<b>Address and Telephone Number (if known)</b>	<b>Subject of Information</b>
Defendant Oliver Read	81 Oakleigh Road Clayton, Bradford, West Yorkshire 8D14 6NP United Kingdom	Defendant has knowledge of correspondence received from Plaintiff, cryptocurrency mining, and questioning by the UK Police regarding Plaintiff's claims.
Plaintiff Andrew Schober	Plaintiff may be contacted through his counsel,  Samuel Jonathan Leake Ballard Stephen David Palley Anderson Kill PC 1717 Pennsylvania Avenue NW Suite 200 Washington, DC 20006	Plaintiff has knowledge as to the acts alleged in the complaint, including but not limited to his investigation of the acts, the value he asserts of his cryptocurrency, correspondence with the defendants, and correspondence with various law enforcement agencies.
Defendant Hazel Davina Wells	81 Oakleigh Road Clayton, Bradford, West Yorkshire 8D14 6NP United Kingdom	Defendant has knowledge of correspondence received by Plaintiff and some information regarding her son's questioning by the UK Police regarding Plaintiff's claims.
Defendant Paul Read	10 Brook Lane Clayton, Bradford, West Yorkshire 8D14 6PH United Kingdom	Defendant has knowledge of correspondence received by Plaintiff and some information regarding his son's questioning by the UK Police regarding Plaintiff's claims.

The I Pro Se. Defendant Hazel Davina Wells will supplement this list as additional information is learned during discovery. I reserve the right to call any witness disclosed or identified by any other party to this lawsuit, as amended or supplemented.

As required by the Federal Rules of Civil Procedure, I will disclose any experts upon whose opinions I intend to rely on.

**I. List of Documents, Electronically Stored Information (ESI) or Tangible Things  
(in Plaintiff's possession, custody or control)**

<b>Description by Category of Document, ESI or Tangible Thing</b>	<b>Location</b>
Correspondence by Plaintiff to Read Defendants	Provided to Plaintiff as Read_000001-2

Dated: August 9, 2021.

s/Hazel Davina Wells  
**Hazel Davina Wells**  
81 Oakleigh Road  
Clayton, Bradford  
West Yorkshire  
Telephone: +44 07305 170462  
E-mail: oliverread2001@gmail.com

*1.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on August 9, 2021, I emailed the foregoing to the following individuals with the following email addresses:

Samuel Jonathan Leake Ballar  
Stephen David Palley  
Anderson Kill PC  
1717 Pennsylvania Avenue NW  
Suite 200  
Washington, DC 20006  
[sballard@andersonkill.com](mailto:sballard@andersonkill.com)  
[spalley@andersonkill.com](mailto:spalley@andersonkill.com)  
*Attorneys for Plaintiff Andrew Schober*

Sarah Jackson Donahue  
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Email: [sdonahue@fnclaw.com](mailto:sdonahue@fnclaw.com)  
*Attorneys for Defendants Benedict Thompson, Edward J. Thompson, and Claire L. Thomps*

Oliver Read  
[Oliverread2001@gmail.com](mailto:Oliverread2001@gmail.com)

Paul Read  
[Paulread66@aol.co.uk](mailto:Paulread66@aol.co.uk)

*Defendants*

Dear Mr. Read and Ms. Wells,

I am writing to you regarding your son Oliver.

Last January, my computer was infected by a malicious program called **Electrum Atom** that stole £145,800 worth of Bitcoin from me. The stolen funds were then deposited at the cryptocurrency exchange Bitfinex. With the help of an attorney and a private investigation firm, the theft was traced to Oliver Paul Read, from Bradford, West Yorkshire. It seems your son has been using malware to steal money from people online.

We have all of the evidence necessary to implicate his guilt: subpoenaed records from Github (where he uploaded the malware), Bitfinex, and Reddit (username **Rad3onx**); restored Github repositories (**Electrum Atom & Electrum Gold**); CryptoCompare.com and BitcoinTalk.org user logs and posts (**sulaiman.h500 & janders6**); false implication of Sulaiman Hussain (**sulaiman.h500**) from Beckfoot Thornton; real & fake Twitter profiles (**OliSwagoi & Koanders6**); forensic analysis of the malware; and blockchain analysis of his bitcoin wallet (which shows multiple thefts).

Ask him yourselves.

Losing that money has been financially and emotionally devastating. He might have thought he was playing a harmless joke, but it has had serious consequences for my life.

As his parents, I am appealing to you first to give him the chance to make this right, without involving law enforcement. Your son is obviously a very intelligent young man. I do not wish for him to be robbed of his future, however it would not be just to let him inflict such a damaging blow to my future.

If he returns what he stole in full, **16.4552 BTC**, to address **38V7h5tK5ywXWXG457UGmgYDDmk5t7h3Vu** by **October 21, 2018**, I will drop this matter and move on. If not, we will pursue recourse through Action Fraud. Given his age and the nature of the crimes, he would likely be charged as an adult. The minimum sentence for Theft: Category 1 Harm (>£100k) with high culpability, and Computer Misuse Section 3: Reckless Intent to Impair Operation, is 4 years and 6 months custody, plus payment of restitution.

I have been advised to remain anonymous as a precaution against retaliation, however I have attached digital signatures from the bitcoin addresses from which the coins were stolen. I include these signatures as cryptographic proof that I own the private keys to those addresses, and to show that I am not trying to extort you, only to have the stolen funds returned.

You can confirm these signatures with any online Bitcoin message verification tool.

**Signature from Address** [1QGHJvJbsr1E3H9h3aj1xFRN2NZnhoz6aD](#)

H7Pu3O/NxTCLBTNzvj9R5aXmbY0LZ1x/HaBufmqywzrKfpvWVy+aPENepM+lu  
gSWeG/KNV66h+ZhetsBw2RB4t4=

**Signature from Address** [1Mb6H2d4Xu7m5LiW2abA4xvtX7yfFHLtyk](#)

IJg7C7dHgpGldhz0v+tVCaYeFJvxavPbiQ+GAPM69f9PWGdpvaGBRfbdZ5JhIM  
d3CNr4hs9urA9wEjY2OX11bHY=

**Message:** I am the rightful owner of this address

\*\*\*

You can confirm the date, addresses, and amount of the theft (what is to be returned) here.

**Transaction ID of Theft:**

[a6db589147ec24d3d97acf244ac957cbfaeaf145d04c06ec57d782a62c365169](#)

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Return funds to this address by **October 21, 2018**



**38V7h5tK5ywXWXG457UGmgYDDmk5t7h3Vu**

I also ask that he send an additional **0.555 BTC** to compensate for a portion of my legal fees, to bring the total to a flat **17 BTC**. This is not a condition of dropping charges, but it is a more accurate reflection of the personal cost of this incident.