

15-1815

To Be Argued By:
EUN YOUNG CHOI

United States Court of Appeals

FOR THE SECOND CIRCUIT

Docket No. 15-1815



UNITED STATES OF AMERICA,

—v.—

Appellee,

ROSS WILLIAM ULBRICHT,
also known as Dread Pirate Roberts, also known as Silk Road,
also known as Sealed Defendant 1, also known as DPR,

Defendant-Appellant.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BRIEF FOR THE UNITED STATES OF AMERICA

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TABLE OF CONTENTS

	PAGE
Preliminary Statement	1
Statement of Facts	3
A. The Government’s Case at Trial	4
1. Overview of the Silk Road Website	4
a. The Tor Network.	5
b. The Silk Road User Interface.	6
c. “Dread Pirate Roberts” Controlled Silk Road	8
2. Illegal Goods and Services Sold on the Silk Road Website	10
a. Illegal Narcotics	10
b. Fraudulent Identification Documents.	11
c. Computer Hacking Tools and Services.	12
d. Money Laundering Services.	13
3. Ross Ulbricht’s Creation and Operation of the Silk Road Website	14
a. Ulbricht Creates and Launches Silk Road	14

	PAGE
b. Ulbricht’s Willingness to Use Violence to Protect His Interests in Silk Road	18
c. Ulbricht Orders Fraudulent Identification Documents from Silk Road.	20
d. Ulbricht’s Arrest and His Electronic Media	21
4. The Volume of Illegal Transactions on Silk Road	25
B. The Defense Case	27
C. The Verdict and Sentencing.	29

ARGUMENT:

POINT I—There Was No Discovery Violation.	30
A. Relevant Facts	30
1. The Maryland Investigation of Silk Road	30
2. The Government’s Pretrial Disclosure of the Investigation of Carl Force.	32
3. The District Court Denies Ulbricht’s Motion	35

	PAGE
4. The Defense’s Attempts to Introduce Evidence Relating to the Force Investigation During Trial	37
5. Ulbricht Moves for a New Trial While the San Francisco USAO Charges Carl Force and Shaun Bridges	38
B. Applicable Law	42
1. The Government’s Discovery Obligations	42
a. Rule 16	42
b. The Jencks Act	43
c. <i>Brady v. Maryland</i>	43
2. Rule 17(c)	45
3. Standards of Review	46
C. Discussion	47
1. There Was No <i>Brady</i> Violation	48
2. The District Court Did Not Abuse Its Discretion in Denying Ulbricht’s Discovery Requests	55
3. There Was No Abuse of Discretion in Denying an Adjournment	56

	PAGE
4. The Government Produced Jencks Act Material in a Timely Fashion	57
5. The District Court Properly Precluded Cross-Examination Using Force’s Hearsay Statements	59
POINT II—The District Court’s Limitations on Cross- Examination Were Proper	61
A. Relevant Facts	61
1. Agent Der-Yeghiayan’s Testimony About Mark Karpeles	61
2. Thomas Kiernan’s Testimony About Ulbricht’s Computer	65
B. Applicable Law	66
1. The Confrontation Clause	66
2. Alternative Perpetrator Evidence.	68
3. Opinions of Law Enforcement Agents	69
C. Discussion	70
1. Agent Der-Yeghiayan’s Testimony Was Properly Limited to Facts	70
2. The District Court Properly Excluded the Fourth-Hand Hearsay of Karpeles	75

	PAGE
3. The District Court Reasonably Limited Cross-Examination of Kiernan to the Scope of His Direct Testimony	77
POINT III—The District Court Properly Precluded Expert Testimony that Was Proffered Without Adequate Disclosure	81
A. Relevant Facts	81
1. Pretrial Proceedings	81
2. The Trial Begins	82
3. The Defense’s Expert Notice	84
4. The District Court’s Preclusion Order	85
B. Applicable Law	86
C. Discussion	89
POINT IV—The District Court Properly Excluded a Co-Conspirator’s Hearsay Statement	96
A. Relevant Facts	96
B. Applicable Law	98
1. The “Against Interest” Exception	98
2. The Residual Exception and Nested Hearsay	100

	PAGE
3. Standard of Review	100
C. Discussion	101
POINT V—The Cumulative Error Doctrine Does Not Warrant Reversal	104
POINT VI—The District Court Properly Denied Ulbricht’s Suppression Motions	105
A. Relevant Facts	105
1. The Pen Register and Trap-and-Trace Orders	105
2. The Warrant for Ulbricht’s Laptop . .	107
3. The Warrants for Ulbricht’s Facebook and Google Accounts	109
4. Ulbricht’s Suppression Motions	112
B. Applicable Law	114
1. The Fourth Amendment and Particularity	114
2. The Good Faith Exception to the Exclusionary Rule	116
3. Severance	118
4. The Pen/Trap Act	119

	PAGE
5. Standard of Review	120
C. Discussion	121
1. The Warrants Were Particular	121
2. Suppression Would Not Be an Appropriate Remedy	126
3. The Pen/Trap Orders Were Valid	127
POINT VII—Ulbricht’s Sentence Was Reasonable	130
A. Relevant Facts	130
1. The Presentence Report	130
2. The Overdose Deaths	132
3. The Parties’ Sentencing Submissions	135
4. Ulbricht’s Sentencing	138
B. Applicable Law	141
C. Discussion	143
1. The District Court Did Not Make a Procedural Error	143
2. A Life Sentence Was Justified	150
CONCLUSION	159

TABLE OF AUTHORITIES

PAGE

Cases:

<i>Alvarez v. Ercole,</i> 763 F.3d 223 (2d Cir. 2014)	74
<i>Amorgianos v. Romano Enters.,</i> 303 F.3d 256 (2d Cir. 2002)	88
<i>Andresen v. Maryland,</i> 427 U.S. 463 (1976).....	115, 122, 123, 125
<i>Boucher v. U.S. Suzuki Motor Corp.,</i> 73 F.3d 18 (2d Cir. 1996)	86
<i>Bowman Dairy Co. v. United States,</i> 341 U.S. 214 (1951).....	46, 56
<i>Brady v. Maryland,</i> 373 U.S. 83 (1963).....	30, 33, 43
<i>Burrage v. United States,</i> 134 S. Ct. 881 (2014).....	146
<i>Canales v. Stephens,</i> 765 F.3d 551 (5th Cir. 2014)	59
<i>Chambers v. Mississippi,</i> 410 U.S. 284 (1973).....	89, 105
<i>Coolidge v. New Hampshire,</i> 403 U.S. 443 (1971).....	114
<i>Cotto v. Herbert,</i> 331 F.3d 217 (2d Cir. 2003)	68, 75
<i>Daubert v. Merrell Dow Pharmaceuticals,</i> 509 U.S. 579 (1993).....	86, 88, 89

	PAGE
<i>Davis v. United States</i> , 564 U.S. 229 (2011).....	117
<i>Delaware v. Van Arsdall</i> , 475 U.S. 673 (1986).....	67, 68
<i>DiBenedetto v. Hall</i> , 272 F.3d 1 (1st Cir. 2001).....	68, 69
<i>Gall v. United States</i> , 552 U.S. 38 (2007).....	141
<i>Giglio v. United States</i> , 405 U.S. 150 (1972).....	43
<i>Hamling v. United States</i> , 418 U.S. 87 (1974).....	86
<i>Hammond v. Hall</i> , 586 F.3d 1289 (11th Cir. 2009)	59
<i>Herring v. United States</i> , 555 U.S. 135 (2009).....	116
<i>Howard v. Walker</i> , 406 F.3d 114 (2d Cir. 2005)	95
<i>Hutchinson v. Groskin</i> , 927 F.2d 722 (2d Cir. 1991)	71
<i>Illinois v. Krull</i> , 480 U.S. 340 (1987).....	117, 130
<i>Kumho Tire Co. v. Carmichael</i> , 526 U.S. 137 (1999).....	86

	PAGE
<i>Kyles v. Whitley</i> , 514 U.S. 419 (1995)	44, 75
<i>Marron v. United States</i> , 275 U.S. 192 (1927)	114
<i>Moore v. Illinois</i> , 408 U.S. 786 (1972)	58
<i>Nat'l City Trading Corp. v. United States</i> , 635 F.2d 1020 (2d Cir. 1980)	116, 122
<i>Network Prot. Scis., LLC v. Fortinet, Inc.</i> , No. C 12-01106 WHA, 2013 WL 146033 (N.D. Cal. Jan. 14, 2013)	79
<i>Paroline v. United States</i> , 134 S. Ct. 1710 (2014)	146
<i>Parsons v. Honeywell, Inc.</i> , 929 F.2d 901 (2d Cir. 1991)	76, 100
<i>Pennsylvania v. Ritchie</i> , 480 U.S. 39 (1987)	51
<i>People of Territory of Guam v. Ignacio</i> , 10 F.3d 608 (9th Cir. 1993)	68
<i>Pinkerton v. United States</i> , 328 U.S. 640 (1946)	149
<i>Rita v. United States</i> , 551 U.S. 338 (2007)	141, 153
<i>Rock v. Arkansas</i> , 483 U.S. 44 (1987)	89

	PAGE
<i>Sims v. Blot</i> , 534 F.3d 117 (2d Cir. 2008)	47
<i>Smith v. Maryland</i> , 442 U.S. 735 (1979).....	113, 119, 128, 129
<i>Strickler v. Greene</i> , 527 U.S. 263 (1999).....	44
<i>Taylor v. Illinois</i> , 484 U.S. 400 (1988).....	61, 89
<i>Townsend v. Burke</i> , 334 U.S. 736 (1948).....	147
<i>United States v. Abu-Jihaad</i> , 630 F.3d 102 (2d Cir. 2010)	46
<i>United States v. Achiekwelu</i> , 112 F.3d 747 (4th Cir. 1997)	72
<i>United States v. Agurs</i> , 427 U.S. 97 (1976).....	52, 53
<i>United States v. Aiello</i> , 864 F.2d 257 (2d Cir. 1988)	154
<i>United States v. Al-Moayad</i> , 545 F.3d 139 (2d Cir. 2008)	104
<i>United States v. Amiel</i> , 95 F.3d 135 (2d Cir. 1996)	58
<i>United States v. Awadallah</i> , 436 F.3d 125 (2d Cir. 2006)	158

	PAGE
<i>United States v. Ayala-Vazquez</i> , 751 F.3d 1 (1st Cir. 2014)	154
<i>United States v. Bagley</i> , 473 U.S. 667 (1985)	44, 55
<i>United States v. Banks</i> , 761 F.3d 1163	91
<i>United States v. Bradley</i> , 812 F.2d 774 (2d Cir. 1987)	158
<i>United States v. Broxmeyer</i> , 699 F.3d 265 (2d Cir. 2012)	141, 142
<i>United States v. Buck</i> , 813 F.2d 588 (2d Cir. 1987)	117
<i>United States v. Cavera</i> , 550 F.3d 180 (2d Cir. 2008)	<i>passim</i>
<i>United States v. Chalmers</i> , 410 F. Supp. 2d 278 (S.D.N.Y. 2006)	52
<i>United States v. Check</i> , 582 F.2d 668 (2d Cir. 1978)	72
<i>United States v. Christie</i> , 624 F.3d 558 (3d Cir. 2010)	120, 128
<i>United States v. Christine</i> , 687 F.2d 749 (3d Cir. 1982)	118
<i>United States v. Clark</i> , 638 F.3d 89 (2d Cir. 2011)	117, 126

	PAGE
<i>United States v. Comprehensive Drug Testing, Inc.</i> , 621 F.3d 1162 (9th Cir. 2010)	125
<i>United States v. Concessi</i> , 38 F. App'x 866 (4th Cir. 2002)	92
<i>United States v. Cook</i> , 657 F.2d 730 (5th Cir. 1981)	118
<i>United States v. Coppa</i> , 267 F.3d 132 (2d Cir. 2001)	43, 45, 52, 55
<i>United States v. Cortez-Diaz</i> , 565 F. App'x 741 (10th Cir. 2014)	154
<i>United States v. Crowley</i> , 318 F.3d 401 (2d Cir. 2003)	67
<i>United States v. Cruz</i> , 363 F.3d 187 (2d Cir. 2004)	86
<i>United States v. Cruz</i> , 981 F.2d 659 (2d Cir. 1992)	88
<i>United States v. Curry</i> , 977 F.2d 1042 (7th Cir. 1992)	93
<i>United States v. Day</i> , 524 F.3d 1361 (D.C. Cir. 2008).	92
<i>United States v. DeVillio</i> , 983 F.2d 1185 (2d Cir. 1993)	<i>passim</i>
<i>United States v. Devin</i> , 918 F.2d 280 (1st Cir. 1990).	57, 58

	PAGE
<i>United States v. Diallo</i> , 40 F.3d 32 (2d Cir. 1994)	94
<i>United States v. DiDomenico</i> , 985 F.2d 1159 (2d Cir. 1993)	86
<i>United States v. Douglas</i> , 525 F.3d 225 (2d Cir. 2008)	44, 46, 57
<i>United States v. Doyle</i> , 130 F.3d 523 (2d Cir. 1997)	99, 100, 101, 102
<i>United States v. Dwyer</i> , 539 F.2d 924 (2d Cir. 1976)	95
<i>United States v. Eberhard</i> , 525 F.3d 175 (2d Cir. 2008)	154
<i>United States v. Evanchik</i> , 413 F.2d 950 (2d Cir. 1969)	51
<i>United States v. Faulkner</i> , 636 F.3d 1009 (8th Cir. 2011)	149
<i>United States v. Fernandez</i> , 443 F.3d 19 (2d Cir. 2006)	142, 156
<i>United States v. Figueroa</i> , 548 F.3d 222 (2d Cir. 2008)	66
<i>United States v. Forrester</i> , 512 F.3d 500 (9th Cir. 2008)	119, 120, 128
<i>United States v. Galpin</i> , 720 F.3d 436 (2d Cir. 2013)	<i>passim</i>

	PAGE
<i>United States v. Ganas</i> , — F.3d —, No. 12-240-cr, 2016 WL 3031285 (2d Cir. May 27, 2016)	117, 120, 124, 126
<i>United States v. Garcia</i> , 413 F.3d 201 (2d Cir. 2005)	70, 71
<i>United States v. George</i> , 975 F.2d 72 (2d Cir. 1992)	<i>passim</i>
<i>United States v. Ghailani</i> , 733 F.3d 29 (2d Cir. 2009)	157
<i>United States v. Gil</i> , 297 F.3d 93 (2d Cir. 2002)	46
<i>United States v. Gomez</i> , 580 F.3d 94 (2d Cir. 2009)	147, 152
<i>United States v. Gotti</i> , 42 F. Supp. 2d 252 (S.D.N.Y. 1999)	116
<i>United States v. Graham</i> , — F.3d. —, Nos. 12-4659, 12-4825, 2016 WL 3068018 (4th Cir. May 31, 2016).	119, 120, 128
<i>United States v. Grinage</i> , 390 F.3d 746 (2d Cir. 2004)	70
<i>United States v. Gupta</i> , 747 F.3d 111 (2d Cir. 2014)	95
<i>United States v. Hoffecker</i> , 530 F.3d 137 (3d Cir. 2008)	92, 94

	PAGE
<i>United States v. Holmes</i> , 670 F.3d 586 (4th Cir. 2012)	92
<i>United States v. Howard</i> , 454 F.3d 700 (7th Cir. 2006)	148
<i>United States v. Hurtado</i> , 47 F.3d 577 (2d Cir. 1995)	104
<i>United States v. Jackson</i> , 345 F.3d 59 (2d Cir. 2003)	43
<i>United States v. Johnson</i> , 529 F.3d 493 (2d Cir. 2008)	69
<i>United States v. Jones</i> , 460 F.3d 191 (2d Cir. 2006)	142, 157
<i>United States v. Kearney</i> , 672 F.3d 81 (1st Cir. 2012)	145
<i>United States v. Kulick</i> , 629 F.3d 165 (3d Cir. 2010)	144
<i>United States v. Lee</i> , 818 F.2d 1052 (2d Cir. 1987)	147
<i>United States v. Leon</i> , 468 U.S. 897 (1984)	117, 126
<i>United States v. LeRoy</i> , 687 F.2d 610 (2d Cir. 1982)	54
<i>United States v. Lewis</i> , 386 F.3d 475 (2d Cir. 2004)	120

	PAGE
<i>United States v. Lopez</i> , 577 F.3d 1053 (9th Cir. 2009)	50
<i>United States v. Lumkin</i> , 192 F.3d 280 (2d Cir. 1999)	86
<i>United States v. Lundy</i> , 676 F.3d 444 (5th Cir. 2012)	92
<i>United States v. Maniktala</i> , 934 F.2d 25 (2d Cir. 1991)	42, 52, 56
<i>United States v. Marquez</i> , 462 F.2d 893 (2d Cir. 1972)	101
<i>United States v. McBride</i> , 786 F.2d 45 (2d Cir. 1986)	95
<i>United States v. McCullough</i> , 523 F. App'x 82 (2d Cir. 2013)	117
<i>United States v. McVeigh</i> , 153 F.3d 1166 (10th Cir. 1998)	69, 74
<i>United States v. Menghi</i> , 641 F.2d 72 (2d Cir. 1981)	57
<i>United States v. Meregildo</i> , 920 F. Supp. 2d 434 (S.D.N.Y. 2013)	52
<i>United States v. Middlemiss</i> , 217 F.3d 112 (2d Cir. 2000)	44
<i>United States v. Millan-Colon</i> , 836 F. Supp. 1007 (S.D.N.Y. 1993)	50

	PAGE
<i>United States v. Molina</i> , 106 F.3d 1118 (2d Cir. 1997)	144
<i>United States v. Moore</i> , 968 F.2d 216 (2d Cir. 1992)	126
<i>United States v. Moskowitz</i> , 888 F.2d 223 (2d Cir. 1989)	145
<i>United States v. Nicolapolous</i> , 30 F.3d 381 (2d Cir. 1994)	58
<i>United States v. Nixon</i> , 418 U.S. 683 (1974)	45, 46
<i>United States v. O'Connor</i> , 650 F.3d 839 (2d Cir. 2011)	47, 56
<i>United States v. Onumonu</i> , 967 F.2d 782 (2d Cir. 1992)	94, 95
<i>United States v. Ortiz</i> , 394 F. App'x 722 (2d Cir. 2010)	154
<i>United States v. Owen</i> , 500 F.3d 83 (2d Cir. 2007)	46
<i>United States v. Pacheco</i> , 489 F.3d 40 (1st Cir. 2007)	148, 149
<i>United States v. Paulino</i> , 445 F.3d 211 (2d Cir. 2006)	45
<i>United States v. Payne</i> , 63 F.3d 1200 (2d Cir. 1995)	44

	PAGE
<i>United States v. Petrie</i> , 302 F.3d 1280 (11th Cir. 2002)	93
<i>United States v. Pipola</i> , 83 F.3d 556 (2d Cir. 1996)	67
<i>United States v. Pisani</i> , 773 F.2d 397 (2d Cir. 1985)	72
<i>United States v. Polowichak</i> , 783 F.2d 410 (4th Cir. 1986)	51
<i>United States v. Pope</i> , 554 F.3d 240 (2d Cir. 2009)	143
<i>United States v. Pujana-Mena</i> , 949 F.2d 24 (2d Cir. 1991)	72
<i>United States v. Rea</i> , 958 F.2d 1206 (1992)	88
<i>United States v. Regan</i> , 706 F. Supp. 1102 (S.D.N.Y. 1989)	116
<i>United States v. Reingold</i> , 731 F.3d 204 (2d Cir. 2013)	141
<i>United States v. Reyes</i> , 18 F.3d 65 (2d Cir. 1994)	69
<i>United States v. Rigas</i> , 490 F.3d 208 (2d Cir. 2007)	142
<i>United States v. Rigas</i> , 583 F.3d 108 (2d Cir. 2009)	46, 143

xx

	PAGE
<i>United States v. Riggs</i> , 690 F.2d 298 (1st Cir. 1982)	118
<i>United States v. Riley</i> , 906 F.2d 841 (2d Cir. 1990)	115
<i>United States v. Rivas</i> , 377 F.3d 195 (2d Cir. 2004)	44
<i>United States v. Rivera</i> , 900 F.2d 1462 (10th Cir. 1990)	104
<i>United States v. Rizzo</i> , 491 F.2d 215 (2d Cir. 1974)	114
<i>United States v. Rodriguez</i> , 706 F.2d 31 (2d Cir. 1983)	102
<i>United States v. Rodriguez-Rivera</i> , 473 F.3d 21 (1st Cir. 2007)	57
<i>United States v. Rosa</i> , 626 F.3d 56 (2d Cir. 2010)	121, 124
<i>United States v. Rutledge</i> , 517 U.S. 292 (1996)	29
<i>United States v. Saget</i> , 377 F.3d 223 (2d Cir. 2004)	99, 102
<i>United States v. Salvador</i> , 820 F.2d 558 (2d Cir. 1987)	99
<i>United States v. Schesso</i> , 730 F.3d 1040 (9th Cir. 2013)	125

	PAGE
<i>United States v. Sessa</i> , 711 F.3d 316 (2d Cir. 2013)	45, 58
<i>United States v. Singer</i> , — F.3d —, No. 15-2169, 2016 WL 3244869 (10th Cir. June 13, 2016) . .	144
<i>United States v. Spinelli</i> , 551 F.3d 159 (2d Cir. 2008)	44
<i>United States v. Stevens</i> , 985 F.2d 1175 (2d Cir. 1993)	42
<i>United States v. Stokes</i> , 733 F.3d 438 (2d Cir. 2013)	116
<i>United States v. Swackhammer</i> , 400 F. App'x 615 (2d Cir. 2010)	155
<i>United States v. Tanner</i> , 628 F.3d 890 (7th Cir. 2010)	154
<i>United States v. Thomas</i> , 62 F.3d 1332 (11th Cir. 1995)	103
<i>United States v. Thomas</i> , 757 F.2d 1359 (2d Cir. 1985)	117
<i>United States v. Tin Yat Chin</i> , 476 F.3d 144 (2d Cir. 2007)	94
<i>United States v. Todisco</i> , 667 F.2d 255 (2d Cir. 1981)	129
<i>United States v. Warme</i> , 572 F.2d 57 (2d Cir. 1978)	50

	PAGE
<i>United States v. Watson</i> , 423 U.S. 411 (1976)	130
<i>United States v. Westry</i> , 524 F.3d 1198 (11th Cir. 2008)	150
<i>United States v. Wexler</i> , 522 F.3d 194 (2d Cir. 2008)	88, 98
<i>United States v. White</i> , 692 F.3d 235 (2d Cir. 2012)	100
<i>United States v. Wilkerson</i> , 361 F.3d 717 (2d Cir. 2004)	66
<i>United States v. Williams</i> , 441 F. App'x 52 (2d Cir. 2011)	155
<i>United States v. Williams</i> , 506 F.3d 151 (2d Cir. 2007)	99
<i>United States v. Young</i> , 745 F.2d 733 (2d Cir. 1984)	88, 114, 115, 123
<i>United States v. Yousef</i> , 327 F.3d 56 (2d Cir. 2003)	87, 94
<i>United States v. Zackson</i> , 6 F.3d 911 (2d Cir. 1993)	54
<i>United States v. Zagari</i> , 111 F.3d 307 (2d Cir.1997)	52
<i>United States Postal Serv. v. CEC Servs.</i> , 869 F.2d 184 (2d Cir. 1989)	116

	PAGE
<i>VMWare, Inc. v. Connectix Corp.</i> , No. C 02-3705 CW, 2005 WL 6220090 (N.D. Cal. Mar. 25, 2005) . . .	79
<i>Wade v. Mantello</i> , 333 F.3d 51 (2d Cir. 2003)	60, 68, 69, 73
<i>Weatherford v. Bursey</i> , 429 U.S. 545 (1977).	51
<i>Williamson v. United States</i> , 512 U.S. 594 (1994).	99
<i>Zuchowicz v. United States</i> , 140 F.3d 381 (2d Cir. 1998)	145
 <i>Statutes, Rules & Other Authorities</i>	
U.S. Const. amend. IV	114
18 U.S.C. § 2510(8).	107
18 U.S.C. § 2703	109, 129
18 U.S.C. §§ 3121-26	105, 129
18 U.S.C. § 3122	119
18 U.S.C. § 3127	119, 128, 129
18 U.S.C. § 3500	43, 57
18 U.S.C. § 3553	144, 148, 155
18 U.S.C. § 3661	147
Fed. R. Crim. P. 6(e)(3)(E)	33
Fed. R. Crim. P. 16(a)(1)(E)	36, 42, 55

	PAGE
Fed. R. Crim. P. 16(b)(1)(B)	82
Fed. R. Crim. P. 16(b)(1)(C)	82, 86, 87, 90
Fed. R. Crim. P. 16(d)(2)	87
Fed. R. Crim. P. 16 adv. committee's note	87, 90
Fed. R. Crim. P. 17(c)	45
Fed. R. Crim. P. 32(d)(2)(B)	144
Fed. R. Crim. P. 33	38
Fed. R. Crim. P. 52(a)	67
Fed. R. Evid. 103	71
Fed. R. Evid. 401	69
Fed. R. Evid. 402	69, 71
Fed. R. Evid. 403	50, 67, 88
Fed. R. Evid. 611(a)	66, 80
Fed. R. Evid. 611(b)	67, 79, 93
Fed. R. Evid. 701	69
Fed. R. Evid. 702	87, 90
Fed. R. Evid. 801(c)(2)	75
Fed. R. Evid. 804(a)(1)	102
Fed. R. Evid. 804(b)(3)	77, 98
Fed. R. Evid. 805	100

	PAGE
Fed. R. Evid. 807	63, 76, 77, 103
U.S.S.G. § 1B1.3	144
U.S.S.G. § 2D1.1	131
U.S.S.G. § 2D1.5	131
U.S.S.G. § 2S1.1	131
147 Cong. Rec. S11,006-07 (Oct. 25, 2001) (statement of Sen. Leahy)	128
147 Cong. Rec. H7,197 (Oct. 23, 2001) (statement of Rep. Conyers)	128
<i>Restatement (Third) of Torts: Phys. & Emot. Harm</i> (2010)	145
Charles Alan Wright & Kenneth W. Graham, Jr., <i>Fed. Prac. & Pro.</i> (2d ed. 2005)	72
Keeton et al., <i>Prosser and Keeton on Torts</i> (5th ed. 1984)	145

United States Court of Appeals
FOR THE SECOND CIRCUIT
Docket No. 15-1815

UNITED STATES OF AMERICA,

Appellee,

—v.—

ROSS WILLIAM ULBRICHT,
also known as Dread Pirate Roberts, also known as
Silk Road, also known as Sealed Defendant 1,
also known as DPR,

Defendant-Appellant.

BRIEF FOR THE UNITED STATES OF AMERICA

Preliminary Statement

Defendant Ross Ulbricht appeals from a judgment of conviction entered on June 1, 2015, in the United States District Court for the Southern District of New York, following an eleven-day jury trial before the Honorable Katherine B. Forrest, United States District Judge.

Superseding Indictment S1 14 Cr. 68 (KBF) (the “Indictment”) was filed on August 21, 2014, charging the defendant in seven counts. Count One charged Ulbricht with distributing and aiding and abetting

the distribution of narcotics, in violation of Title 21, United States Code, Sections 841(a), 841(b)(1)(A) and 2; Count Two charged him with doing so by means of the Internet, in violation of Title 21, United States Code, Section 841(h) & 841(b)(1)(A); Count Three charged him with conspiring to distribute narcotics, in violation of Title 21, United States Code, Section 846; Count Four charged Ulbricht with engaging in a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848; Count Five charged him with conspiring to obtain unauthorized access to a computer, for purposes of commercial advantage and private financial gain and in furtherance of other criminal and tortious acts, in violation of Title 18, United States Code, Section 1030(a)(2) & 1030(b); Count Six charged him with conspiring to traffic in fraudulent identification documents, in violation of Title 18, United States Code, Section 1028(f); and Count Seven charged him with conspiring to launder money, in violation of Title 18, United States Code, Section 1956(h).

Trial commenced on January 13, 2015 and ended on February 4, 2015, when the jury found Ulbricht guilty on all counts. On May 29, 2015, the District Court sentenced the defendant to a term of life imprisonment, ordered forfeiture in the amount of \$183,961,921, and imposed a \$500 special assessment.

Ulbricht is currently serving his sentence.

Statement of Facts

From early 2011 through October 1, 2013, Ross Ulbricht owned and operated a vast online black market, known as “Silk Road,” through which thousands of vendors sold approximately \$183 million dollars of illegal drugs, as well as a variety of other goods and services. The defendant designed and created Silk Road to facilitate illegal transactions anonymously and beyond the reach of law enforcement, including by hosting the site on the Onion Router (or “Tor”) network, which hides the identities of its users and their IP addresses, and by requiring vendors and customers to do business in Bitcoin, a virtual currency designed to be as anonymous as cash. During its operation, Ulbricht oversaw and managed all aspects of Silk Road, including maintaining the computer infrastructure, determining vendor and customer policies, deciding what could be sold on the site, managing a staff of online administrators and computer programmers, and controlling the profits, from which he personally earned millions of dollars.

The evidence at trial consisted of testimony by law enforcement agents who spent years investigating the operation of Silk Road through undercover purchases and online communications with the man who administered it using the alias “Dread Pirate Roberts” (or “DPR”). Despite “DPR”’s efforts to mask the location of Silk Road through Tor, law enforcement agents ultimately identified the servers hosting Silk Road (and seized the trove of data they contained, documenting thousands of transactions and communications through the site and its associated forums). Ulbricht

was initially identified as “DPR” through connections between his personal email account and online posts about Silk Road. After identifying him, agents were able to catch Ulbricht red-handed, arresting him in a public library while he was logged into Silk Road from his laptop as “DPR,” administering the site and talking online as “DPR” with an undercover agent. That laptop, in turn, contained journals describing how Ulbricht created and operated the site (corroborated by testimony from one of Ulbricht’s college friends), records related to Silk Road’s operation, and Bitcoin “wallets” containing millions of dollars’ worth of Bitcoins.

A. The Government’s Case at Trial

1. Overview of the Silk Road Website

Silk Road was an extensive and sophisticated online criminal marketplace that sought to make conducting illegal transactions on the Internet as easy and frictionless as shopping online at mainstream e-commerce websites. (Tr. 87-88).¹ The web-

¹ “PSR” and “Presentence Report” refer to the Presentence Investigation Report prepared by the United States Probation Office (the “Probation Office”) in connection with Ulbricht’s sentencing; “Br.” refers to the defendant’s brief on appeal; “A.” refers to the appendix filed with that brief; “S.” refers to the sealed appendix filed with that brief; “SA” refers to the Government’s supplemental appendix, filed with this brief; “NACDL Br.” refers to the *Amicus Curiae*

site offered a sales platform that allowed users to conduct transactions online, and the basic user interface resembled those of well-known online marketplaces. (Tr. 87-88).

a. The Tor Network

Unlike mainstream commerce websites, however, Silk Road was accessible only through the Tor network. (Tr. 99). The Tor network is a special network of computers on the Internet, distributed around the world, that is designed to conceal the true Internet Protocol (or “IP addresses”)² of the computers on the network, and, thereby, the identities of the network’s users. (Tr. 98-110, 135). Every communication sent through Tor is bounced through relays within the network, and wrapped in layers of encryption, such that it is practically impossible to trace the communi-

Brief of the National Association of Criminal Defense Lawyers in support of Ulbricht’s appeal; “DPA Br.” refers to the *Amici Curiae* Brief of the Drug Policy Alliance, Law Enforcement Against Prohibition, JustLeadershipUSA, and Nancy Gertner in support of Ulbricht’s appeal; “Docket Entry” refers to an entry on the District Court’s docket for this case; and “Tr.” refers to the corrected and final trial transcript. With respect to the last item, the Government notes that the Appendix contains portions of the transcript that were later corrected.

² See *infra* n.26.

cation back to its true, originating IP address. (Tr. 136-38).

Tor also allows websites that operate on the network, referred to as “hidden services,” to conceal the true IP addresses of the computer servers that host them. (Tr. 137-38). Hidden services like Silk Road have complex web addresses ending in “.onion,”³ which can only be accessed using specialized Tor web browser software (which is freely available on the Internet). (Tr. 98-99).

b. The Silk Road User Interface

Upon arriving at the Silk Road website, users could create a new account and access the site simply by creating a unique username and password. (Tr. 140-41).

The website’s homepage contained its logo, “Silk Road anonymous market,” and listed various categories of illegal items for sale on the site, including, most prominently, “Drugs.” (Tr. 141-46; SA 1, 9, 70). The homepage also included links permitting users to access: (1) a private message system, which allowed users to send messages to each other through the website, similar to emails (Tr. 192); (2) online forums, where users could post messages to “discussion threads” concerning various topics related to the website (Tr. 196-200); (3) a “wiki” that contained a collection of frequently asked questions, and other

³ Silk Road’s address was silkroadvb5piz3r.onion. (Tr. 98).

forms of guidance for users (Tr. 211-13; SA 4); and (4) a “support” section, where users could get assistance from the Silk Road administrative staff. (Tr. 236).

When a user clicked on any of the links to items for sale, the website would bring up a page containing the details of the listing, including a description of the item, its price and product reviews, and the username of the vendor selling it. (Tr. 148-51; SA 3). To purchase an item, the user would simply click on a link to add the item to an electronic “shopping cart.” (Tr. 164-65). The user would later be prompted to supply a shipping address and to confirm the placement of the order. (Tr. 165). Once the order was placed, it would be processed through Silk Road’s Bitcoin-based payment system.⁴ (Tr. 150-51, 165-67).

⁴ Bitcoins are an anonymous, decentralized form of electronic currency, existing entirely on the Internet and without any physical form. (Tr. 151, 159-60). The currency is not issued by any government, bank, or company, but rather is generated and controlled automatically through computer software operating on a decentralized network of computers (the “Bitcoin network”). (Tr. 159-60). Although there exists a public record of Bitcoin transactions (known as the “Blockchain”), which prevents individuals from spending the same Bitcoin twice, Bitcoins are exchanged by sending them from one anonymous Bitcoin address (analogous to a bank account number) to another, and without independent information tying an individual to their address, so the transactions are effectively untraceable. (Tr. 159-64). Bitcoin

Silk Road would collect a commission on each sale. (Tr. 170-72).

c. “Dread Pirate Roberts” Controlled Silk Road

In or about June 2011, a Silk Road user emerged on the Silk Road forum who held himself out as the lead administrator and person in charge of Silk Road, who posted information about rules and policies of the site, and signed messages as “Silk Road staff.” (Tr. 242-45). On January 31, 2012, the administrator announced that he was adopting the name “Dread Pirate Roberts” (or “DPR”) but continued to operate as the lead administrator of both the Silk Road marketplace and the Silk Road forums. (Tr. 243, 245-46). “Dread Pirate Roberts” used a particular electronic signature—known as a “PGP” signature, short for “Pretty Good Privacy”—to encrypt and digitally sign his communications to allow users to authenticate that messages from “DPR” had in fact been sent by “DPR,” and “DPR” alone.⁵ (Tr. 246-49). “Dread Pirate

holders can convert that currency into a national currency (like dollars) through various exchange services. (Tr. 152-53, 170-71).

⁵ PGP software creates a unique “public key,” which can be shared by the message sender with others. (Tr. 247). When the message sender uses a “private key” to digitally sign messages, the recipients of the message can use the PGP program to validate that the message sent was from a particular sender and had not been altered. (Tr. 247-49, 370-83). Dur-

Roberts” would post various messages to the Silk Road community, including rules and regulations regarding the marketplace, commissions that would be charged, issues related to site maintenance, and the “State of the Road” address, outlining his plans for Silk Road. (Tr. 250-64).

“Dread Pirate Roberts” ran the site with the aid of support staff. (Tr. 264). In furtherance of the Government’s investigation, in July 2013, one undercover agent lawfully assumed control of the accounts of “cirrus,” a support staff member, on both the Silk Road forums and the marketplace. (Tr. 264-65). As “cirrus,” the agent served as a moderator for the Silk Road forums, which allowed him to access certain features of Silk Road that general users could not, such as search capabilities and the ability to edit, delete, and move threads and posts on the forum. (Tr. 268-70, 273). While using the “cirrus” accounts, the agent frequently communicated with “DPR,” as well as other staff support administrators, through Silk Road’s built-in messaging systems on both the Silk Road marketplace and forum, as well as through a Silk Road “staff chat,” a private messaging platform that “DPR” had set up (separate from the Silk Road website) which “DPR” used to communicate with his

ing the operation of Silk Road, “Dread Pirate Robert”’s public PGP key—which validated messages sent from “DPR”—did not change, and thus “DPR”’s private key had not changed during that time. (Tr. 368-84).

employees in real time. (Tr. 272-77, 290-310).⁶ Those communications confirmed that “Dread Pirate Roberts” served as the ultimate decision maker for the staff, paid the staff members a salary, and had the capacity to grant new administrative powers to “cirrus” and other staff members. (Tr. 272-74, 290).

2. Illegal Goods and Services Sold on the Silk Road Website

The illegal nature of the items sold on Silk Road was readily apparent to any user browsing through its offerings, and included the following.

a. Illegal Narcotics

The vast majority of the goods for sale were illegal drugs of nearly every variety, which were openly advertised on the site as such. (Tr. 88, 142-43). As of the takedown of the Silk Road website on October 2, 2013, there were nearly 13,802 listings for controlled substances on the website, listed under the categories “Cannabis,” “Dissociatives,” “Ecstasy,” “Intoxicants,” “Opioids,” “Precursors,” “Prescription,” “Psychedelics,” and “Stimulants,” among others. (Tr. 1756-57;

⁶ The instructions that were provided by “Dread Pirate Roberts” to “cirrus” on July 20, 2013 on how to log onto Silk Road staff chat and communicate with him (as well as other Silk Road staff), including “DPR”’s `dread@pi5mmj2ronhutyxv.onion` address, were found in a text file on Ulbricht’s computer. (Tr. 991-94).

SA 70). As of the same date, among other illegal narcotics, there were at least 643 different listings for cocaine products, which included listings for cocaine base (commonly known as “crack” cocaine), 205 different listings for heroin products, at least 305 different listings for LSD products, and 261 different listings for methamphetamine products. (Tr. 1759-63; SA 71-82).

During the course of the investigation, law enforcement seized a wide variety of controlled substances obtained through undercover purchases made on the Silk Road website, including cocaine, crack, heroin, MDMA (commonly known as “ecstasy”), LSD, and oxycodone. (Tr. 88-96, 98, 149-52, 154-68, 176-83, 1388-90; SA 68-69).

b. Fraudulent Identification Documents

Silk Road also offered for sale counterfeit and fraudulent identity documents, which included, among other things, counterfeit United States and foreign passports and driver’s licenses and social security cards. (Tr. 1764-68; SA 83-99). As of October 2, 2013, there were approximately 156 different listings for forged identity documents in the “Forgeries” section of the Silk Road website. (SA 83).

During the course of the investigation, law enforcement seized counterfeit identity documents that had been ordered through the Silk Road website, which included nine counterfeit U.S. and foreign driver’s licenses that had been ordered by the defendant. (Tr. 1467-76; SA 64).

c. Computer Hacking Tools and Services

Silk Road offered a wide variety of computer hacking tools as well as the services of computer hackers. (Tr. 1768-71). As of the takedown of the Silk Road website on October 2, 2013, the following computer hacking goods and services were available on the site, among others:

- Account password hacking tools and services, which included tools for compromising the usernames and passwords of online accounts, including email accounts, Facebook accounts, and other social media accounts. (Tr. 1769-70; SA 102-07).
- Remote Access Tools, commonly known as “RATs,” which allow users to obtain unauthorized remote access to a compromised computer. (Tr. 1769-70, SA 100-01). Once a RAT is installed, a hacker can use such a tool to view the user’s activity, view the user’s webcam activity, and execute programs remotely, among other things. (Tr. 1769-70; SA 101).
- Keyloggers, which allow a user to monitor keystrokes inputted by a victim into his or her computer and are used to steal confidential

information, including usernames, passwords, and account information. (SA 108-09).

- Distributed Denial of Service (“DDoS”) services, which involve disabling websites or other publicly available services on the Internet by using large networks of compromised computers to flood victim systems with malicious Internet traffic. (SA 110-11).

During the course of the investigation, law enforcement purchased a computer hacking pack from a Silk Road vendor that contained a variety of 50 different computer hacking tools, including RATs, keyloggers, and other computer viruses. (Tr. 1390-95). The FBI tested a selection of the tools that were purchased from the computer hacking pack, and verified that they operated as advertised to compromise victim computer systems. (Tr. 1613-33).

d. Money Laundering Services

Silk Road offered a variety of money laundering services to its users, many of which were directly marketed to vendors who sold illegal goods and services on the website as a means to convert proceeds of illegal transactions (obtained in Bitcoins, the required means of payment on the Silk Road website) into other forms of currency. (Tr. 1771-74; SA 112-14). Vendors in this category offered, among other things, the sale of United States currency, anonymous debit cards preloaded with currency, and other

prepaid payment systems, including Moneypak cards. (Tr. 1771-74; SA 115-26).

3. Ross Ulbricht's Creation and Operation of the Silk Road Website

Ulbricht conceived of Silk Road during 2009 and 2010, worked to launch it in early 2011, and oversaw every aspect of its operation from then until his arrest on October 1, 2013.

a. Ulbricht Creates and Launches Silk Road

Ulbricht conceived of Silk Road in late 2009 as an “online storefront that couldn’t be traced back to me.” (Tr. 989-91). As described in a personal journal entry, he wanted “to create a website where people could buy anything anonymously, with no trail whatsoever that could lead back to them.” (Tr. 898-900; SA 27). Ulbricht researched the technologies, including Tor and digital currencies, to promote anonymity for himself and users of the site. (Tr. 898-900, 989-91; SA 27). By mid-2010, he was growing illegal, hallucinogenic mushrooms “so that [he] could list them on the site for cheap to get people interested.” (Tr. 898-900; SA 27). During the same time period, in late 2010, “[o]n the website side, [Ulbricht] was struggling to figure out on [his] own how to set it up.” (SA 27).

Ulbricht solicited computer programming help from a college friend, Richard Bates, as he built the site. (Tr. 1114-16, 1120-24). Bates testified that, for a number of months initially, when he would ask Ulbricht what type of site he was working on, Ulbricht

would reply only that it was “top secret.” (Tr. 1123-24). However, after Bates refused to provide further programming help unless Ulbricht disclosed the nature of his project, Ulbricht confided that he was running an online marketplace for illegal drugs, which he showed to Bates—the Silk Road website. (Tr. 1124-38).⁷

In early 2011, Ulbricht launched an early version of the website (Tr. 900-04; SA 30). Ulbricht attempted to attract users to Silk Road by marketing it on various online forums, including forums frequented by

⁷ On November 11, 2011, Ulbricht told Bates that he had “sold” Silk Road to someone else. (Tr. 1157-59). But chats dated December 9, 2011 between Ulbricht and a co-conspirator named “Variety Jones,” or “vj,” recovered from Ulbricht’s laptop, made clear that this was a lie Ulbricht had told to Bates and his ex-girlfriend, both of whom he feared knew too much about his involvement in Silk Road. (Tr. 1211). And about a month thereafter, on January 15, 2012, the same co-conspirator, “vj,” suggested to Ulbricht that he change his name from “Admin” to “Dread Pirate Roberts” on Silk Road, to “[c]lear your trail.” (Tr. 1211-12). The name—an allusion to the protagonist of the cult classic film “The Princess Bride”—was deliberately adopted by Ulbricht so as to falsely suggest that multiple people ran Silk Road, when in fact Ulbricht alone controlled it from inception to end. (Tr. 367-68; 1211-12).

Bitcoin users. (Tr. 900-04, 1252-68; SA 30).⁸ Those efforts were successful enough to enable Ulbricht to

⁸ Law enforcement was able to trace those online forum posts to an email address, rossulbricht@gmail.com, controlled by Ulbricht. (Tr. 1266-67). A review of the contents of that email account confirmed his connection to “altoid,” the name used to publicize Silk Road on online forums. (Tr. 1271-75).

The contents of Ulbricht’s email account and his related Facebook account also included various additional pieces of information that confirmed Ulbricht’s identity as “Dread Pirate Roberts” and his involvement as chief administrator of the Silk Road website. For example, Ulbricht’s personal email account contained discussions of a rental property in Bastrop, Texas, and receipts for various lab-related materials from 2010, which matched a journal entry from Ulbricht’s laptop that referred to setting up a “lab in a cabin out near Bastrop [Texas] off the grid” to grow hallucinogenic mushrooms, and a Silk Road expense spreadsheet listing the materials purchased for the lab. (Tr. 1275-81). Emails containing airline reservations for both international and domestic trips in Ulbricht’s account, as well as Facebook messages from Ulbricht’s account noting travel during the same time, matched Silk Road staff chats from Ulbricht’s computer, discussing “DPR”’s travel plans at the same time. (Tr. 1291-1301, 1366-74). These include, for example, chats from “DPR” about a trip from Australia to Thailand at the end of January 2012 and messages and pictures on Ulbricht’s Facebook page of

sell approximately 10 pounds of his hallucinogenic mushrooms through the website. (Tr. 900-01; SA 30).

According to Ulbricht's journal, user traffic to the website increased dramatically following an article posted on the Gawker website in June 2011, which described Silk Road. (Tr. 436, 900-04; SA 30). Sales spiked (with Ulbricht recording monthly revenues of approximately \$20,000 to \$25,000 in United States currency), and based on the growth, Ulbricht decided to hire staff to help with the site. (Tr. 902-04; SA 31-32).

The defendant oversaw every aspect of the operation of the Silk Road website until his arrest in October 2013. Among other things, Ulbricht was responsible for setting the commission rate for transactions

the defendant in Thailand during January and February of 2012. (Tr. 1296-1301). Documents from Ulbricht's laptop, including a chat from March 2012 in which "DPR" and a co-conspirator discussed getting foreign passports (such as from the Caribbean nation of Dominica), as well as application materials for citizenship in Dominica, containing the defendant's identifying information, were complemented by emails from Ulbricht's email account dated May 2012, discussing the defendant's application for citizenship to Dominica. (Tr. 997-1003, 1357-63). And finally, Ulbricht's email account contained emails in which others referred to him as "Frosty," the name of both Ulbricht's laptop computer, and the sole username for that computer. (Tr. 864-65, 1309, 1752-54).

that occurred over Silk Road. (Tr. 256-61). He was responsible for determining what goods were allowed to be sold on Silk Road. (Tr. 254-55). He enforced the rules of the site, including the ban against offline sales directly between vendors and customers, designed to avoid Silk Road commissions. (Tr. 220-21, 229-30, 261-63, 939-47, 1609-11, 1789-91). Ulbricht maintained and managed the computer servers and code used to operate and run Silk Road. (Tr. 250-54, 900-04, 960-67, 974-87, 1378, 1637-48). And he managed the day-to-day operations of the site, with the help of his staff of employees whom he hired, supervised, and paid. (Tr. 266-68, 270-74, 904-05, 924-25, 935-37, 939-43, 947-48, 953-56).

b. Ulbricht's Willingness to Use Violence to Protect His Interests in Silk Road

Communications seized from the Silk Road server also revealed that Ulbricht was willing to use violence to protect his interests in Silk Road, paying a total of approximately \$650,000 in United States currency to solicit the murders-for-hire of five people.

Beginning in or about March 13, 2013, a vendor by the name "FriendlyChemist" threatened to release the identities of other vendors and customers, unless Ulbricht paid him approximately \$500,000 in United States currency. (Tr. 1802-24, 1876-79). "FriendlyChemist" predicted that the release of the information would expose those individuals to law enforcement and threaten the future of Silk Road:

what do u . . . think will happen if thousands of usernames, order amounts, addresses get leaked? all those people will leave service and be scared to use it again. those vendors will all be busted and all their customers will be exposed too and never go back to service

(Tr. 1806-07). He also provided a sample of the user information that he claimed to have stolen. (Tr. 1807-08).

In response, on March 27, 2013, Ulbricht contacted the man he understood to be a supplier for “FriendlyChemist” (who went by the moniker “redandwhite”) and indicated that he wished to have “FriendlyChemist” executed. (Tr. 1819-22). Ulbricht provided identifying information for “FriendlyChemist” and negotiated to pay “redandwhite” approximately 1,670 Bitcoins (roughly \$150,000 in United States currency at the time). (Tr. 1822, 1883-85). “Redandwhite” later confirmed that he received the payment and, about a day later, told the defendant that the murder had been carried out. (Tr. 1886-87). At Ulbricht’s request, “redandwhite” sent a photograph purporting to be of the victim, with a code chosen by the defendant visible in the picture. (Tr. 1891-92). On April 5, 2014, the defendant replied, “I’ve received the picture and deleted it. Thank you again for your swift action.” (Tr. 1892).

Ulbricht remained concerned that associates of “FriendlyChemist” were involved with the extortion attempt and might still pose a threat, however. (Tr. 1887-1896, 1905-08). After negotiating with

“redandwhite,” Ulbricht sent another \$500,000 to assassinate those four associates, with the understanding that if “redandwhite” recovered any drugs or money from the scene of the crime, they would split it equally. (Tr. 1896-99).⁹

c. Ulbricht Orders Fraudulent Identification Documents from Silk Road

Communications seized from the Silk Road server and a controlled delivery revealed that Ulbricht used the Silk Road account “shefoundme” to order nine fraudulent identity documents from Silk Road.

In June 2013, “shefoundme” made arrangements to purchase the documents from a vendor on the Silk Road website for approximately \$1,650 in United States currency. (Tr. 1794-1802). “Shefoundme” asked if the documentation would be good enough to “pass airport security for a domestic flight” or to “get through being pulled over by a cop,” and the vendor confirmed that the identity documents were shipped in early July 2013. (Tr. 1794-95, 1800).

⁹ Blockchain records confirm that the payments for the five attempted murders for hire were made from Bitcoin addresses associated with Bitcoin wallet files (defined below, *see infra* n.11), found on Ulbricht’s laptop computer (Tr. 1729-32, 1884-86, 1899-1900; SA. 66-67). The murders-for-hire do not appear to have been carried out, however, as the Government stipulated at trial. (Tr. 1908-09).

On July 10, 2013, U.S. Customs and Border Protection intercepted a package inbound from Canada, containing nine counterfeit driver's licenses from six different U.S. states and three countries (matching the list of jurisdictions requested in the order made by "shfoundme"), each of which bore Ulbricht's photograph and date of birth, but different names. (Tr. 1467-71; SA 64). On July 26, 2013, Homeland Security agents performed a controlled delivery of those documents to Ulbricht in San Francisco, California. (Tr. 1471-72). During the encounter, when asked about the source of the fraudulent identification documents, Ulbricht said, "[H]ypothetically an individual could purchase anything they wanted—fake IDs, drugs, or generally anything illegal on the Tor browser, using the Tor browser to access the Silk Road website." (Tr. 1475).

d. Ulbricht's Arrest and His Electronic Media

On October 1, 2013, Ulbricht was arrested while he was logged into Silk Road and acting as "Dread Pirate Roberts." As law enforcement agents surveilled him, Ulbricht began using his computer at a public library in San Francisco, California. (Tr. 323-27, 847-54). Moments after Ulbricht entered the library, an undercover agent who had been masquerading as "cirrus," a trusted member of "Dread Pirate Robert"'s Silk Road's customer support staff, began chatting with "Dread Pirate Roberts" and asked him to check a specific message on the Silk Road web site. (Tr. 327-35, 384-86). After the undercover agent confirmed that "Dread Pirate Roberts" was online and

using his account, other agents arrested Ulbricht and seized his laptop computer. (Tr. 333-35, 386-88, 854-56). At the time of the defendant's arrest, he was logged into the Silk Road website under the username "Dread Pirate Roberts," and he was logged into an online chat client, engaged in the conversation with the undercover agent. (Tr. 388-94, 859-71; SA 11-24).¹⁰

Subsequent examination of the defendant's computer revealed voluminous evidence tying the defendant to the creation, ownership, and operation of Silk Road for the length of its existence. This included, among other things:

- Thousands of pages of chat logs with his employees (Tr. 890-97, 904-09, 911-12, 918-22, 924-27, 935-49, 960-67, 980-87, 1062, 1152-54, 1211-12, 1296-98, 1301-05, 1357-61, 1366-67, 1369-73, 1459-66, 1609-11, 1905-08, 1917-21, 2000-01);

¹⁰ At the time he was arrested, Ulbricht was accessing the Silk Road "Mastermind" webpage, the top-level administrative page for Silk Road that, forensic analysis of the Silk Road server showed, could only be accessed using "Dread Pirate Roberts"'s account on the server, and could not be accessed by any of the other Silk Road staff employees. (Tr. 399-400, 1775-76).

- Journal entries describing his ownership and operation of the Silk Road website (Tr. 897-904, 909-11, 922-24, 1050-52; SA 26-43);
- A weekly “to do” list regarding Silk Road-related tasks (Tr. 947-48; SA 57-58);
- A copy of the Silk Road website (Tr. 1006-11; SA 62-63);
- A copy of the Silk Road website’s database (which included information about Silk Road’s users and their transactions) (Tr. 1053-55);
- A spreadsheet listing information regarding the servers used to operate Silk Road (Tr. 975-79, 1637-49);
- The private PGP encryption key “Dread Pirate Roberts” used to authenticate and encrypt his messages (Tr. 1010-15);
- An expense report spreadsheet, listing expenses and profits related to Silk Road (Tr. 950-52; SA 44-51);
- A spreadsheet listing Ulbricht’s assets, which included a reference to Silk Road being an asset valued

at approximately \$104 million as of June 2012 (Tr. 957-60; SA 53); and

- Scanned copies of identification documents belonging to Silk Road staff members (Tr. 932-34; SA 60).

From a Bitcoin wallet file recovered from the defendant's computer, FBI agents seized approximately 144,341 Bitcoins, then worth approximately \$18 million. (Tr. 1052-53, 1673-78).¹¹ A review of Blockchain records regarding Bitcoin addresses associated with the Silk Road servers and Ulbricht's laptop computer demonstrated a huge flow of Bitcoins from the Silk Road servers to the files maintained on the defendant's computer. (Tr. 1682-99, 1723-27). Nearly 90 percent of all the Bitcoins ever transferred into the wallets on Ulbricht's laptop came directly from the wallets found on Silk Road, and those transfers were made over many months. (Tr. 1695-99; SA 65).¹²

¹¹ Bitcoin wallets are electronic files which contain Bitcoin addresses and the private keys required to control the funds associated with the Bitcoin addresses within the file. (Tr. 1668-70).

¹² These transfers were consistent with Ulbricht using his laptop as a "cold storage" location for Silk Road proceeds—*i.e.*, a storage location that was not vulnerable to hacks or crashes that might affect the Silk Road servers. (Tr. 1677-78, 1737-39). Indeed, a "log" file found on Ulbricht's computer contained an entry dated April 7, 2013, which said, "moved storage

On the day of Ulbricht's arrest, law enforcement agents also executed a search warrant on Ulbricht's residence. During that search, they recovered, among other things, a thumb drive containing versions of Silk Road-related documents recovered from Ulbricht's computer. (Tr. 1038-52, 1111-13). In addition, agents seized handwritten notes from Ulbricht's trash bin which contained details about the revamped Silk Road vendor rating system that "Dread Pirate Roberts" had recently announced on the Silk Road forums. (Tr. 406-08, 414-18).

4. The Volume of Illegal Transactions on Silk Road

In the course of its investigation, the FBI seized computer servers located in Iceland and the United States that were used to operate and back up the Silk Road marketplace. (Tr. 1637-59). Those servers included records of transactions occurring on Silk Road throughout its operation. (Tr. 1739-52, 1783-84, 1909-12, 1921-26). The records included detailed information about each transaction, including but not limited to the category of product that was sold, the purchase price (in Bitcoins and U.S. dollars), and the commission taken by the website. (Tr. 1909-12, 1921-26). According to that data, between February 2, 2011

wallet to local machine," and metadata associated with the primary wallet file on the laptop indicated that the file had been moved to the laptop on the same date, April 7, 2013. (Tr. 1052-53, 1673, 2155; SA. 25, 39).

and October 2, 2013, approximately 1.5 million transactions occurred over Silk Road, with a total value of approximately \$213.9 million in United States currency, which generated a total of approximately \$13.2 million in commissions for Silk Road, based on Bitcoin exchange rates at the time that the transactions occurred. (Tr. 1942-44; SA 130).

The vast majority of sales, approximately \$183 million dollars' worth, were for illegal narcotics (Tr. 1929-32; SA 127), including heroin, cocaine, methamphetamine, and LSD:

Drug	Total No. of Sales	Total Sales Revenue
Heroin	53,649	\$8,930,657
Cocaine	82,582	\$17,386,917
Methamphetamine	34,689	\$8,110,453
LSD	54,567	\$7,073,838

(Tr. 1935-37; SA 131).

Thousands of fraudulent identification documents were sold through the site:

Type	Total No. of Sales	Total Sales Revenue
Fake IDs	3,642	\$699,053
Forgeries	3,487	\$197,291
Passports	103	\$105,292

(Tr. 1933-34; SA 128).

And millions of dollars' worth of currency and valuable metals were laundered using services available through the site:

Type	Total No. of Sales	Total Sales Revenue
Money	14,345	\$2,846,025
Digital Currencies	18,134	\$177,167
Gold	81	\$159,944
Bullion	122	\$80,952
Silver	138	\$9,746

(Tr. 1934-35; SA 129).

The database also included information regarding the number of vendors and users on the Silk Road website. Between approximately January 2011 and October 2013, there were approximately 3,748 different registered vendor accounts and approximately 115,391 registered buyer accounts that had engaged in at least one transaction on the website (Tr. 1942-44; SA 130), for users who were located around the world (Tr. 1939-42; SA 132-33).

B. The Defense Case

In its opening statement, the defense admitted that Ulbricht conceived of and “created” Silk Road, but “after a few months,” he “handed it off to others,” because running the site had become “too stressful for him and [had] got[ten] out of hand.” (Tr. 60-61).

The defense argued that ultimately, it was the unidentified buyers of the site who, after believing they were under investigation, lured Ulbricht back to Silk Road, some two-and-a-half years later, so that Ul-

Ulbricht could “take the fall” for them. (Tr. 61). In support of this theory, defense counsel argued that no one as technically-sophisticated and security-conscious as “Dread Pirate Roberts” would have made the mistakes of, for example, leaving notes about Silk Road in his waste basket at home, or using his laptop and file sharing programs on a public Wi-Fi network. (Tr. 62-63). As for the evidence on Ulbricht’s laptop, the defense’s theory was that the real “DPR” had planted it, so “when the FBI arrived,” the day of his arrest, Ulbricht “would be left holding the bag.” (Tr. 65).

The defense pursued this theory through its cross-examination of the Government’s witnesses, particularly Special Agent Jared Der-Yeghiayan, who had investigated other individuals before another agent brought his attention to Ulbricht in September 2013. (Tr. 489-509, 527-30, 651-55, 659-79). One of those individuals was Mark Karpeles, who owned the company that hosted a website on the open Internet (“silkroadmarket.org”) that provided information on how to access the real Silk Road through Tor. (Tr. 528-29, 660-61). Evidence later recovered from Ulbricht’s laptop revealed that Ulbricht was the customer who leased the space on Karpeles’s server, however. (Tr. 809-11; 1003-06). The other individual was Anand Athavale, who posted on a libertarian website (“mises.org”) that “Dread Pirate Roberts” referred to in his online profile. (Tr. 813-14). Agent Der-Yeghiayan noted similarities between the language “DPR” used on the Silk Road forums and postings on mises.org by Athavale. (Tr. 813-19).

The defense also called three character witnesses and authenticated a document obtained from Ulbricht's laptop that contained a task list. (Tr. 2001-22, 2098-112). As described in more detail below, *see infra* Point III.A, the defense proffered testimony by two witnesses as experts, but upon the Government's motion, the Court precluded testimony from both witnesses because the defense did not provide timely or sufficient notice of their testimony. (A. 362-79).

C. The Verdict and Sentencing

After closing arguments, the jury returned with a verdict after three-and-a-half hours of deliberation. Ulbricht was found guilty on all counts. (Tr. 2334-38).

At the beginning of the sentencing hearing on May 29, 2015, Judge Forrest vacated Ulbricht's convictions on Counts One and Three of the Indictment, finding that they were lesser included offenses, and therefore duplicative, of other counts of conviction, pursuant to *United States v. Rutledge*, 517 U.S. 292 (1996). (A. 1459-62).

As described in more detail below, *see infra* Point VII.A, Judge Forrest sentenced Ulbricht principally to life imprisonment, ordered forfeiture in the amount of \$183,961,921, and imposed a \$500 special assessment. (A. 1539-41).

ARGUMENT

POINT I

There Was No Discovery Violation

Confronted with overwhelming proof (the sufficiency of which he does not challenge on appeal), Ulbricht claims that his rights were violated, because he was not given unfettered access to the Government's criminal investigation of two law enforcement agents for behaving corruptly in connection with their roles in a parallel investigation of Silk Road, and because he was precluded from introducing evidence of that investigation at trial. (Br. 20-62). But nowhere, either below or here, has Ulbricht explained, other than in the most conclusory way, how the corruption of two agents—who neither testified at his trial nor generated the evidence against him—tended to disprove that he was running Silk Road from his laptop. As the District Court found in vetting this challenge both before and after trial, neither *Brady v. Maryland*, 373 U.S. 83 (1963), nor any recognized principle of criminal discovery justified the relief Ulbricht sought or a basis to overturn his conviction.

A. Relevant Facts

1. The Maryland Investigation of Silk Road

In 2013, the United States Attorney's Office for the District of Maryland ("Baltimore USAO") indicted Ulbricht for conspiring to distribute narcotics, witness tampering, and murder for hire, *see United*

States v. Ross William Ulbricht, No. CCB-13-0222 (D. Md.), as a result of an undercover investigation led by a group of federal agents based in Baltimore (the “Baltimore Task Force”), including then-Special Agent Carl Force of the Drug Enforcement Administration (“DEA”). (A. 649).

The Baltimore undercover investigation stemmed from the arrest of one Silk Road employee, Curtis Green, a/k/a “Flush,” on narcotics charges in early 2013. (A. 664). Green quickly cooperated and provided Force with access to his “Flush” account on Silk Road, to use for undercover purposes. (A. 664). Force also used Green to communicate with “DPR” during this period. (A. 664). About a week later, another Silk Road employee (named “Inigo”) advised “DPR” that approximately \$350,000 worth of Bitcoins had been stolen from Silk Road user accounts, possibly by the user named “Flush,” and that he had locked “Flush” out of his account. (A. 665). “DPR” then reached out to “nob”—an undercover account that then-Agent Force had been using to communicate with “DPR,” posing as a large-scale drug dealer—and paid him \$80,000 to torture and murder Green. (A. 652, 664).¹³

¹³ Although the Government indicated during pretrial proceedings that it would seek to admit Ulbricht’s communications concerning this murder for hire (A. 664), at trial, the Government did not seek to admit any aspect of either this attempted murder or Ulbricht’s communications about it, including with Force.

The Government (meaning, this Office) produced these facts to Ulbricht in the ordinary course of discovery, through Force's investigative reports and documents (including chat conversations between Ulbricht and "nob") recovered from Ulbricht's computer. (A. 664-65).

2. The Government's Pretrial Disclosure of the Investigation of Carl Force

On November 21, 2014 (two months before trial), the Government sought leave from the District Court to disclose to the defense that a grand jury in San Francisco was investigating Force for selling information about the Silk Road investigation to Ulbricht and for stealing proceeds from Silk Road website users. (A. 649-54).

As the Government explained, the San Francisco U.S. Attorney's Office (the "San Francisco USAO") began investigating Force after learning that he exchanged hundreds of thousands of dollars' worth of Bitcoins into dollars over some period of time, which he transferred to his personal accounts; and that during that time (as described above) Ulbricht had learned that "Flush" had stolen approximately \$350,000 worth of Bitcoins from Silk Road users. (A. 650). This Office assisted that investigation by sharing evidence it had collected in the course of its own investigation (like copies of digital media), and communications recovered from that media suggested that Force might have used other Silk Road accounts (besides his authorized undercover account, "nob") to offer (and potentially sell) information about the

DEA's investigation of "Dread Pirate Roberts." (A. 650-51).

Because the foregoing matters related to a non-public, ongoing grand jury proceeding, the Government moved the District Court under Federal Rule of Criminal Procedure 6(e)(3)(E) for leave to disclose the foregoing facts to Ulbricht's defense counsel, subject to a protective order, so that the defense would have the opportunity to challenge the Government's conclusion that the information in question was neither exculpatory nor otherwise discoverable. (A. 653-54).

In response, Ulbricht moved *in limine* to unseal the Government's November 21, 2014 disclosure letter and to admit the facts described therein at trial, citing *Brady v. Maryland*, 373 U.S. 83. (Docket Entry 227-1, at 15-20). The District Court granted the Government's requested protective order, scheduled a conference, and asked the Government to respond in writing to certain follow-up questions (largely related to the need for ongoing secrecy), which it did. (A. 656-60).

In a sealed pretrial conference held on December 15, 2014, the District Court indicated that it had also received an *ex parte* submission from the defense and, perhaps based thereon, explored whether the investigation of Force was exculpatory insofar as it raised the possibility that Force had the opportunity to fabricate evidence against Ulbricht through his access to the "Flush" account on Silk Road. (A. 225-26, 228-31, 240-41; *see also* Docket Entries 281, 283). As the Government explained then and in a subsequent written submission, Force's access to "Flush"'s account cre-

dentials would have given him a limited amount of administrator access (such as the power to reset user passwords, which, conceivably, could have enabled him to make unauthorized withdrawals), but it was not the kind of core, root-level access that “DPR” had, nor did it include access to Ulbricht’s laptop or to chat facilities outside the Silk Road website. (A. 228-31, 240-41, 242-43, 256, 663, 666-67). Nevertheless, the Government agreed that the defense was free to investigate Force or to otherwise explore the theory that evidence against Ulbricht had been manufactured, short of revealing to anyone that Force was the subject of a grand jury investigation. (A. 249-50).

The defense then sought to unseal the information contained in the Government’s letter and requested extensive discovery into the ongoing Force investigation, including, but not limited to, “any and all” records of Force’s bank accounts, other assets, phone records, email messages and chat communications, tax records, and the fruits of any legal process or computer forensic examination. (A. 669-72). After consulting with the San Francisco USAO, the Government urged the District Court not to approve subpoenas with respect to the defense discovery requests, but it affirmed its obligation to provide any exculpatory material stemming from the Force investigation, to the extent it learned of it. (Docket Entry 227-1, at 67-72).

3. The District Court Denies Ulbricht's Motion

The District Court denied Ulbricht's motion to unseal information about the Force investigation and for discovery by written decision issued December 22, 2014. (A. 673-700). In light of the presumption of secrecy attaching to matters occurring before a grand jury, and the Government's specific representations that public disclosure of the Force grand jury investigation could have adverse consequences, the District Court rejected the defense's motion to unseal, finding that the defense "has failed to make a showing of 'particularized need' sufficient to overcome the presumption of secrecy." (A. 696). In so doing, the District Court found that the information in the Government's disclosure was, if anything, "*inculpatory*" (A. 690 n.13 (emphasis original)), and that, while there was "persuasive evidence that no . . . fabrication" of evidence occurred (A. 691), the defense was free to pursue that theory through technical examination of the Silk Road evidence produced in discovery (A. 694). The Government's commitment to produce any such information, pursuant to its *Brady* obligations, should it come to light, combined with the fact that it would not use any evidence obtained from the Baltimore USAO's investigation (such as any communication between Ulbricht and Force), "mitigate[d] the (virtually non-existent) risk of 'possible injustice' from maintaining" the disclosure under seal. (A. 694).

Consistent with these conclusions, the District Court also denied the defendant's requests for additional discovery, noting that (1) the defendant had

failed to “meet the threshold of materiality” required to compel disclosure under Federal Rule of Criminal Procedure 16(a)(1)(E) (A. 696); (2) the scope of the discovery demands constituted an “unreasonable or oppressive” “fishing expedition” disallowed by Rule 17 (A. 699); and (3) the defendant had failed to “articulate[] a coherent or particular reason why” either the fact of the Force investigation, Force’s leaking of information regarding the Silk Road investigation, or Force’s conversion and/or theft of bitcoins, would either “counter the government’s case” or “bolster the defense.” (A. 697). It also noted that the Government’s continuing *Brady* obligation to produce any exculpatory material discovered through the Force investigation was not, itself, an affirmative vehicle for the defense to compel discovery. (A. 699).

On December 30, 2014, Ulbricht requested a third adjournment of trial “until the government completes its grand jury investigation” of former Agent Force, again citing the possibility that the investigation might yield exculpatory evidence. (A. 701-03).¹⁴ The Government opposed (A. 704-06), and the next day, the District Court denied the request for the adjournment, citing its prior ruling (A. 706; Tr. 118-19).

¹⁴ Although trial was initially scheduled for November 3, 2014, on applications by Ulbricht, the Court adjourned the trial to November 10, 2014 and then to January 5, 2015. (A. 877; Docket Entries 58, 78, 90).

4. The Defense's Attempts to Introduce Evidence Relating to the Force Investigation During Trial

During trial, Ulbricht attempted to introduce evidence that was tangentially related to the investigation of Force. (Tr. 594-614, 1440-42, 2084-97).

More specifically, Ulbricht sought to introduce chat messages sent to "DPR" by a Silk Road user named "DeathFromAbove," in which "DeathFromAbove" intimated that he knew "DPR"'s true identity was that of an individual named Anand Athavale, and he threatened to leak this name to law enforcement unless "DPR" paid him \$250,000. (Tr. 594-614, 1440-42; A. 712). The Government opposed admitting those messages, on the ground that they constituted hearsay statements, which the defense sought to introduce in support of an alternative perpetrator theory. (A. 707-18).

As it turned out, Force controlled the "DeathFromAbove" account, and was using it to extort money from "DPR," based on information he learned from his access to the reports of Agent Der-Yeghiayan (who, as described above, had initially suspected that Athavale was "DPR," based on some common patterns in their writing, *see supra* page 28). (Tr. 1440; A. 710-11). In any event, "DPR" responded to "DeathFromAbove" by telling him to "[s]top messaging me and go find something else to do," and he wrote in a "log" file that "DeathFromAbove"'s threats to expose him were "bogus." (A. 708-10).

The District Court ultimately precluded the messages, finding that they were hearsay that the defense was improperly seeking to introduce for their truth, and that they were more prejudicial than probative, since they were not substantial evidence of an “alternative perpetrator.” (Tr. 1872-73).

5. Ulbricht Moves for a New Trial While the San Francisco USAO Charges Carl Force and Shaun Bridges

On March 6, 2015, Ulbricht filed post-trial motions, pursuant to Federal Rule of Criminal Procedure 33, in which, among other things, he argued that the Government violated its disclosure obligations under *Brady* because (1) Force “himself was obligated to disclose any misconduct he committed during the course of or related to his investigation of the Silk Road website,” and Force’s “knowledge in that regard is imputed to the prosecution as a whole”; and (2) the Government’s February 1, 2015 letter regarding Force’s control of “DeathFromAbove” (A. 707-10) constituted additional exculpatory material that the Government had failed to disclose in a timely manner. (A. 719-21; Docket Entry 224, at 10 n.2).¹⁵

¹⁵ Ulbricht also contended that the timing and manner in which Agent Der-Yeghiayan’s 3500 material was produced (to the extent it reflected his initial theories of who might have been responsible for Silk Road) and the Government’s changes to its trial exhibits amounted to a *Brady* violation. (Docket Entry 224, at 10-15).

On March 30, 2015 (after the defendant had filed his Rule 33 motion, but before the Government filed its opposition), the San Francisco USAO unsealed a criminal complaint charging both Carl Force and Shaun Bridges, a former United States Secret Service Special Agent who had previously served with Force on the Baltimore Task Force. (SA 134-228 (the “Force Complaint”); Docket Entry 226). The Force Complaint alleged theft of government property, in violation of Title 18, United States Code, Section 641; wire fraud, in violation of Title 18, United States Code, Section 1343; money laundering, in violation of Title 18, United States Code, Section 1956(h); and criminal conflict of interest, in violation of Title 18, United States Code, Section 208. (SA 134, 140-41).

As related to the Silk Road investigation, the Force Complaint alleged that (i) Force converted the Bitcoins that Ulbricht had sent to “nob” (Force’s official undercover identity) to his own personal use; and (ii) Force used other unauthorized online personas to extort Ulbricht by seeking money in exchange for information related to the investigation of Silk Road. (SA 145-60). It further alleged that (iii) Bridges used the Baltimore Task Force’s access to their informant Curtis Green’s “Flush” account (as well as another account under Bridge’s control) to steal approximately \$350,000 dollars’ worth of Bitcoins from the Silk Road marketplace.¹⁶ (SA 175-80 & n.26).

¹⁶ On or about July 1, 2015, Force pled guilty to an information charging him with money laundering,

In response, Ulbricht argued that the Force Complaint undermined the Government's justification for keeping the investigation secret, and that he was entitled to materials related to the Force investigation, based on certain revelations in the Force Complaint. (Docket Entry 232).

The Government opposed Ulbricht's motion, because "Force played no role in the investigation of Silk Road conducted by this Office; he was never contemplated as a witness at trial; and none of the trial evidence otherwise came from the USAO-Baltimore

in violation of 18 U.S.C. § 1956(a)(1)(A) and (B) (Count One); obstruction of justice, in violation of 18 U.S.C. § 1512(c)(2) (Count Two); and extortion under color of official right, in violation of 18 U.S.C. § 1951 (Count Three). (*United States v. Force*, No. 15 Cr. 319, Docket Entries 38, 47 (N.D. Cal.) (hereinafter "*Force*" Docket Entries). On or about October 19, 2015, Force was sentenced principally to 78 months' imprisonment. (*Force* Docket Entries 81, 88).

On or about August 31, 2015, Bridges pled guilty to an information charging him with money laundering, in violation of 18 U.S.C. § 1957 (Count One); and obstruction of justice, in violation of 18 U.S.C. § 1512(c)(2) (Count Two) (*Force* Docket Entries 36, 65). On or about December 7, 2015, Bridges was sentenced principally to 71 months' imprisonment. (*Force* Docket Entries 97, 100). The San Francisco USAO continues to investigate Bridges. (*See Force* Docket Entry 116, at 3).

investigation in which he was involved,” and because the USAO-San Francisco investigation never yielded any information that was exculpatory as to Ulbricht, “not before trial, not during trial, and not since.” (Docket Entry 230, at 22, 25).

On April 27, 2015, the District Court denied the defendant’s motion in its entirety. (A. 876-900). The District Court set forth the evidence at trial, calling it “overwhelming” and “unrebutted,” and noted that Ulbricht’s motion “does not address how any additional evidence, investigation, or time would have raised even a remote (let alone reasonable) probability that the outcome of the trial would be any different.” (A. 878-79; *see also* A. 893).

With respect to the investigation of Force and Bridges, the District Court found that it “remains unclear (as it always was) as to how any information relating to that investigation is material or exculpatory vis-à-vis Ulbricht.” (A. 892). Even after assuming, for the sake of argument, what the defense *might* have argued the omitted information *could* have revealed, the District Court rejected those possible defense theories as having “no basis in the record,” and amounting to “no more than speculation and premised on erroneous assumptions as to the scope of discovery obligations and the meaning of exculpatory evidence.” (A. 892). Finally, the District Court rejected Ulbricht’s assertion that he was prevented from “exploring potentially exculpatory avenues,” because although the Government “had an obligation to turn over favorable material evidence to prevent injustice; it had no obligation to keep Ulbricht continually ap-

prised of developments in a separate investigation.” (A. 893-94).

B. Applicable Law

1. The Government’s Discovery Obligations

a. Rule 16

The Government’s discovery obligations in criminal cases begin with Federal Rule of Criminal Procedure 16(a)(1)(E), which provides, in pertinent part, that the Government must disclose to the defense documents and objects that are “within the government’s possession, custody, or control” if they are “material to preparing the defense” or will be used by the Government in its case-in-chief at trial. Evidence is material to the defense “if it could be used to counter the government’s case or to bolster a defense,” but “information not meeting either of those criteria is not to be deemed material within the meaning of” Rule 16. *United States v. Stevens*, 985 F.2d 1175, 1180 (2d Cir. 1993) (interpreting the Rule’s predecessor, Fed. R. Crim. P. 16(a)(1)(C)).

“Materiality means more than that the evidence in question bears some abstract logical relationship to the issues in the case. There must be some indication that the pretrial disclosure of the disputed evidence would have enabled the defendant significantly to alter the quantum of proof in his favor.” *United States v. Maniktala*, 934 F.2d 25, 28 (2d Cir. 1991) (internal quotation marks omitted).

b. The Jencks Act

The Jencks Act provides that “[a]fter a witness called by the United States has testified on direct examination, the court shall, on motion of the defendant, order the United States to produce any statement . . . of the witness in the possession of the United States which relates to the subject matter as to which the witness has testified.” 18 U.S.C. § 3500(b).

The purpose of the statute is not to serve as a general vehicle for discovery, but rather to provide the defense with prior statements of Government witnesses for purposes of impeachment. *See United States v. Jackson*, 345 F.3d 59, 76 (2d Cir. 2003) (noting that the Jencks Act “does not normally mandate disclosure of statements made by a person who does not testify”).

c. Brady v. Maryland

The Government has an obligation under the Due Process Clause to disclose to the defendant material exculpatory and impeaching evidence. *See Brady v. Maryland*, 373 U.S. 83 (1963); *Giglio v. United States*, 405 U.S. 150 (1972). To warrant a new trial based on a violation of this obligation, “a defendant must show that: (1) the Government, either willfully or inadvertently, suppressed evidence; (2) the evidence at issue is favorable to the defendant; and (3) the failure to disclose this evidence resulted in prejudice.” *United States v. Coppa*, 267 F.3d 132, 140 (2d Cir. 2001). Thus, it is not enough to show that the Government failed to turn over any favorable evidence. A *Brady* or *Giglio* violation will result in a new trial only “if the

undisclosed information is ‘material,’ within the exacting standard of materiality established by the governing case law.” *United States v. Spinelli*, 551 F.3d 159, 164 (2d Cir. 2008); *accord United States v. Rivas*, 377 F.3d 195, 199 (2d Cir. 2004); *United States v. Middlemiss*, 217 F.3d 112, 123 (2d Cir. 2000).

Where a new trial is sought based on a proffered *Brady* violation, the Supreme Court has said that the “touchstone of materiality is a reasonable probability of a different result,” that is, whether “the government’s evidentiary suppression undermines confidence in the outcome of the trial.” *Kyles v. Whitley*, 514 U.S. 419, 434 (1995) (internal quotation marks omitted); *accord United States v. Bagley*, 473 U.S. 667, 682 (1985) (suppressed evidence is “material only if there is a reasonable probability that, had the evidence been disclosed to the defense, the result of the proceeding would have been different”); *Strickler v. Greene*, 527 U.S. 263, 281 (1999) (“[T]here is never a real ‘*Brady* violation’ unless the nondisclosure was so serious that there is a reasonable probability that the suppressed evidence would have produced a different verdict.”); *United States v. Douglas*, 525 F.3d 225, 244-45 (2d Cir. 2008); *United States v. Payne*, 63 F.3d 1200, 1209 (2d Cir. 1995) (“[U]ndisclosed evidence will be deemed material only if it ‘could reasonably be taken to put the whole case in such a different light as to undermine confidence in the verdict.’” (quoting *Kyles v. Whitley*, 514 U.S. at 435)). “While the trial judge’s factual conclusions as to the effect of nondisclosure are ordinarily entitled to great weight, this Court conducts its own independent examination of the record in determining whether the

suppressed evidence is material.” *United States v. Sessa*, 711 F.3d 316, 321 (2d Cir. 2013) (internal quotation marks omitted).

Moreover, “evidence is not considered to have been suppressed within the meaning of the *Brady* doctrine if the defendant or his attorney either knew, or should have known, of the essential facts permitting him to take advantage of that evidence.” *United States v. Paulino*, 445 F.3d 211, 225 (2d Cir. 2006) (internal quotation marks omitted). There can be no “suppression” for *Brady* purposes when the defense actually possessed the information in time for effective use at trial or to otherwise investigate the information, even if the evidence was produced after trial had begun. *See United States v. Coppa*, 267 F.3d at 144 (“[A]s long as a defendant possesses *Brady* evidence in time for its effective use, the government has not deprived the defendant of due process of law simply because it did not produce the evidence sooner.”).

2. Rule 17(c)

Rule 17(c) grants to criminal defendants and the Government the right to subpoena documents and objects to be introduced as evidence *at trial*, and further states that a court “may direct the witness to produce the designated items in court *before trial* or before they are to be offered in evidence.” Fed. R. Crim. P. 17(c) (emphasis added). However, the rule “was not intended to provide a means of discovery for criminal cases.” *United States v. Nixon*, 418 U.S. 683, 698 (1974). Although Rule 17(c) may be used to pro-

cure “evidentiary” materials in anticipation of trial, pretrial subpoenas “merely [constituting] a fishing expedition to see what may turn up” are not authorized by Rule 17(c) and should be quashed. *Bowman Dairy Co. v. United States*, 341 U.S. 214, 221 (1951). “It was not intended by Rule 16 to give a limited right of discovery, and then by Rule 17 to give a right of discovery in the broadest terms.” *Id.* at 220. Accordingly, a pretrial Rule 17(c) subpoena should not issue unless it meets three criteria: “(1) relevancy; (2) admissibility; (3) specificity.” *United States v. Nixon*, 418 U.S. at 700.

3. Standards of Review

Where a defendant’s *Brady* claim is raised in a motion for a new trial, the denial of that claim is reviewed on appeal for abuse of discretion, *United States v. Douglas*, 525 F.3d 225, 245 (2d Cir. 2008); *United States v. Gil*, 297 F.3d 93, 101 (2d Cir. 2002), like motions for a new trial, generally, *United States v. Rigas*, 583 F.3d 108, 125 (2d Cir. 2009); *United States v. Owen*, 500 F.3d 83, 87 (2d Cir. 2007).

Similarly, review of a district court’s discovery rulings, including rulings on motions to compel or to issue pretrial subpoenas, are also reviewed under the abuse of discretion standard. *See Nixon*, 418 U.S. at 702; *United States v. Abu-Jihaad*, 630 F.3d 102, 142 (2d Cir. 2010); *United States v. Rigas*, 583 F.3d at 125. Abuse of discretion occurs if a district court “based its ruling on an erroneous view of the law or on a clearly erroneous assessment of the evidence, or rendered a decision that cannot be located within the

range of permissible decisions.” *Sims v. Blot*, 534 F.3d 117, 132 (2d Cir. 2008) (alteration, citations, and internal quotation marks omitted)).

Finally, “the decision whether to grant a continuance is a matter traditionally within the discretion of the trial judge.” *United States v. O’Connor*, 650 F.3d 839, 854 (2d Cir. 2011) (internal quotation marks omitted). This Court “review[s] an order denying a continuance for abuse of discretion, and . . . will find no such abuse unless the denial was an arbitrary action that substantially impaired the defense.” *Id.* (internal quotation marks omitted).

C. Discussion

Ulbricht’s appeal based on the corruption of two Baltimore agents fails for the simple reason that, even now, Ulbricht has not explained how the information he sought to compel or admit was exculpatory. As the District Court remarked, “[e]ither the defense assumes the answer is so obvious that it need not explain, or its omission is purposeful.” (A. 892). Because Ulbricht has not identified any suppressed, exculpatory information, much less demonstrated that it could have impacted the verdict, his *Brady* claim should be rejected. That being the case, Ulbricht’s collateral claims, concerning his statutory discovery demands, limitations on his cross-examination, and his request for an adjournment, should likewise be rejected.

1. There Was No *Brady* Violation

As the District Court held, and the Government acknowledged, the prosecution team was under a continuing obligation to turn exculpatory information over to the defense, including any information that tended to show that evidence on either Ulbricht's laptop or the Silk Road servers was fabricated or compromised. (A. 694, 699; Docket Entry 227-1, at 70). Were there any evidence that Force, Bridges, or anyone else had planted or altered evidence, or that the Government's exhibits were otherwise unreliable, the Government would have been obligated to produce that information to the defense.

But the fact that two agents sold information to Ulbricht, attempted to extort him, and stole money from his customers' accounts through the Silk Road website, itself did nothing to undermine the reliability of the evidence found outside that website that demonstrated that Ulbricht was "Dread Pirate Roberts," including:

- A wide variety of documentary evidence on his laptop, created over many years, ranging from chat logs and journal entries; to Silk Road financial and employee records, a to-do list, and the very PGP key that "DPR" used to authenticate his messages; and \$18 million dollars' worth of Bitcoins, most of which were previously stored on the Silk Road servers (*supra* pages 22-25);

- The overlap between Ulbricht's personal email and Facebook accounts and chat logs recovered from his laptop (*supra* note 8); and
- The fact that Ulbricht was acting as *the* Silk Road administrator "Dread Pirate Roberts" at the moment he was arrested (*supra* pages 21-22).

Neither has Ulbricht explained how Force or Bridges, even with unauthorized Silk Road user accounts and the limited ability to reset other users' passwords (using the "Flush" account), could have manipulated the data that *was* admitted from the Silk Road servers (principally records establishing the type and volume of transactions conducted through the Silk Road website and private messages with and posts from "DPR" that demonstrated how that individual, whoever he was, ran Silk Road (Tr. 192-203, 207-64, 1783-1803)). Indeed, the Government offered the District Court "persuasive evidence that no such fabrication occurred." (A. 240-41, 691 (citing A. 666-67); *cf.* Tr. 273-74 (Agent Der-Yeghiayan's administrator account had limited privileges)).

Nowhere does Ulbricht explain how Force's and Bridge's crimes impeach the Government's "overwhelming" proof. (A. 878). If anything, Force's attempts to sell information to "DPR" or otherwise extort him were "*inculpatory* as [they] suggest[ed] that Ulbricht, as 'DPR,' was seeking to pay law enforce-

ment for inside information to protect his illegal enterprise.” (A. 893). And to the extent Ulbricht assumes that he should have been permitted to inform the jury that some of the agents who targeted him were corrupt, even though they neither testified nor developed the evidence against him, he is mistaken. Such a line of argument, without even the slightest nexus to the proof at trial, would have been far more prejudicial than probative and properly excluded on that basis. *See* Fed. R. Evid. 403; *United States v. Millan-Colon*, 836 F. Supp. 1007, 1013 (S.D.N.Y. 1993) (“[A]s the Government indicates that it will not offer evidence seized by any officer implicated in the corruption investigation and that those officers will not be in the chain of custody, any testimony regarding their misdeeds would be substantially more prejudicial than probative.”); *cf. United States v. Warme*, 572 F.2d 57, 62 n.6 (2d Cir. 1978) (deferring to district court’s decision not to order prosecution to turn over 3500 material concerning the investigation of defendant’s associates, which “was not relevant to any issue at trial”); *United States v. Lopez*, 577 F.3d 1053, 1057-58, 1067 (9th Cir. 2009) (undisclosed assessment that testifying informant was not reliable was not material under *Brady*, in part because his testimony “did not directly inculpate” defendant).¹⁷

¹⁷ Ulbricht asserts throughout his brief that he was precluded from admitting evidence of Force’s and Bridge’s misconduct (Br. 37), but in fact, the District Court indicated that it would, “over the course of the trial, entertain specific requests to use information

Ulbricht’s appeal rests on the unspoken assumption that, once the Government identified a pocket of corruption in sweeping law enforcement investigations of him, he was entitled to conduct his own independent inquiry, to ensure no exculpatory material existed anywhere in the federal government’s holdings. But that is not the law. “There is no general constitutional right to discovery in a criminal case, and *Brady* did not create one.” *Weatherford v. Bursey*, 429 U.S. 545, 559 (1977); see also *United States v. Polowichak*, 783 F.2d 410, 414 (4th Cir. 1986) (“*Brady* did not create a criminal right analogous to discovery in a civil case.”); *United States v. Evanchik*, 413 F.2d 950, 953 (2d Cir. 1969) (“Neither [*Brady*] nor any other case requires the government to afford a criminal defendant a general right of discovery.”). Nor does the defense have a “constitutional right to conduct his own search of the [Government’s] files to argue relevance.” *Pennsylvania v. Ritchie*, 480 U.S. 39, 59 (1987). “Unlike Rule 16 and the Jencks Act . . . *Brady* is not a discovery rule, but a rule of fairness and min-

from [the Government’s disclosures] on cross-examination,” and if the Government “open[ed] the door to specific information or facts develop which render particularized disclosure of facts or documents relevant, the Court will entertain a renewed application at that time” (A. 700). Ulbricht never sought to question any witnesses about the agents’ corruption or to proffer such evidence at trial, however, aside from the statements by “DeathFromAbove,” discussed below, *infra* Point I.C.5.

imum prosecutorial obligation” *United States v. Maniktala*, 934 F.2d 25, 28 (2d Cir. 1991) (internal quotation marks omitted); *see also United States v. Meregildo*, 920 F. Supp. 2d 434, 440 (S.D.N.Y. 2013) (“*Brady* is not a rule of discovery—it is a remedial rule.” (citing *Coppa*, 267 F.3d at 140)). It was the prosecution team’s duty to evaluate whether exculpatory information existed within its holdings. *See United States v. Agurs*, 427 U.S. 97, 109 (1976) (“If everything that might influence a jury must be disclosed, the only way a prosecutor could discharge his constitutional duty would be to allow complete discovery of his files as a matter of routine practice. . . . [T]he Constitution surely does not demand that much.”). Having concluded that it did not, however, the Government was entitled to protect the ongoing investigation of Force and Bridges from exposure, and to try Ulbricht with independently derived evidence.¹⁸

¹⁸ Ulbricht challenges the independence of this Office’s investigation from the investigations in Baltimore and San Francisco. (Br. 40-46). As previously discussed, the investigations were independent, as the agents involved in the Baltimore investigation played no role in the New York investigation, and none of the trial evidence came from the Baltimore investigation (*supra* page 40). In any event, whether those different prosecutors were part of the same prosecution team might bear on this Office’s duty to search for exculpatory material, *see United States v. Zagari*, 111 F.3d 307, 320 n.13 (2d Cir.1997); *United*

The fact that the Government disclosed the ongoing investigation “in an abundance of caution” (A. 649) was neither remarkable nor a concession that the existence of the Force investigation was actually exculpatory. (*Contra* Br. 38-39). The Government’s decision to go *beyond* what it perceived its *Brady* obligations to be, so that the defense would have the opportunity to litigate the question, was simply prudent practice, common in this District. *Cf. United States v. Agurs*, 427 U.S. at 108 (“The prudent prosecutor will resolve doubtful questions in favor of disclosure.”); A. 225 (Government’s practice of disclosing “in an abundance of caution” occurs “with relative frequency”). As the Government intended, the District Court encouraged the defense to alert the prosecutors to its theories, to help the Government ensure that it was complying with *Brady* in its continuing reviews (although the defense declined the offer). (A. 700).

Moreover, Ulbricht knew that \$350,000 had been stolen, apparently by a Silk Road employee, and potentially by “Flush,” a user whose account Force, Bridges, and the Baltimore Task Force controlled.

States v. Chalmers, 410 F. Supp. 2d 278, 289-90 (S.D.N.Y. 2006), but, as the District Court found, “whether the investigations proceeded separately or intersected has no bearing on whether any undisclosed materials relating to the Rogue Agents are exculpatory as to Ulbricht.” (A. 892 n.6).

(A. 664-65, 690-91). To the extent Ulbricht suspected that Force (or anyone else) had planted evidence on his laptop or elsewhere, the defense was free to examine those media forensically for signs of tampering. In other words, regardless of whether a law enforcement agent was responsible, knowledge that *someone* exploited a Silk Road administrator's credentials to steal money was enough information to lead the defense to investigate the authenticity of the Government's exhibits (assuming, of course, there was any connection between the two, which the Government disclaims). "Evidence is not 'suppressed' if the defendant either knew, or should have known, of the essential facts permitting him to take advantage of any exculpatory evidence." *United States v. Zackson*, 6 F.3d 911, 918 (2d Cir. 1993). This is because "[t]he rationale underlying *Brady* is not to supply a defendant with all the evidence in the Government's possession which might conceivably assist in the preparation of the defense, but to assure that the defendant will not be denied access to exculpatory evidence only known to the Government." *United States v. LeRoy*, 687 F.2d 610, 619 (2d Cir. 1982); *see also United States v. Zackson*, 6 F.3d at 918 (same). Since the defense was in the same position as the Government (insofar as the Government was unaware of any evidence tending to impeach the authenticity of its proof, but the defense was able to explore that possibility through forensic analysis), nothing was "suppressed" from the defense.

In seeking a new trial based on the suppression of exculpatory material, Ulbricht's burden is to point out information that calls into question the verdict

against him. *See United States v. Bagley*, 473 U.S. at 682; *Coppa*, 267 F.3d at 140. Since the fact of a collateral corruption investigation alone was inadmissible, and because “there is no basis . . . to believe that any undisclosed materials” relating to that investigation “would have been remotely useful, let alone exculpatory, vis-à-vis Ulbricht” (A. 892), he has failed to carry that burden.

2. The District Court Did Not Abuse Its Discretion in Denying Ulbricht’s Discovery Requests

The District Court also properly denied Ulbricht’s sweeping demand for discovery with respect to the Force investigation. (A. 669-72).

As the District Court found, the 28 requests for “any and all” information related to the investigation amounted to a “speculative fishing expedition” well-beyond Rule 16’s limitation to items “material to preparing the defense.” (A. 680 & n.9, 696-97). Fed. R. Crim. Pro. 16(a)(1)(E). For the same reasons that information about Force’s corruption was not itself exculpatory, “[d]efendant has not articulated a coherent and particular reason why the fact of SA Force’s investigation, or that fruits of that investigation, could themselves counter the government’s case or bolster a defense.” (A. 697 (internal quotation marks omitted)). “Such broad and speculative requests are inappropriate under Rule 16.” (A. 697). Since Ulbricht did not demonstrate how fulfilling his blunderbuss requests for information about Force “would have enabled [him] significantly to alter the quantum of *proof* in

his favor,” *Maniktala*, 934 F.2d at 28 (emphasis added), it was no abuse of discretion for the District Court to deny them under Rule 16. And for the same reason, it would have been inappropriate to approve pretrial subpoenas under Rule 17. *See Bowman Dairy Co. v. United States*, 341 U.S. at 221.

3. There Was No Abuse of Discretion in Denying an Adjournment

Based on the District Court’s denial of his discovery motion and the subsequent charges against Force and Bridges, Ulbricht argues he was entitled to an adjournment of trial until after the corruption investigation was complete. (Br. 37). But the defense’s adjournment request was based on a desire to wait until the “full nature of [Force’s] alleged misconduct is known, and available to [the] defense.” (A. 701). And as the District Court found, Ulbricht never “made a showing that either the fact of the Force Investigation or the information learned during that investigation is ‘needed to avoid a possible injustice.’” (A. 690).

In light of the defendant’s continued inability to posit how any information from that investigation would tend to exculpate Ulbricht, even now that Force and Bridges have been charged (and in light of the defendant’s two prior requests for adjournments (A. 877; Docket Entries 58, 78, 90)), it cannot be said that the denial was either “arbitrary” or that it “substantially impaired the defense,” so as to amount to an abuse of discretion. *United States v. O’Connor*, 650 F.3d at 854 (internal quotation marks omitted).

4. The Government Produced Jencks Act Material in a Timely Fashion

Ulbricht also argues that the manner in which the Government produced Agent Der-Yeghiayan's prior statements pursuant to the Jencks Act, 18 U.S.C. § 3500, violated *Brady*, because he lacked a sufficient opportunity to use the material to support his "alternative perpetrator" theory. (Br. 61-63).

Although Ulbricht asserts that 70 documents in the 3500 material "contained exculpatory material and information that was not provided to the defense at a time in which it could be used effectively at trial," the only defense they are proffered to support was the "alternative perpetrator" theory. (Br. 61 (citing A. 643-48)). But the materials in question were produced to Ulbricht on December 31, 2014, 13 days before trial (A. 889-90), and Ulbricht's counsel requested no adjournment *at that time* on that ground (A. 890). *See Douglas*, 525 F.3d at 245-46 (disclosure of 290 pages one day before trial does not constitute suppression); *see also United States v. Menghi*, 641 F.2d 72, 75 (2d Cir. 1981) (no *Brady* violation where, *inter alia*, defense counsel made no motion for a continuance to allow for further investigation); *United States v. Devin*, 918 F.2d 280, 290 (1st Cir. 1990) ("[T]he five day interval provided an adequate period within which to digest the substance of the materials and prepare for cross-examination."). Instead, as the District Court noted, counsel "displayed great familiarity with the Karpeles/Athavale Materials and used them repeatedly during cross examination." (A. 890). *See United States v. Rodriguez-Rivera*, 473 F.3d 21,

26 (1st Cir. 2007) (finding no *Brady* violation where “nothing within the . . . files was necessary to develop [the] theory” that defendant successfully explored through cross-examination and argued to the jury). Here, as below, “Ulbricht does not offer any explanation as to why there is a chance that he would not have been convicted had the defense been given more time to review the Karpeles/Athavale Materials.” (A. 890). “A defendant who claims that his hand was prematurely forced by delayed disclosure cannot rely on wholly conclusory assertions but must bear the burden of producing, at the very least, a *prima facie* showing of a plausible strategic option which the delay foreclosed.” *United States v. Devin*, 918 F.2d at 290. Here, there is “no reasonable probability that, had the evidence been disclosed to the defense” earlier, “the result of the proceeding would have been different.” *United States v. Nicolapolous*, 30 F.3d 381, 383-84 (2d Cir. 1994) (discussing materiality in the 3500 context).

Moreover, the fact that Agent Der-Yeghiayan pursued multiple leads in the course of his investigation, but rejected them conclusively, is not exculpatory. There is “no constitutional requirement that the prosecution make a complete and detailed accounting to the defense of all police investigatory work on a case,” including an “early lead the police abandoned.” *See Moore v. Illinois*, 408 U.S. 786, 795 (1972); *see also United States v. Sessa*, 711 F.3d 316, 322 (2d Cir. 2013) (“[T]he fact that the authorities diligently pursued other leads but found no evidence implicating any other person [does not] tend to exculpate [the defendant].”); *United States v. Amiel*, 95 F.3d 135, 145

(2d Cir. 1996) (“The government has no *Brady* obligation to communicate preliminary, challenged, or speculative information.” (internal quotation marks omitted)); *Canales v. Stephens*, 765 F.3d 551, 576 (5th Cir. 2014) (“[T]here is not a *Brady* violation every time the government does not disclose an alternative suspect, especially when the other suspect was not a particularly plausible one.”); *Hammond v. Hall*, 586 F.3d 1289 (11th Cir. 2009) (ruling that non-disclosed “evidence casting suspicion on” another murder suspect was not *Brady* material because it “d[id] not amount to much,” whereas “[o]verwhelming evidence” connected defendant to the crime). As described above, *see supra* page 28, Agent Der-Yeghiayan suspected Karpeles because he owned the servers that hosted a website related to Silk Road, and he suspected Athavale for even less reason (namely, some linguistic similarities between his writing and “DPR”s). In the face of the overwhelming evidence establishing that Ulbricht was “DPR,” and the *lack* of evidence that either Karpeles or Athavale were, even if (counterfactually) the Government had not disclosed those leads, they would not have qualified as material *Brady* information in the context of this case.

5. The District Court Properly Precluded Cross-Examination Using Force’s Hearsay Statements

Finally, Ulbricht challenges the District Court’s decision to preclude his cross-examination using statements by a Silk Road user, “DeathFromAbove,”

who threatened to expose “Dread Pirate Roberts” as Anand Athavale. (Br. 27-29, 37).

Although Ulbricht includes this issue in the section of his brief devoted to *Brady*, the prosecutors did not learn that “DeathFromAbove” was controlled by Force until *after* the defense proffered the relevant exhibit (A. 707, 710-11), and at trial, Ulbricht appeared to be offering the chat messages from “DeathFromAbove” in order to shore up his theory that “Dread Pirate Roberts” was Athavale (not Ulbricht), and not to delve into the Force investigation. (Tr. 672-79, 682, 813-19, 840; A. 712). The District Court correctly concluded that “DeathFromAbove”’s statements were hearsay that the defense was improperly seeking to introduce for the truth, and that in any event, the messages were more prejudicial than probative, since they were not substantial evidence of an “alternative perpetrator.” (Tr. 1871-73). *See Wade v. Mantello*, 333 F.3d 51, 61-62 (2d Cir. 2003) (“Although . . . a defendant has a right to attempt to establish his innocence by showing that someone else did the crime, a defendant still must show that his proffered evidence on the alleged alternative perpetrator is sufficient, on its own or in combination with other evidence in the record, to show a nexus between the crime charged and the asserted ‘alternative perpetrator.’”). This would be so, regardless of who “DeathFromAbove” was, but the fact that it was Force (whose “knowledge” can be traced to Agent Der-Yeghiayan’s initial investigation of Athavale) reduces the marginal probative value of this chat conversation to zero, because it merely recycles the basis for Agent Der-Yeghiayan’s cross-

examination through the misleading impression that a second source believed that Athavale was “DPR.” Because no defendant has “an unfettered right to offer testimony that is incompetent . . . or otherwise inadmissible under standard rules of evidence,” *Taylor v. Illinois*, 484 U.S. 400, 410 (1988), the District Court did not abuse its discretion in denying the defendant’s effort to introduce this chat conversation.

To the extent that Ulbricht sought to use this exhibit to reveal that a law enforcement agent (namely Force) was attempting to extort Ulbricht, that would have introduced the very same prejudicial, and irrelevant, argument that the District Court had denied Ulbricht discovery to develop. As described above, the fact that Force behaved corruptly in attempting to extort Ulbricht has no bearing on the independent evidence admitted against Ulbricht.

POINT II

The District Court’s Limitations on Cross-Examination Were Proper

A. Relevant Facts

1. Agent Der-Yeghiayan’s Testimony About Mark Karpeles

During cross-examination of Agent Der-Yeghiayan, defense counsel sought to advance its theory that the owner and operator of Silk Road was actually Mark Karpeles (who owned a Bitcoin exchange known as “Mt. Gox”), based on Agent Der-Yeghiayan’s earlier investigation of him. (Tr. 490-91,

494-96, 502-03; *see also* Tr. 541-47). For example, the defense elicited Agent Der-Yeghiayan's statements, in an application for a warrant to search Karpeles's email account, that there was probable cause to believe that Karpeles engaged in narcotics trafficking and money laundering and controlled the open Internet site, "silkroadmarket.org." (Tr. 527-30). When counsel sought to elicit what an informant had told Agent Der-Yeghiayan about Karpeles, however, the Government objected on hearsay grounds. (Tr. 530, 537). The Government also objected more generally to eliciting Agent Der-Yeghiayan's beliefs, rather than merely the facts he learned from investigating Karpeles (which might themselves be admissible). (Tr. 548-51). Judge Forrest indicated her tentative view that the defense was entitled to elicit that Agent Der-Yeghiayan investigated Karpeles, and how he did so, but she also invited briefing on the issue over the weekend and made clear that she had yet to reach a conclusion. (Tr. 537-38, 541, 552-57).

The defense also sought to elicit that Agent Der-Yeghiayan learned from federal prosecutors in Baltimore that Karpeles's attorney had told one of them that his client was willing to "tell the government who was behind Silk Road if he would not be prosecuted," which, he contended, demonstrated that Karpeles was trying to "set up Mr. Ulbricht." (Tr. 506-08, 512; *see also* A. 310-11). The Government objected, both on hearsay grounds and for lack of notice. (Tr. 514). Judge Forrest indicated that she was inclined to admit the fact that Karpeles's attorney made a proffer, but not for its truth (*i.e.*, that Karpeles actually knew anything about who was running

Silk Road), and she offered counsel the opportunity to brief that issue as well. (Tr. 522-23).

Over the weekend, the Government moved to strike testimony elicited from Agent Der-Yeghiayan concerning his initial beliefs about Karpeles's involvement, because a law enforcement officer's opinion about guilt is not probative, admissible evidence. (A. 312-15, 319). The Government also sought to preclude testimony concerning the hearsay statements of Karpeles's lawyer to Baltimore prosecutors, because those statements did not satisfy the requirements of Federal Rule of Evidence 807. (A. 315-17). Finally, the Government urged the District Court to reject evidence of an "alternative perpetrator" unless the defense established, through competent evidence, a "substantial" nexus between that perpetrator and the crime, as case law requires. (A. 317-18). In response, the defense argued Agent Der-Yeghiayan himself had established the requisite nexus between Karpeles and the crimes charged; that Karpeles's attorney's statements were not themselves hearsay (and that the repetition of those statements to Agent Der-Yeghiayan satisfied Rule 807); and that any objection was untimely. (A. 326-33).

In ruling, the District Court acknowledged the defense's right to pursue an "alternative perpetrator" theory and admit "competent . . . evidence" in favor of it, but that would not include the "thoughts and beliefs" of Agent Der-Yeghiayan, which, it ruled, were "irrelevant." (Tr. 575, 577). In providing examples of proper questions, the District Court made clear that Agent Der-Yeghiayan's firsthand knowledge of facts,

based on his investigation of Karpeles, could be admitted, but his suspicions or instincts could not be. (Tr. 579-80). As to Karpeles's attorney's proffer, the District Court found that the offer to provide information was not, itself, probative of any disputed issue of fact, and to the extent it invited the jury to speculate (contrary to fact) that Karpeles had inside knowledge about who was responsible for Silk Road (which, as it turns out, he did not), his lawyer's proffer was more prejudicial than probative. (Tr. 580-81).

The District Court invited the Government to propose specific portions of the testimony that should be struck, based on its ruling (Tr. 583-84, 589), which the Government did (A. 334-41), and which the District Court adopted (Tr. 646, 647). To avoid drawing extra attention to that testimony, the District Court did not point out to the jury the particular questions and answers that were struck and instead instructed it generally to disregard any testimony from Agent Der-Yeghiayan concerning his "personal beliefs or suspicions he may have had about particular individuals at various points during his investigation." (Tr. 646-47, 974). The jury did not request Agent Der-Yeghiayan's testimony during its deliberations and never saw it redacted. (Tr. 2329-38).

The defense then continued its cross-examination of Agent Der-Yeghiayan, which included many questions about Karpeles, most of which were proper. (Tr. 651-54, 659-72, 681-82). Over the course of cross-examination, defense counsel established that (1) Karpeles owned Mt. Gox, a large Bitcoin exchange (Tr. 490, 494); (2) Karpeles is a computer developer

systems administrator and a self-proclaimed hacker (Tr. 495); (3) Agent Der-Yeghiayan investigated Karpeles (Tr. 491-92, 672); (4) as did the Department of Homeland Security, which seized several million dollars from a Karpeles company in May 2013 (Tr. 497-98); (5) the website “silkroadmarket.org”—the website on the regular Internet that provided instructions on how to access Silk Road on Tor—was registered to Karpeles’s company (Tr. 500-01); and (6) websites run by Karpeles had software features in common with Silk Road (Tr. 659-61, 663).

On redirect, the Government elicited testimony from Agent Der-Yeghiayan to clarify that the software used by Karpeles’s websites and Silk Road was freely available and widely used (Tr. 742-45), that the silkroadmarket.org website was merely one of many websites hosted by a company that Karpeles controlled (Tr. 751-53), and that it was registered using an alias found on Ulbricht’s laptop (Tr. 809-11).

2. Thomas Kiernan’s Testimony About Ulbricht’s Computer

During his direct examination, FBI Computer Scientist Thomas Kiernan testified as a percipient lay witness to the seizure and review of Ulbricht’s laptop. (Tr. 852-71). His testimony was limited to (1) what he saw on Ulbricht’s laptop on the day of the arrest (*e.g.*, Tr. 859-71); (2) what he later found when reviewing a copy of Ulbricht’s laptop’s hard drive (*e.g.*, 872, 880-81, 886-87); and (3) what certain documents from Ulbricht’s laptop said (*e.g.*, Tr. 898-904, 921-22).

On cross-examination, the District Court precluded, as beyond the scope of direct examination, three lines of questioning concerning: (1) whether the FBI permitted Kiernan to run BitTorrent (a file sharing software that Ulbricht was using at the time of his arrest) on his work computer, in light of the security hazards it presented (Tr. 1072-74); (2) whether Kiernan could interpret certain computer code (obtained from Ulbricht's laptop), to determine whether someone who logged onto the Silk Road website using "DPR"'s username and password would automatically be directed to the "Mastermind" page, from which "DPR" administered Silk Road (Tr. 1081, 1084-88); and (3) and the Linux "kernel," including whether Kiernan's version of TorChat (one of the programs "DPR" used to communicate with Silk Road staff) ran on the same version of Linux that Ulbricht had installed on his computer (Tr. 1089-94).

B. Applicable Law

1. The Confrontation Clause

While the Confrontation Clause of the Sixth Amendment guarantees a defendant the right to cross-examine witnesses and present a defense, the scope and extent of cross-examination are committed to the sound discretion of the trial judge. *See United States v. Figueroa*, 548 F.3d 222, 227 (2d Cir. 2008); *United States v. Wilkerson*, 361 F.3d 717, 734 (2d Cir. 2004). District courts are responsible for supervising the "mode . . . of examining witnesses" so as to make the presentation effective for "determining the truth" and to "avoid wasting time." Fed. R. Evid. 611(a).

In carrying out this responsibility, the district judge has “wide latitude insofar as the Confrontation Clause is concerned to impose reasonable limits on . . . cross-examination based on concerns about, among other things, harassment, prejudice, confusion of the issues, the witness’ safety, or interrogation that is repetitive or only marginally relevant.” *Delaware v. Van Arsdall*, 475 U.S. 673, 679 (1986); see also *United States v. Crowley*, 318 F.3d 401, 417 (2d Cir. 2003); Fed. R. Evid. 403. Additionally, “[c]ross-examination should not go beyond the subject matter of the direct examination and matters affecting the witness’s credibility.” Fed. R. Evid. 611(b). Only upon showing that the district court abused its “broad discretion” to “restrict cross-examination” is a defendant entitled to relief on appeal. *United States v. Crowley*, 318 F.3d at 417. “To find such an abuse, [this Court] must be persuaded that the trial judge ruled in an arbitrary and irrational fashion.” *United States v. Pipola*, 83 F.3d 556, 566 (2d Cir. 1996).

An error in limiting cross-examination should be disregarded if the error is harmless. See Fed. R. Crim. P. 52(a). “The correct inquiry is whether, assuming that the damaging potential of the cross-examination were fully realized, a reviewing court might nonetheless say that the error was harmless beyond a reasonable doubt.” *Delaware v. Van Arsdall*, 475 U.S. at 684. The principal factors to be considered in assessing the effect of the confrontation error are (1) the importance of the witness’s testimony, (2) whether that testimony was cumulative, (3) the presence of contradictory evidence on material points, (4) the extent of cross-examination otherwise permit-

ted, and (5) the strength of the evidence against the defendant. *Id.*; accord *Cotto v. Herbert*, 331 F.3d 217, 254 (2d Cir. 2003).

2. Alternative Perpetrator Evidence

Although “a defendant has a right to attempt to establish his innocence by showing that someone else did the crime,” he “must show that his proffered evidence on the alleged alternative perpetrator is sufficient, on its own or in combination with other evidence in the record, to show a nexus between the crime charged and the asserted ‘alternative perpetrator.’” *Wade v. Mantello*, 333 F.3d at 61-62 (internal quotation marks omitted). “[U]nsupported speculation that another person may have done the crime” will not suffice, because “[s]uch speculative blaming intensifies the grave risk of jury confusion, and it invites the jury to render its findings based on emotion or prejudice.” *Id.* at 62 (internal quotation marks omitted); see also *DiBenedetto v. Hall*, 272 F.3d 1, 8 (1st Cir. 2001) (“Evidence that tends to prove a person other than the defendant committed a crime is relevant, but there must be evidence that there is a connection between the other perpetrators and the crime, not mere speculation on the part of the defendant.”); *People of Territory of Guam v. Ignacio*, 10 F.3d 608, 615 (9th Cir. 1993) (requiring “substantial evidence tending to directly connect that person with the actual commission of the offense” (internal quotation marks omitted)).

In light of this principle, courts have excluded such evidence where, for example, there was evidence

that a third-party had the motive to murder a victim but not the opportunity, *see Wade*, 333 F.3d at 60, and where an undercover informant had information about other extremists in the area who shared the defendant's political views, but no evidence tied them to the crime at issue, *United States v. McVeigh*, 153 F.3d 1166, 1188-92 (10th Cir. 1998), and where the only concretely identified third parties "could not possibly have been" responsible for the crime, *DiBenedetto v. Hall*, 272 F.3d at 9.

3. Opinions of Law Enforcement Agents

Evidence must be relevant to be admissible. Fed. R. Evid. 402. Evidence is relevant when "it has any tendency to make a fact [of consequence] more or less probable." Fed. R. Evid. 401. But as this Court has made clear, "[t]he agent's state of mind as the investigation progressed is ordinarily of little or no relevance to the question of the defendant's guilt." *United States v. Johnson*, 529 F.3d 493, 501 (2d Cir. 2008); *accord United States v. Reyes*, 18 F.3d 65, 70-72 (2d Cir. 1994); *see also* Fed. R. Evid. 701 (limiting lay opinion to that which is "rationally based on the witness's perception").

Nor is such testimony made relevant if the agent attempts to explain the basis for his belief by summarizing, even at a general level, what led him to his conclusion. It only makes matters worse for an agent to give, for example, the "imprecise assurance that his belief is based on information from other people, actual physical evidence, and verification through interviewing the people who are involved." *United*

States v. Johnson, 529 F.3d at 499 (internal quotation marks omitted); *see also United States v. Garcia*, 413 F.3d 201, 211 (2d Cir. 2005) (finding it was “error to allow law enforcement witnesses to express opinions as to the defendant’s culpability based on the totality of information gathered in the course of their investigations”); *United States v. Grinage*, 390 F.3d 746, 750-51 (2d Cir. 2004) (rejecting opinion testimony from law enforcement agent who had listened to the contents of a wiretap). This is because, when an agent evaluates an individual’s guilt based on the “entirety’ or ‘totality’ of information gathered in an investigation,” “he is not presenting the jury with the unique insights of an eyewitness’s personal perceptions,” as Rule 701 requires. *United States v. Garcia*, 413 F.3d at 211.

C. Discussion

1. Agent Der-Yeghiayan’s Testimony Was Properly Limited to Facts

The District Court properly instructed the jury not to consider Agent Der-Yeghiayan’s “personal beliefs or suspicions he may have had about particular individuals at various points during his investigation.” (Tr. 974). Ulbricht does not dispute that instruction was accurate, nor does he identify relevant, admissible evidence that was excluded under this rule or otherwise demonstrate, specifically, how it prejudiced him. Contrary to the suggestion of his brief on appeal, Ulbricht was free to pursue his alternative perpetrator theory (*contra* Br. 63-71), and the District Court’s

rulings limiting him to competent evidence were no abuse of discretion.

Ulbricht does not really dispute that a law enforcement agent's opinion about the guilt of an individual is inadmissible, because it is irrelevant, *see Garcia*, 413 F.3d at 211, other than to imply without support that the rule simply does not apply when it is the defendant who seeks to admit the agent's opinion, as opposed to the Government. (Br. 66 (distinguishing cases based on whether they "protect[]" the defendant's rights)). But the Rules of Evidence do not distinguish between inculpatory and exculpatory evidence: "Relevant evidence is admissible. . . . Irrelevant evidence is not admissible." Fed. R. Evid. 402. And Agent Der-Yeghiayan's belief, early in the investigation, that Karpeles and one of his employees might be responsible for Silk Road, was clearly irrelevant to Ulbricht's guilt. (A. 336-37). The District Court's decision to strike those portions of testimony that elicited Agent Der-Yeghiayan's "beliefs," "theories," and "conclusions" was clearly correct. (A. 336-41 (highlighting stricken testimony)).¹⁹

¹⁹ Although Ulbricht contends otherwise, the Government's objections were timely. (*Contra* Br. 70-71). Rule 103 of the Federal Rules of Evidence requires a "timely" objection or motion to strike, but it does not define timeliness. Although an objection should generally be interposed "after the question has been asked but before an answer has been given, this rule is not inflexible." *Hutchinson v. Groskin*, 927

F.2d 722, 725 (2d Cir. 1991). Courts do “not necessarily find an objection affirmatively waived because it might have been interposed a few questions earlier in the midst of a hotly-contested trial, particularly where the grounds for the objection are not immediately apparent.” *United States v. Pujana-Mena*, 949 F.2d 24, 33 (2d Cir. 1991). And where, as here, “it became increasingly apparent exactly what the [defense] was attempting to accomplish through” its cross-examination, courts have allowed greater flexibility and have not insisted upon immediate, fully fleshed out objections. *United States v. Check*, 582 F.2d 668, 676 (2d Cir. 1978). Here, the Government repeatedly objected after the purpose and extent of defense counsel’s questioning became more clear. (*E.g.*, Tr. 509, 530).

And even if the Government’s objection was untimely, the District Court, which could have stricken the testimony *sua sponte*, see *United States v. Pisani*, 773 F.2d 397, 402 (2d Cir. 1985), had the discretion to grant the Government’s request for relief, see *United States v. Achiekwele*, 112 F.3d 747, 754 (4th Cir. 1997) (explaining that Rule 103 “provide[s] that a party must object timely *in order to preserve the issue for appellate review*” and “do[es] not address the power of a district court to exclude evidence in the first instance after a late objection” (emphasis added)); 21 Charles Alan Wright & Kenneth W. Graham, Jr., *Fed. Prac. & Pro.* § 5037.1 (2d ed. 2005) (“[T]he trial judge has discretion to sustain an objection even though it was untimely.”).

Moreover, nothing in that ruling precluded Ulbricht from pursuing his alternative perpetrator theory, based on the evidence that Agent Der-Yeghiayan gathered (and which he was competent to sponsor), for example, that Karpeles was a self-described hacker who ran a major Bitcoin exchange, who was targeted by law enforcement, and had connections (albeit superficial ones) to Silk Road. *See supra* pages 64-65. Indeed, Ulbricht argued that very theory to the jury in summation. (Tr. 2205, 2007-09).²⁰

Even if the District Court erred in striking any of Agent Der-Yeghiayan's responses, there was no prejudice to Ulbricht, because he failed entirely to demonstrate a sufficient "nexus between the crime charged and the asserted 'alternative perpetrator'" to justify admitting *any* of the evidence against Karpeles. *Wade*, 333 F.3d at 61-62. The only objective link between Karpeles and Silk Road was the fact that Karpeles ran a webhosting company that hosted, among other websites, one that provided directions

²⁰ Nor was Ulbricht prejudiced by the District Court's rejection of his request for an adjournment to digest its ruling. (Br. 64). As the District Court noted, once the Government raised the issue, defense counsel had a long weekend to prepare to properly elicit any facts that had been admitted based on improper questioning (Tr. 648-49), and the stricken testimony was hardly so voluminous as to preclude such preparation by one of the defendant's three trial lawyers, even on the morning of the ruling (A. 334-341).

on how to reach Silk Road through Tor (Tr. 379), which, by itself, provided no basis for a rational jury to conclude that Karpeles was “Dread Pirate Roberts” (especially given the evidence that it was Ulbricht who registered that website (Tr. 809-11)). The facts that Karpeles owned a Bitcoin exchange and that websites associated with him used publicly available software also used by the Silk Road website (Tr. 502-03, 742-45), are no more probative than the fact that extremists in Oklahoma besides Timothy McVeigh considered attacking the Murrah Federal Building (a fact that was excluded from McVeigh’s trial). See *United States v. McVeigh*, 153 F.3d at 1188-92. Ulbricht’s only response is that Agent Der-Yeghiayan “provided the requisite nexus between the alternate perpetrator and specific offenses here” (Br. 69), by which he must mean that Agent Der-Yeghiayan’s decision to investigate Karpeles was itself sufficient. Not so: Agent Der-Yeghiayan’s hunch, instinct, opinion, or the like was not competent to satisfy *Wade*. Accordingly, the District Court would have been justified in excluding more than it did.

This case is easily distinguished from those relied upon by the defense (Br. 69-70), where an alternate suspect had been identified, who lived near the crime, whose first name, physical characteristics, and automobile’s color and appearance “were consistent with the descriptions given to the police by eyewitnesses to the shooting,” but whom the NYPD never pursued, *Alvarez v. Ercole*, 763 F.3d 223, 230-32 (2d Cir. 2014); where the defense was entirely precluded from cross-examining a witness, the “only living person” to identify the defendant as a shooter, on his hearsay identi-

fication, *Cotto v. Herbert*, 331 F.3d at 223-24, 249; or where the crux of the error was a failure to disclose *Brady* material to the defense, *Kyles*, 514 U.S. at 432-41, 453.

Finally, even if the District Court erred (and it did not), any error was harmless, in light of “the extent of cross-examination otherwise permitted,” *Cotto*, 331 F.3d at 254 (internal quotation marks omitted), the fact that the jury never asked to read Agent Der-Yeghiayan’s testimony during deliberations, and “the overall strength of the prosecution’s case,” *id.* (internal quotation marks omitted), which was overwhelming.

2. The District Court Properly Excluded the Fourth-Hand Hearsay of Karpeles

It was also entirely proper to strike (and preclude) testimony that Agent Der-Yeghiayan had heard from one federal prosecutor, who heard from another federal prosecutor, who heard from Karpeles’s lawyer, that Karpeles was willing to share who he thought was running Silk Road in exchange for immunity. (Tr. 580-81; A. 340-41).

Each of those nested statements was itself hearsay, offered for the purpose of showing that each declarant in the chain had been told “the truth of the matter asserted.” Fed. R. Evid. 801(c)(2). Although Ulbricht maintained that he was not offering Karpeles’s statement for its truth (Tr. 584-85), Karpeles’s offer was irrelevant *unless* one believed that he actually had information to give. Indeed, Ulbricht’s counsel sought to admit Karpeles’s offer so as to imply

that Karpeles was a Silk Road insider (to support counsel's stated theory that Karpeles was actually responsible for Silk Road). (Tr. 586).

There was no basis to admit this compound hearsay. Although the so-called "residual exception" permits admission of hearsay not specifically covered by an exception, the statement must have "equivalent circumstantial guarantees of trustworthiness," be "evidence of a material fact," and be more probative than any other evidence the proponent can obtain through "reasonable efforts." Fed. R. Evid. 807. As this Court has repeatedly noted, the residual hearsay exception is meant to "be used very rarely, and only in exceptional circumstances." *Parsons v. Honeywell, Inc.*, 929 F.2d 901, 907 (2d Cir. 1991) (citation omitted); *see also United States v. DeVillio*, 983 F.2d 1185, 1190 (2d Cir. 1993) (residual hearsay exception is "applied in the rarest of cases").

Even assuming "exceptional circumstances" justified application of the exception in the "interests of justice," Fed. R. Evid. 807(a)(4), and that it would have been unreasonable to expect Ulbricht to seek testimony directly from Karpeles's lawyer (it was not), Ulbricht has not satisfied the other requirements of the rule. First and foremost, the record reveals that Karpeles's information concerned a suspicious account at Mt. Gox that, he believed, was associated with Silk Road. (A.310-12). Eliciting *only* the offer to provide information, but not his basis of belief, would have falsely (and unfairly) implied that Karpeles was himself criminally responsible for Silk Road (which, of course, was the defense's goal). The

statement was not, therefore, “evidence of a material fact,” or at least, not the fact that the defense sought to prove. Fed. R. Evid. 807(a)(2).

Second, Karpeles’s statement lacked “circumstantial guarantees of truthfulness” that are “equivalent” to existing hearsay exceptions. Fed. R. Evid. 807(a)(1). Knowing that he was the target of a criminal investigation (Tr. 507-08), Karpeles had the incentive to exaggerate his knowledge in order to appear valuable enough to law enforcement to obtain a meeting with them. Indeed, conditioning his offer on immunity, and conveying it through counsel, distinguishes his statement from one that might have been admitted, under different circumstances, as an admission against penal interest. *See* Fed. R. Evid. 804(b)(3)(A). That Karpeles’s statement lacks “equivalent” guarantees of trustworthiness counseled against admitting it. Fed. R. Evid. 807(a)(1).

Finally, although the District Court struck this testimony as a formal matter (A. 340-41), since the jury heard it, and nothing about the District Court’s curative instruction addressed it (Tr. 974), Ulbricht probably received an unjustified benefit from this testimony, notwithstanding the fact the District Court granted the Government’s motion. He certainly was not unfairly prejudiced.

3. The District Court Reasonably Limited Cross-Examination of Kiernan to the Scope of His Direct Testimony

Finally, as to Kiernan, Ulbricht argues that the District Judge abused her discretion by excluding a

few questions as irrelevant or beyond the scope of the Government's direct examination. (Br. 75-76). To the contrary, the District Court's limitations were sensible ones, in light of the scope of Kiernan's direct testimony, and in any event, the defense made the points it sought to before the jury.

First, the defense sought to establish that the software program BitTorrent, which Ulbricht was running at the moment he was arrested, was not secure. (Br. 76). It did so by asking Kiernan a slew of questions about the security of BitTorrent (Tr. 1068-72, 1108-09), establishing, among other things, that seven other computers were connected to Ulbricht's computer at the time he was arrested (Tr. 1069-70), that running BitTorrent required an open port to the Internet on Ulbricht's laptop, exposing him to hackers (Tr. 1070-72), and that file sharing of that type could have exposed Ulbricht's laptop to malware (Tr. 1071). The only question the District Court *sua sponte* precluded was whether the *FBI* permitted *Kiernan* to run BitTorrent at work (Tr. 1072), because it was "irrelevant" and "beyond the scope" of Kiernan's testimony on direct examination (Tr. 1073-74). This ruling was proper, because the *FBI*'s network security practices were "far afield" from any issues in the case and would be based on a variety of factors beyond the scope of this case. (Tr. 1073).

Second, although Kiernan remembered that Ulbricht had been logged into the "Mastermind" page of the Silk Road website (Tr. 864-70), he could not tell, from reviewing the purported code for that webpage, whether a user who logged into Silk Road using

“DPR”’s username and password would automatically be directed to that page (Tr. 1081). During the break at that point in the testimony, the District Court admonished the defense to remain within the scope of direct examination, which was “quite narrow,” and not attempt to turn Kiernan into a “generalized computer expert.” (Tr. 1084-88). Defense counsel protested that Kiernan could be questioned with respect to any aspect of the laptop he sponsored, but the District Court disagreed. (Tr. 1085). This was a reasonable limitation, *see* Fed. R. Evid. 611(b), and in any event, the defense has not identified what testimony was excluded that Kiernan was competent to provide.

Finally, the District Court precluded the defense from asking Kiernan a few questions about the Linux “kernel,”²¹ including whether, when Kiernan tested TorChat, he was running it on the same version of Linux (or “kernel”) that Ulbricht had installed on his laptop. (Br. 76). Even if that particular question were within the scope of Kiernan’s direct (and it was not, since Kiernan offered only high-level descriptions of how his copy of TorChat worked (Tr. 887-90)), any error was harmless, because defense counsel elicited the limits of Kiernan’s knowledge about the operation

²¹ The “kernel” refers to the core of an operating system, like Linux. *See Network Prot. Scis., LLC v. Fortinet, Inc.*, No. C 12-01106 WHA, 2013 WL 146033, at *5 (N.D. Cal. Jan. 14, 2013); *VMWare, Inc. v. Connectix Corp.*, No. C 02-3705 CW, 2005 WL 6220090, at *14 (N.D. Cal. Mar. 25, 2005).

of TorChat on *Ulbricht's* computer, such as whether the chats stored on Ulbricht's computer could have been altered (Tr. 1075-76, 1097), or whether they were necessarily created on Ulbricht's laptop at all (Tr. 1077). Defense counsel also elicited possible differences in the operation of TorChat on Kiernan's computer and on Ulbricht's laptop, as Kiernan did not know what version of TorChat Ulbricht used, whether Kiernan had used the same version, and whether Kiernan had installed TorChat in the same way Ulbricht had, nor did Kiernan test TorChat on Ulbricht's laptop (Tr. 1092-95). Having made the basic point, the District Court had the discretion to limit defense counsel's cross-examination to "avoid wasting time," Fed. R. Evid. 611(a).

In all respects, then, the District Court reasonably limited defense counsel's cross-examination to matters within the scope of Kiernan's direct examination, and the defense has not shown that it was prejudiced by those limits.

POINT III

The District Court Properly Precluded Expert Testimony that Was Proffered Without Adequate Disclosure

A. Relevant Facts

1. Pretrial Proceedings

The Indictment in this case charged Ulbricht with designing, owning, and operating an online marketplace that used “a Bitcoin-based payment system” to facilitate illegal commerce, including by concealing the identities and locations of its users. (A. 150-51, 161). The criminal complaint on which Ulbricht was arrested (the “Complaint”) explained in more detail how Ulbricht used that payment system to construct “the most sophisticated and extensive criminal marketplace” then on the Internet. (A. 53, 59-61). It also summarized data extracted from the Silk Road servers, including the value of Bitcoin transactions conducted through the site. (A. 61-62).

In March 2014, 10 months before trial, the Government produced in discovery copies of the Silk Road servers (including evidence of Bitcoin transactions), a copy of Ulbricht’s laptop (including the Bitcoin wallets thereon), and evidence of what Ulbricht was doing on his laptop at the time of his arrest. (Docket Entry 70-1; A. 363).

Five weeks before trial, on December 3, 2014, the Government produced most of its proposed trial ex-

hibits, including those derived from the Silk Road servers and Ulbricht's laptop. (Docket Entry 96).

On December 29, 2014, the Government "reiterate[d] its requests for reciprocal discovery from the defense," including, pursuant to Federal Rule of Criminal Procedure 16(b)(1)(B), the "disclosure of any results or reports of any scientific text or experiment that the defense intends to use . . . or that relates to the testimony of any witness that the defense intends to call who prepared any such report," and, pursuant to Rule 16(b)(1)(C), the "disclosure of a written summary of any expert testimony the defendant intends to use at trial." (A. 397).

As of the start of trial, on January 13, 2015, the defense had not provided any expert disclosure.

2. The Trial Begins

In its opening statement, the Government summarized the evidence it intended to introduce, including the fact that Ulbricht's laptop "contained the defendant's enormous profits" from running Silk Road, in the form of "[B]itcoins worth approximately \$18 million at the time of his arrest." (Tr. 55).

During its opening, the defense countered with its theory that, although the defendant had created Silk Road, the "real DPR" had framed Ulbricht by planting files on his computer, and that because Ulbricht was the originator of the site and a Bitcoin investor, he was the perfect "fall guy" when law enforcement closed in on Silk Road. (Tr. 61-65).

On the second day of trial, January 14, 2015, the District Court asked defense counsel to estimate the length of any defense case, including “whether or not [he] had a computer expert in [his] pocket who [he] w[as] thinking of having on the stand for a week.” (Tr. 124-25). The Government noted that it had received no expert notice and would object to an untimely notice. (Tr. 125). The District Court said it had assumed that “all the required notices” were being given, and the defense responded that “as soon as [it had] a firm intention to call a witness, [it would] provide it,” “at the earliest possible rather than the latest.” (Tr. 125).

As discussed above, *see supra* page 66, during cross-examination of Kiernan, the District Court sustained various objections that the defense’s questions were outside the scope of direct, but it reminded the defense that, if it “complied with the appropriate disclosure requirements,” it could call its own witnesses, including an expert. (Tr. 1084; *see also* Tr. 670-71 (sustaining objection on basis that SA Der-Yeghiayan is “not an expert witness to talk about the evidence of hacking”), 1073-74 (sustaining objection on basis that defense was “trying to make [Kiernan] into a general expert on BitTorrent” which was “far afield” of his testimony), 1084-88 (limiting scope of Kiernan cross to scope of direct)).

In addition, in response to the defense’s opening statement, the Government called a former FBI Special Agent, Ilhwan Yum, to preempt the claim that the defendant had earned the approximately \$18 million worth of Bitcoins recovered from his laptop

through innocent investing and trading. (*See* Tr. 1637-58, 1661-67, 1673-75, 1683-97).

3. The Defense's Expert Notice

On January 26, 2015, the defense notified the Government that it intended to call Andreas M. Antonopolous as an expert witness on Bitcoin. (A. 349-50). The notice listed eight "subjects" of "expert opinion testimony," such as "the origins of Bitcoin" and their "purposes and uses," the "value of Bitcoin over time," and the "ability to tie Bitcoins from Silk Road to Mr. Ulbricht," although it did not describe the substance of the testimony or any opinions it would include. (A. 349-50). The Government moved to preclude Antonopolous's testimony, arguing that the anticipated topics of his testimony, to the extent the Government discerned them, were either not relevant to the case or not the proper basis for expert testimony. (A. 342-48).

On January 30, 2015, the defense notified the Government that it intended to call another witness, Steven M. Bellovin, to provide expert testimony on six subjects, including "[g]eneral principles" of "internet security," "public-key cryptography," and other technical matters, and to explain certain computer code produced in discovery. (A. 360). The Government likewise moved to preclude his testimony, on the ground that the notice was insufficient. (A. 354-59).

The defense opposed the Government's motions on January 31 and February 1, 2015. (A. 380-84; 385-89).

4. The District Court's Preclusion Order

On February 1, 2015, the District Court issued an opinion granting the Government's motions to preclude both expert witnesses. (A. 362-79). After reciting the relevant procedural history of the case, illustrating the length of time during which defense counsel had the opportunity to develop its defense (A. 362-66), the District Court first observed that the disclosure letters for both experts were lacking (1) "any expected opinions," (2) "the bases for such opinions," (3) "any description of analysis or methodology," and, (4) in the case of Antonopoulos, "any indication that [he] has any expertise in the areas in which he seeks to testify." (A. 366).

The District Court found that this "tactical choice" not to comply with Rule 16 (A. 367), which the defense failed to cure in its response to the Government's motions to preclude (A. 373), left it "unable to determine what Antonopoulos'[s] and Bellovin's opinions are," whether their views are relevant, whether their methods are reliable, and whether they are even qualified. (A. 376). Nor could the District Court weigh the probative value of their testimony against its potential for prejudice, as required by Rule 403. (A. 378).

Finally, the District Court evaluated remedies short of preclusion. Finding that the Government would be "at a plain and unfair disadvantage in countering such testimony" (A. 378), given that it was resting the next day, and the witnesses were "on deck" (A. 369), the District Court declined to continue the trial, because doing so could lead to the potential

dismissal of one or two jurors who had “timing issues” (A. 369). Accordingly, the District Court declined to order a continuance and granted the Government’s motions to preclude. (A. 369).

B. Applicable Law

In light of district courts’ established “gatekeeping” role with regard to expert testimony based on scientific, technical, or “other specialized” knowledge, *see Kumho Tire Co. v. Carmichael*, 526 U.S. 137, 141 (1999); *Daubert v. Merrell Dow Pharmaceuticals*, 509 U.S. 579, 597 (1993), the admission or exclusion of expert testimony is committed to the broad discretion of the trial court, *see Hamling v. United States*, 418 U.S. 87, 108 (1974); *Boucher v. U.S. Suzuki Motor Corp.*, 73 F.3d 18, 21 (2d Cir. 1996); *United States v. DiDomenico*, 985 F.2d 1159, 1163 (2d Cir. 1993). Accordingly, this Court reviews a district court’s decision to admit or exclude expert testimony for abuse of discretion, *Kumho Tire Co. v. Carmichael*, 526 U.S. 137 at 158, and “a decision to exclude expert testimony . . . shall be sustained unless manifestly erroneous,” *United States v. Lumkin*, 192 F.3d 280, 289 (2d Cir. 1999) (internal quotation marks omitted); *United States v. Cruz*, 363 F.3d 187, 192 (2d Cir. 2004).

Federal Rule of Criminal Procedure 16(b)(1)(C) provides, in relevant part:

The defendant must, at the government’s request, give to the government a written summary of any testimony that a defendant intends to use under Rules 702, 703, or 705 of the Federal Rules of

Evidence as evidence at trial This summary must describe the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications.

Fed R. Crim. P. 16(b)(1)(C); *see also United States v. Yousef*, 327 F.3d 56, 148 (2d Cir. 2003) (noting that Rule 16 “requires” a defendant to provide such material at the Government’s request) (citing Rule 16(b)(1)(C)).

The purpose of this rule is to “minimize surprise that often results from unexpected expert testimony, reduce the need for continuances, and to provide the opponent with a fair opportunity to test the merit of the expert’s testimony through focused cross-examination.” Fed. R. Crim. P. 16, advisory committee’s note (1993). A party who fails to comply with its discovery obligations may be precluded from introducing evidence not disclosed. Fed. R. Crim. P. 16(d)(2).

Compliance with Rule 16 is necessary to enable a district court to make several determinations required by the Federal Rules of Evidence. Rule 702 provides that, where “specialized knowledge will help the trier of fact,” a witness who is “qualified as an expert by knowledge, skill, experience, training, or education” may testify if: “[1] the testimony is based on sufficient facts or data; [2] the testimony is the product of reliable principles and methods; and [3] the expert has reliably applied the principles and methods to the facts of the case.” Fed. R. Evid. 702. District courts are responsible for ensuring that expert testi-

mony “rests on a reliable foundation and is relevant to the task at hand,” *Amorgianos v. Romano Enters.*, 303 F.3d 256, 265 (2d Cir. 2002) (citation and internal quotation marks omitted), and would assist the jury by “shed[ding] light on activities not within the common knowledge of the average juror,” see *United States v. Wexler*, 522 F.3d 194, 204 (2d Cir. 2008) (citation and internal quotation marks omitted); *United States v. Cruz*, 981 F.2d 659, 663-64 (2d Cir. 1992); see also *United States v. Rea*, 958 F.2d 1206, 1216-17 (1992) (“[W]hether the witness’s opinion will be ‘helpful’ . . . [is] a legal matter that must be determined by the court before it may allow the opinion to be heard by the jury.”). Thus, compliance with Rule 16 facilitates the district court’s assessment of whether expertise is helpful, whether the expert is qualified, and whether his testimony is relevant and reliable.

Even if expert testimony would otherwise be admissible, it may be excluded under Rule 403 if its probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury. Fed. R. Evid. 403; *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. at 595. As the Supreme Court noted in *Daubert*, “Expert evidence can be both powerful and quite misleading because of the difficulty in evaluating it.” 509 U.S. at 595 (internal quotation marks omitted); see also *United States v. Young*, 745 F.2d 733, 766 (2d Cir. 1984) (danger of confusion stems from the “aura of special reliability and trustworthiness surrounding expert testimony” (internal quotation marks omitted)).

Finally, as the Supreme Court has explained, “[t]he principle that undergirds the defendant’s right to present exculpatory evidence is also the source of essential limitations on the right,” *Taylor v. Illinois*, 484 U.S. at 410, and therefore it “may, in appropriate cases, bow to accommodate other legitimate interests in the criminal trial process,” *Rock v. Arkansas*, 483 U.S. 44, 55 (1987) (quoting *Chambers v. Mississippi*, 410 U.S. 284, 295 (1973)). Thus, a defendant’s failure to follow “established rules of procedure and evidence designed to assure both fairness and reliability in the ascertainment of guilt and innocence,” *Chambers v. Mississippi*, 410 U.S. at 302, may prompt the court to correspondingly curtail the defendant’s right to present evidence. *See, e.g., Taylor*, 484 U.S. at 412 (“The court’s preclusion sanction was an entirely proper method of assuring compliance with its order.” (citation omitted)).

C. Discussion

The defendant’s expert notice left the District Court unable to perform the “gatekeeping” function assigned to it, *Daubert*, 509 U.S. at 597, and reflected a tactical choice of “trial by ambush” (A. 368). Accordingly, it was neither an abuse of discretion to preclude the defense’s proffered witnesses, nor even now has the defense shown that exclusion was prejudicial.

The defense’s initial disclosures were clearly inadequate. Listing the “subjects” of testimony, as the defense did (A. 349-50, 360), is not the same as providing “a written summary of” that testimony, including any “opinions” and the “bases and reasons for” those

opinions, as Rule 16(b)(1)(C) requires. *See also* Fed. R. Crim. P. 16 advisory committee's note (1993) (“[T]he requesting party is entitled to a summary of the expected testimony. . . . For example, this should inform the requesting party whether the expert will be providing only background information on a particular issue or whether the witness will actually offer an opinion.”). Because the defense did not describe what the witnesses would actually *say*, by reference to the evidence in the case and the defense's theories, there was no way for the District Court to assess whether the testimony would “help the trier of fact to understand the evidence or to determine a fact in issue,” whether the witness was qualified to offer such testimony, or whether the testimony was based on sufficient information and otherwise reliable. Fed. R. Evid. 702.

For example, presumably Antonopoulos was being called to rebut Yum's testimony, tracing the Bitcoins on Ulbricht's laptop to the Silk Road servers (A. 350), but other than referring generally to “the ability to tie Bitcoins from Silk Road to Mr. Ulbricht” (A. 350) the defense did not give the witness's opinion on the matter (if he had one), much less the “bases and reasons” for it, Fed. R. Crim. P. 16(b)(1)(C). In responding to the Government's objection, the defense explained in more detail why Antonopoulos's testimony concerning Bitcoin might have been *relevant*, as a topical matter, but it still did not explain *how* Antonopoulos would have countered the evidence connecting Ulbricht's Bitcoins to Silk Road. (A. 380-84). The closest he came was a proffer that, based on “market forces,” it would have been difficult for Ulbricht to

sell large amounts of Bitcoins that were transferred to his laptop but not recovered there (A. 381), but that is too vague to satisfy Rule 16, and still lacks the “bases” for Antonopoulos’s conclusions about those “market forces” (much less his qualifications to opine about them) (A. 373).

Similarly, with respect to the other witness, Bellovin, the defense sought “an opportunity . . . to provide further specifics as [to] the opinions Dr. Bellovin plans to offer and the bases for those opinions,” but then failed to offer them. (A. 385). For example, Bellovin would testify to “the security implications” of using file sharing software, BitTorrent, but not what those “implications” were (or the bases for Bellovin’s conclusions). (A. 386). Even when given the opportunity to cure, defense counsel proffered the *topics* of testimony, not a “summary” of it, much less the “bases and reasons” for any opinions. (A. 387 (defense will elicit testimony “with respect to” the creation time for certain files; or “whether an individual [using “DPR”’s account] would automatically be directed to the Mastermind page”), 388 (the “varying methods of software installation” and how it can “change the way a computer program operates”).

“The proponent of expert testimony bears the burden of showing that its proffered expert’s testimony is admissible.” *United States v. Banks*, 761 F.3d 1163, 1200 (10th Cir.) (internal quotation marks omitted), *cert. denied*, 135 S. Ct. 308 (2014) (affirming preclusion). Ulbricht’s “generalized explanations do not provide us with any real information about what these experts would have said at trial,” making it im-

possible for the District Court (much less this Court) to assess admissibility. *United States v. Hoffecker*, 530 F.3d 137, 187 (3d Cir. 2008) (affirming preclusion because defense notice “did not include the experts’ opinions and the bases and reasons for those opinions”); *see also United States v. Day*, 524 F.3d 1361, 1371-72 (D.C. Cir. 2008) (affirming preclusion where a doctor listed the tests he had performed but “failed to state what [he] had concluded”); *United States v. Concessi*, 38 F. App’x 866, 868 (4th Cir. 2002) (expert designations properly excluded where they “included only the general topics concerning which each proposed expert would testify” but “failed to describe the witnesses opinions or provide the bases and reasons for the witnesses’ opinions”). To be sure, the general topic areas of testimony overlapped with the subject matter of the case, but “undoubted relevance does not trump the need to provide opinions and, particularly here, analytical or methodological bases.” (A. 378). The District Court’s conclusion that the defense’s notice was entirely “[l]acking” was entirely correct. (A. 366).

Moreover, the untimely nature of the defense’s notices, coming, as they did, after the 7th and 10th days of trial, and between one and three days before the Government rested, respectively, would itself justify exclusion. Case law is legion that untimely disclosure justifies preclusion, especially where, as here, the defense knew of the subject matter of expert testimony much earlier. *See United States v. Lundy*, 676 F.3d 444, 452 (5th Cir. 2012); *United States v. Holmes*, 670 F.3d 586, 597-99 (4th Cir. 2012); *United States v. Hoffecker*, 530 F.3d at 184-87; *United States v. Day*, 524

F.3d at 1371-72; *United States v. Petrie*, 302 F.3d 1280, 1288 (11th Cir. 2002); *United States v. Curry*, 977 F.2d 1042, 1052 (7th Cir. 1992). As the District Court noted, the electronic evidence on which the Government's case was based had been disclosed to the defense "long" before trial. (A. 363). And although Ulbricht contends that he was only responding to Yum's testimony tying Ulbricht's Bitcoins to the Silk Road servers, which he could not have anticipated (Br. 81-83), it was, in fact, the defense that opened on the theory that the Bitcoins on Ulbricht's laptop resulted from innocent trades, and which necessitated the Government's 11th hour scramble for Yum's testimony (A. 373-74).²²

²² Likewise, this Court should reject the defense's complaint that it required experts only because it was not permitted to cross-examine the Government's witnesses beyond the scope of their direct testimony. (Br. 80-81). That argument "defies credulity" and is "without a scintilla of merit." (A. 374). In fact, defense counsel was able to question Government fact witnesses about many of the topics listed in the defective notice as to Bellovin. *See, e.g.*, Tr. 628 (PGP encryption); 1070-72 (potential computer vulnerabilities); 1095 (operation of time stamps in UNIX-based operating systems); 1243-50 (forensic memory analysis and potential computer vulnerabilities). And in any event, the District Court's decision to enforce the Rules of Evidence, *see* Fed. R. Evid. 611(b), does not excuse the defense from complying with its discovery obligations.

This Court should credit the District Court's finding that the defense's "substantially inadequate notices" reflected a "tactical choice" (A. 367; *see also* A. 373-74) and the kind of "sharp practice" and "ambush" that "might well violate due process," *United States v. Tin Yat Chin*, 476 F.3d 144, 146 (2d Cir. 2007), for which preclusion is an appropriate sanction. In *Chin*, a one-day continuance was sufficient to avoid reversal, in part because that was all defense counsel requested. *Id.* Here, however, allowing the proffered testimony would have been all the more unfair, given that it appeared to go to the heart of the Government case (A. 378), the Government could not reasonably be expected to respond immediately (A. 369), and any continuance to address the unfairness could impact the jurors to the point of causing a mistrial (A. 369).

Finally, even now, Ulbricht has "failed to establish prejudice" from excluding the witnesses, *United States v. Yousef*, 327 F.3d 56, 148 (2d Cir. 2003), by explaining "why their testimony would have altered the outcome of the trial," *Hoffecker*, 530 F.3d at 187 (internal quotation marks omitted); *see also United States v. Onumonu*, 967 F.2d 782, 788 (2d Cir. 1992) ("[T]he district court's erroneous exclusion of testimony is subjected to harmless-error analysis."). Ulbricht merely repeats the topics of testimony, not *how, specifically*, that testimony would have "countered" the Government's case. (Br. 78-79, 85). Unlike cases cited by the defense (Br. 86-89), where the relevance of the expert's testimony to disputed issues of fact was clear, *see United States v. Diallo*, 40 F.3d 32, 33-34 (2d Cir. 1994); *United States v. Onumonu*, 967

F.2d at 784; *United States v. McBride*, 786 F.2d 45, 49-50 (2d Cir. 1986); *United States v. Dwyer*, 539 F.2d 924, 927 (2d Cir. 1976), it is impossible to know what either defense witness would have said, with any degree of specificity, much less how it would have impacted the jury.²³ In the face of the overwhelming proof against Ulbricht, *see supra* pages 14-25, any error in excluding general, educational testimony about technical matters (which is all the defense has proffered) was harmless. *See generally United States v. Gupta*, 747 F.3d 111, 133-34 (2d Cir. 2014) (listing factors this Court considers in evaluating whether improper exclusion of evidence amounts to reversible error, including “the overall strength of the prosecution’s case”), *cert. denied*, 135 S. Ct. 1841 (2015); *Howard v. Walker*, 406 F.3d 114, 132 (2d Cir. 2005) (considering “strength of the prosecution’s case as a whole”).

Having chosen “trial by ambush” (A. 368, 363), Ulbricht’s challenge to the preclusion of his proffered experts should be rejected.

²³ These cases are also distinguishable for the additional reason that those district courts, unlike Judge Forrest, provided either improper justifications or no justification at all for excluding the experts. *See, e.g., Onumonu*, 967 F.2d at 788; *United States v. Dwyer*, 539 F.2d at 927; *United States v. McBride*, 786 F.2d at 50-51.

POINT IV

The District Court Properly Excluded a Co-Conspirator's Hearsay Statement

A. Relevant Facts

About two weeks before trial, on December 29, 2014, the Government disclosed to the defense the substance of certain statements by a cooperating witness, Andrew Michael Jones, a/k/a “Inigo,” who had been an administrator on Silk Road and who plead guilty to various offenses pursuant to a cooperation agreement with the Government. (A. 398).

According to Jones, in or about October 2012, Jones and “Dread Pirate Roberts” agreed upon a verbal “handshake” to verify each other’s identity during online chat conversations, in which Jones would mention a certain prompt and “Dread Pirate Roberts” would provide an agreed-upon response. (A. 398). In or about August or September 2013, Jones tried to confirm that he was speaking with the same individual and “provided what he believed to be the designated prompt,” but “Dread Pirate Roberts’ was unable to provide the response Jones thought they had agreed on.” (A. 398). However, later in the conversation, Jones asked “Dread Pirate Roberts” to demonstrate his identity by specifying the first job that “Dread Pirate Roberts” had ever assigned to him (running the “DPR Book Club”), which “Dread Pirate Roberts” was able to do. (A. 398).

The Government further disclosed that an October 2012 chat between Ulbricht and Jones (previously

produced in discovery) discussed a “handshake,” but the Government had not located any record of the 2013 conversation. (A. 398).

About two weeks later, the Government advised the defense that it would not be calling Jones as a witness as planned, during its case in chief. (A. 563, 584-85). When Ulbricht’s counsel then explored the possibility of calling Jones to the stand, Jones’s defense counsel advised that Jones would assert his Fifth Amendment privilege. (A. 564, 585).

Although the Government was amenable to stipulating to the sum and substance of the disclosure, the defense would not agree to stipulate that, when Jones used a second prompt, he believed he was successful in validating “Dread Pirate Roberts”’s identity. (A. 395-96, 399-400, 563-64, 566, 568). In the defense’s view, doing so would “compromise Mr. Ulbricht’s Sixth Amendment confrontation rights” and give the Government a benefit it should only obtain by calling Jones to the stand. (A. 396; *see also* A. 587 (“They could have called the witness if they wanted balance.”)).

When the parties could not agree (A. 579-81), the defense moved the District Court to admit the Government’s disclosure as if it were Jones’s own statement, as a statement against interest, pursuant to Federal Rule of Evidence 804(b)(3), or under the “residual” exception, pursuant to Rule 807. (A. 395-96). In the alternative, Ulbricht argued that he had a Due Process right under the Fifth Amendment to admit the statement, and he urged the District Court to grant Jones immunity so that he could testify.

(A. 395). Ulbricht also sought a missing witness instruction from the District Court. (Tr. 1863).

The District Court denied the defense's application, concluding that the statements were not made against penal interest, because they were made while Jones was cooperating with the Government, they were not sufficiently corroborated, and they did not possess sufficient indicia of trustworthiness. (A. 583-84, 589-90). The District Court also denied the defense's request for a missing witness charge, because the record did not support the inference that Jones's testimony would have been unfavorable to the Government, so as to justify the instruction, given that "Dread Pirate Roberts" was able to identify himself in response to the second prompt. (A. 590-92).

B. Applicable Law

1. The "Against Interest" Exception

The Federal Rules of Evidence provide an exception to the hearsay rule for statements by an unavailable declarant that were "against interest." Fed. R. Evid. 804(b)(3). "To satisfy [this] exception the proponent must show (1) that the declarant is unavailable as a witness, (2) that the statement is sufficiently reliable to warrant an inference that a reasonable man in [the declarant's] position would not have made the statement unless he believed it to be true, and (3) that corroborating circumstances clearly indicate the trustworthiness of the statement." *United States v. Wexler*, 522 F.3d 194, 202 (2d Cir. 2008) (internal quotation marks omitted).

At bottom, a statement qualifies as such only if “a reasonable person in the declarant’s shoes would perceive the statement as detrimental to his or her own penal interest.” *United States v. Saget*, 377 F.3d 223, 231 (2d Cir. 2004). “[N]on-self-inculpatory statements . . . made within a broader narrative that is generally self-inculpatory” are not admissible as statements against penal interest, *Williamson v. United States*, 512 U.S. 594, 600-01 (1994), and neither are proffer statements of non-testifying witnesses, which are made under the condition they cannot be used against the declarant if he tells the truth, *United States v. Doyle*, 130 F.3d 523, 543 n.16 (2d Cir. 1997). “Whether a challenged statement is sufficiently self-inculpatory can only be answered by viewing it in context,” *United States v. Williams*, 506 F.3d 151, 155 (2d Cir. 2007) (reasoning that hearsay is more reliable under Rule 804(b)(3) where the declarant “was not attempting to minimize his own culpability, shift blame onto [the defendant], or curry favor with the authorities”).

With regard to the requisite corroboration to establish trustworthiness, such corroboration is “not an insignificant hurdle,” *DeVillio*, 983 F.2d at 1190, and “must be strong, not merely allowable,” *United States v. Salvador*, 820 F.2d 558, 561 (2d Cir. 1987) (requirement “demonstrates the obvious suspicion with which the drafters of the Rule regarded a statement exposing the declarant to criminal liability but exculpating the accused” (internal quotation marks omitted)).

2. The Residual Exception and Nested Hearsay

Meanwhile, the residual hearsay exception of Rule 807 allows a statement not covered by another exception to the hearsay rule to be admitted only if: “(1) the statement has equivalent circumstantial guarantees of trustworthiness; (2) it is offered as evidence of a material fact; (3) it is more probative on the point for which it is offered than other evidence that the proponent can obtain through reasonable efforts; and (4) admitting it will serve the purposes of these rules and the interests of justice.” As this Court has noted, the residual hearsay exception is meant to “be used very rarely, and only in exceptional circumstances.” *Parsons v. Honeywell, Inc.*, 929 F.2d at 907 (internal quotation marks omitted); *see also, e.g., DeVillio*, 983 F.2d at 1190 (residual hearsay exception is “applied in the rarest of cases”).

Additionally, “[h]earsay within hearsay” may be admitted only if “each part of the combined statements conforms with an exception to the rule.” Fed. R. Evid. 805.

3. Standard of Review

The District Court’s evidentiary rulings are reviewed for abuse of discretion. *See, e.g., United States v. Doyle*, 130 F.3d at 544 (Rule 804(b)(3)). To find an abuse of discretion, this Court “must conclude that the trial judge’s evidentiary rulings were arbitrary and irrational.” *United States v. White*, 692 F.3d 235, 244 (2d Cir. 2012), *as amended* (Sept. 28, 2012) (internal quotation marks omitted).

C. Discussion

On appeal, Ulbricht challenges only the District Court's decision not to admit Jones's statement under an exception to the hearsay rule. (Br. 90-96). But Jones's statement to the Government while he was cooperating, and after he had pled guilty to essentially the same offenses Ulbricht was charged with, was not the kind that could have exposed him to additional criminal liability at that point, and, therefore, it failed to satisfy Rule 804(b)(3).

When a declarant is in a cooperative posture with the Government, his statements may not tend to expose him to "more serious charges or more severe punishment," *United States v. Marquez*, 462 F.2d 893, 895 (2d Cir. 1972), and, as a result, are not against his penal interest. For this reason, this Court has approved the exclusion of statements made pursuant to the protections of a proffer agreement, *Doyle*, 130 F.3d at 543 n.16, or while the declarant was actively cooperating with the Government and wearing a wire, *DeVillio*, 983 F.2d at 1190.

By December 2013, when Jones made the statements in question, he had pled guilty to a four-count information charging him with essentially the same criminal activity that Ulbricht was on trial for, including narcotics trafficking, computer hacking, identification fraud, and money laundering through the Silk Road website from October 2012 to October 2013. (SA 229-30). In exchange for his guilty plea and his commitment to provide truthful information (SA 230), the Government agreed that Jones "will not be further prosecuted criminally by this Office for any

crimes . . . related to” that activity (SA 231).²⁴ As a result, Jones’s statements that he attempted to authenticate “Dread Pirate Roberts”’s identity with a handshake in 2013, and succeed on the second attempt, were not the kind that “a reasonable person in the declarant’s shoes would perceive. . . as detrimental to his or her own penal interest.” *United States v. Saget*, 377 F.3d at 231. He had “already accepted responsibility” for his crimes, and those statements “did not add much additional weight to his confession.” *Doyle*, 130 F.3d at 543 n.16.²⁵ Accord-

²⁴ The Government also agreed not to prosecute Jones for his personal involvement in selling narcotics, on and off Silk Road, and his work as a Silk Road forum moderator after October 2013. (SA. 231).

²⁵ The record does not reveal why defense counsel for Jones advised that his client would have invoked his Fifth Amendment right, but, on this record, Ulbricht must assume that he would have done so legitimately, as only the proper invocation of that privilege would have rendered Jones “unavailable,” as required by the rule. *See* Fed. R. Evid. 804(a)(1); *United States v. Rodriguez*, 706 F.2d 31, 40 (2d Cir. 1983). And because “[t]he ‘against penal interest’ requirement of Rule 804(b)(3) is more narrow than the Fifth Amendment’s declaration that no person ‘shall be compelled in any criminal case to be a witness against himself,’” proper invocation of the privilege against self-incrimination does not necessarily mean that the statement fell within the exception to the

ingly, admission under Rule 804(b)(3) would have been improper.

Rule 807, which applies in only the “rarest of cases,” *DeVillio*, 983 F.2d at 1190, was also not satisfied, for a number of reasons. Even assuming the statement had “circumstantial guarantees of trustworthiness” “equivalent” to those of the hearsay exceptions in Rules 803 or 804, because Jones was obligated to tell the truth by the terms of his cooperation agreement, Ulbricht’s counsel did not demonstrate “reasonable efforts” to ensure Jones’s was available at trial, *see* Fed. R. Evid. 807(a)(3), by, for example, giving the Government sufficient notice, prior to the eve of the defense case, that Jones’s testimony was crucial enough to ensure his availability (including immunization, if required). (A. 584 (Government counsel: “He’s under our control and we would not have resisted allowing him to testify.”)). *See also* Fed. R. Evid. 807(b).

But most significantly, the defense sought to distort the record by admitting *only* that portion of Jones’s statement that he deemed helpful, which would not “serve the purposes of these rules and the interests of justice.” Fed. R. Evid. 807(a)(4). (A. 400 (defense counsel’s redline to proposed stipulation, depriving Government of a fair reading of Jones’s statements)). As the District Court found, “the only reasonable inference to be drawn” from the fact that

hearsay rule. *United States v. Thomas*, 62 F.3d 1332, 1338 (11th Cir. 1995).

“Dread Pirate Roberts” answered a second question correctly was that “the DPR identification was completed,” and as a result, Jones’s statements, when taken in their entirety, lacked the exculpatory flavor counsel sought to wring from them. (A. 592).

There was no abuse of discretion in the District Court’s decision to exclude the nested hearsay statements of the defendant’s co-conspirator, and no injustice in that ruling, where the defense refused a “balance[d]” stipulation that would have admitted the facts he sought. (A. 587).

POINT V

The Cumulative Error Doctrine Does Not Warrant Reversal

Ulbricht is correct that a series of errors that are harmless individually might, when aggregated, yield a “cumulative unfairness” that deprives a defendant of a fair trial. *See United States v. Al-Moayad*, 545 F.3d 139, 178 (2d Cir. 2008). However, “a cumulative-error analysis aggregates only actual errors to determine their cumulative effect.” *United States v. Rivera*, 900 F.2d 1462, 1470 (10th Cir. 1990). Ulbricht cannot establish cumulative error by stitching together a series of correct, but adverse, rulings by the District Court. *See United States v. Hurtado*, 47 F.3d 577, 586 (2d Cir. 1995).

Whether it was the decision not to identify how alleged corruption might have affected the integrity of the physical evidence against him, *supra* Point I, or not to investigate alternate perpetrators, *supra* Point

II, or provide timely and complete expert notice, *supra* Points II & III, or ensure that a purportedly key witness was available at trial, *supra* Point IV, the thread running through the errors urged on appeal was the defense's tactical decision to share as little information as possible with the Government and the Court, thereby flouting the "established rules of procedure and evidence [that are] designed to assure both fairness and reliability in the ascertainment of guilt and innocence." *Chambers*, 410 U.S. at 302. That tactical choice, while perhaps a reasonable defense strategy, does not, in hindsight, transform the proper exercise of discretion by the District Court into reversible error when it fails. There was no error in the District Court's rulings, much less cumulative error sufficient to overwhelm the evidence that Ulbricht was "Dread Pirate Roberts."

POINT VI

The District Court Properly Denied Ulbricht's Suppression Motions

A. Relevant Facts

1. The Pen Register and Trap-and-Trace Orders

By September 2013, Ulbricht was the FBI's leading suspect in the investigation of "Dread Pirate Roberts." (Docket Entry 57, Decl. of Christopher Tarbell ¶ 19 ("Tarbell Decl.")). To further the investigation, the Government obtained five pen register and trap-and-trace orders (the "pen/trap orders"), pursuant to

18 U.S.C. §§ 3121-26 (the “Pen/Trap Act”), authorizing the FBI to collect routing data about the Internet traffic to and from the IP address²⁶ assigned to Ulbricht’s residence by his Internet service provider (“ISP”), the wireless router at that residence, and certain devices that were determined to be regularly connecting to that router. (Tarbell Decl. ¶ 19; S. 67-78, 80-91, 93-99, 125-32, 134-41).

The pen/trap orders authorized the Government to receive the source and destination IP addresses for all Internet traffic to and from, respectively, each of the foregoing facilities, along with the dates, times, durations, and other routing information associated with those connections. (*See* S. 69, 80, 93, 125, 134; *see also* Tarbell ¶ 19). In each application, the Government expressly noted that it was “not requesting, and d[id] not seek to obtain, the contents of any communications,” and that the information sought did not “encompass the ‘contents’ of a communication” nor “information concerning the substance, purport, or meaning of that communication.” (S. 75,

²⁶ Every device on the Internet is identified by a unique number called an Internet Protocol (“IP”) address. This number is used to route information between devices, for example, between two computers. To send information from one computer to another over the Internet, the data is split into discrete “packets,” each of which carries the IP addresses of the device that sent it and of the device to which it is destined. (S. 73-74).

88, 98, 130, 139 (quoting 18 U.S.C. § 2510(8)). None of the applications requested, nor did the orders authorize, collection of location data regarding any of the devices in question. (Tarbell Decl. ¶ 21).

2. The Warrant for Ulbricht's Laptop

On the morning of October 1, 2013, hours before arresting Ulbricht, the Government applied for a warrant to search a silver Samsung laptop with a certain unique identifier (known as a “MAC address”), believed to be his personal laptop. (S. 202-03 (the “Laptop Warrant”).

In its application, the Government alleged probable cause to believe that Ulbricht was committing enumerated federal crimes, namely, narcotics trafficking, computer hacking, money laundering, and murder-for-hire, in violation of, 21 U.S.C. § 846 and 18 U.S.C. §§ 1030, 1956 & 1958, respectively, which it defined as the “Subject Offenses.” (S. 207). After describing the design and operation of the Silk Road website (S. 209-21) and “Dread Pirate Roberts”'s role as owner and operator (S. 221-31), the affidavit identified the bases for believing Ulbricht was “DPR,” including common attributes between Ulbricht's public statements on social networking sites and statements by “DPR” (S. 231-32, 234-35), Internet posts related to Silk Road made under pseudonyms linked to Ulbricht (S. 232-34, 239-41), administrator-level security measures on the Silk Road website that used Ulbricht's pseudonym (S. 241-42), IP logs and other information suggesting that “DPR” accessed the Silk Road website from a cafe near Ulbricht's home (S.

235-37), and that “DPR” was seeking to purchase fraudulent identification at or about the same time that Ulbricht ordered and received some through Silk Road (S. 237-39). There was also evidence that “DPR” and Ulbricht were using the same type of computer, and logged on and off the same websites at or about the same times. (S. 242-46).

The application went on to explain the evidence agents expected to find on the laptop, including, as pertains to this appeal, “evidence relevant to corroborating the identification of Ulbricht as the Silk Road user ‘Dread Pirate Roberts,’” including, but not limited to, “writings by Ulbricht, which may reflect linguistic patterns or idiosyncracies associated with ‘Dread Pirate Roberts,’ or political/economic views associated with him”; evidence of Ulbricht’s travel or patterns of movement, “to allow comparison with patterns of online activity of ‘Dread Pirate Roberts’ and any information known about his location at particular times”; and “other evidence implicating Ulbricht in the Subject Offenses.” (S. 248-49).

A federal magistrate judge in the Northern District of California issued the Laptop Warrant, authorizing the FBI to seize Ulbricht’s laptop and to search the laptop for “evidence, contraband, fruits or instrumentalities” of the Subject Offenses that fit two categories. (S. 206, 252-53). The first, not challenged on appeal, was “[a]ny evidence relating in any way to the Silk Road website, including but not limited to” six types of data related to Silk Road or Tor. (S. 252).

Second, the Laptop Warrant authorized the seizure of “[a]ny evidence concerning Ross William Ul-

Ulbricht relevant to the investigation of the Subject Offenses, including but not limited to” (a) “any communications or writings by Ulbricht”; and “any evidence concerning” (b) “any computer equipment, software, or usernames used by Ulbricht”; (c) “Ulbricht’s travel or patterns of movement”; (d) “Ulbricht’s technical expertise concerning Tor, Bitcoins, computer programming, website administration, encryption, or any other area of [relevant] technical expertise . . .”; (e) “any efforts by Ulbricht to obtain fake identification documents”; (f) “any aliases used by Ulbricht”; and (g) “any effort to evade law enforcement.” (S. 252-53 (capitalization standardized)).

Finally, the Laptop Warrant specified the procedure agents should employ in executing the warrant, including seizing it, making a forensic copy, and reviewing the computer off-site. (S. 253-55).

3. The Warrants for Ulbricht’s Facebook and Google Accounts

On October 8, 2013, the Government sought two warrants authorizing the FBI to obtain the contents of Ulbricht’s Facebook and Google accounts (the “Facebook Warrant” and the “Google Warrant,” respectively), pursuant to the Stored Communications Act, 18 U.S.C. § 2703. (S. 312-18, 376-82). Just as with the Laptop Warrant, the applications for these warrants set forth probable cause to search those accounts for evidence, fruits or instrumentalities of specific offenses, namely, conspiracy to commit narcotics trafficking, computer hacking, and money laundering, in violation of Title 21, United States Code, Section 846,

and Title 18, United States Code, Sections 1030 and 1956. (S. 320-21, 384-85). Each warrant incorporated the Complaint by reference, which, like the Laptop Warrant, described the Silk Road website, “Dread Pirate Robert”’s role in operating it, and the evidence that Ulbricht was “DPR.” (S. 336-74, 395-443). The Facebook and Google Warrant applications alleged that, “Given the parallels that law enforcement has been able to draw between Ulbricht and ‘DPR’ based on Ulbricht’s public online footprint, . . . examination of Ulbricht’s communications contained in [those accounts] will reveal additional parallels between Ulbricht and ‘DPR’ that will further corroborate the identification of Ulbricht as ‘DPR,’” such as “linguistic patterns or idiosyncracies” and “travel or patterns of movement.” (S. 328-29, 386-87).

After reviewing both applications, Magistrate Judge Gabriel W. Gorenstein issued both warrants, which ordered Facebook and Google to produce copies of Ulbricht’s Facebook and Google accounts to the Government (S. 312, 333-34, 376, 392-393), and authorized the Government to search their contents for “evidence, fruits, and instrumentalities” of the specified offenses, including:

1. Any evidence concerning Ross William Ulbricht relevant to the investigation of the Subject Offenses, including but not limited to:
 - a. any communications or writings by Ulbricht;

- b. any evidence concerning any computer equipment, software, or usernames used by Ulbricht;
 - c. any evidence concerning Ulbricht's travel or patterns of movement;
 - d. any evidence concerning Ulbricht's technical expertise concerning Tor, Bitcoins, computer programming, website administration, encryption, or any other area of technical expertise relevant to administering the Silk Road website;
 - e. any evidence concerning any efforts by Ulbricht to obtain fake identification documents; and
 - f. any evidence concerning any aliases used by Ulbricht or other means of evading law enforcement.
2. Any communications with co-conspirators, aiders, abettors, or anyone else involved in any way with the Subject Offenses, including but not limited to any communications seeking to recruit such individuals.
3. Any evidence concerning Bitcoin exchangers or bank accounts used by Ulbricht, or any other evidence relevant to

locating the proceeds of the Subject Offenses.

4. Any evidence concerning the Silk Road website or otherwise concerning narcotics trafficking.

5. Any evidence concerning the use of Bitcoins to move criminal proceeds or otherwise concerning money laundering.

6. Any other evidence of the Subject Offenses.

(S. 334-35, 393-94 (capitalization standardized)).

4. Ulbricht's Suppression Motions

On August 1, 2014, Ulbricht moved to suppress the majority of electronic evidence in the investigation, including, as pertains to this appeal, evidence obtained pursuant to the Laptop, Facebook, and Google Warrants, on the grounds that they lacked the particularity required by the Fourth Amendment, and were unlawful fruits of the pen/trap orders. (Docket Entries 46-48). The Government opposed Ulbricht's motions. (Docket Entries 56-57).

On October 10, 2014, the District Court denied Ulbricht's suppression motions. (A. 176-213). First, the District Court suggested that Ulbricht had not adequately established his personal expectation of privacy in any of the searched materials, because he did not submit a sworn statement establishing as

much. (A. 198-203).²⁷ Moving to the merits, the District Court disagreed that these were “general warrants,” because they were “specific” both “as to the items to be seized” and “as to what type of evidence should be searched for.” (A. 204). The District Court specifically noted that, in a case where “the use of idiosyncratic linguistic patterns” was a “key issue[.]” relevant to attribution, it was appropriate for the Government to review “any [of the] communications or writings” in the subject email account. (A. 207 n.12). The District Court further concluded that even if the warrants were overbroad, the exclusionary rule should not apply, because the agents were entitled to rely in good faith upon the warrants, as the applications therefor were neither so lacking in probable cause nor so facially deficient as to render that reliance unreasonable. (A. 207 n.12). Finally, the District Court rejected Ulbricht’s argument that the pen/trap orders violated the Fourth Amendment, concluding that “[t]he law is clear—and there is truly no room for debate—that the type of information sought in [the pen/trap orders] was entirely appropriate for that type of order.” (See A. 208-09 (citing *Smith v. Mary-*

²⁷ As to the searches challenged on appeal, however, the Government indicated that it was willing to stipulate to his standing, because his privacy interest in at least the laptop and Google and Facebook accounts “seems clear” (A. 175), and the District Court considered challenges to those searches on the merits (A. 183).

land, 442 U.S. 735 (1979); *United States v. Rizzo*, 491 F.2d 215, 216 n.3 (2d Cir. 1974)).

B. Applicable Law

1. The Fourth Amendment and Particularity

The Fourth Amendment requires that warrants “particularly describ[e] . . . the person or things to be seized.” U.S. Const. amend. IV. The particularity requirement “makes general searches . . . impossible and prevents the seizure of one thing under a warrant describing another,” *Marron v. United States*, 275 U.S. 192, 196 (1927), by foreclosing a “general, exploratory rummaging in a person’s belongings,” *Coolidge v. New Hampshire*, 403 U.S. 443, 467 (1971). To satisfy the particularity requirement, warrants must specify (1) the offenses for which probable cause has been established; (2) the place to be searched; and (3) the items to be seized relating to the specified offenses. *United States v. Galpin*, 720 F.3d 436, 445-46 (2d Cir. 2013).

Although “nothing [should be] left to the discretion of the officer executing the warrant,” *Marron v. United States*, 275 U.S. at 196, “[c]ourts tend to tolerate a greater degree of ambiguity where law enforcement agents have done the best that could reasonably be expected under the circumstances, have acquired all the descriptive facts which a reasonable investigation could be expected to cover, and have insured that all those facts were included in the warrant.” *United States v. Young*, 745 F.2d 733, 759 (2d Cir. 1984) (upholding warrant that concluded a list of specific items

to be seized with “other evidence of a conspiracy” to distribute narcotics).

Accordingly, “broadly worded categories of items available for seizure” do not necessarily render a warrant deficient: “Once a category of seizable papers has been adequately described, with the description delineated in part by an illustrative list of seizable items, the Fourth Amendment is not violated because the officers executing the warrant must exercise some minimal judgment as to whether a particular document falls within the described category.” *United States v. Riley*, 906 F.2d 841, 843-45 (2d Cir. 1990) (upholding warrant that authorized a search for “records and other items that constitute evidence of the offenses of conspiracy to distribute controlled substances and distribution of the same”). “It is true that a warrant authorizing seizure of records of criminal activity permits officers to examine many papers in a suspect’s possession to determine if they are within the described category. But allowing some latitude in this regard simply recognizes the reality that few people keep documents of their criminal transactions in a folder marked ‘drug records.’” *Id.* at 845; *see also Andresen v. Maryland*, 427 U.S. 463, 480-82 & n.10 (1976) (upholding warrant that authorized the seizure of “other fruits, instrumentalities, and evidence of crime at this [time] unknown,” when limited to a real estate fraud relating to a particular parcel of land); *United States v. Young*, 745 F.2d at 759-60 (“[U]se of the term ‘other evidence’ following the term ‘money’ was sufficient to permit the agents to seize such manifestations of wealth as furs, jewelry, and expensive automobiles.”); *United States v. George*,

975 F.2d 72, 76 (2d Cir. 1992) (collecting similar cases).

And “where a particularly complex scheme is alleged to exist, it may be appropriate to use more generic terms to describe what is to be seized.” *United States v. Gotti*, 42 F. Supp. 2d 252, 274 (S.D.N.Y. 1999) (Parker, J.) (citing *United States v. Regan*, 706 F. Supp. 1102, 1113 (S.D.N.Y. 1989) (“The degree to which a warrant must state its terms with particularity varies inversely with the complexity of the criminal activity investigated.”)). For example, where there is probable cause to believe that a business is “permeated with fraud,” “the agents could properly seize all of the business records.” *Nat’l City Trading Corp. v. United States*, 635 F.2d 1020, 1026 (2d Cir. 1980); accord *United States Postal Serv. v. CEC Servs.*, 869 F.2d 184, 187 (2d Cir. 1989).

2. The Good Faith Exception to the Exclusionary Rule

Although the exclusionary rule “requir[es] the exclusion of evidence [w]hen the police exhibit deliberate, reckless, or grossly negligent disregard for Fourth Amendment rights,” *United States v. Stokes*, 733 F.3d 438, 443 (2d Cir. 2013) (internal quotation marks omitted, alteration in original), the rule “is not an individual right and applies only where it result[s] in appreciable deterrence,” *Herring v. United States*, 555 U.S. 135, 141 (2009) (internal quotation marks omitted, alteration original). Accordingly, in *United States v. Leon*, the Supreme Court held that evidence should not be suppressed where the authorities act in

“objective good faith” and “reasonable reliance” on a warrant, even if the warrant is later found to be invalid. 468 U.S. 897, 920, 922 (1984); see *United States v. Ganius*, — F.3d —, No. 12-240-cr, 2016 WL 3031285, at *17 (2d Cir. May 27, 2016) (*en banc*). “[M]ost searches conducted pursuant to a warrant would likely fall within [Leon’s] protection,” *United States v. Clark*, 638 F.3d 89, 99 (2d Cir. 2011), because a law enforcement agent is not “required to disbelieve a judge who has just advised him, by word and by action, that the warrant he possesses authorizes him to conduct the search he has requested,” *United States v. Buck*, 813 F.2d 588, 592 (2d Cir. 1987); see also *United States v. Thomas*, 757 F.2d 1359, 1368 (2d Cir. 1985) (finding good faith reliance on warrant that was predicated unwittingly on a constitutional violation).

The Supreme Court later extended that principle to include actions taken by an officer “acting in objectively reasonable reliance on a statute,” unless the statute was “clearly unconstitutional” at the time the officer obtained the evidence, *Illinois v. Krull*, 480 U.S. 340, 349 (1987); see *United States v. McCullough*, 523 F. App’x 82, 83 (2d Cir. 2013) (applying principle in the context of cellphone location records obtained under Section 2703), as well as to “searches conducted in objectively reasonable reliance on binding appellate precedent,” *Davis v. United States*, 564 U.S. 229, 231 (2011).

3. Severance

Finally, even where a warrant is facially invalid, suppression can be narrowly tailored to remedy only the constitutionally infirm portion of a search warrant. In *United States v. George*, this Court adopted the doctrine of severance, *i.e.*, the separation of any constitutionally infirm portion of a warrant from the rest of the warrant, thereby permitting the admission of evidence pursuant to the valid portion of the warrant. 975 F.2d 72, 79 (2d Cir. 1992) (“Fourth Amendment guarantees are adequately protected by suppressing only those items whose seizure is justified solely on the basis of the constitutionally infirm portion of the warrant, which no reasonably well-trained officer could presume to be valid.” (citing *United States v. Riggs*, 690 F.2d 298, 300 (1st Cir. 1982); *United States v. Christine*, 687 F.2d 749, 754 (3d Cir. 1982); *United States v. Cook*, 657 F.2d 730, 735 (5th Cir. 1981)).

For this remedy to apply, “the court must be able to excise from the warrant those clauses that fail the particularity or probable cause requirements in a manner that leaves behind a coherent, constitutionally compliant redacted warrant.” *United States v. Galpin*, 720 F.3d at 448-49. Severance “is not available where no part of the warrant is sufficiently particularized, where no portion of the warrant may be meaningfully severed, or where the sufficiently particularized portions make up only an insignificant or tangential part of the warrant.” *United States v. George*, 975 F.2d at 79-80 (citations omitted).

4. The Pen/Trap Act

The Pen/Trap Act authorizes installation of a “pen register” to record or capture, prospectively, “dialing, routing, addressing, or signaling information” that is “transmitted by an instrument or facility from which a wire or electronic communication is transmitted,” and a “trap and trace” device to “identify the originating number or . . . source of a wire or electronic communication,” 18 U.S.C. § 3127(3) & (4). To install either device, the Government must certify that the information likely to be collected is relevant to an ongoing criminal investigation, but it is not required to establish probable cause or obtain a warrant. 18 U.S.C. § 3122.

The Supreme Court has held, in the context of telephones, that the use of a pen register does not constitute a “search” under the Fourth Amendment, for which a warrant is ordinarily required, because “a person has no legitimate expectation of privacy in information he voluntarily turns over to third parties,” such as the dialing instructions he conveys to telephone companies when he makes a call. *Smith*, 442 U.S. at 743-44.

This same principle behind the “third party doctrine” applies when a pen register is used to collect the data, like IP addresses, used to route electronic communications over the Internet, which is “constitutionally indistinguishable from the use of a pen register that the Court approved in *Smith*.” *United States v. Forrester*, 512 F.3d 500, 510 (9th Cir. 2008); *accord United States v. Graham*, — F.3d. —, Nos. 12-4659, 12-4825, 2016 WL 3068018, at *7-8 (4th Cir. May 31,

2016); *United States v. Christie*, 624 F.3d 558, 574 (3d Cir. 2010). Just like telephone users, Internet users “rely on third-party equipment in order to engage in communication” and “have no expectation of privacy in . . . the IP addresses of the websites they visit, because they should know that this information is provided to and used by Internet service providers for the specific purpose of directing the routing of information.” *United States v. Forrester*, 512 F.3d at 510; *accord Graham*, 2016 WL 3068018, at *7. Accordingly, IP addresses and similar Internet routing information are not protected by the Fourth Amendment and can be collected without a warrant under the Pen/Trap Act. *Id.*

5. Standard of Review

“The factual findings on which the district court’s suppression ruling was based are reviewed for clear error, viewing the evidence in the light most favorable to the government; the legal conclusions on which this ruling was based are reviewed *de novo*.” *United States v. Lewis*, 386 F.3d 475, 480 (2d Cir. 2004); *see also United States v. George*, 975 F.2d at 75, 77 (whether search warrant is sufficiently particular, or good faith exception applies, are questions of law reviewed *de novo*). Additionally, this Court “may uphold the validity of a judgment on any ground that finds support in the record.” *United States v. Ganas*, 2016 WL 3031285, at *6 (internal quotation marks omitted).

C. Discussion

1. The Warrants Were Particular

Ulbricht's argument that the Laptop, Facebook, and Google Warrants "lacked *any* particularity," and thus violated the Fourth Amendment (Br. 98), is unavailing, because the applications recited sufficient probable cause to justify the scope of the Warrants, which themselves listed particular items and offenses that, in turn, limited other general language therein.

To satisfy the particularity requirement, a warrant must specify: (1) the offenses for which probable cause has been established; (2) the place to be searched; and (3) the items to be seized relating to the specified offenses. *Galpin*, 720 F.3d at 445-46. Ulbricht contends that "the terms of the warrants imposed no limitation at all on the parameters of the searches" that law enforcement were authorized to undertake (Br. 104), but in fact, the Warrants enumerated categories of communications and other information that were relevant to establishing Ulbricht's identity as "DPR," through parallels in their language and behavior. (S. 252-53, 334-35, 393-94). The Warrants and their applications explicitly "link[ed] the items to be searched and seized to the suspected criminal activity." *United States v. Rosa*, 626 F.3d 56, 62 (2d Cir. 2010). For example, even the clauses that authorized the seizure of "any communications or writings by Ulbricht" and "any evidence concerning Ulbricht's travel or patterns of movement" (highlighted by Ulbricht and *amicus curiae* National Association of Criminal Defense Lawyers (Br. 99;

NACDL Br. 10-11)), were phrased to “identify with reasonable certainty those items that the magistrate has authorized [the agents] to seize.” *George*, 975 F.2d at 75.

Moreover, those categories of evidence, while broad, were explicitly justified by the Warrant applications, which described “the items to be seized with as much particularity as the circumstances reasonably allow[ed].” *George*, 975 F.2d at 76. Ulbricht’s communications and travels were highly relevant to the goal of the Government’s investigation at this stage: “corroborating the identification of Ulbricht as the Silk Road user ‘Dread Pirate Roberts.’” (S. 248; *see also* S. 328, 387). It was the parallels between the online persona “DPR” and Ulbricht’s attributable statements and conduct—his online habits, where he lived and traveled, and even his tone, spelling, syntax, and viewpoints—that led the Government to develop probable cause to believe Ulbricht was “DPR.” (S. 231-35, 248, 327-29, 359-68, 386-88, 418-27). All “communications” and “travel” records are broad categories, but, like business records of an enterprise “permeated with fraud,” *Nat’l City Trading Corp. v. United States*, 635 F.2d at 1026, they were justifiably seized, because even innocent communications or travel records might contain details overlapping with “DPR”s (innocent) statements, shoring up the proof against Ulbricht. *See also Andresen v. Maryland*, 427 U.S. at 481 n.10 (acknowledging that to uncover a complex scheme, a warrant may seek a broader range of evidence). And, as the application foreshadowed, the warrant yielded additional evidence of this type establishing Ulbricht’s identity beyond a reasonable

doubt at trial. (*See, e.g.*, Tr. 1298-1301, 2143 (statements made by “DPR” coupled with pictures and posts from Facebook and information about Ulbricht’s whereabouts gleaned from Google used to establish identity, including that both “DPR” and Ulbricht were likely in Thailand at same time)).²⁸

Amicus NACDL also challenges references to “any other evidence” implicating Ulbricht in the subject crimes (NACDL Br. 11 (referring to S. 248-49, 252-53)). But while a warrant that authorizes the seizure of “any other evidence relating to the commission of a crime,” *George*, 975 F.2d at 75 (emphasis added), or “violations of . . . federal statutes” generally, *Galpin*, 720 F.3d at 447, is invalid, a warrant that lists specific offenses, and specific items that may be seized as evidence (or fruits or instrumentalities) of those offenses, will not be invalidated by reference to “other evidence” of those identified offenses, because the specific terms are naturally read to limit the general ones. *See Andresen*, 427 U.S. at 480-82 & n.10; *Young*, 745 F.2d at 759-60.

Ulbricht and NADCL’s principal contention sounds less in the doctrine of particularity than it faults the Warrants for permitting the Government to

²⁸ For this reason, *amicus* NACDL’s suggestion (NACDL Br. 24-26) that this Court limit warrants by the information the Government already has at that stage of the investigation is misguided, because it would defeat the point of an investigative technique designed to gather *new* information.

search the data it obtained to find the identified categories of information, *i.e.*, that the Warrants allowed “a detailed review of every piece of digital information,” instead of prescribing search protocols. (Br. 102; NACDL Br. 12-23). But as this Court recently acknowledged *en banc*, comprehensive review of digital media is often necessary, because although “to a user a hard drive may seem like a file cabinet, a digital forensic expert reasonably perceives the hard drive simply as a coherent physical storage medium for digital data—data which is interspersed *throughout* the medium, which itself must be maintained and accessed with care, lest this data be altered or destroyed.” *Ganias*, 2016 WL 3031285, at *10 (emphasis original); *see also id.* (noting files “are not as discrete as they may appear to a user,” and “[t]heir interspersion through a digital storage medium . . . may affect the degree to which it is feasible . . . to fully extract and segregate responsive data from non-responsive data”). Although a warrant that authorizes the search of electronic devices without specifying what data thereon may be seized will be invalid, *see United States v. Rosa*, 626 F.3d at 58-59, 62, this Court has recognized that “the size or other outwardly visible characteristics of a file may disclose nothing about its contents,” which is why, “by necessity, government efforts to locate particular files will require examining a great many other files to exclude the possibility that the sought-after data are concealed there,” *Galpin*, 720 F.3d at 447 (internal quotation marks omitted). This practical reality of digital media “demands a heightened sensitivity to the particularity requirement in the context of digital searches,” *id.*, but it

does not impeach the *procedure* used here to execute the warrants. *Cf. Andresen*, 427 U.S. at 482 n.11 (“[I]t is certain that some innocuous documents will be examined, at least cursorily, in order to determine whether they are, in fact, among those papers authorized to be seized.”).²⁹

²⁹ The NACDL urges this Court to reject the search procedures laid out on the warrants (S. 253-55, 331-32, 390-91) and to adopt the procedures set forth by Judge Kozinski in his concurrence in *United States v. Comprehensive Drug Testing, Inc.*, 621 F.3d 1162, 1177 (9th Cir. 2010) (*en banc*) (*per curiam*) (“*CDT III*”). (NACDL Br. 13-19). But the Second Circuit has expressly declined to adopt Judge Kozinski’s suggested protocols as required under the Fourth Amendment. *See Galpin*, 720 F.3d at 451 (citing *CDT III* and noting “[u]nlike the Ninth Circuit, we have not required specific search protocols or minimization undertakings as basic predicates for upholding digital search warrants, and we do not impose any rigid requirements in that regard at this juncture”). Even the Ninth Circuit has noted the limited precedential value of *CDT III*. *See United States v. Schesso*, 730 F.3d 1040, 1049-50 (9th Cir. 2013) (describing search procedures in *CDT* as “no longer binding circuit precedent” and emphasizing no “clear-cut rule” because, “[u]ltimately, the proper balance between the government’s interest in law enforcement and the right of individuals to be free from unreasonable searches and seizures of electronic data must be determined on a case-by-case basis”). To date, no other federal Court

2. Suppression Would Not Be an Appropriate Remedy

Even if some portions of the Warrants were overbroad, suppression would have been inappropriate, for two reasons.

First, as the District Court found, “the law enforcement agents who executed the searches and seizures at issue were entitled to rely in good faith upon the magistrates judges’” decision to issue the Warrants. (A. 207 n.12). That reliance was “objectively reasonable,” *United States v. Leon*, 468 U.S. 897, 921-22 (1984); *see also United States v. Moore*, 968 F.2d 216, 222 (2d Cir. 1992), and neither Ulbricht nor *amicus* contends otherwise. There is no evidence investigators “sought evidence beyond the scope of the [crimes] that [were] particularized in the warrant application[s] and for which the application[s] supplied probable cause,” *Galpin*, 720 F.3d at 453, nor do the Warrants contain “*only* a catch-all description of the property to be seized,” so as to render them “facially invalid” and incapable of supporting good faith reliance, *George*, 975 F.2d at 77-78 (internal quotation marks omitted). Put simply, “[t]here is nothing more the officer could have or should have done under these circumstances to be sure his search would be legal.” *United States v. Ganius*, 2016 WL 3031285, at *18 (internal quotation marks omitted); *see also United States v. Clark*, 638 F.3d at 105 (“[W]here the need

of Appeals has required *CDT III*s procedures in every case involving a search of electronic evidence.

for specificity in a warrant or warrant affidavit on a particular point was not yet settled or was otherwise ambiguous, we have declined to find a well-trained officer could not reasonably rely on a warrant issued in the absence of such specificity.”).

Second, even if the magistrate judges erred in approving the Warrants, *and* the agents were deemed to have acted unreasonably in relying on them, wholesale suppression of their fruits would be inappropriate. “[A] search conducted pursuant to a warrant held unconstitutional in part does not invalidate the entire search.” *George*, 975 F.2d at 79. Rather, the exclusionary rule requires “suppressing only those items whose seizure is justified solely on the basis of the constitutionally infirm portion of the warrant.” *Id.* As long as the warrant’s “valid parts are distinguishable from the nonvalid parts,” and the valid parts do not “make up ‘only an insignificant or tangential part of the warrant,’” severance is appropriate. *Galpin*, 720 F.3d at 448-49 (*quoting George*, 975 F.2d at 80). Accordingly, because the evidence admitted at trial fell into specific categories of the Warrant, nothing would have been suppressed, even if the Warrant’s more general provisions (referring to “other evidence”) were struck.

3. The Pen/Trap Orders Were Valid

Ulbricht’s challenge to the pen/trap orders has no support in either statutory or case law and should be rejected.

The Government may obtain dialing information prospectively and without a warrant, because there is

no reasonable expectation of privacy in non-content information used to route communications, *Smith*, 442 U.S. at 743-44, and the use of a pen register to collect basic Internet routing data is “constitutionally indistinguishable” from the use of a pen register to collect dialing instructions, *Forrester*, 512 F.3d at 510; *see also Graham*, — F.3d. —, Nos. 12-4659, 12-4825, 2016 WL 3068018, at *7-8; *United States v. Christie*, 624 F.3d at 574. The data collected by the Government here (namely, source and destination IP addresses, and associated dates and times of communication) are analogous to the dialed numbers in *Smith* and plainly covered by the Pen/Trap Act. 18 U.S.C. § 3127(3) & (4).³⁰

Ulbricht argues that the pen/trap orders were invalid, because they monitored Internet traffic in and out of his home, thus revealing activity in a special locus of constitutional privacy protection. (Br. 118-

³⁰ Congress amended the Pen/Trap Act in 2001 to explicitly include non-content addressing information for Internet communications, in addition to telephone toll records. 18 U.S.C. § 3127(3); *see also* 147 Cong. Rec. S11,006-07 (Oct. 25, 2001) (statement of Sen. Leahy) (describing amendment as a way to “ensure[] that the pen register and trap and trace provisions apply to facilities other than telephone lines (e.g., the Internet)”; 147 Cong. Rec. H7,197 (Oct. 23, 2001) (statement of Rep. Conyers) (same).

20).³¹ But that argument proves too much, as today's telephone pen registers likewise reveal when someone is home, when they answer the phone or place a call. *See Smith*, 442 U.S. at 743 ("The fact that [petitioner] dialed the number on his home phone rather than on some other phone could make no conceivable difference, nor could any subscriber rationally think that it would."); *see also United States v. Todisco*, 667

³¹ Ulbricht also mischaracterizes the pen/trap orders as "hybrids," procured through both 18 U.S.C. § 3127 and 18 U.S.C. § 2703(d), and akin to cell-site location orders (Br. 122), but in fact, the pen/trap orders were sought and issued only pursuant to the Pen/Trap Act, 18 U.S.C. §§ 3121-27. (*See, e.g., S.* 67-78). Accordingly, the authorities addressing location data under the Stored Communications Act are irrelevant. (*Contra* Br. 122-24).

Nor did the pen/trap orders authorize the collection of content. (Tarbell Decl. ¶ 19). The Government did not collect the URLs for websites Ulbricht viewed or the searches he typed into Google. (*Contra* Br. 113-14). Nor did it collect geolocation data. (Tarbell Decl. ¶ 21). Rather, the Government sought and obtained only routing information that revealed when someone using the specified facilities connected to the Internet and the IP addresses of the computers he was communicating with, just as a pen register on a home phone would reveal when an occupant was using the phone and what numbers he dialed.

F.2d 255, 258 (2d Cir. 1981) (installing a pen register on a home telephone is not a Fourth Amendment search, even if it is installed by police without the assistance of a telephone company).

Even if this Court were to be the first to conclude that use of the Pen/Trap Act to collect Internet routing information violates the Fourth Amendment, contrary to the “strong presumption of constitutionality due to an Act of Congress,” *United States v. Watson*, 423 U.S. 411, 416 (1976) (internal quotation marks omitted), agents were entitled to rely in good faith on orders issued under the Pen/Trap Act, and suppression of their fruits would be unjustified, *see Illinois v. Krull*, 480 U.S. at 349.

Accordingly, the District Court properly denied Ulbricht’s motions to suppress.

POINT VII

Ulbricht’s Sentence Was Reasonable

A. Relevant Facts

1. The Presentence Report

In advance of the defendant’s sentencing, the Probation Office prepared a Presentence Report, which calculated that the Total Offense Level was 43, that the defendant’s Criminal History Category was I, and that the recommended sentence under the Guidelines was life imprisonment. (PSR at 36).

Section 2D1.1 drove the Guidelines calculation. Based on a “conservative” estimate of drug weight,

derived from the Silk Road website's transactions database, Ulbricht was accountable for more than 82 kilograms of cocaine, more than 26 kilograms of heroin, and more than 8 kilograms of methamphetamine (PSR ¶¶ 60, 94), for a base offense level of 36 (PSR ¶ 94 & n.2), which was increased by 4 levels, for operating a continuing criminal enterprise (U.S.S.G. § 2D1.5; PSR ¶ 94). The Probation Office increased that offense level of 40 by three enhancements of two levels each, for directing the use of violence (U.S.S.G. § 2D1.1(b)(2)), distributing a controlled substance through mass-marketing by means of an interactive computer service (U.S.S.G. § 2D1.1(b)(7)), and maintaining a premises for the purpose of manufacturing or distributing a controlled substance (U.S.S.G. § 2D1.1(b)(12)). (PSR ¶ 94).³² The Probation Office increased that offense level by two levels for money laundering, pursuant to Section 2S1.1(b)(2)(B) (PSR ¶ 95), and arrived at a total offense level of 50. (PSR ¶ 99). After conducting a grouping analysis that did not impact that offense level (PSR ¶¶ 100-20), the Probation Office reduced the offense level to the maximum under the Guidelines, 43, pursuant to Section 5A, comment. (n.2).

³² Accordingly, the base offense level should have been 46, not 48, as the Probation Office calculated, although as described below, the mistake was not material, because the maximum offense level under the Guidelines is 43.

The Probation Office recommended that Ulbricht be sentenced to life imprisonment. (PSR at 36). Such a sentence was warranted in part because Silk Road was “unprecedented” in its ability to entice people who would not otherwise have engaged in “traditional drug deals.” (PSR at 38). In light of Silk Road imitators that were quick to populate the dark web after Ulbricht’s arrest, “a severe sentence is needed to provide general deterrence.” (PSR at 38).

2. The Overdose Deaths

Although it did not impact the Guidelines calculation, the Government urged the District Court to consider the overdose deaths of six individuals that were linked to drugs purchased from Silk Road. Those deaths were relevant, the Government argued, because they “illustrate the obvious: that drugs can cause serious harm, including death, particularly when distributed in the massive quantities they were here.” (A. 902). The individuals who died were:

Jordan M.: On August 29, 2013, first responders found Jordan M. unconscious, slumped in a chair next to his laptop computer in his bedroom, in Bellevue, Washington. (PSR ¶ 62). A black belt with a looped end was lying near his feet, and a hypodermic needle, a bag containing 1.7 grams of powdered heroin, and a torn open express mail package were strewn around the room. (PSR ¶ 63). Jordan’s computer was open to his private message inbox on Silk Road, which included messages from a Silk Road vendor about a package of heroin and Xanax due to arrive that morning, with a tracking number that matched

the package in his room; another browser window showed tracking information for the package from the Postal Service. (PSR ¶ 64). Jordan M. was transferred to a hospital where he died two days later. (PSR ¶ 62). An autopsy determined the cause of death to be acute intoxication from heroin, Xanax, and valium, all drugs he had ordered on Silk Road. (PSR ¶¶ 62, 65, 68).

Preston B.: On February 15, 2013, during a post-prom party at a hotel, Preston B., a 16-year old boy from Perth, Australia, took two doses of 25i-NBOMe (known as “N-bomb”), a powerful synthetic drug designed to mimic LSD, which one of Preston’s friends purchased from Silk Road. (PSR ¶¶ 77-78). Preston began acting erratically, muttering incoherently with aggressive outbursts and random, destructive behavior, seemingly “at war with himself.” (PSR ¶ 79). When Preston’s friends went to get help, Preston screamed loudly, then jumped off the room’s balcony to the pool deck below. (PSR ¶ 80). He died two days later. (PSR ¶ 77).

Bryan B.: On October 7, 2013, Boston police found Bryan B., age 25, dead in his apartment, with a belt in his left hand and a small plastic bag of brown heroin and a syringe next to him. (PSR ¶ 69). Opiates were found in his system and were listed as the cause of death on his death certificate. (PSR ¶ 69). Only days before law enforcement shuttered Silk Road, Bryan used the website to purchase a pack of syringes and one gram of heroin (approximately 5 to 10 doses’ worth), which arrived on October 1. (PSR ¶¶ 70-72).

Alejandro N.: On September 10, 2012, Alejandro N., age 16, took four doses of N-bomb that had been purchased from a dealer on Silk Road. (PSR ¶¶ 73-76). Alejandro acted “goofy” at first, then became increasingly incoherent and aggressive before he fell on his face, had a seizure, and died on the floor of a friend’s garage in California. (PSR ¶ 74).

Scott W.: On May 19, 2013, Scott W., a 36-year old man from Australia, was found dead at his home, hunched over his desk, with his sleeve rolled up and a used syringe and a plastic bag of cream-colored powder nearby. (PSR ¶ 85). An autopsy found toxic levels of morphine in Scott’s system that were “almost certainly derived from heroin,” as well as depressants with the potential to increase the drug’s harmful effects. (PSR ¶ 85). The cause of death was determined to be “multiple drug toxicity.” (A. 926, 1322). Scott had used Silk Road to place nearly 70 orders between January and May 2013, including 9 orders for heroin and 19 orders for depressants, all of which were shipped to him at the address where he was found dead. (PSR ¶ 86).

Jacob L.: On February 14, 2013, the mother of 22-year-old Jacob L. found him dead at their home in Australia. (PSR ¶ 81). Jacob was recently treated for bronchitis, and the autopsy listed the cause of death as pneumonia, although heroin, cocaine, and other drugs were found in his system, which “may have blunted the deceased’s perception of the severity of his illness.” (PSR ¶¶ 82-83). A Silk Road account named “Needheroin” was used to place more than 30 orders for various drugs between early 2012 and ear-

ly 2013, including heroin, “speed,” “meth,” and “crack,” which were shipped to Jacob under his true name at the address where he was found dead. (PSR ¶ 84).

These were, the Government argued, “specific examples of the harm caused by drug trafficking in the context of this case,” which resulted from risks that were “plainly foreseeable” to the defendant. (A. 902).

3. The Parties’ Sentencing Submissions

Through its first of several submissions, on May 15, 2015, the defense made two principal arguments to mitigate offense conduct. First, the defense contended that Silk Road made drug dealing and using safer, through a variety of measures like “access to physician counseling,” “quality control,” and vendor “ratings.” (A. 904-05). It invoked academic studies of Silk Road that found that anonymity allowed members to “converse freely about their drug use,” “minimized drug-related stigma by reinforcing a[] sense of community,” and, in some cases, made it easier to get information about how to quit using. (A. 905-06 (internal quotation marks omitted)).

Second, relying on review of the relevant records by a forensic pathologist, Dr. Mark Taff (S. 437-47), the defense argued that the evidence was “utterly insufficient to attribute any of the deaths to drugs purchased from vendors on the Silk Road site,” and that they should not be included in the Presentence Report. (A. 904, 1047-48). According to the defense, deficiencies in the death investigations would prevent any medical examiner from opining “to a reasonable

degree of medical certainty as to the cause, manner, and time of death,” in a manner that would qualify for statutory, criminal liability. (A. 911, 913-14). For example, Jordan M.’s death might have been caused by hemorrhaging in his brain after he took the heroin and other drugs that were in his system. (A. 923-24). Dr. Taff also pointed to gaps in the paperwork associated with various cases. (*E.g.*, A. 927).

The defense specifically disclaimed the need for a hearing to settle any factual disputes, however, encouraging the District Court to rely on the papers. (A. 903-04).³³

In a second submission, on May 22, 2015, the defense sought a sentence “substantially below the applicable advisory” Guidelines sentence, based on the defendant’s history and characteristics and other factors. (A. 973-75). After a lengthy recitation of Ulbricht’s personal history, Ulbricht argued that he created Silk Road because he was a “young idealist” who wanted people to have “the freedom to make their own choices, to pursue their own happiness,” and that he “never sought to create a site that would provide an avenue for people to feed their addictions” or because he was interested in “financial gain.” (A. 1003 (internal quotation marks omitted)). The defense also urged the District Court to disregard the attempted murder-for-hire allegations, and objected

³³ The District Court ordered the defense to respond to several questions in response to its initial filing (A. 971-72), and it did so (A. 1386-1413).

to an enhancement based on that conduct, because the plots were “fictitious” and “limited to cyberspace.” (A. 1007, 1047-48). The defense argued that Ulbricht’s conduct was more analogous to running a so-called crack house, in violation of Title 18, United States Code, Section 856, than being a member of a drug distribution conspiracy. (A. 1014). As such, it would be unfair to sentence him as if he were one of “the most dangerous offenders” (A. 1019 (internal quotation marks omitted)), and it would not be justified by concerns about deterrence. (A. 1021-46).³⁴

For its part, the Government sought “a lengthy sentence, one substantially above the mandatory minimum” of 20 years’ imprisonment. (A. 1315). In the Government’s view, Ulbricht was the kingpin of a global drug-trafficking enterprise who was responsible for all of the foreseeable consequences of his actions, including the multiple deaths tied to drug sales on Silk Road. (A. 1316-24). Ulbricht knew, and sometimes mocked the fact, that his customers were often addicts struggling to quit, and he took their money, all the same. (A. 1327). The proliferation of “dark markets” in the wake of Silk Road’s founding underscored the need for general deterrence. (A. 1327-28).

³⁴ The defense made three additional submissions regarding the profits, safety, transactions, and customers of Silk Road; attaching additional letters in support of Ulbricht; and including a final report from Dr. Taff regarding the six overdose deaths. (A. 1386-1413, 1414-34, 1435-46).

And notwithstanding positive aspects of Ulbricht's personal history, he "consciously chose to operate a criminal enterprise for several years, motivated in substantial part by greed and vanity." (A. 1328). The Government also submitted five victim impact statements from relatives of the individuals whose drug-related deaths were described above. (A. 1362-85).

4. Ulbricht's Sentencing

Judge Forrest sentenced Ulbricht on May 29, 2015. (A. 1447-1544). After noting that she had read "the entirety of every piece of paper submitted to [her] in this proceeding" (A. 1451), the District Court turned to the Guidelines calculation and the Presentence Report. (A. 1458). In a decision not challenged on appeal, the District Court found "ample and unambiguous evidence that Ulbricht commissioned five murders as part of his efforts to protect his criminal enterprise and that he paid for these murders." (A. 1464-66). Consistent with the Probation Office, the District Court found that the defendant's offense level was 43 and that his Criminal History Category was I. (A. 1470).

The District Court also denied Ulbricht's request to strike references in the Presentence Report to the six overdose deaths tied to drugs purchased from Silk Road. (A. 1471-72). The District Court acknowledged Dr. Taff's report, but found that the standard he applied (whether he could "render opinions to a reasonable degree of medical certainty as to the cause" of death) was inapplicable here, because the District Court was not attempting to determine whether the

drugs purchased on Silk Road were a “but-for” cause of death. (A. 1476). Instead, the relevant question was whether “there is a connection between” those drugs and death, that is, “whether the drugs . . . purchased on Silk Road were ingested and whether the ingestion of those drugs may be reasonably associated with those deaths.” (A. 1476). The District Court found, by a preponderance of the evidence, a “direct tie” between Silk Road and “each of the decedents and to the purchase of the drugs in proximate—very proximate relation to their death.” (A. 1473-74). That evidence was “strong and even more than sufficient circumstantial evidence,” which the District Court recounted in part. (A. 1476-80). The District Court then adopted the PSR’s factual findings. (A. 1481).

After hearing from the parents of two of those decedents, Bryan B. and Preston B. (A. 1482-96), the Government, and the defense (A. 1496-1508), the District Court pronounced sentence. Judge Forrest said she “spent well over 100 hours on this sentence contemplating it, walking and being silent and thinking about it, and running over and over and over it in my mind from every angle I could think of.” (A. 1509). The District Court emphasized that the “biggest part of the sentencing” is “thinking about each and every fact and consideration and provision of law that [it is] required to look at.” (A. 1510). The District Court noted that while the Guidelines recommended a life sentence, she arrived at her sentence only after independently considering the factors set forth in Section 3553(a). (A. 1510). Citing extensively to the record, the District Court analyzed those factors while rejecting a number of Ulbricht’s arguments, including

that (1) Silk Road was started by a naïve and impulsive young man; (2) Silk Road was merely an economic experiment; (3) Silk Road did not expand the market for drugs; (4) the sale of drugs imposes no costs on society; (4) Ulbricht’s murder-for-hire schemes should be ignored; (5) the negative effects of Silk Road were mitigated by its “harm reduction” features; (6) general deterrence, through sentencing, is illusory; (7) personal deterrence is unnecessary in this case; and (8) the recent sentencing of a Silk Road moderator to time-served provided a meaningful benchmark. (A. 1514-36).

After reiterating that it had “examined each potential year of incarceration carefully,” the District Court sentenced Ulbricht to life imprisonment on both Counts Two and Four and to 5, 15, and 20 years’ imprisonment on Counts Five, Six, and Seven, respectively, to be served concurrently. (A. 1539-40).³⁵ The District Court also ordered Ulbricht to forfeit \$183,961,921 (A. 1536) and imposed a \$500 special assessment (A. 1541).

The District Court found, “after deep contemplation and much searching . . . that this sentence and no other is sufficient but not greater than necessary to meet the factors under 3553(a).” (A. 1541).

³⁵ At the beginning of sentencing, the District Court vacated the convictions on Counts One and Three, as lesser included offenses of Counts Two and Four, respectively (and therefore duplicative). (A. 1459-61; Docket Entries 258, 259).

B. Applicable Law

Appellate review of a district court's sentence "encompasses two components: procedural review and substantive review." *United States v. Cavera*, 550 F.3d 180, 189 (2d Cir. 2008) (*en banc*). An appellate court "must first ensure that the district court committed no significant procedural error, such as failing to calculate (or improperly calculating) the Guidelines range, treating the Guidelines as mandatory, failing to consider the Section 3553(a) factors, selecting a sentence based on clearly erroneous facts, or failing to adequately explain the chosen sentence—including an explanation for any deviation from the Guidelines range." *Gall v. United States*, 552 U.S. 38, 51 (2007). In that regard, a district court's findings of fact are reviewed for clear error, *United States v. Broxmeyer*, 699 F.3d 265, 281 (2d Cir. 2012), and application of the Guidelines based on those factual findings is reviewed *de novo*, *United States v. Reingold*, 731 F.3d 204, 222 (2d Cir. 2013). Procedural error also occurs if the sentencing judge fails to provide an adequate explanation for the sentence imposed, which requires showing that "it has 'considered the parties' arguments' and that it has a 'reasoned basis for exercising [its] own legal decisionmaking authority.'" *United States v. Cavera*, 550 F.3d at 193 (quoting *Rita v. United States*, 551 U.S. 338, 356 (2007)).

If the Court determines that there was no procedural error, it "should then consider the substantive reasonableness of the sentence imposed under an abuse-of-discretion standard." *Gall v. United States*,

552 U.S. at 51. Defendants challenging the substantive reasonableness of their sentences bear a “heavy burden[,] because [this Court’s] review of a sentence for substantive reasonableness is particularly deferential.” *United States v. Broxmeyer*, 699 F.3d at 289. In conducting such review, this Court must “take into account the totality of the circumstances, giving due deference to the sentencing judge’s exercise of discretion, and bearing in mind the institutional advantages of district courts.” *Cavera*, 550 F.3d at 190. This Court cannot “substitute [its] own judgment for the district court’s on the question of what is sufficient to meet the § 3553(a) considerations in any particular case,” and should “set aside a district court’s substantive determination only in exceptional cases where the trial court’s decision ‘cannot be located within the range of permissible decisions.’” *Id.* at 189 (quoting *United States v. Rigas*, 490 F.3d 208, 238 (2d Cir. 2007)); see also *United States v. Fernandez*, 443 F.3d 19, 26-27 (2d Cir. 2006).

When applying the applicable, deferential standard of review, this Court will also bear in mind that a sentencing judge may take into consideration his or her “own sense of what is a fair and just sentence under all of the circumstances.” *United States v. Jones*, 460 F.3d 191, 195 (2d Cir. 2006). “That is the historic role of sentencing judges, and it may continue to be exercised, subject to the reviewing court’s ultimate authority to reject any sentence that exceeds the bounds of reasonableness.” *Id.* “The particular weight to be afforded aggravating and mitigating factors is a matter firmly committed to the discretion of the sentencing judge,” *Broxmeyer*, 699 F.3d at 289 (internal

quotation marks omitted), and it need not be the weight that this Court would give each factor, so long as “the factor, as explained by the district court, can bear the weight assigned it under the totality of circumstances in the case.” *Cavera*, 550 F.3d at 191; *accord United States v. Pope*, 554 F.3d 240, 246-47 (2d Cir. 2009).

Review for substantive reasonableness is comparable to considering whether a jury’s verdict constitutes “manifest injustice” or whether state actors have engaged in conduct that “shocks the conscience.” *United States v. Rigas*, 583 F.3d at 122-23. At bottom, the substantive reasonableness standard “provide[s] a backstop for those few cases that, although procedurally correct, would nonetheless damage the administration of justice because the sentence imposed was shockingly high, shockingly low, or otherwise unsupported as a matter of law.” *Id.* at 123.

C. Discussion

1. The District Court Did Not Make a Procedural Error

Ulbricht argues that the District Court committed procedural error by considering the six overdose deaths in imposing sentence, because its factual finding that those deaths related to Silk Road was “clearly erroneous” and relied on the wrong legal standard. (Br. 125). To the contrary, the District Court was entitled to consider deaths linked to Silk Road in sentencing Ulbricht, and its factual finding that those six overdoses qualified was not clearly erroneous.

In fashioning a sentence, the District Court was obligated to consider “the nature and circumstances of the offense” and “the seriousness of the offense.” 18 U.S.C. § 3553(a)(1) & (a)(2)(A). For these purposes, the term “offense” is broad and includes more than merely the conduct that justifies specific enhancements under the Guidelines. See *United States v. Kullick*, 629 F.3d 165, 174 n.7 (3d Cir. 2010) (“[C]onduct that is in some way ‘related’ to the offense conduct need not be technically covered by the definition of relevant conduct in order to be considered in a § 3553(a) analysis.” (internal quotation marks omitted)). This provision contains no causation requirement itself, and encompasses harm to victims broadly, even indirect victims who lack the “nexus or proximity to the offense” required by the Guidelines. *United States v. Singer*, — F.3d —, No. 15-2169, 2016 WL 3244869, at *7 (10th Cir. June 13, 2016) (internal quotation marks omitted); see also Fed. R. Crim. P. 32(d)(2)(B) (requiring presentence reports to contain “information that assesses any financial, social, psychological, and medical impact on *any victim*” (emphasis added)).³⁶ Ulbricht faults the District Court for

³⁶ Even under the Guidelines, which look to the “harm that resulted from” jointly undertaken criminal activity, U.S.S.G. § 1B1.3(a)(3), this Court has taken an expansive view of consequences relevant to sentencing. What matters, under that provision, is whether the defendant “knowingly risked” the lives of others by “put[ting] into motion a chain of events that contained an inevitable tragic result.” *United States*

v. *Molina*, 106 F.3d 1118, 1124 (2d Cir. 1997) (wounding of a bystander by a security guard “resulted from” the defendants’ robbery attempt) (internal quotation marks omitted). Even where a defendant’s conduct merely “contributed to the danger” directly caused by others, he is properly punished for it. *United States v. Moskowitz*, 888 F.2d 223, 227 (2d Cir. 1989). The focus on the defendant’s conduct and state of mind, and the reasonable foreseeability of consequences flowing therefrom (*i.e.*, proximate cause), as opposed to but-for causation, is appropriate at sentencing.

This Court has recognized, in the context of common law torts, that, although it can be difficult to determine whether one among several factors “caused” injury, “if (a) a negligent act was deemed wrongful *because* that act increased the chances that a particular type of accident would occur, and (b) a mishap of that very sort did happen, this was enough to support a finding by the trier of fact that the negligent behavior caused the harm.” *Zuchowicz v. United States*, 140 F.3d 381, 390 (2d Cir. 1998); *see also United States v. Kearney*, 672 F.3d 81, 98 (1st Cir. 2012) (“‘When the conduct of two or more actors is so related to an event that their combined conduct, viewed as a whole, is a but-for cause of the event, and application of the but-for rule to each of them individually would absolve all of them, the conduct of each is a cause in fact of the event.’” (quoting Keeton et al., *Prosser and Keeton on Torts* § 41 at 268 (5th ed. 1984))); *Restatement (Third) of Torts: Phys. & Emot. Harm* § 27, cmt. n.g (2010) (“[S]ome or all of the person’s exposures [to a toxic

evaluating whether the deaths were “related to Silk Road” (Br. 128), but that was the right standard for

agent] may not have been but-for causes of the disease. Nevertheless, each of the exposures prior to the person’s contracting the disease . . . is a factual cause of the person’s disease Whether there are some exposures that are sufficiently *de minimis* that the actor should not be held liable is a matter not of factual causation, but rather of policy . . .”). While that rule may not suffice to support a conviction beyond a reasonable doubt, “given the need for clarity and certainty in the criminal law,” *Burrage v. United States*, 134 S. Ct. 881, 890-92 (2014), it is appropriate in the context of sentencing, where “less demanding causal standards are necessary . . . to vindicate the law’s purposes,” *Paroline v. United States*, 134 S. Ct. 1710, 1724 (2014) (applying principles of “aggregate causation” to determine fair restitution to a victim of child pornography, where many offenders besides the defendant viewed images of the victim).

Not even the defense’s expert suggested that the decedents would have died *without* ingesting the drugs obtained from Silk Road. (*E.g.*, S. 445 (“Based on my review of [Alejandro A.’s] records, it is my opinion . . . that [his] cause of death was due to multiple drug (25I-NBOMe, marijuana and Prozac) intoxication.”)). Accordingly, the District Court’s conclusion that the drugs from Silk Road “caused” harm to the decedents was justified, even if they were not a “but for” cause. (A. 1473).

the District Court to use in evaluating the scope of “the offense.” Whether “ingestion of those drugs [purchased on Silk Road] may be reasonably associated with those deaths” (A. 1476) was an entirely reasonable basis for measuring the consequences of Ulbricht’s actions under Section 3553(a).

Moreover, the District Court’s factual findings that those deaths were “connect[ed]” to Silk Road were amply supported by the record, and certainly not clearly erroneous. (A. 1476-77). In making its findings, the District Court was free to consider information from any source without “limitation,” 18 U.S.C. § 3661; *see United States v. Gomez*, 580 F.3d 94, 105 (2d Cir. 2009) (sentencing court may consider, for example, “evidence of uncharged crimes, dropped counts of an indictment and criminal activity resulting in acquittal in determining sentence” (internal quotation marks omitted)); *United States v. Lee*, 818 F.2d 1052, 1055 (2d Cir. 1987) (“Any circumstance that aids the sentencing court in deriving a more complete and true picture regarding the convicted person’s . . . behavior is properly considered.”). That information must, of course, be “reliable and accurate,” as opposed to “‘untrue’” or “‘misinformation,’” but a district court’s factual findings may be supported by a preponderance of the evidence, not just evidence beyond a reasonable doubt. *United States v. Lee*, 818 F.2d at 1055, 1057 (quoting *Townsend v. Burke*, 334 U.S. 736, 741 (1948)).

The evidence recounted above (and in more detail in paragraphs 62-86 of the Presentence Report) amply supported the District Court’s finding that there

was “more than sufficient circumstantial evidence to show the connection” between Silk Road and those deaths. (A. 1476-77). The defense did not dispute the evidence proffered by the Government that each victim purchased illegal drugs (of the type that caused his death) either directly from Silk Road or from others who did, nor did the defense dispute that consuming those drugs contributed in some way to their death. Those facts were a sufficient basis for the District Court to consider those deaths in fashioning a sentence under Section 3553(a). *See United States v. Pacheco*, 489 F.3d 40, 45 (1st Cir. 2007) (affirming district court’s conclusion that defendant’s drugs caused victim’s death where, among other things, the record contained no evidence that victim had other sources for narcotics); *United States v. Howard*, 454 F.3d 700, 702-03 (7th Cir. 2006) (affirming district court’s conclusion that defendant was “responsible for” an overdose victim’s death, and took that fact into account under Section 3553(a), where the weight of evidence suggested decedent had bought the heroin in question from defendant).

Ulbricht’s principal argument, below and on appeal, is that gaps in the documentation relating to the overdose deaths, as well as evidence that some of the victims suffered from other health issues (or used other drugs), precluded the District Court from drawing any conclusions about the legal cause of their death. (Br. 130-33). But Dr. Taff, whose opinion Ulbricht relied on, addressed an irrelevant standard when he concluded that he could not draw conclusions about the causes of death “to a reasonable degree of forensic medical certainty.” (S. 445). Whether

some of the victims might have deliberately overdosed or suffered from other health problems, or whether their deaths were the result of a combination of drugs, which were the questions he focused on (S. 438-39, 445-46), were all beside the point, for these purposes. A drug dealer takes his customers as he finds them. *See United States v. Pacheco*, 489 F.3d at 48 n.5 (“[W]hile [defendant] could not have anticipated the exact sequence of events that unfolded here, he could (and should) have foreseen the possibility of the kind of serious harm that in fact occurred.”). And although Dr. Taff may not have rendered an opinion on the causes of death in most cases, he did not dispute that illegal drugs played a role in each death. (*E.g.*, S. 440 (Jordan M.: “Autopsy report correctly attributed death to multiple/combined drug intoxication.”)).³⁷

³⁷ *Amici* argue that the association between the six overdose deaths and Silk Road is “specious,” because the causes of overdose are “incredibly complex,” and typically the “result of societal failings rather than the drug use alone.” (DPA Br. 9). Regardless of whether more could be done as a matter of social policy to prevent those deaths, drugs themselves still “cause” them, in any meaningful legal, moral, and scientific sense of that word; they are also likely to do so, and those who sell them are properly held accountable for the “necessary or natural consequence[s]” of their actions. *Pinkerton v. United States*, 328 U.S. 640, 648 (1946); *see also United States v. Faulkner*, 636 F.3d 1009, 1022 (8th Cir. 2011) (“While [the defendant] may not have played a direct role in

The District Court found there was “no factual doubt that[,] based on the evidence before the Court, the sale of the drugs through Silk Road caused harm to the decedents” (A. 1473), and that it would have been “pure speculation” to believe that any decedent would have died absent the drugs he obtained from Silk Road. (A. 1477-80). Those findings, which were not clearly erroneous, were relevant to Ulbricht’s sentence and properly considered by the District Court under Section 3553(a).

2. A Life Sentence Was Justified

In challenging the substantive reasonableness of his sentence, Ulbricht implies that a life sentence is *per se* unreasonable (Br. 134), accuses the District Court of “ignor[ing]” his arguments (Br. 135), and contends that, because prison does not deter criminals, deterrence should not have factored into his sentence (Br. 138-39). To the contrary, the record reveals that Judge Forrest carefully weighed Ulbricht’s arguments, but found them wanting in light of his conduct, and she imposed a sentence within the rea-

manufacturing or distributing the heroin that caused [the victim’s] death, he was part of the conspiracy that distributed the heroin.”); *United States v. Westry*, 524 F.3d 1198, 1219 (11th Cir. 2008) (“Where a conspirator is involved in distributing drugs to addicts, . . . it is a reasonably foreseeable consequence that one or more of those addicts may overdose and die.”).

sonable exercise of her broad discretion and with due regard for Section 3553(a)'s parsimony clause.

“Silk Road was a worldwide criminal drug enterprise with a massive geographic scope,” which, the District Court found, “posed serious danger to public health and to our communities.” (A. 1512). Approximately 1.5 million transactions, having a value of nearly \$214 million, were conducted over Silk Road, the vast majority of which involved illegal drugs. (PSR ¶ 59). Silk Road became what it was, not because Ulbricht was “an impulsive or naïve young man,” but because he viewed himself as “above the law,” and consequently set out to “run[] a multi-million dollar criminal enterprise.” (A. 1513-15). Ulbricht’s own words, such as when he joked about a heroin addict who relapsed, or allowed cyanide to be sold on the site, were “the words of a man who knows precisely what he is doing and . . . who is callous as to the consequences or the harm and suffering that it may cause others.” (A. 1521).

The District Court rejected the defense’s arguments that Silk Road mitigated the harm of drug dealing by providing a safer forum to obtain narcotics. (A. 904-10). By making illegal drugs of every variety available over the Internet, the site “[brought] drugs to communities that previously may have had no access to such drugs or in such quantities.” (A. 1522; *see also* A. 1487, 1492 (statements from deceased victims’ relatives)). It greatly eased access to drugs for “first-time users or those trying different drugs for the first time.” (A. 1522). As a result, the District Court found, there was “no doubt” that Silk

Road was “market expanding” and left “a tr[ai]l of drug users and drug dealers in its wake.” (A. 1521-22). After summarizing the social costs of narcotics distribution and use, the District Court called the defense’s harm reduction arguments “fantasy.” (A. 1529).³⁸

The District Court also cited the defendant’s efforts to murder “five people to protect [his] drug enterprise.” (A. 1528). While recognizing that there was no evidence the murders were actually carried out, the District Court found “no doubt” that the defendant intended to solicit them. (A. 1528-29).³⁹ As it noted, the defendant commissioned the murders, and paid for them—using \$650,000 in Bitcoins—after receiving photographs purporting to be of the dead bodies, sent to him as confirmation that they were carried out. (A. 1471, 1529; PSR ¶¶ 49, 60).

Finally, the District Court emphasized the need for deterrence—both general and specific. As to general deterrence, the District Court found that what the defendant did “was unprecedented” in terms of the vast online criminal enterprise he created, and

³⁸ The District Court called a physician who advised Silk Road users on their drug use, sight-unseen, “particularly despicable” and “breathtakingly irresponsible.” (A. 1529-30).

³⁹ *Amici* are mistaken to suggest such conduct needed to be proven to a jury beyond a reasonable doubt to be considered at sentencing. (DPA Br. 15). See *United States v. Gomez*, 580 F.3d at 105.

that the outcome of the case was being closely followed by the public. (A. 1533). Under the circumstances, the District Court found general deterrence interests to be particularly salient, commenting to the defendant: “For those considering stepping into your shoes, carrying some flag, some misguided flag, or doing something similar, they need to understand very clearly and without equivocation that if you break the law this way there will be very, very severe consequences.” (A. 1533).

As to specific deterrence, the District Court found that the defendant could not be trusted to live a law-abiding life upon release from prison—despite his assurances to the court to that effect. It noted that the defendant had lived a double life for several years and had made substantial plans to flee and obtain citizenship in a Caribbean country. (A. 1533-34). The District Court also expressed doubt that the defendant had abandoned the beliefs that led him to start Silk Road in the first place. (A. 1534).

Based on the foregoing, meticulous response to the defense’s arguments and dispassionate review of the evidence, the District Court’s decision to impose a Guidelines sentence of life imprisonment was entirely reasonable. To be clear, the District Court noted that it arrived at its sentence independent of the Guidelines, but the fact that the Guidelines called for a life sentence (as did the Probation Office in its recommendation) further underscored that the sentence appropriately reflected the relevant Section 3553(a) factors and was not substantively unreasonable. *Rita v. United States*, 551 U.S. at 355 (“[W]here [the sen-

tencing] judge and [the Sentencing] Commission *both* determine that the Guidelines sentence is an appropriate sentence for the case at hand, that sentence likely reflects the § 3553(a) factors.”); *United States v. Eberhard*, 525 F.3d 175, 179 (2d Cir. 2008) (“[I]n the overwhelming majority of cases, a Guidelines sentence will fall comfortably within the broad range of sentences that would be reasonable in the particular circumstances.”).

None of Ulbricht’s arguments on appeal provide a basis to disturb the District Court’s sentence. Ulbricht argues that life sentences are “extremely rare in the federal system.” (Br. 134). But life sentences are hardly unprecedented for defendants who held leadership roles in large-scale drug conspiracies, especially when they used the threat of violence to maintain their organization. *See United States v. Ortiz*, 394 F. App’x 722, 726 (2d Cir. 2010); *United States v. Aiello*, 864 F.2d 257, 265 (2d Cir. 1988); *see also United States v. Ayala-Vazquez*, 751 F.3d 1, 34-35 (1st Cir. 2014); *United States v. Cortez-Diaz*, 565 F. App’x 741, 745, 751 (10th Cir. 2014); *United States v. Tanner*, 628 F.3d 890, 908-09 (7th Cir. 2010). Far from establishing that Ulbricht’s sentence was an outlier, a study by the United States Sentencing Commission (cited by the defense and *amici*) demonstrates that Ulbricht’s sentence is comparable to others who were similarly situated. (Br. 134, DPA Br. 5 & n.10-12) (citing Glenn R. Schmitt & Hyun J. Konfrst, *Life Sentences in the Federal System*, United States Sentencing Commission (February 2015), available at <http://go.usa.gov/chzRj>) (“USSC Study”). Drug trafficking was the most common basis for a life

sentence in 2013, and the median drug quantities in those cases were dwarfed by the quantities Ulbricht facilitated through Silk Road. *See* USSC Study, at 4, 7 (38.8kg for powder cocaine, 1 kg for heroin, and 4.8kg for methamphetamine convictions).

Nor did the District Court “ignore[.]” Ulbricht’s arguments. (Br. 135). Judge Forrest discussed each one, concluding, for example, that the letters submitted on Ulbricht’s behalf did not outweigh the defendant’s conduct (A. 1535), that the defense’s “harm reduction” arguments were “misguided in many respects” (A. 1523), that “‘highly publicized’” punishments, in a closely watched case like this one, may deter in ways other sentences do not (A. 1532 (quoting a study relied upon by the defense)),⁴⁰ and (as

⁴⁰ *Amici* argue that general deterrence theory does not provide a basis for imposing sentence in drug cases, “because there is no evidence that long sentences have a general deterrent effect,” or more of one than shorter sentences do. (DPA Br. 15-21). They ignore, however, the statutory mandate that courts “shall consider” the “need for the sentence . . . to afford adequate deterrence.” 18 U.S.C. § 3553(a)(2)(B); *see also United States v. Williams*, 441 F. App’x 52, 56 (2d Cir. 2011) (rejecting contention that district court was obligated to cite “social science studies or other empirical evidence to show that [defendant’s] sentence would have a deterrent effect in the community”); *United States v. Swackhammer*, 400 F. App’x 615, 616 (2d Cir. 2010) (“To reverse simply because the District Court did not conduct an empirical anal-

discussed above), why Dr. Taff's affidavit was off-point (A. 1476). The District Court was not required even to *address* each of these arguments in the first place, much less accept them. *See United States v. Fernandez*, 443 F.3d at 30 (district court is not required to "expressly parse or address every argument relating to [sentencing] factors that the defendant advanced").

Although Ulbricht likens himself to the "landlord" who lets his tenants sell drugs (Br. 138), in fact he was a kingpin, the "captain of th[e] ship," (Tr. 258), in his words, who was "lead[ing] an international narcotics organization" from "[b]ehind [his] wall of anonymity," (Tr. 264, 283). The drug dealers who sold through Silk Road were his "business partners" (Tr. 1793), not mere tenants, and unlike a landlord, Ulbricht received a commission on each and every sale that Silk Road facilitated. Ulbricht generally did not sell drugs himself,⁴¹ *because he did not have to*; like any other kingpin, he had an entire network of individuals operating under his umbrella who did the work for him, including individuals he paid to kill others (Tr. 272-77, 290-310, 1802-24, 1876-79, 1883-87, 1891-92).

ysis of the statistical support underlying the Sentencing Guidelines would reach far beyond the scope of our substantive reasonableness review.").

⁴¹ Ulbricht did sell several kilograms of hallucinogenic mushrooms through Silk Road, when he first launched the site, to attract traffic. (PSR ¶¶ 45-46).

Nor was Ulbricht comparable to Peter Nash, a Silk Road staff member who worked for him as a forum “moderator.” (A. 1535). As the District Court remarked, Nash “was a very, very different person” from Ulbricht, who was “way up on top of the hierarchy,” while Nash was “way down.” (A. 1535-36). And in any event, while a district court is permitted to consider disparities between co-defendants (or co-conspirators), it is not required to do so. *See United States v. Ghailani*, 733 F.3d 29, 55 (2d Cir. 2009).

At bottom, the District Court rejected Ulbricht argument that Silk Road was different from any other multi-million dollar narcotics enterprise, because it sold drugs online as a form of morally ambiguous protest against authority: “No drug dealer from the Bronx selling meth or heroin or crack has ever made these kinds of arguments to the Court. It is a privileged argument, it is an argument from one of privilege.” (A. 1523).

The District Court had broad discretion to weigh the applicable factors under Section 3553(a), and this Court has declined to “substitute [its] own judgment for the district court’s on the question of what is sufficient to meet the § 3553(a) considerations in any particular case.” *Cavera*, 550 F.3d at 189. Judge Forrest was not obligated, as Ulbricht suggests, to justify “each potential increment of time” in prison (although she did consider it (A. 1539)). “Selection of an appropriate amount of punishment inevitably involves some degree of subjectivity that often cannot be precisely explained.” *United States v. Jones*, 460 F.3d at 195. In light of the vast scope of the defendant’s crim-

inal enterprise, its deadly social impact, the precedent he set for other criminals, and his willingness to kill, the District Court's sentence was clearly the product of a "reasoned exercise of discretion" that should be affirmed. *Cavera*, 550 F.3d at 193.⁴²

⁴² Even if this Court finds that the District Court erred in sentencing Ulbricht, it should not assign the matter to a different judge on remand, as Ulbricht requests. (Br. 139). "Remanding a case to a different judge is a serious request rarely made and rarely granted." *United States v. Awadallah*, 436 F.3d 125, 135 (2d Cir. 2006). It is appropriate "only in the rare instance in which the judge's fairness or the appearance of the judge's fairness is seriously in doubt." *United States v. Bradley*, 812 F.2d 774, 782 n.9 (2d Cir. 1987). Ulbricht asserts that resentencing before a different judge is required "to avoid the irremediable taint from the improper factors the [District] Court considered" (Br. 139), but even Ulbricht's brief alleges only that Judge Forrest gave too much weight to some factors and too little weight to others, and he does not contend that she was biased or otherwise unfair. (Br. 133-39). Accordingly, reassignment would not be appropriate, particularly in light of the District Court's familiarity with an extensive trial record.

159

CONCLUSION

The judgment of conviction should be affirmed.

Dated: New York, New York
June 17, 2016

Respectfully submitted,

PREET BHARARA,
*United States Attorney for the
Southern District of New York,
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CERTIFICATE OF COMPLIANCE

Pursuant to Rule 32(a)(7)(C) of the Federal Rules of Appellate Procedure, the undersigned counsel hereby certifies that this brief complies with the Court's June 7, 2016 order permitting the Government leave to file an oversized brief of up to 40,000 words. As measured by the word processing system used to prepare this brief, there are 37,016 words in this brief.

PREET BHARARA,
*United States Attorney for the
Southern District of New York*

By: ADAM S. HICKEY,
Assistant United States Attorney

15-1815

United States Court of Appeals

FOR THE SECOND CIRCUIT

Docket No. 15-1815



UNITED STATES OF AMERICA,

—v.—

Appellee,

ROSS WILLIAM ULBRICHT,

also known as Dread Pirate Roberts, also known as Silk Road,
also known as Sealed Defendant 1, also known as DPR,

Defendant-Appellant.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SUPPLEMENTAL APPENDIX

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Southern District of New York,
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TABLE OF CONTENTS

	PAGE
<u>Silk Road screenshots taken by Special Agent Der-Yeghiayan</u>	
Government Exhibit 109	
<i>Silk Road homepage</i>	SA-1
Government Exhibit 111	
<i>Silk Road crack cocaine listing</i>	SA-3
Government Exhibit 119	
<i>Silk Road "Buyer's guide"</i>	SA-4
Government Exhibit 125J	
<i>DPR post on SR forum, 1/10/2012</i>	SA-7
Government Exhibit 132	
<i>Silk Road homepage</i>	SA-9
 <u>Photographs of Ulbricht's laptop screen following October 1, 2013 arrest</u>	
Government Exhibit 201A	SA-11
Government Exhibit 201C	SA-13
Government Exhibit 201D	SA-15
Government Exhibit 201G	SA-17
Government Exhibit 201J	SA-19
Government Exhibit 201L	SA-21
Government Exhibit 201M	SA-23

	PAGE
<u>Documents recovered from Ulbricht laptop</u>	
Government Exhibit 214	
<i>Screenshot of Bitcoin wallet file (wallet.dat)</i>	SA-25
Government Exhibit 240A	
<i>2010 journal</i>	SA-26
Government Exhibit 240B	
<i>2011 journal</i>	SA-30
Government Exhibit 240C	
<i>December 29, 2011 journal</i>	SA-34
Government Exhibit 240D	
<i>January 1, 2012 journal</i>	SA-36
Government Exhibit 241	
<i>Log, March 20, 2013 through September 30, 2013</i>	SA-38
Government Exhibit 250	
<i>Silk Road expense report</i>	SA-44
Government Exhibit 251	
<i>"Net Worth Calculator" spreadsheet</i>	SA-53
Government Exhibit 255	
<i>Weekly "To Do" List</i>	SA-57
Government Exhibit 256	
<i>Andrew Jones a/k/a "Inigo" Driver's License</i>	SA-60
Government Exhibit 268	
<i>Silk Road "down for maintenance" webpage</i>	SA-62
Government Exhibit 269	
<i>Dread Pirate Robert PGP public key</i>	SA-63
<u>Fake identification documents ordered by Ulbricht</u>	
Government Exhibit 402	SA-64

Bitcoin analysis documents

Government Exhibit 620A

*Summary chart reflecting direct flow of Bitcoins from Silk Road
Bitcoin wallets to Ulbricht laptop Bitcoin laptop* SA-65

Government Exhibit 630

*Screenshot of Blockchain reflecting March 31, 2013 payment
of Bitcoins from Bitcoin wallet recovered from Ulbricht laptop* SA-66

Government Exhibit 631

*Screenshot of Blockchain reflecting April 8, 2013 payment
of Bitcoins from Bitcoin wallet recovered from Ulbricht laptop* SA-67

Undercover drug purchases from Silk Road

Government Exhibit 801

*Chart summarizing undercover buys by
Homeland Security Investigations, Chicago Field Office* SA-68

Government Exhibit 802

*Chart summarizing undercover buys by
Drug Enforcement Administration, New York Field Office* SA-69

Screenshots of Silk Road website as of October 2, 2013 seizure

Government Exhibit 910

Silk Road homepage SA-70

Government Exhibit 911A

Cocaine listings SA-71

Government Exhibit 911B

Heroin listings SA-74

Government Exhibit 911C

LSD listings SA-77

Government Exhibit 911D

Methamphetamine listings SA-80

Government Exhibit 914

Forgery listings SA-83

	PAGE
Government Exhibit 915B	
<i>Listing for fraudulent European passports and IDs</i>	SA-84
Government Exhibit 915C	
<i>Listing for fraudulent New York driver's license</i>	SA-85
Government Exhibit 915D	
<i>Listing for fraudulent Pennsylvania driver's license.</i>	SA-88
Government Exhibit 915E	
<i>Listing for fraudulent Tennessee driver's license.</i>	SA-91
Government Exhibit 915F	
<i>Listing for fraudulent New South Wales driver's license</i>	SA-94
Government Exhibit 915G	
<i>Listing for forged social security card</i>	SA-97
Government Exhibit 916D	
<i>Listing for remote access tool</i>	SA-100
Government Exhibit 916E	
<i>Listing for remote access tool for Android phones</i>	SA-101
Government Exhibit 916I	
<i>Listing for e-mail account cracking tool.</i>	SA-102
Government Exhibit 916J	
<i>Listing for Facebook, Twitter and YouTube hacking tool.</i>	SA-103
Government Exhibit 916K	
<i>Listing for "I Will Crack Username & Password" service.</i>	SA-105
Government Exhibit 916L	
<i>Listing for e-mail cracking tool.</i>	SA-106
Government Exhibit 916P	
<i>Listing for keylogger tool</i>	SA-108
Government Exhibit 916U	
<i>Listing for distributed denial of service (DDoS) service</i>	SA-110
Government Exhibit 916V	
<i>Listing for distributed denial of service (DDoS) service</i>	SA-111
Government Exhibit 917	
<i>Money listings</i>	SA-112

	PAGE
Government Exhibit 917A	
<i>Listing for “\$10,000 delivered” service</i>	SA-115
Government Exhibit 917B	
<i>Listing for “Vendors Cash In Ur Coins” service.</i>	SA-116
Government Exhibit 917C	
<i>Listing for anonymous VISA ATM card.</i>	SA-118
Government Exhibit 917D	
<i>Listing for anonymous VISA card</i>	SA-120
Government Exhibit 917E	
<i>Listing for \$100 Green Dot Moneypak</i>	SA-123
Government Exhibit 917F	
<i>Listing for “Bitcoin Laundry” service</i>	SA-125
<u>Silk Road transaction summary charts</u>	
Government Exhibit 940A	
<i>Breakdown of Total Categorized Silk Road Sales</i>	SA-127
Government Exhibit 940B	
<i>Sales of Fake IDs, Forgeries and Passports</i>	SA-128
Government Exhibit 940C	
<i>Sales in Money-Related Categories.</i>	SA-129
Government Exhibit 940D	
<i>Silk Road Transactions, January 2011-October 2013</i>	SA-130
Government Exhibit 940E	
<i>Total Silk Road Sales of Selected Drugs</i>	SA-131
Government Exhibit 940F	
<i>Map depicting countries with 10 or more Silk Road vendors</i>	SA-132
Government Exhibit 940G	
<i>Map depicting countries with 100 or more Silk Road buyers</i>	SA-133

Other documents

Criminal Complaint in <i>United States v. Carl Mark Force IV, et al.</i> 15 Mag. 70370 (N.D. Cal. Mar. 25, 2015)	SA-134
Cooperation Agreement with Andrew Michael Jones, a/k/a “Inigo” dated October 2, 2014	SA-229

SA-1

File Edit View History Bookmarks Tools Help

Welcome! | Silk Road


silkkroadvb5piz3r.onion/index.php/silkroad

Bitcoin Wallet - Be Your Own... | Problem loading page

Privnote - Send notes that wi... | Problem loading page

messages 30 | orders 6 | account: \$366.42

Search



Silk Road
anonymous market

Shop by Category

- Drugs 1,690
- Cannabis 312
- Dissociatives 13
- Ecstasy 54
- Opioids 193
- Other 49
- Precursors 1
- Prescription 483
- Psychedelics 338
- Stimulants 137
- Art 2
- Books 33
- Collectibles 9
- Computer equipment 19
- Custom Orders 16
- Digital goods 152
- Drug paraphernalia 79
- Electronics 20
- Erotica 24
- Food 4
- Forgeries 53
- Hardware 2
- Herbs & Supplements 14
- Home & Garden 1
- Jewelry 1
- Lab Supplies 30
- Lotteries & games 18
- Medical 36
- Money 78
- Packaging 21
- Services 18
- Weight loss 6
- Writing 1
- Yubikeys 3

Hi, **alilove**
on vacation - logout

the Dread Pirate Roberts

Go

News

- Closing the Armory
- A brand new look for Silk Road!
- The gift that keeps on giving
- Who's your favorite?
- Acknowledging Heroes

Favorite vendors

- lucymcees(100) remove
- Hydrofarm remove
- mahakalat(86) remove
- PureO(100) remove
- 3Jane(100) remove
- Jannis(100) remove
- Ivory(99) remove
- Karat(100) remove
- Vlad Tepes(100) remove
- Kat remove
- Buddhahature(100) remove
- kobrivoie(100) remove
- thebogeyman(100) remove
- primated(99) remove
- RedHempfield(99) remove
- FarmerBob(100) remove
- meganug(100) remove
- albiomessentials(100) remove
- bluevell(100) remove

GOVERNMENT EXHIBIT 109
14 Cr. 68 (KBF)

10 GR 60 % PURE > DUTCH SPEED < \$96.44

Heroin #4 1gr \$243.00

25-NBOMe 600 ug single dose capsules x 10* NEW \$22.37

7g TRAINWRECK x GREEN CRACK NUGGETS - FREE \$100.00

2 g of Speed / Amphetamine TOP QUALITY \$40.00

Test prop. 100 Testosterone propionate 10ml x 100mg \$132.75

1 gram high quality cocaine \$191.81

1 gram of Blue Magic Black Tar Heroin (86% pure) \$145.82

mkkh @ SilkRoa

20 ml Novalgine (Metamizol) "flussig" \$16.50

The Social Engineer

10 x 120mg MDMA/Mitsubishi Ecstasy Pills *AUS ONLY \$209.99

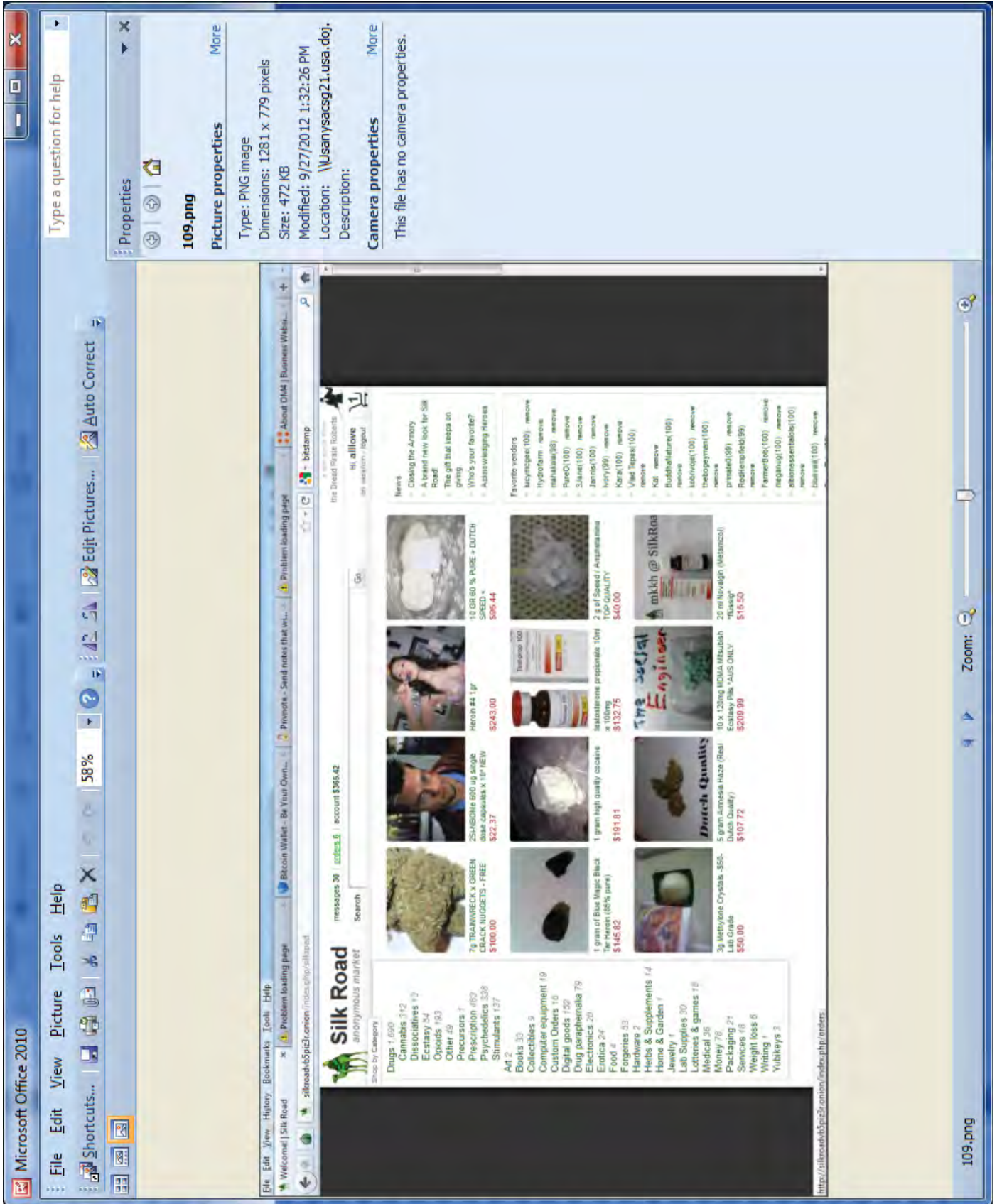
Dutch Quality

5 gram Amnesia Haze (Real Dutch Quality) \$107.72

3g Methylene Crystals -\$50- Lab Grade \$50.00

http://silkkroadvb5piz3r.onion/index.php/orders

SA-2



SA-3

0,5Gr Uncut Crack Cocaine! | Silk Road

silkradvb5piz3r.onion/silkroad/item/97d2714037

messages 0 | orders 0 | account **B18.72**

Silk Road
anonymous market

Shop by Category

Hi, **aspire2b**
logout

the Dread Pirate Roberts

a few words from

0,5Gr Uncut Crack Cocaine!!

B1.65 add to cart

seller: HappyTimezz(100)
ships from: Netherlands
ships to: Worldwide
category: Crack
bookmark this item

postage options:
NL (€0.04)

report this item



Description

Uncut Crack Cocaine.

- Product will be send within 12 hours after order is placed.
- it is possible to ship from Belgium. (Ask for info)
- I destroy all your information after the order has been furnished.

#info:

- I am aware of the latest stealth packaging
- Using the best quality materials.
- My packaging is professional and up-to-date
- Working with bit coins only, NO payments outside of escrow
- Shipping worldwide

GOVERNMENT EXHIBIT
111
14 Cr. 68 (KBF)


SA-4

File Edit View History Bookmarks Tools Help

Books | Silk Road Buyer's guide - Sil... Security BTC \$18.65? Browser-based wallet... Bitcoin Transaction b... Toolbox | DNSstuff

dkn255hz262ypmil.onion/wiki/index.php/Buyer's_guide magicaltux bitcoin forum

Log in



Navigation

- [Main page](#)
- [Community portal](#)
- [Current events](#)
- [Recent changes](#)
- [Random page](#)
- [Help](#)

Toolbox:

- [What links here](#)
- [Related changes](#)
- [Special pages](#)
- [Printable version](#)
- [Permanent link](#)

GOVERNMENT EXHIBIT 119
14 Cr. 68 (KBF)

Page Discussion Read View source View history

Buyer's guide

The currency used to buy stuff on Silk Road are Bitcoin. Bitcoin uses encryption and a system of peer-to-peer double checking to create a completely digital currency. No personal information is associated with your bitcoins at all, making them ideal for anonymous transactions. Additionally, Silk Road employs a built-in tumbler that mixes all incoming bitcoins through a series of dummy transactions before they ever leave. Click here for instructions on how to get Bitcoins, or visit Bitcoin.org to learn more.

Silk Road employs a escrow system for all transaction. This means that when you make a order the bitcoins are deducted from you wallet, moves into a temporary escrow account, then after the vendor sends to order they confirm it being sent. When you receive the package, you confirm it being received and the vendor revives the coin. If for whatever reason you do not receive the package you can send the order into resolution, where you and the vendor can resolve the problem or should that not work Silk Road well step in an resolve the issue. Keep in mind this system is to prevent fraud on both the end of the seller and the buyer.

Contents [hide]

- 1 Connecting to Hidden Services
- 2 Getting bitcoins
- 3 Shopping Cart
 - 3.1 Receiving address
- 4 Payment
 - 4.1 Tumbler
- 5 Escrow
 - 5.1 Escrow hedge
- 6 Receiving packages
- 7 Purchasing statistics
- 8 Final note

Connecting to Hidden Services

Connecting to Hidden Services main article

If you are reading this now, you have at least figured out how to access a tor hidden service, good job :) You have either installed tor and configured your browser to use it, or you are using a proxy such as tor2web. We strongly encourage you to connect to the hidden service directly rather than going through a proxy as it is much more secure and anonymous. The [Tor Browser Bundle](#) is available for all major platforms.

Getting bitcoins

Bitcoin main article

Click here for a list of reputable exchangers that will take many different forms of payment for Bitcoins. When they ask for your receiving address, give them the address on your account page that looks something like this:

1E8sKdGWSy9ysm5ndCbBfdySZRhIPwmYDr

Your deposit will appear in your account once the Bitcoin network confirms your transfer. This can take up to an hour or more. If for some reason your transfer doesn't come through, just let us know and be sure to include the address you sent the coins to.

Your account has a built-in eWallet for Bitcoins, so you can buy and sell here without ever having to worry about third-party services at all. When you sell something, your account is credited, and when you buy something, it is debited.

Shopping Cart

Shopping Cart main article

The first step to placing an order is selecting the items you want to purchase by adding them to your shopping cart. From the cart, you may increase the quantity of your purchase, and select the appropriate postage option. See your vendor's page or the item description for postage instructions. When you've chosen your postage and quantity, click "update cart" to confirm the changes. Once your cart is ready, you must enter the address you would like your items sent to. This is the one point in the process where some kind of personal information is revealed. We take this very seriously and have taken every precaution to protect it.

Receiving address

From the moment you submit your order, to the moment it is displayed to your vendor, the information is fully encrypted and totally unreadable. Then, as soon as your vendor marks your package with the address and confirms shipment, the address is deleted forever and is not retrievable. For the extra cautious, you can encrypt your information yourself with your [vendor's public key](#) so that even we at Silk Road would be unable to view it, even if we wanted to. See below for more ways to be safe.

Payment

If you have enough funds in your account to cover your purchase, then your order will be validated instantly and sent on to your vendor. If not, then you must deposit enough Bitcoins into your account to cover your total.

When your order ships, its status will change from "processing" to "in transit." Now just kick back and wait for it to arrive. Once it does, don't forget to click "finalize" next to your order and leave feedback :)

SA-5

Tumbler

Just when you thought Silk Road couldn't be more secure, we went one step further. The tumbler sends all payments through a complex, semi-random series of dummy transactions, each with a new, one-use receiving address, making it nearly impossible to link your payment with any coins leaving the site. The quantity, frequency, and number of transactions are all varied chaotically in a way that mimics the transactions of the bitcoin economy as a whole.

Escrow

[Escrow main article](#)

Our commitment is to total satisfaction for each and every purchase you make here. If your package never arrives or is not in the condition you expected, you may have a chance at a full or partial refund of the purchase price. Just click "resolve" next to your order. Our resolution center gives you total flexibility in working out a mutually agreeable outcome with your vendor, whether you want to request a full or partial refund, release payment to your vendor, or extend the time you wait for arrival. In the rare event that an agreement can't be made, a Silk Road admin will be right there to mediate and investigate if necessary. The vast majority of orders are filled exactly as expected, but to avoid even the rare hang up, we strongly encourage you to read your vendor's feedback and ask questions of them ahead of time.

NEVER go around the escrow and pay a vendor directly. We will be totally unable to protect you in this event and the vendor will have much less motivation to serve you well. People HAVE been scammed this way. If a seller requests that you pay them directly, please let us know so we can address the situation.

Escrow hedge

Unfortunately, the Bitcoin exchange rate isn't as stable as we would all like it to be, and can fluctuate wildly in a matter of hours, let alone the days or weeks it takes for a package to arrive. Because of this, there is a real danger that the Bitcoins being held in your escrow account will lose value by the time your vendor gets paid or you are refunded. So, we've given the option to vendors to hedge the future payments they are expecting from escrow such that the dollar value of the payment doesn't change as the Bitcoin exchange rate changes.

For example, a vendor is hedging the escrow for a 10 btc order you place with them, and the dollar value of your order when you purchase it is \$100. Now, let's say your order never arrives and your vendor agrees to a full refund, but those 10 btc are no longer worth \$100, they're worth \$50! Because your vendor hedged the escrow, you won't get a refund of 10 btc, you'll get 20 btc equaling the original value of \$100. Of course, the opposite is also true. If Bitcoins appreciate in value while your order is in escrow, your refund will be fewer Bitcoins, but still equaling the original dollar value.

When checking out, you will see which orders will be hedged and which won't. After the order is placed, your escrow balance will reflect the dollar value of your hedged orders and the Bitcoin value of your unhedged orders. All hedged orders are hedged as soon as the order is placed. So when getting a refund for hedged items, don't be surprised if the number of Bitcoins you get back is not the same as the amount you paid.

Receiving packages

Use a different, unrelated address than the one where your item will be kept such as a friends house or P.O. box. Once the item arrives, transport it discretely to its final destination. Avoid abandoned buildings or any place where it would be suspicious to have mail delivered.

Do not sign for your package. If you are expecting a package from us, do not answer the door for the postman, let him leave it there and then transport it as described above. Do not use your real name. This tactic doesn't work in some places because deliveries won't be made to names not registered with the address. If you think this is a problem, send your self a test letter with the fake name and see if it arrives.

If you follow these guidelines, your chances of being detected are minimal. In the event that you are detected, deny requesting the package. Anyone can send anyone else anything in the mail.

Purchasing statistics

Because you are totally anonymous on Silk Road, the vendors here have no way of knowing if they can trust you at first. To help them judge whether they want to do business with you or not, some statistics are kept about your past purchases. When you purchase an item, before the order is accepted, your vendor can see how long you have been a member on the site, how many orders have been shipped out to you, and what percentage of the payments you made for those purchases were ultimately refunded to you. They can also see how many orders you ignored and allowed to "auto-finalize." So, the best way to keep a good reputation and eventually be accepted by all of the vendors here is to finalize your orders as soon as they arrive and you confirm they are good, and to only request a refund when you deserve it. The statistics are weighted toward the present, so you must keep up your good behavior, but if you have a bad streak, you can recover by doing well going forward. You can view your own stats at any time by clicking the link on your account page.

Final note

We do everything we can to protect your anonymity and ensure that your visits here bring you great satisfaction. However, you should understand the risks of possessing and using any of the items you purchase here. Research these matters before jumping in and be responsible for your actions. Learn how Tor and Bitcoin work so you can understand how to use them and where their limitations are. If you have any questions or concerns, we are here to support you.

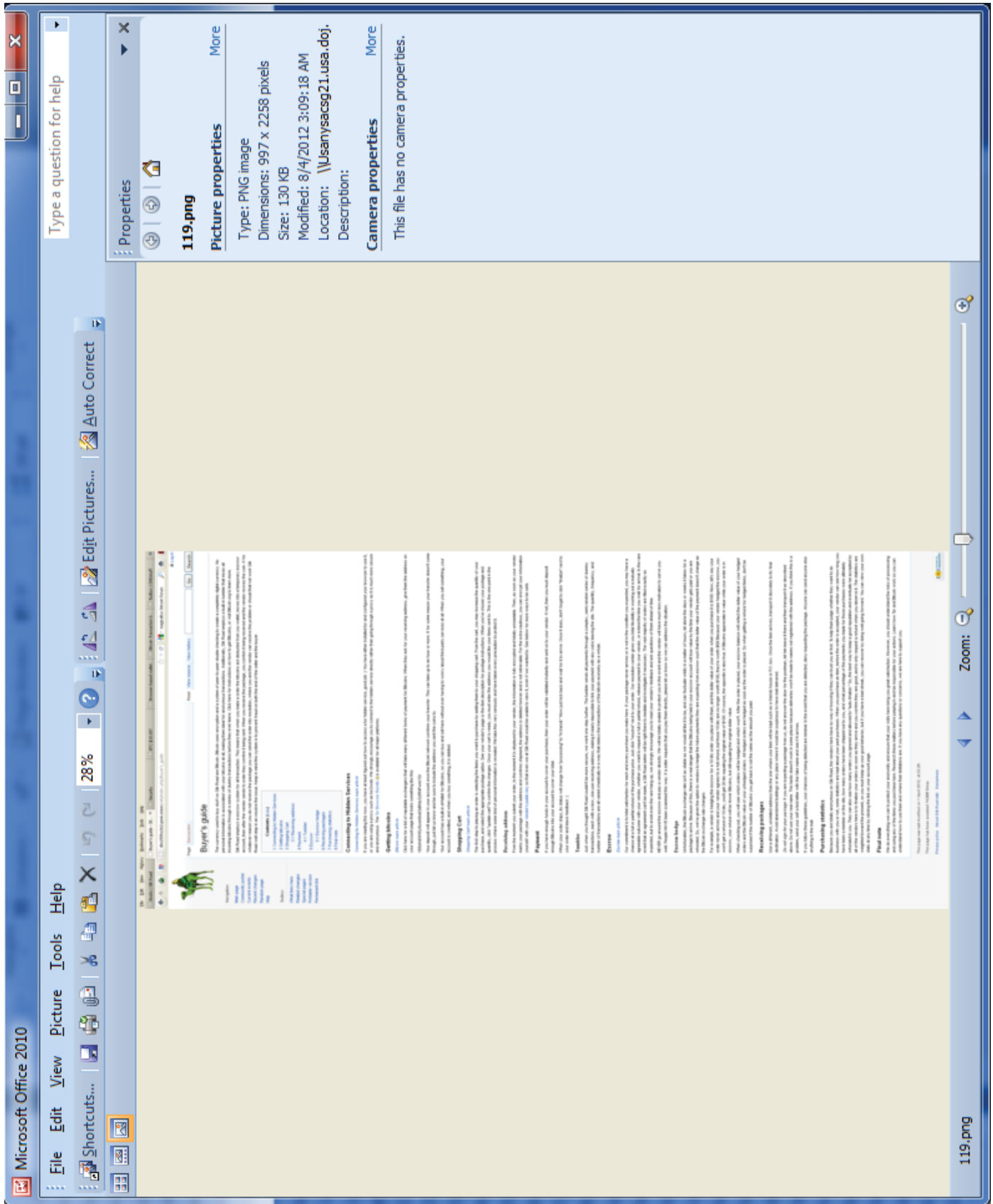
This page was last modified on 1 April 2012, at 22:26.

This page has been accessed 14,995 times.

[Privacy policy](#) [About Silk Road wiki](#) [Disclaimers](#)



SA-6



SA-7

GOVERNMENT EXHIBIT 125 J
14 Cr. 68 (KBF)

658 Silk Road discussion / Re: State of the Road Address

on: January 10, 2012, 02:17 am *

Thank you everyone for your comments and suggestions. One suggestion I especially like is the one about commission being affected by trade volume. To those of you that are either supportive of the change, or have faith in what I am doing regardless of whether you see the point or not, thank you for your support! I have done everything I can to earn that trust and I cherish it.

To those of you chalking my actions up to pure greed and ignoring the context for the changes, I say shame on you. When have I lied? When have I cheated or stolen from anyone here? When have I treated anyone unfairly? When have I lead you astray? Why do you turn on me now when I have poured my heart and soul into this community and project?

10% on \$50 orders? We are talking about an extra \$1.88! A \$10 order? An extra 38 cents! Do you think this site built itself? Do you think it runs itself? Do you have any clue what goes on behind the scenes to keep this going? Do you have any idea the risk the people operating this site are taking? Do you have any clue what we've been through to get here today? Do you have any clue what it's going to take to get through the next year?

Whether you like it or not, I am the captain of this ship. You are here voluntarily and if you don't like the rules of the game, or you don't trust your captain, you can get off the boat. For those that stay, we at Silk Road will continue to do everything in our power to keep this market running smoothly and safely, and thank you again for your support!

Reply Quote Notify Remove

SA-8

Microsoft Office 2010

File Edit View Picture Tools Help

Shortcuts... Edit Pictures... Auto Correct

Type a question for help

1251.png

Properties

Picture properties More

Type: PNG image
Dimensions: 1117 x 4987 pixels
Size: 896 KB
Modified: 10/6/2013 8:19:02 PM
Location: \\usnysacsq21.usa.doj.
Description:

Camera properties More

This file has no camera properties.

bounty is going to take longer than expected, or you are going to be away for a few days, we need to know.

657 recycle bin / Re: Render Controller : Multi-part \$200
on: January 10, 2012, 05:21 am *

Quote from: zanguebing on January 09, 2012, 05:58 pm
If you send up the request as a separate HTTP request, which maybe you don't want for some other reason.

This is very important in fact. We want to reduce every page request to a single http request whenever possible. The main bottleneck for hidden services is connections.

658 Silk Road discussion / Re: State of the Road Address
on: January 10, 2012, 02:17 am *

Thank you everyone for your comments and suggestions. One suggestion I especially like is the one about commission being affected by trade volume. To those of you that are either supportive of the change, or have faith in what I am doing regardless of whether you see the point or not, thank you for your support! I have done everything I can to earn that trust and I cherish it.

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659 Silk Road discussion / Re: State of the Road Address
on: January 09, 2012, 10:54 am *

Quote from: Candyshop on January 09, 2012, 10:54 am
Are you telling me that I can't accept debit payments anymore from customers? You know how many are struggling with bitcoins and prefer paying me through other paying methods!

that's right, you can sell them bitcoins for usd and then they can buy your item with bitcoins.

660 Silk Road discussion / Re: State of the Road Address
on: January 09, 2012, 05:08 am *

Quote from: godofall2 on January 09, 2012, 05:08 am
I'm good with no more ODE stuff! Just did that when ppl ask for it so I don't care, but just want to know how can ppl like BTC buddy and sugarmama stay robust with the new ODE rule? maybe use BTC buddy to get bitcoin to cash out what I can. lol is a lot safer and faster than using the other ways I can. so I don't want to see them gone they help a lot with ppl getting bitcoin fast and for vendor to cash out.

Another clarification. Bitcoin exchangers will still be able to operate. We are working to address the needs of the exchangers and prevent fraud on this front as well.

1251.png

Zoom: 56%

SA-9

the Dread Pirate Roberts

Hi, **citrus**
logout

messages 0 | orders 0 | account \$0.0000 \$0.00

Go

Search

Silk Road
anonymous market

Shop by Category

- Drugs 13,810
- Cannabis 2,934
- Disassociatives 199
- Ecstasy 1,274
- Intoxicants 75
- Opioids 367
- Other 82
- Precursors 62
- Prescription 4,659
- Psychedelics 1,754
- Stimulants 1,634
- Tobacco 219
- Apparel 767
- Art 15
- Books 1,322
- Collectibles 27
- Computer equipment 101
- Custom Orders 86
- Digital goods 886
- Drug paraphernalia 512
- Electronics 234
- Erotica 584
- Fireworks 35
- Food 10
- Forgeries 152
- Hardware 35
- Home & Garden 27
- Jewelry 104
- Lab Supplies 29
- Lotteries & games 165
- Medical 60
- Money 258
- Musical instruments 6
- Packaging 95
- Services 168
- Sporting goods 4
- Tickets 4
- Writing 8



25X LSD BLOTTER
\$421.19



PIRACETAM tbl.
100x1200mg (nootropil)
\$92.64



Boldabol 200 (B. Dragon),
10ml, 200mg/ml
\$66.11



2mg Xanax Bars from
Wallgreens
\$5.42



100x Green Android™ (The
New Mortal Kombatt™)
\$547.65



7 grams of PURE MDMA
Moonrocks.
\$378.58



SCIROXX - Nandrodex
300mg/ml 10ml USA ONLY
\$114.21



HYDRO BUDS 2G
\$40.00



10.0g MDA - Reagent
Tested
\$550.00



1/4 Bubba Kush
\$90.20



4 Orange sunshine 300ug
\$90.49



10g Amnesia Haze
\$194.77

- From the forum
- Buyer ratings discussion
 - Feedback system changes
 - HOW TO: Run your own relay and help the Tor network!
 - Ask a drug expert physician about drugs and health
 - Winning the war on drugs
 - New display currencies
 - Try Tailis for a more secure OS

- Favorite vendors
- Dread Pirate Roberts 5.0
remove
 - Libertas 1.0 - remove
 - inigo 0.0 - remove

GOVERNMENT EXHIBIT
132
14 Cr. 68 (KBF)

SA-10

Microsoft Office 2010

File Edit View Picture Tools Help

Shortcuts... Edit Pictures... Auto Correct

64%

messages 0 orders 0 account \$0.0000 \$0.00

Search

the Dread Pirate Roberts

Hi, **cirrus** [logout](#)

Go

Silk Road
anonymous market

Shop by Category

- Drugs 13,810
- Cannabis 2,934
- Dissociatives 199
- Ecstasy 1,274
- Intoxicants 75
- Opioids 367
- Other 82
- Precursors 62
- Prescription 4,659
- Psychedelics 1,754
- Stimulants 1,634
- Tobacco 219
- Apparel 767
- Art 15
- Books 1,322
- Collectibles 27
- Computer equipment 101
- Custom Orders 86
- Digital goods 886
- Drug paraphernalia 612
- Electronics 234
- Erotica 584
- Fireworks 35
- Food 10
- Forgeries 152
- Hardware 35
- Home & Garden 27
- Jewelry 104
- Lab Supplies 29
- Lotteries & games 165
- Medical 60
- Money 258
- Musical instruments 6
- Packaging 95
- Services 168
- Sporting goods 4
- Tickets 4
- Writing 8

25X LSD BLOTTER
\$421.19

Geratom 1200mg
\$92.64

Boldabol 200 (B. Dragon),
10ml, 200mg/ml
\$66.11

PIRACETAM tbl.
100x1200mg (nootropil)
\$92.64

100x Green Android™ (The
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\$547.65

7 grams of PURE MDMA
Moonrocks.
\$378.58

2mg Xanax Bars from
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\$5.42

HYDRO BUDS 2G
\$40.00

10.0g MDA - Reagent
Tested
\$550.00

SCIROXX - Nandrodex
300mg/ml 10ml USA ONLY
\$114.21

1/4 Bubba Kush
\$90.20

4 Orange sunshine 300ug
\$90.49

10g Amnesia Haze
\$194.77

From the forum

- Buyer ratings discussion
- Feedback system
- HOW TO: Run your own relay and help the Tor network!
- Ask a drug expert physician about drugs and health
- Winning the war on drugs
- New display currencies
- Try Tails for a more secure OS

Favorite vendors

- Dread Pirate Roberts 5.0 [remove](#)
- Libertas 1.0 [remove](#)
- Inigo 0.0 [remove](#)

Type a question for help

Properties

132.png

Picture properties [More](#)

Type: PNG image
Dimensions: 1117 x 995 pixels
Size: 857 KB
Modified: 10/1/2013 6:22:34 PM
Location: \\usanyacsq21.usa.doj.

Camera properties [More](#)

This file has no camera properties.

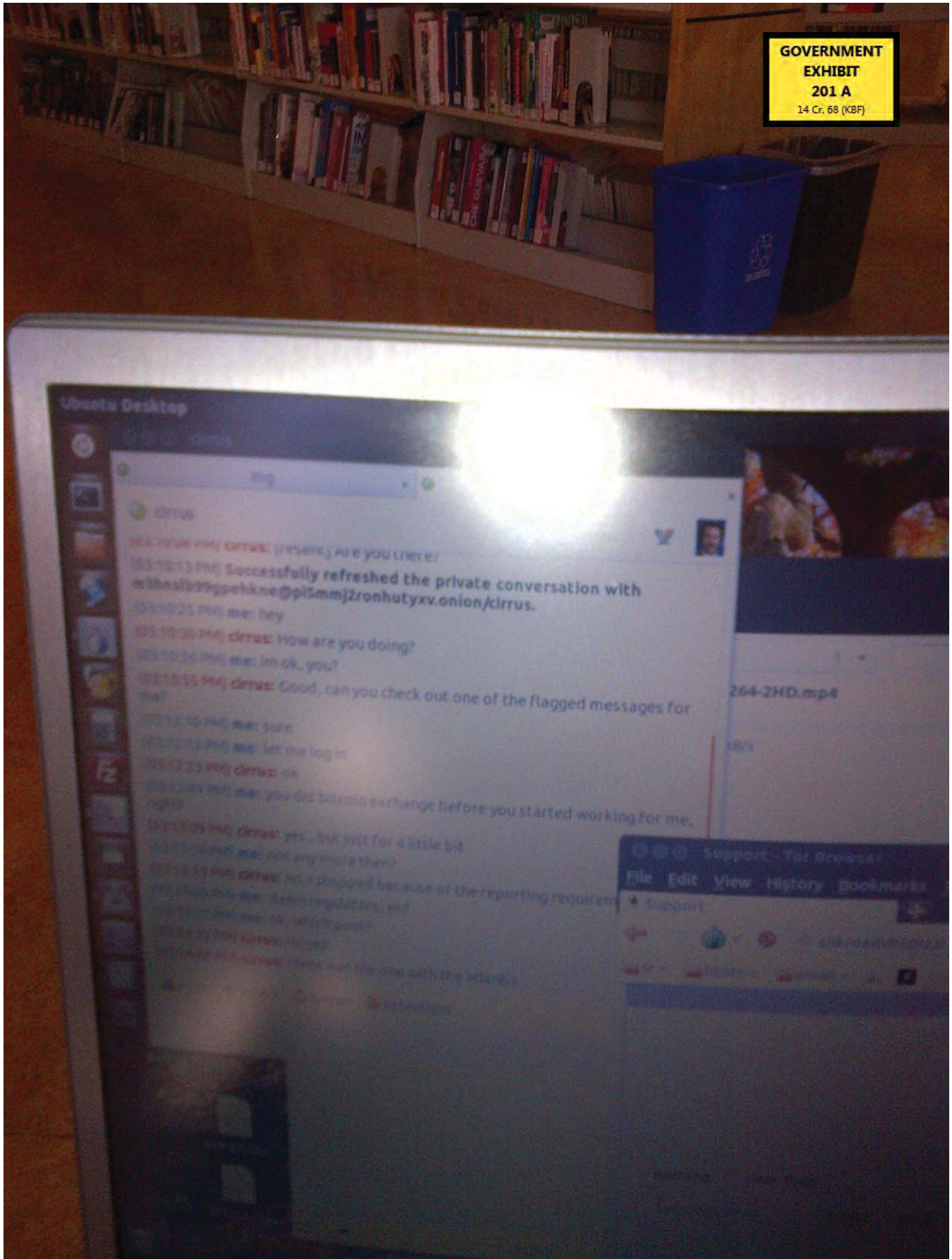
community forums | wiki | support

Zoom:

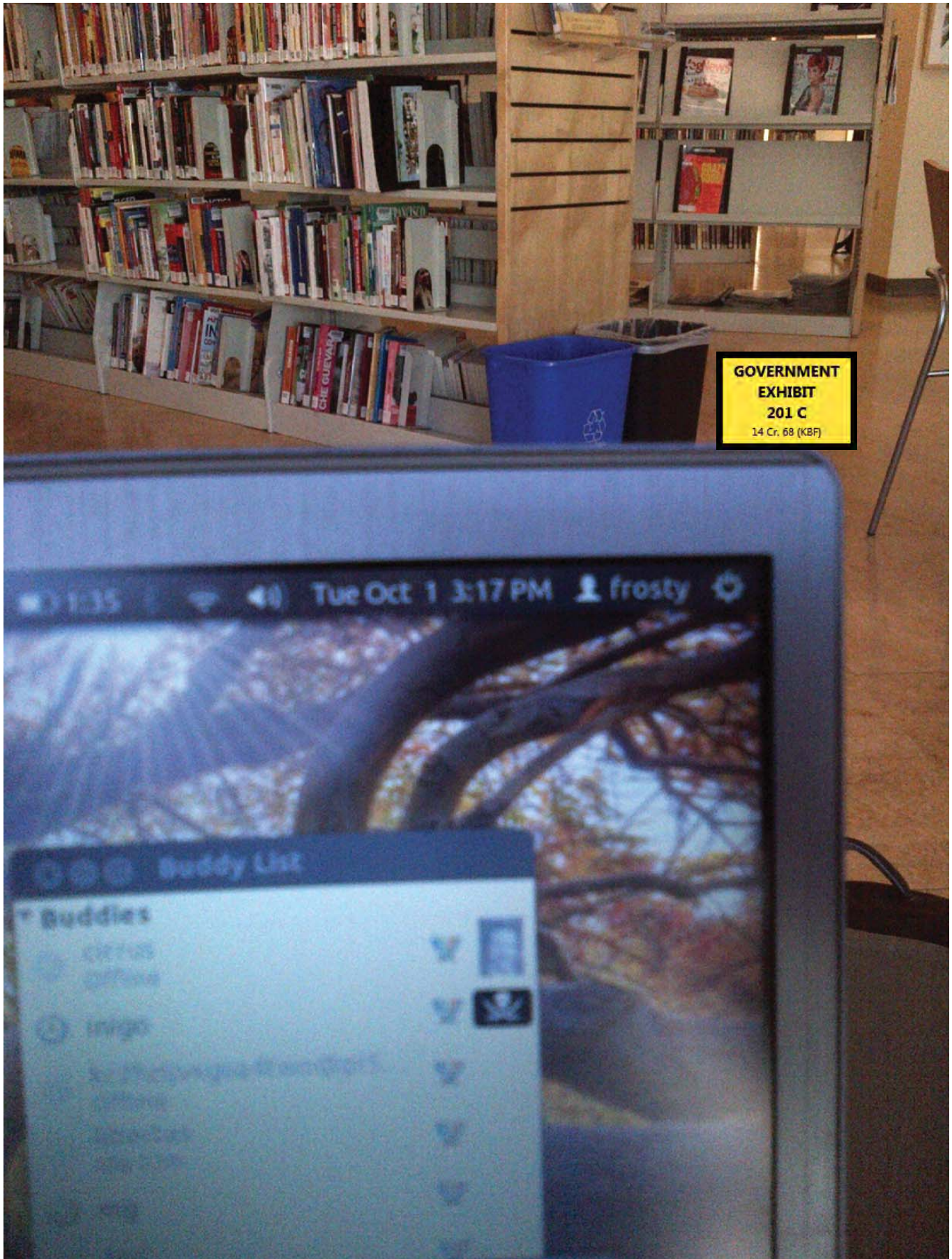
132.png

SA-11

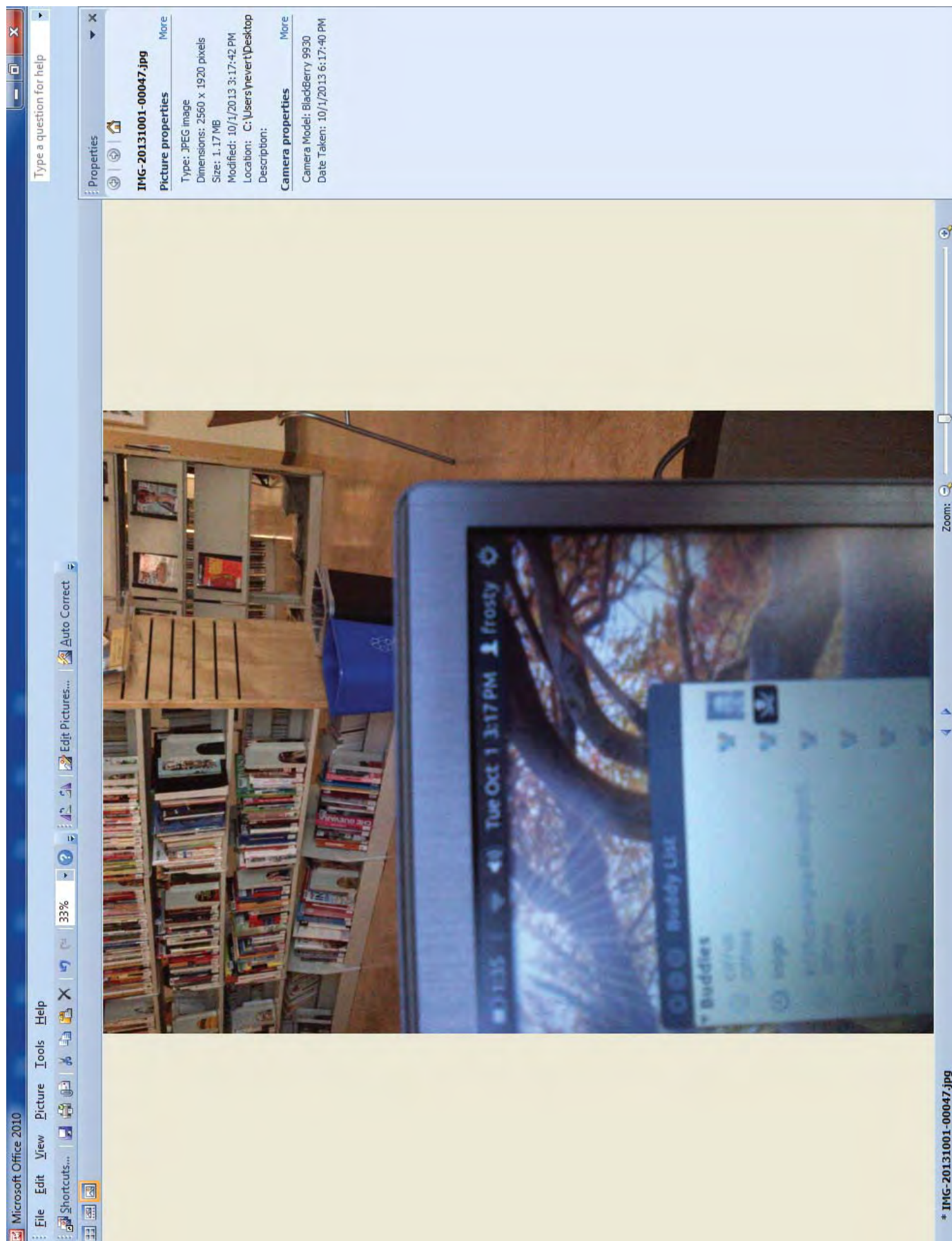
**GOVERNMENT
EXHIBIT
201 A**
14 Cr. 68 (KBF)



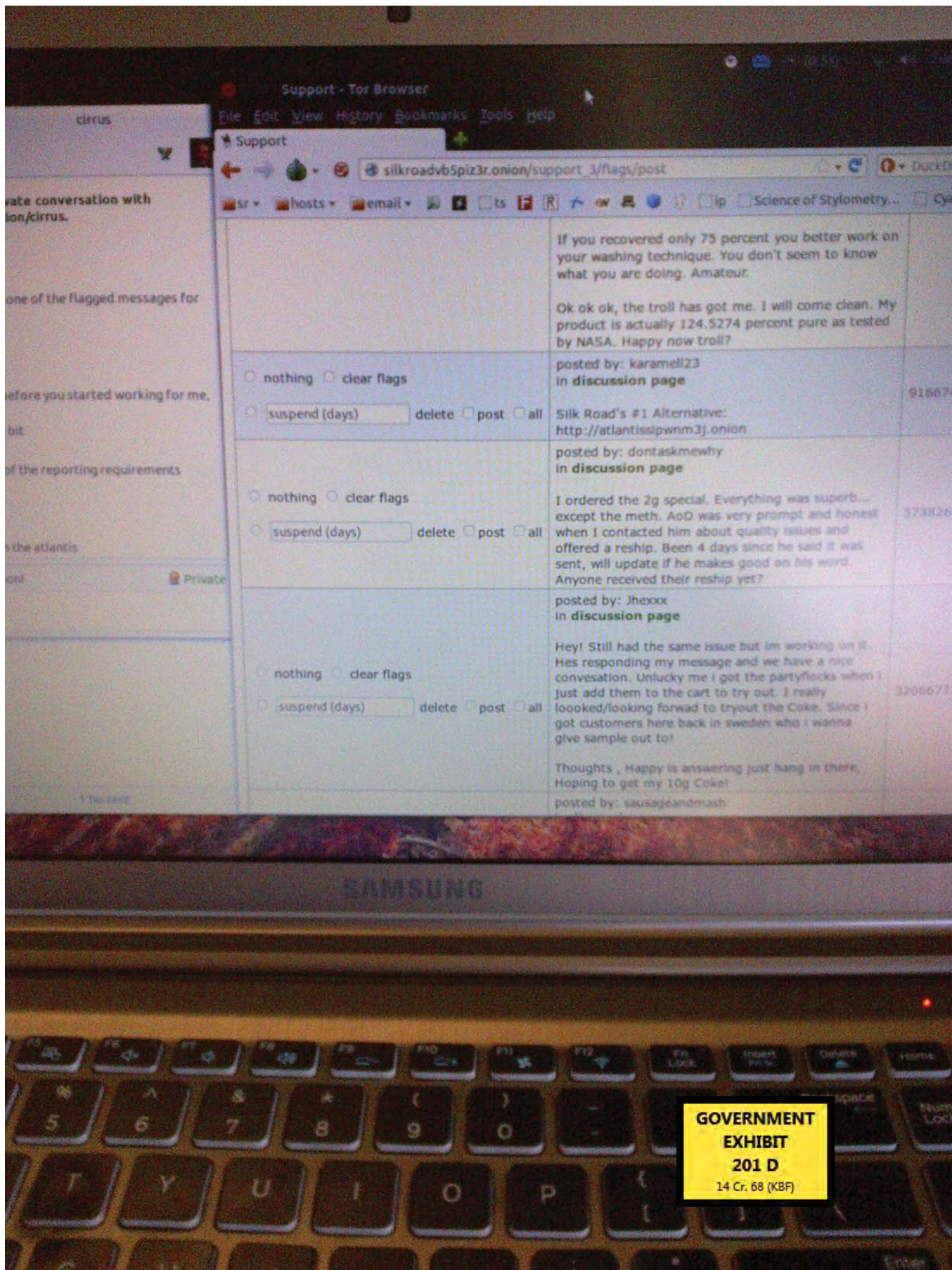
SA-13



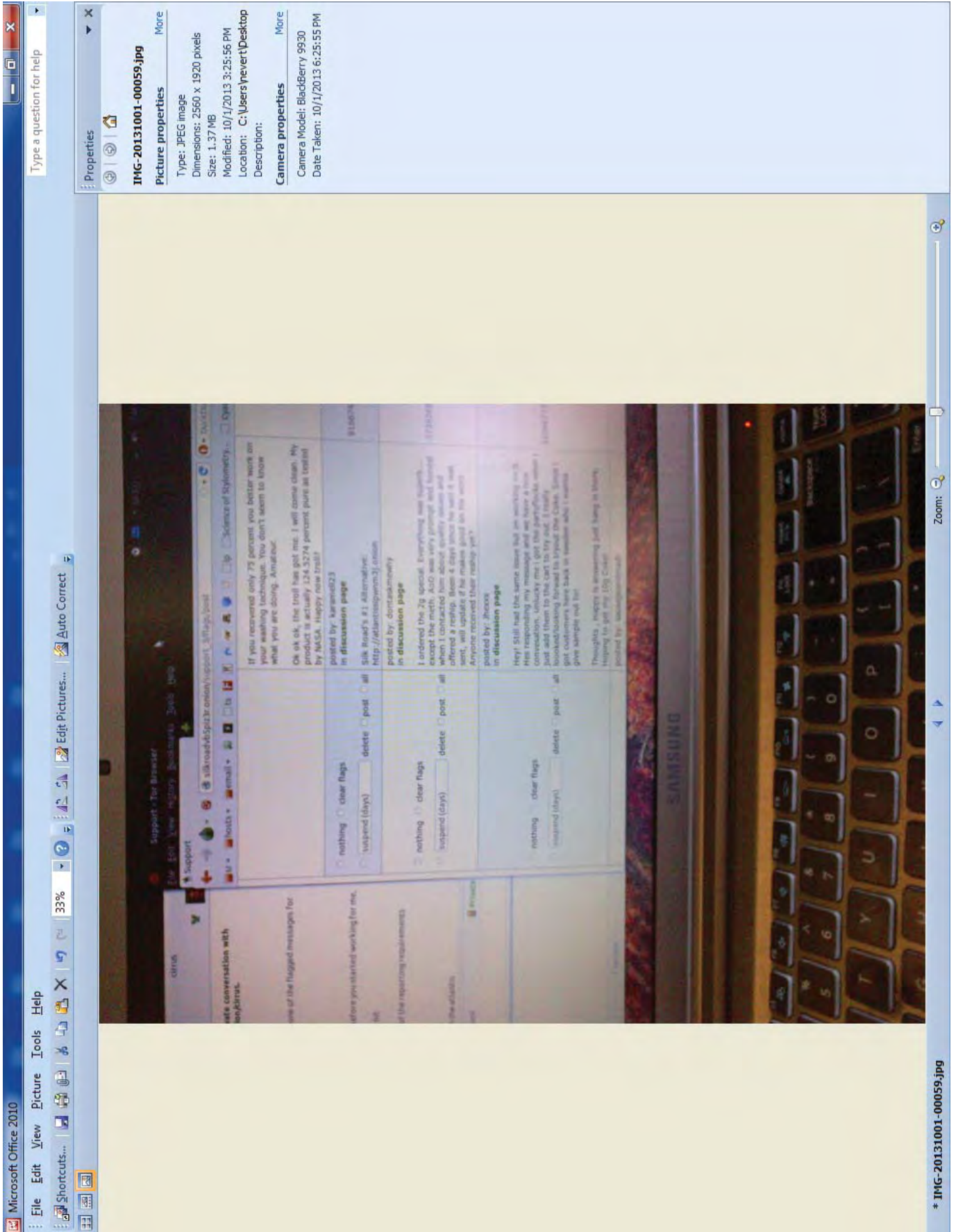
SA-14



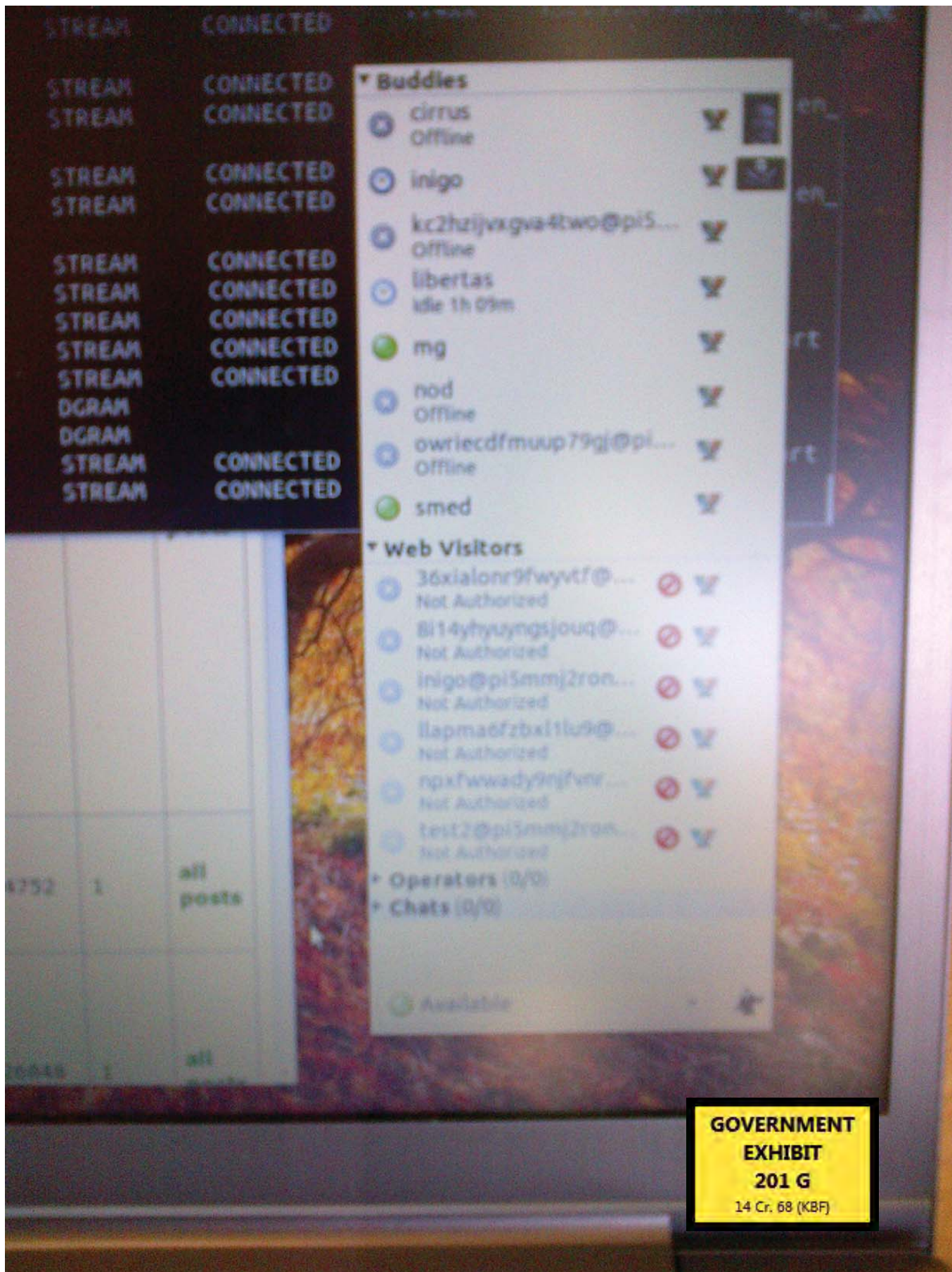
SA-15



SA-16

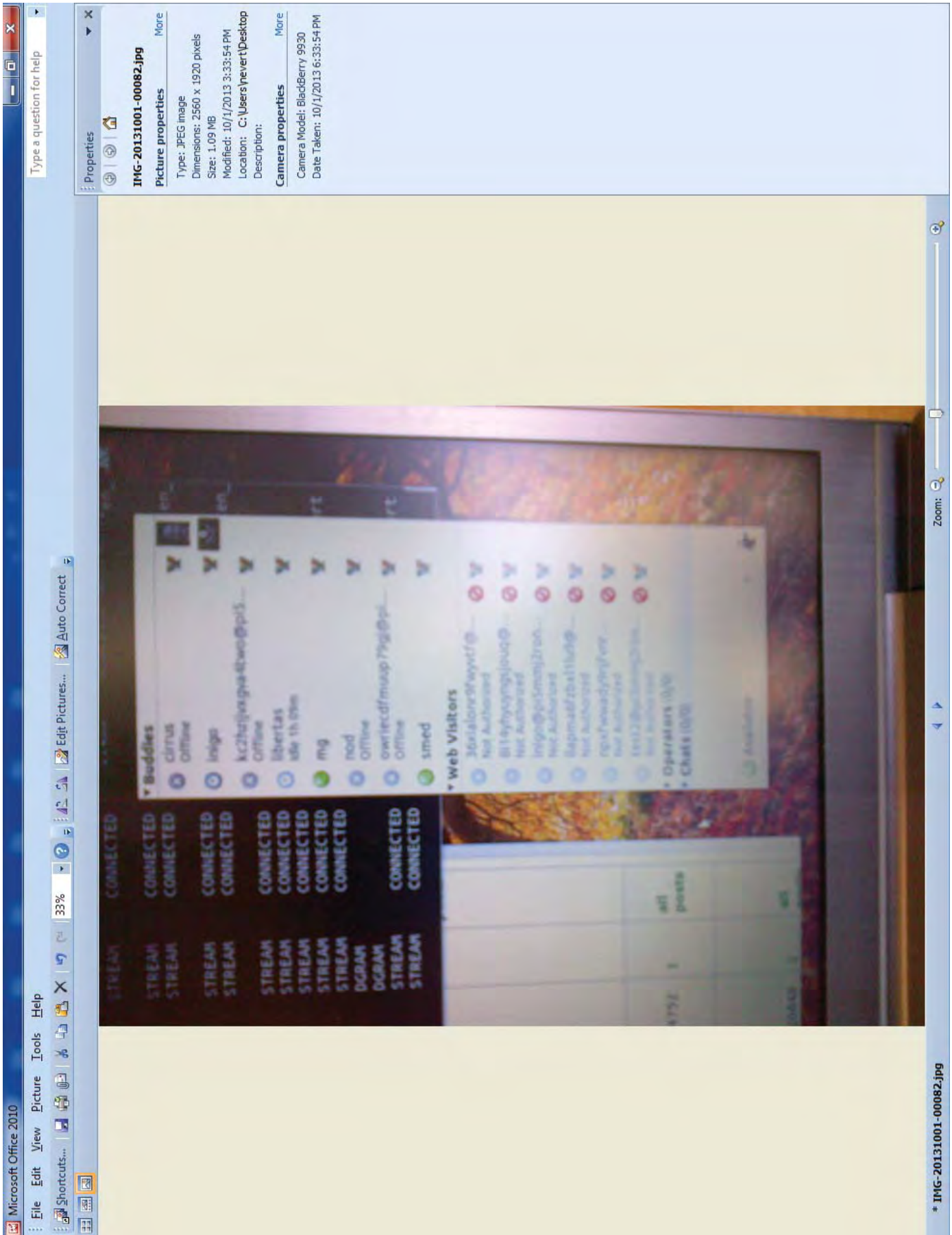


SA-17

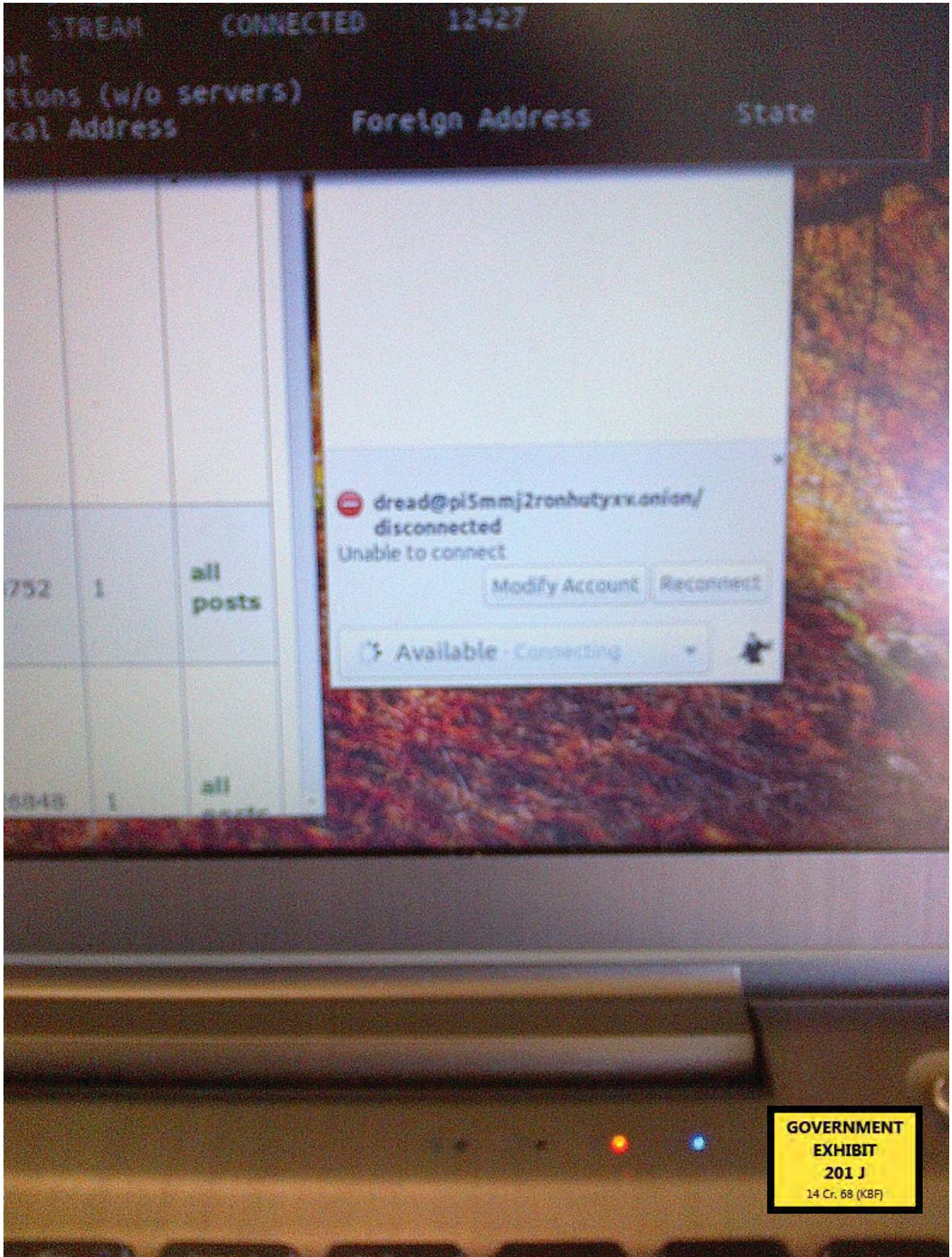


**GOVERNMENT
EXHIBIT
201 G**
14 Cr. 68 (KBF)

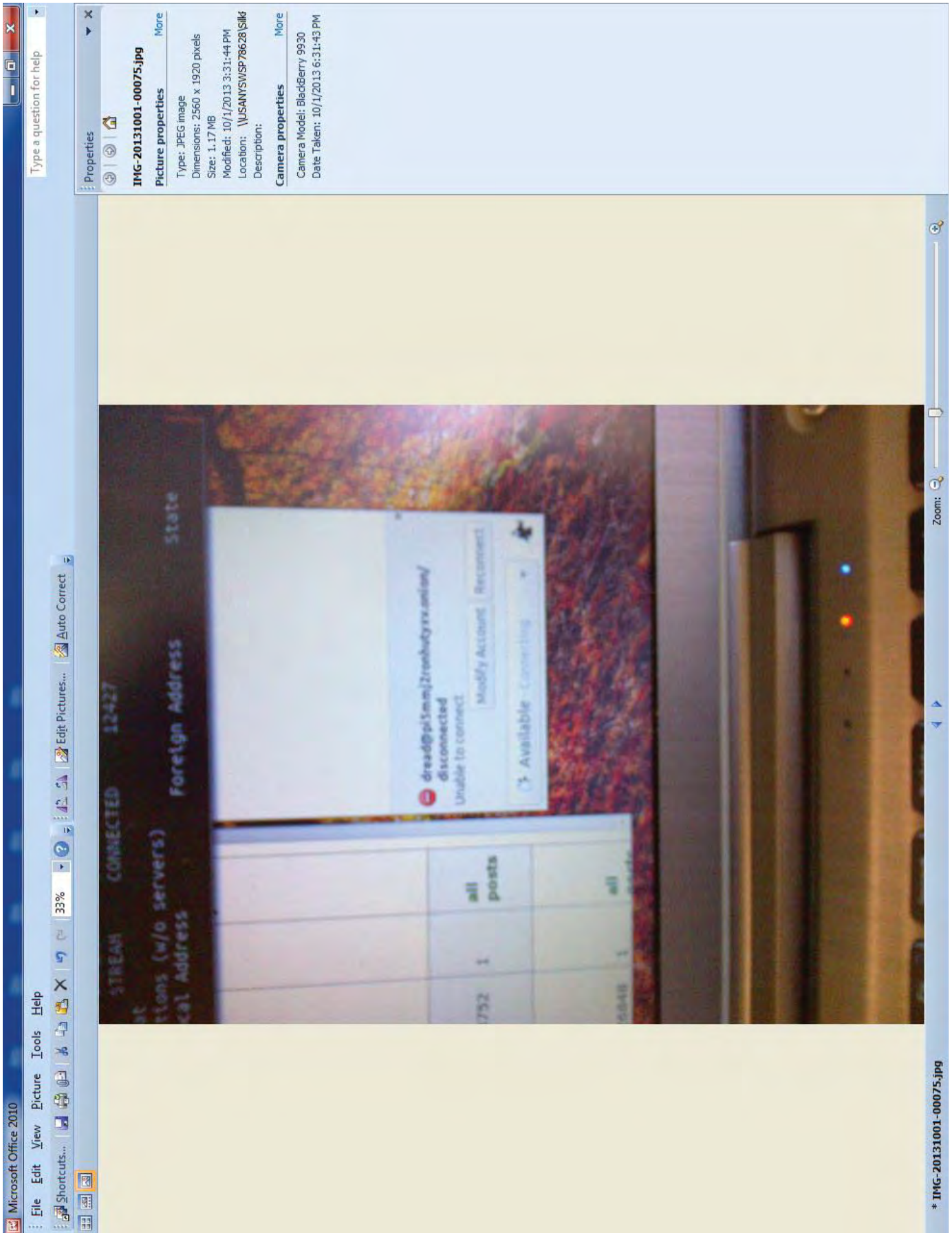
SA-18



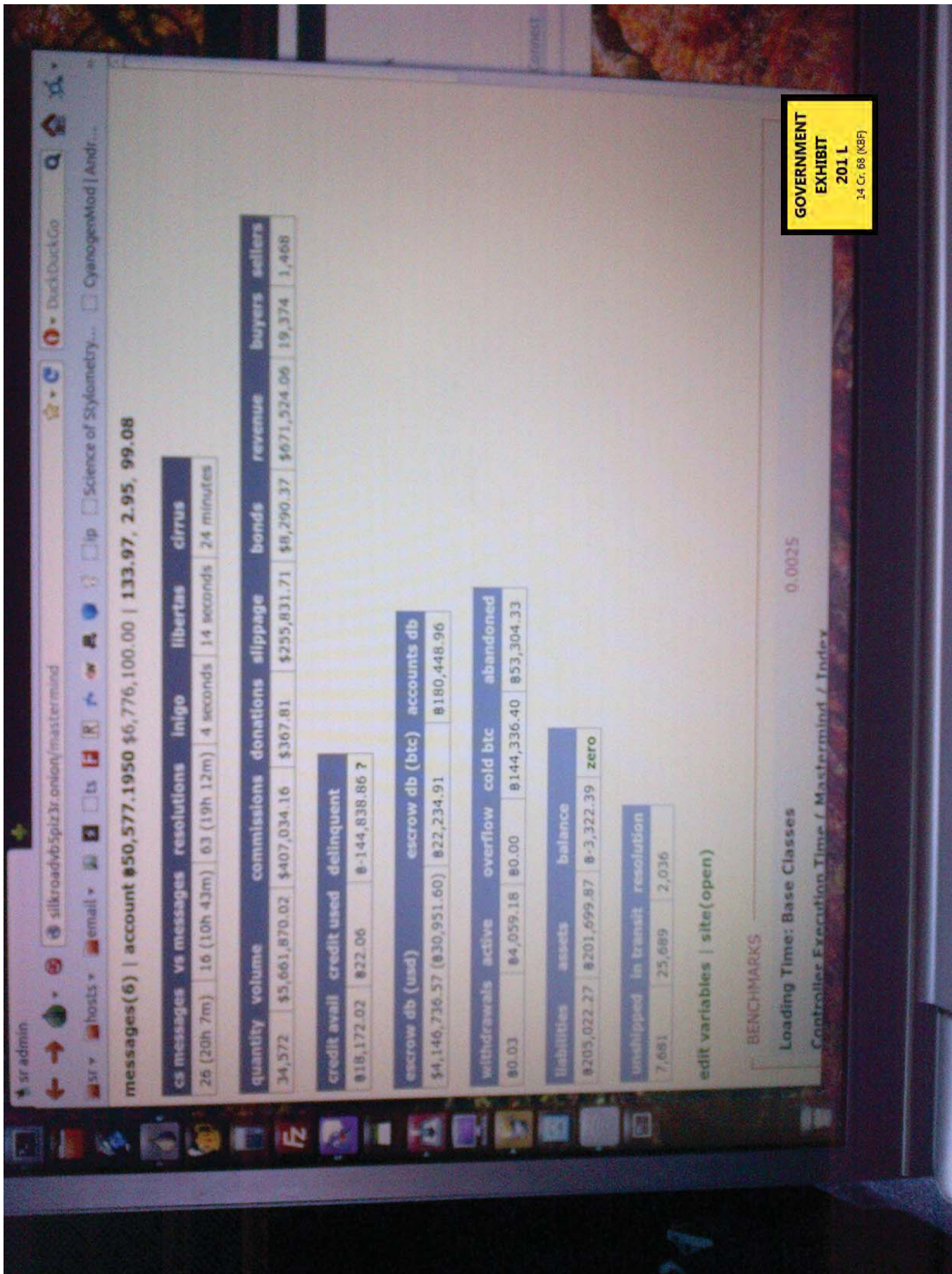
SA-19



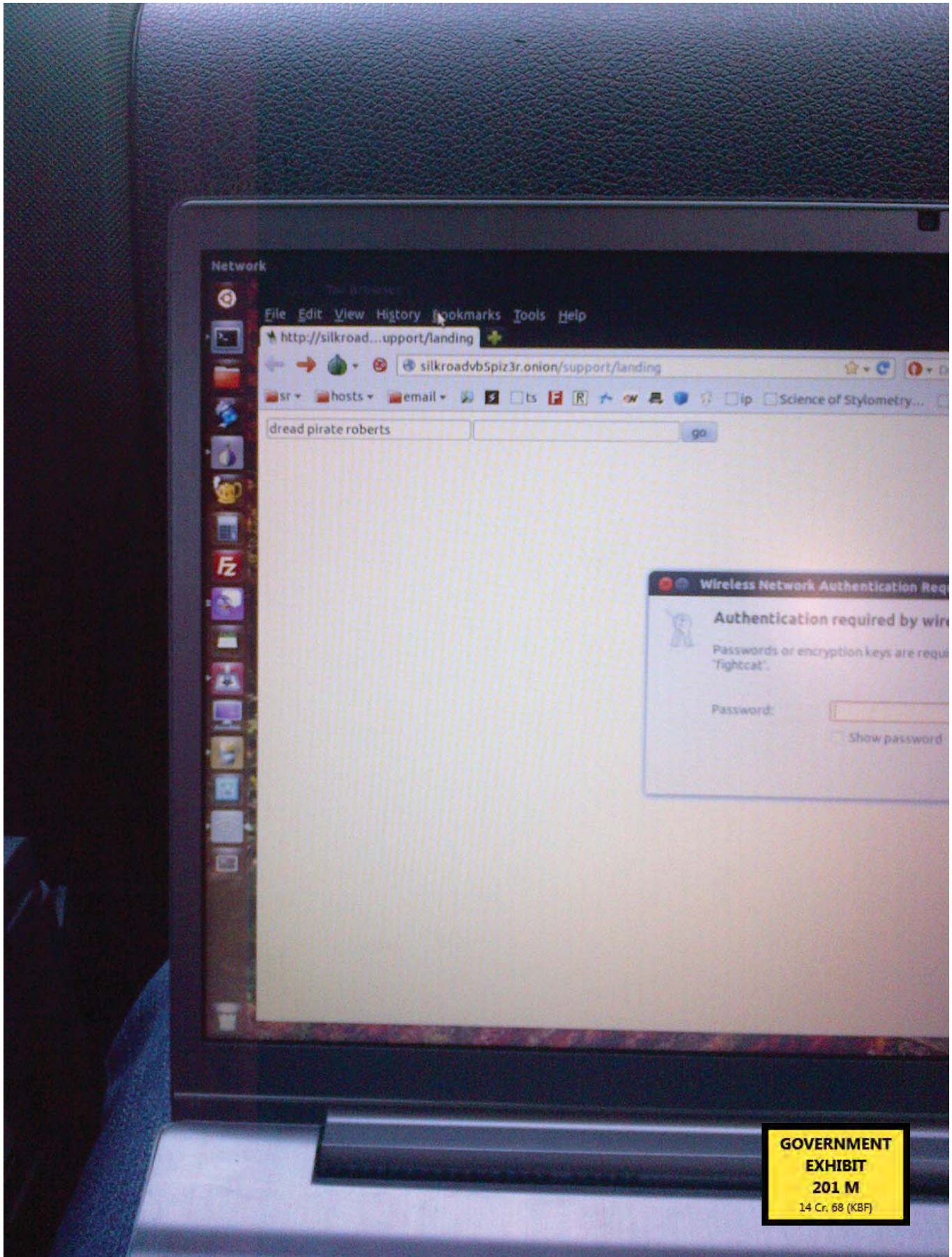
SA-20



SA-21

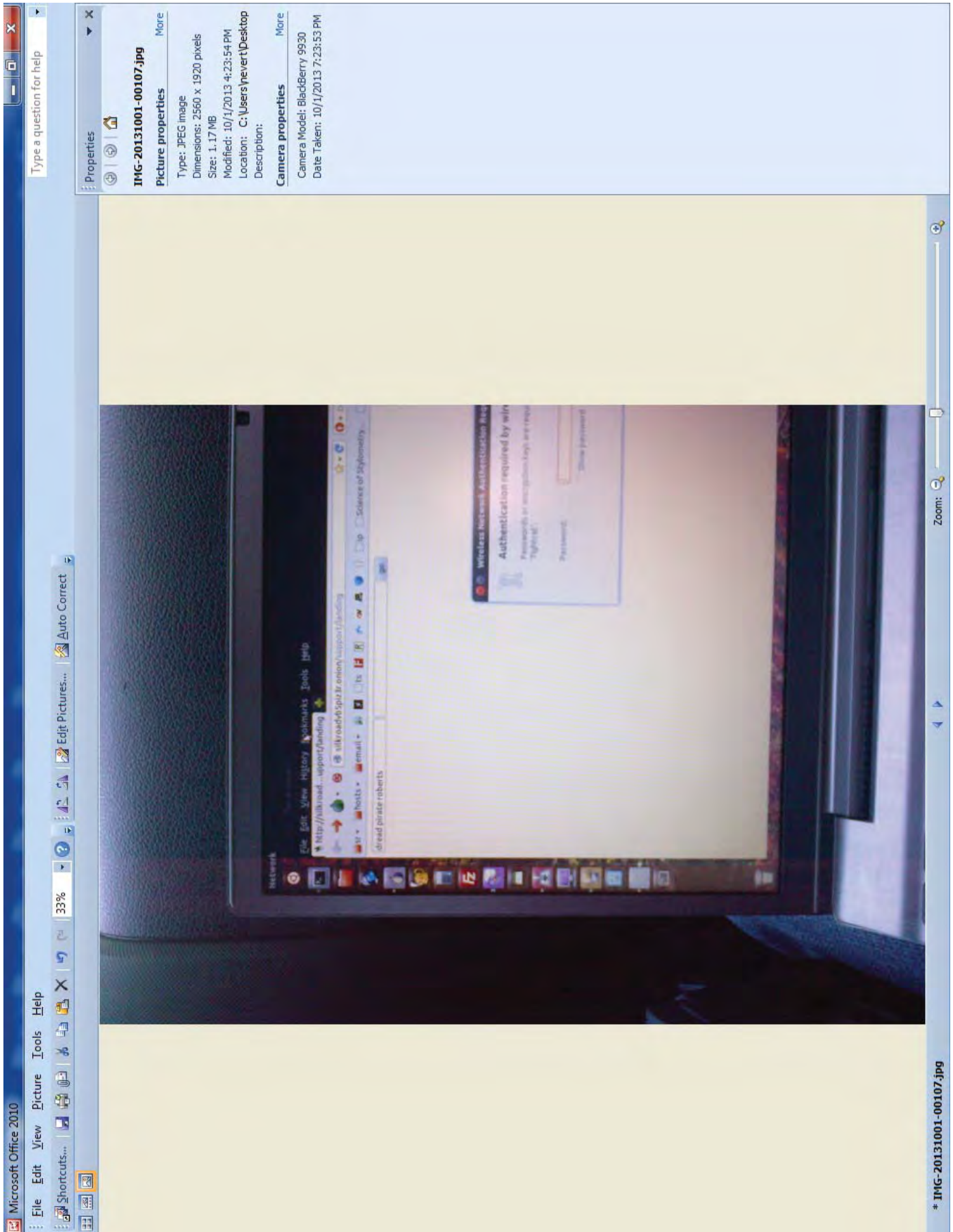


SA-23



**GOVERNMENT
EXHIBIT
201 M
14 Cr. 68 (KBF)**

SA-24



SA-25

The screenshot displays the AccessData FTK Imager 3.0.1443 interface. The main window shows a file list with columns for Name, Size, Type, and Date Modified. The Properties window is open, showing details for the file 'wallet.dat'. The hex dump view is visible at the bottom, with a yellow stamp overlaid on it.

Name	Size	Type	Date Modified
blocks	4 KB	Directory	8/27/2013 3:58:35 AM
chainstate	4 KB	Directory	8/27/2013 4:20:13 AM
lock	0 KB	Regular File	6/13/2012 3:01:50 PM
db.log	0 KB	Regular File	6/13/2012 3:01:50 PM
bitcoin.conf	1 KB	Regular File	7/5/2013 5:46:35 AM
wallet.dat	46,779 KB	Regular File	8/27/2013 5:07:16 AM
preers.dat	35 KB	Regular File	8/27/2013 5:07:16 AM
debug.log	5,293 KB	Regular File	8/27/2013 5:07:17 AM

Properties

General

- Name: wallet.dat
- File Class: Regular File
- File Size: 47,896,624
- Physical Size: 47,896,624
- Start Cluster: 31,897,600
- Date Accessed: 10/2/2013 1:58:02 AM
- Date Created: 4/7/2013 7:25:50 PM
- Date Modified: 8/27/2013 5:07:16 AM
- Actual File: True

UNIX Security Attributes

- Unix Permissions: -rw-rw-r--
- UID: 1,000
- GID: 1,000

EXT2/3/4 Information

- Inode Number: 3,674,229
- Inode Change Time: 8/27/2013 5:07:16 AM

Hex Dump: 00000000 00 00 00 00 01 00 00 00 00 00 00 00 00 00 00 00 62 31 05 00 ...

GOVERNMENT EXHIBIT 214
1.4 Cr. 68 (KBF)

Cursor pos = 6; cls = 31897600; log sec = 255189800; phy sec = 286425472
sd4_crypt.dd\ubcrypt-root [589412MB]\NONAME [ext4]\[root]\home\foosy\bitcoin\wallet.dat

SA-26

2010

I started the year in the middle of my stint with Good Wagon Books.

Donny and I had worked on it the last quarter of 2009 and were trying to ramp up by hiring people to go door-to-door. It was a real struggle and by the end of our trial partnership, it was clear that we hadn't grown the business to the point that it made sense for me to stay on. I also had an offer for a job from Peter and David that sounded great and I was ready to move on and work for them on their private equity venture. Unfortunately, they were all smoke and mirrors and after several weeks of them not returning my calls, I realized there was not an opportunity for me there. This was extremely discouraging. There I was, with nothing. My investment company came to nothing, my game company came to nothing, Good Wagon came to nothing, and then this.

I had to find a job quickly, so I turned to Craig's List and found American Journal Experts. For the next six months, I edited scientific papers written by foreigners. It sucked. The hours were flexible, but it drained me. I hated working for someone else and trading my time for money with no investment in myself.

Up to this point, I had been working on selling my rental house in Pennsylvania. It had helped me stay afloat with around \$600/mo in cashflow, but finally the sale came to a close. I made about \$30k off the whole thing, and could finally start trading again. I had been practice trading for a while and saw an opportunity to take my \$30k and make it as a day trader. \$30k isn't alot to start with, and I didn't get off to a very good start with my trading.

Around that time, another opportunity came into my life. Donny had gotten a job offer from his brother in Dallas to be the VP of sales at their milling company. He didn't know what to do about Good Wagon, which he had grown somewhat to the point that he was making around \$6k per month in sales. He made me an offer. 50% of the company and a \$3k per month salary to take over and run the business going forward. I took the deal and we went to work on it. By the end of the



SA-27

year, we had our best month on record with around \$10k in sales in December.

While all of this was happening, I began working on a project that had been in my mind for over a year. I was calling it Underground Brokers, but eventually settled on Silk Road. The idea was to create a website where people could buy anything anonymously, with no trail whatsoever that could lead back to them. I had been studying the technology for a while, but needed a business model and strategy. I finally decided that I would produce mushrooms so that I could list them on the site for cheap to get people interested. I worked my ass off setting up a lab in a cabin out near Bastrop off the grid. In hindsight, this was a terrible idea and I would never repeat it, but I did it and produced several kilos of high quality shrooms. On the website side, I was struggling to figure out on my own how to set it up. Driving out to Bastrop, working on Good Wagon, and trying to keep up my relationship with Julia was taking all of my time. By the end of the year, I still didn't have a site up, let alone a server.

I went through a lot over the year in my personal relationships as well. I had mostly shut myself off from people because I felt ashamed of where my life was. I had left my promising career as a scientist to be an investment adviser and entrepreneur and came up empty handed. More and more my emotions and thoughts were ruling my life and my word was losing power. At some point I finally broke down and realized my love for people again, and started reaching out. Throughout the year I slowly re-cultivated my relationship with my word and started honoring it again.

My relationship with Julia was pretty rocky throughout the year. We even broke up for about a month and half toward the end. I

SA-28

couldn't even tell you now why it was a struggle, or why we broke up. On my side, I wasn't communicating well at all. I would let little things build up until I got mad. We eventually got back together and even moved in together, and it has been amazingly good since.

In 2011, I am creating a year of prosperity and power beyond what I have ever experienced before. Silk Road is going to become a phenomenon and at least one person will tell me about it, unknowing that I was its creator. Good Wagon Books will find its place and get to the point that it basically runs itself. Julia and I will be happy and living together. I have many friends I can count on who are powerful and connected.

SA-29

The screenshot displays the AccessData FTK Imager 3.0.0.1443 interface. The main window shows a file list with columns for Name, Size, Type, and Date Modified. The file list contains various documents, including PDFs, Word documents, and spreadsheets. The file '2010.docx' is selected, and its properties are shown in the bottom right pane.

Name	Size	Type	Date Modified
papers	4 KB	Directory	5/7/2012 5:34:58 AM
books	324 KB	Regular File	1/18/2005 7:30:14 PM
integrationTables.pdf	1 KB	Regular File	2/7/2006 4:14:54 AM
monmcc.txt	26 KB	Regular File	3/27/2006 9:28:32 PM
Selling CR instructions.doc	10 KB	Regular File	9/21/2006 7:57:56 PM
Undegrad transcript.rtf	39 KB	Regular File	10/5/2006 8:21:08 PM
Undegrad transcript.doc	1 KB	Regular File	12/10/2006 12:05:34 AM
ids.jpg	28 KB	Regular File	1/5/2007 11:25:38 AM
ims id and pass.rtf	85 KB	Regular File	1/5/2007 10:12:18 PM
fall '06 grades.pdf	85 KB	Regular File	1/8/2007 12:16:38 PM
bankstatement	85 KB	Regular File	1/9/2007 4:45:32 AM
ccstatement.jpg	1 KB	Regular File	1/26/2007 5:45:24 PM
alpha asar.rtf	1 KB	Regular File	2/17/2007 2:24:30 PM
sovs.rtf	1,903 KB	Regular File	3/19/2007 1:01:52 PM
PSUextended2006-7map.jpg	4 KB	Regular File	5/22/2007 3:10:54 AM
political contacts.rtf	40 KB	Regular File	6/27/2007 7:54:48 PM
psufootball.pdf	281 KB	Regular File	12/11/2007 7:54:48 PM
statercollegedentists.doc	3,807 KB	Regular File	1/11/2008 7:16:50 PM
id62.pdf	1 KB	Regular File	1/22/2008 7:55:42 PM
oanda address.rtf	1 KB	Regular File	2/2/2008 11:29:56 PM
CornellMap.gif	1,085 KB	Regular File	2/12/2009 4:24:32 AM
_DS_Store	2 KB	Regular File	5/11/2009 7:54:58 PM
Contacts.txt	2 KB	Regular File	6/18/2009 3:32:22 PM
dl.jpg	95 KB	Regular File	6/24/2009 12:40:44 AM
RossUlrichID.jpg	214 KB	Regular File	7/10/2009 2:13:38 PM
credit card info.txt	1 KB	Regular File	10/20/2009 5:56:52 PM
PEMMICAN.pdf	1,404 KB	Regular File	6/2/2010 12:36:48 AM
Banking & trading accounts.pdf	23 KB	Regular File	12/28/2010 7:09:06 PM
gtaice.txt	1 KB	Regular File	12/28/2010 7:09:06 PM
Thumbs.db	40 KB	Regular File	1/1/2011 1:55:28 PM
Firefox Sync Key.html	1 KB	Regular File	1/1/2011 1:55:28 PM
Juliasn.txt	1 KB	Regular File	1/26/2011 5:31:40 PM
studio address.txt	1 KB	Regular File	2/17/2011 11:42:20 PM
med.txt	1 KB	Regular File	2/26/2011 7:34:14 PM
2010.docx	13 KB	Regular File	2/27/2011 8:56:32 PM
_DS_Store	4 KB	Regular File	11/22/2011 11:55:44 PM
_alpha asar.rtf	4 KB	Regular File	11/22/2011 11:55:44 PM
_bankstatement	60 KB	Regular File	11/22/2011 11:55:44 PM
_ccstatement.jpg	60 KB	Regular File	11/22/2011 11:55:44 PM
_Contacts.txt	4 KB	Regular File	11/22/2011 11:55:44 PM
_ids.jpg	51 KB	Regular File	11/22/2011 11:55:44 PM
_ims id and pass.rtf	4 KB	Regular File	11/22/2011 11:55:50 PM
_oanda address.rtf	4 KB	Regular File	11/22/2011 11:59:04 PM
_political contacts.rtf	4 KB	Regular File	11/22/2011 11:56:06 PM
_PSUextended2006-7map.jpg	4 KB	Regular File	11/22/2011 11:56:06 PM
_statercollegedentists.doc	4 KB	Regular File	11/22/2011 11:56:06 PM
_Undegrad transcript.doc	4 KB	Regular File	11/22/2011 11:56:08 PM
_Undegrad transcript.rtf	4 KB	Regular File	11/22/2011 11:56:08 PM

Properties

General

- Name: 2010.docx
- File Class: Regular File
- File Size: 13,255
- Physical Size: 16,384
- Start Cluster: 15,297,972
- Date Accessed: 10/2/2013 1:43:32 AM
- Date Created: 5/8/2012 8:45:09 PM
- Date Modified: 2/27/2011 8:56:32 PM
- Actual File: True

UNIX Security Attributes

- Unix Permissions: -rw-r--r--
- UID: 1,000
- GID: 1,000

Ext3/3.4 Information

- Inode Number: 3,802,602
- Inode Change Time: 7/12/2013 4:38:09 AM

File List

```

0000 50 45 03 04 14 00 06 00-08 00 00 21 00 ED FC FF:.....:..E0
0010 95 37 66 01 00 00 20 09-00 00 13 00 06 02 5B 43:..[C
0020 62 E 25 14 63 05 74 35 34-79 00 65 73 30 26 78 60:.....[C
0030 00 00 00 00 00 00 00 00-00 00 00 00 00 00 00 00:.....
0040 00 00 00 00 00 00 00 00-00 00 00 00 00 00 00 00:.....
0050 00 00 00 00 00 00 00 00-00 00 00 00 00 00 00 00:.....
0060 00 00 00 00 00 00 00 00-00 00 00 00 00 00 00 00:.....
0070 00 00 00 00 00 00 00 00-00 00 00 00 00 00 00 00:.....
0080 00 00 00 00 00 00 00 00-00 00 00 00 00 00 00 00:.....
0090 00 00 00 00 00 00 00 00-00 00 00 00 00 00 00 00:.....

```

Cursor pos = 0; dds = 15297972; log sec = 122383776; phy sec = 15962848

sd4_crypt.dd\ubcrypt-root [58841.2MB]\NONAME [ext4]\root\home\froyst\Documents\archive\Documents\reference\2010.docx

SA-30

2011

still working on good wagon books and Silk Road at the same time. Programming now. Patchwork php mysql. Don't know how to host my own site. Didn't know how to run bitcoind. Got the basics of my site written. Launched it on freedomhosting. Announced it on the bitcointalk forums. Only a few days after launch, I got my first signups, and then my first message. I was so excited I didn't know what to do with myself. Little by little, people signed up, and vendors signed up, and then it happened. My first order. I'll never forget it. The next couple of months, I sold about 10 lbs of shrooms through my site. Some orders were as small as a gram, and others were in the qp range. Before long, I completely sold out. Looking back on it, I maybe should have raised my prices more and stretched it out, but at least now I was all digital, no physical risk anymore. Before long, traffic started to build. People were taking notice, smart, interested people. Hackers. For the first several months, I handled all of the transactions by hand. When they came into my local bitcoin client, I matched them up with the amount and time of the purchase and did all of the necessary account adjustments. Between answering messages, processing transactions, and updating the codebase to fix the constant security holes, I had very little time left in the day, and I had a girlfriend at this time! At some point, a hacker found some major flaws in my code. I sent it to him for review and he came back with basically "this is amateur shit". I knew it too. I tried to work with him but I think he lost interest and since I wasn't charging commission, I only had my shroom money to pay him with. Thankfully that quadrupled from bitcoin increasing in price, little did I know I could've cashed out at 8x higher for a total of 32x! That would have gotten me off to a hell of a start. As it was, I cashed out all the way up and all the way down. I called the peak, my timing was just off. In any case, I decided to rewrite the site in an mvc framework as suggested by my benevolent hacker adviser. So, while still manually processing transactions and responding to a bigger and bigger message load, I learned to use codeigniter and began rewriting the site. At some point around this time, I also learned how to host my own site and was on my own servers. I think I made this plunge because I wasn't sure how much traffic freedomhost could handle, and I wanted control of my .onion domain. So, when I switched I posted a redirect from the old .onion to the new, ianxz6zefk72ulzz.onion. And yea, that was yet another learning curve, configuring and running a LAMP server, oh joy! But I was loving it. My ideas were actually working. Sure it was a little crude, but it worked! Rewriting the site was the most stressful couple of months I've ever experienced. I worked all day everyday, still processing transactions by hand, dealing with scammers, answering messages, meeting new strange people through my site and getting to know them. When I finally got the site ready, there were several new features including a tumblr and automated payment processing. The weekend of the switch was the peak of stress for me. Updating a live site to a whole new version is no easy task. You don't realize how many little pieces lay on top of one another so it works just right (at least when you code poorly like my amateur ass was doing). So for about 48 hours it was stop and start on the switch, but I finally got there and it was working. It looked like I didn't have to process the transactions manually anymore, but then the rot started. Some where, the site accounting wasn't balancing, and I was losing hundreds of dollars every few hours. I started to panic. I tried everything I could think of, but couldn't stop the bleeding. It was getting to be thousands of dollars and I was losing sleep and getting slow. I didn't give up though. I rewrote the entire transaction processor from scratch and some how it worked. To this day I don't know what the problem was. AND in addition to these stressors, Silk Road got its first press, the infamous Gawker article. When you look at the historical #s, you can see right when it happened. A huge spike in signups, and the beginning of an upward trend in commerce that would continue until the time of this writing, and hopefully for much longer. There was really a smattering of press at this time

SA-31

including the local news in FL! Most interestingly, two US senators came out against the site and against bitcoin. They made a big deal out of it and called for a shutdown of the site. I started to get into a bad state of mind. I was mentally taxed, and now I felt extremely vulnerable and scared. The US govt, my main enemy was aware of me and some of it's members were calling for my destruction. This is the biggest force wielding organization on the planet. Eventually we got through it though and entered a more calm and harmonious phase, there were still the hackers and scammers, and occasional fuck ups by me when trying to add a feature of what not, but in general, working within the CI framework and getting a feel for linux allowed me to take it a little easier and get into a normal work rhythm. Some major advances were price pegging, vendor ranking, a more sophisticated feedback system, buyer stats, transaction logging, and building up the admin toolset. Most importantly, the market began it's path to maturity. Vendors and buyers forged great relationships, more vendors came in to fill holes in the market, others competed and variety, customer service, and professionalism emerged. After making about \$100k and up to a good \$20-25k monthly, I decided it was time to bring in some hired guns to help me take the site to the next level. This would prove to be the biggest challenge I had ever faced. I actually got to see a fairly wide range of employee types. SYG, the schmoozer who winds up being a waste, DA, the model employee. Super enthusiastic, hard working, and trainable. Then there is utah, professional who does it for the money. Get's the job done, but his heart isn't always in it. First I put up an ad for a system administrator. I needed someone to help me take the back end to the next level in security. I had many candidates duke it out in the forum on many topics from os to isolation to software to security. In the end, I made what I thought was a wise decision. Looking back, I picked the most vocal one who also was on board ideologically. At first he was very good, giving me lots of advise and helping me upgrade the server's security. We spent many hours on torchat configuring the server. We ran it on FreeBSD for the first time and it actually ran pretty well. Getting it set up was a total disaster, though. My host had suddenly stopped paying his upstream provider and dropped it on me that in a few days they would shut off the server. Luckily I had a backup and a spare server ready to go, so we decided to setup freebsd and run it. It was a trial by fire, but we eventually passed. The site was down for almost a week. You can see it die on the historical charts. For the next 3 months, SYG had my full attention. I was basically at his mercy because he knew FreeBSD and I didn't. We kept trying to implement different solutions, but he just kept dragging on and on. He was trying to get his bitcoin exchange thing going through the site at the same time and he just wasn't giving the site everything he had. In the end, he milked me for the last few weeks and eventually I had to let him go. It was a really painful lesson, but one I hopefully won't need to learn again. I eventually moved the site back to ubuntu where I am comfortable. At around the time SYG was falling out of favor, I started looking for someone new and utah was there. I gave him more and more responsibility and he gave me good time estimates and followed through on them. I was still working with SYG, so utah was set to work on rewriting the site. Around this time, Variety Jones showed up. This was the biggest and strongest willed character I had met through the site thus far. He quickly proved to me that he had value by pointing out a major security hole in the site I was unaware of. It was an attack on bitcoind. We quickly began discussing every aspect of the site as well as future ideas. He convinced me of a server configuration paradigm that gave me the confidence to be the sole server administrator and not work with someone else at all. He has advised me on many technical aspect of what we are doing, helped me speed up the site and squeeze more out of my current servers. He also has helped me better interact with the community around Silk Road, delivering proclamations, handling troublesome characters, running a sale, changing my name, devising rules, and on and on. He also helped me get my

SA-32

head straight regarding legal protection, cover stories, devising a will, finding a successor, and so on. He's been a real mentor. Shortly after I met VJ, I started looking for a right hand man, an administrative assistant of sorts. Someone to answer messages, manage the forum and wiki, and eventually even dispute resolution. I found that man in Digital Alchemy, who was one of the original members of the site, and had been modding the forums for pretty much the whole time. There were lots of applicants, but for some reason DA stuck out as promising, and he has turned out to be invaluable. He quickly learned how to respond to messages and keep things running smoothly. Before long he was managing the forums, the wiki, the messages, the resolution center, scam prevention, and odd jobs for me like mini-research projects and tedious tasks. He works his ass off and will eventually get burnt out, so I need to find him some help at some point.

SA-33

The screenshot displays the AccessData FTK Imager 3.0.0.1443 interface. The main window shows a file list with columns for Name, Size, Type, and Date Modified. The selected file is '2011.odt', which is 21 KB and was last modified on 2/5/2012 at 10:39:04 AM. The file list also includes various system folders and files such as 'photo', 'dropbox', 'pkc', 'samsungtools', 'freemind', 'shotwell', 'Pictures', 'bloom', 'Documents', 'books', 'archive', 'journal', '2011', '2012', 'taxes', 'VirtualBox', 'mozilla', 'kde', 'config', 'websites', 'Public', 'Misc', 'chrome2_private', 'Templates', 'wpad-0.0', 'VirtualBox VMs', 'pingua', 'torrcial', 'gnps-2.6', 'Ubuntu One', 'abus', 'putty', 'java', 'zbi', 'netbeans-7.3.1', 'netbeans', 'cache', 'compiz-1', 'ash', 'thunderbird', 'gconf', 'gstreamer-0.10', and 'local'.

The Properties window is open, showing the following details for the selected file:

- General:** Name: 2011.odt, File Class: Regular File, File Size: 21,022, Physical Size: 24,576, Start Cluster: 17,488,719, Date Accessed: 10/2/2013 1:45:17 AM, Date Created: 5/8/2012 8:51:04 PM, Date Modified: 2/5/2012 10:39:04 AM, Actual File: True.
- UNIX Security Attributes:** Unix Permissions: -rwx-r--r--, UID: 1,000, GID: 1,000.
- Ext2/3/4 Information:** Inode Number: 4,327,109, Inode Change Time: 7/12/2013 4:38:09 AM.

The hex data window at the bottom shows the raw byte sequence of the file, starting with '0000 50 4B 03 04 14 00 00 0E-00 00 E2 54 45 40 5E C6 EK...' and ending with '0090 12 58 54 46 2D 38 22 3F-3E 0A 3C 6F 66 69 63'. The cursor position is noted as 0.

SA-34

12/29/2011

chatted with VJ again today. Him coming onto the scene has re inspired me and given me direction on the SR project. He has helped me see a larger vision. A brand that people can come to trust and rally behind. Silk Road chat, Silk Road exchange, Silk Road credit union, Silk Road market, Silk Road everything! And it's been amazing just talking to a guy who is so intelligent and in the same boat as me, to a certain degree at least. So, today we talked mostly about the exchange, what to charge, boundary conditions, etc. Then I went for a surf with Billy Becket. Caught a couple of good waves, chatted with him took some wipe outs, and went in. Soon after, I ran around the city with Ashely and Kelly. We drank some beer, walked around the city and botanical gardens. I then went out with Jessica. Our conversation was somewhat deep. I felt compelled to reveal myself to her. It was terrible. I told her I have secrets. She already knows I work with bitcoin wich is also terrible. I'm so stupid. Everyone knows I am working on a bitcoin exchange. I always thought honesty was the best policy, and now I don't know what to do. I should've just told everyone I am a freelance programmer or something, but I had to tell half truths. It felt wrong to lie completely so I tried to tell the truth without revealing the bad part, but now I am in a jam. Everyone knows too much. Dammit.



SA-35

The screenshot shows the AccessData FTK Imager interface. The main window displays a file system tree with various folders and files. The file 'daily.odt' is selected, and its properties are shown in the bottom right pane. The properties include:

- Name: daily.odt
- File Class: Regular File
- File Size: 11,860
- Physical Size: 12,288
- Start Cluster: 17,488,725
- Date Accessed: 10/2/2013 1:45:17 AM
- Date Created: 5/8/2012 8:51:04 PM
- Date Modified: 12/29/2011 12:42:06 PM
- Actual File: True

The bottom right pane also shows the UNIX Security Attributes and Ext2/3/4 Information:

- UNIX Security Attributes:
 - Unix Permissions: -rw-r--r--
 - UID: 1,000
 - GID: 1,000
- Ext2/3/4 Information:
 - Inode Number: 4,327,113
 - Inode Change Time: 7/12/2013 4:38:09 AM

The main window also shows a file list with columns for Name, Type, Size, and Date Modified. The file 'daily.odt' is listed with a size of 12 KB and a date modified of 12/29/2011 12:42:06 PM.

SA-36

January 1st 2012

Well, I'm choosing to write a journal for 2012. I imagine that some day I may have a story written about my life, and it would be good to have a detailed account of it. I did some work in the morning, can't remember now exactly what it was, but it wasn't long before I was responding to text messages and making plans to hang out on the beach. It was a holiday for everyone, so the beach was as packed as I've ever seen it. A teeming mass of humanity, helicopters flying overhead, waves crashing, a real spectacle. I was offered a ticket to a warehouse party by Nicole, but just couldn't bring myself to accept. I just was not in the partying mood. George also invited me to join him camping for 2-3 nights. I wanted to go, but the swell is low and it's just too much time away from Silk Road, and there is so much to do before the rents get here, and before I leave for Thailand. I need to get DigitalAlch set up handling the resolutions, and it just seems like Variety Jones gives my broad sweeping tasks on a daily basis. Emma, Jessica, Cally, Kim, Tim and a couple others, Mike, were all on the beach with me. Playing paddle ball and soaking up the sun. I've been thinking a bunch about what is next for me. I like my little life here in Bondi, but what if I love Thailand, or want to go on even further? I don't want to go backwards, and while I could see a lot more in Australia, I'm not even taking the opportunities that are coming up as it is. I need to find a place I can work from. Cheap and off the beaten path.



SA-37

AccessData FTK Imager 3.0.0.1443

File View Mode Help

Evidence Tree

- gnome2
 - dropbox-dist
 - wine
 - phipple
 - adobe
 - Downloads
 - pulse
 - apps
 - vnc
 - thumbnails
 - fontconfig
 - macromedia
 - gphoto
 - dropbox
 - pkc
 - samsung-tools
 - freemind
 - shotwell
 - Pictures
 - bitcoin
 - Documents
 - books
 - archive
 - journal
 - 2011
 - 2012
 - Q1
 - January
 - week 1
 - taxes
 - VirtualBox
 - mozilla
 - kde
 - config
 - websites
 - Public
 - Music
 - gnome2_private
 - Templates
 - gegl-0.0
 - Videos
 - VirtualBox VMs
 - pingus
 - torchat
 - gimp-2.6
 - Ubuntu One
 - putty
 - java

File List

Name	Size	Type	Date Modified
Daily.odt	13 KB	Regular File	1/1/2012 9:47:24 PM

Properties

General

Name: Daily.odt
 File Class: Regular File
 File Size: 12,315
 Physical Size: 16,384
 Start Cluster: 17,488,728
 Date Accessed: 10/2/2013 1:45:17 AM
 Date Created: 5/8/2012 8:51:04 PM
 Date Modified: 1/1/2012 9:47:24 PM
 Actual File: True

UNIX Security Attributes

Unix Permissions: -rw-r--
 UID: 1,000
 GID: 1,000

Ext2/3/4 Information

Inode Number: 4,327,120
 Inode Change Time: 7/12/2013 4:38:09 AM

```

0000 50 4B 03 04 14 00 00 08-00 00 EC AD 21 40 5E C6 PK-----i-1@^E
0010 32 0C 27 00 00 00 27 00-00 00 08 00 00 00 6D 69 2.'-----mi
0020 6D 65 74 79 70 65 61 70-70 6C 69 63 61 74 69 6F metypeapplicatio
0030 6E 2F 76 6E 64 2E 6F 61-73 69 73 2E 6F 70 65 6E n/vnd.oasis.open
0040 64 6F 63 75 6D 65 6E 74-2E 74 65 78 74 50 4B 03 document.textPK-
0050 04 14 00 00 08 00 00 EC-AD 21 40 76 DF 9E 78 0A -----i-1@B x-
0060 04 00 00 0A 04 00 00 08-00 00 00 6D 65 74 61 2E -----meta.
0070 78 6D 6C 3C 3F 78 6D 6C-20 76 65 72 73 69 6F 6E xml<?xml version
0080 3D 22 31 2E 30 22 20 65-6E 63 6F 64 69 6E 67 3D ="1.0" encoding=
0090 22 55 54 46 2D 38 22 3F-3E 0A 3C 6F 66 66 69 63 "UTF-8"?><offic
00a0 65 3A 64 6F 63 75 6D 65-6E 74 2D 6D 65 74 61 20 e:document-meta
00b0 78 6D 6C 6E 73 3A 6F 66-66 69 63 65 3D 22 75 72 xmlns:office="ur
00c0 6E 3A 6F 61 73 69 73 3A-6E 61 6D 65 73 3A 74 63 n:oasis:names:tc
00d0 3A 6F 70 65 6E 64 6F 63-75 6D 65 6E 74 3A 78 6D :opendocument:xm
00e0 6C 6E 73 3A 6F 66 66 69-63 65 3A 31 2E 30 22 20 lns:office:1.0"
00f0 78 6D 6C 6E 73 3A 78 6C-69 6E 6B 3D 22 68 74 74 xmlns:xlink="htt
0100 70 3A 2F 2F 77 77 77 2E-77 33 2E 6F 72 67 2F 31 p://www.w3.org/1
0110 39 39 39 2F 78 6C 69 6E-6B 22 20 78 6D 6C 6E 73 999/xlink" xmlns
0120 3A 64 63 3D 22 68 74 74-70 3A 2F 2F 70 75 72 6C :dc="http://purl
0130 2E 6F 72 67 2F 64 63 2F-65 6C 65 6D 65 6E 74 73 .org/dc/elements
0140 2F 31 2E 31 2F 22 20 78-6D 6C 6E 73 3A 6D 65 74 /1.1/" xmlns:met
0150 61 3D 22 75 72 6E 3A 6F-61 73 69 73 3A 6E 61 6D a="urn:oasis:nam
0160 65 73 3A 74 63 3A 6F 70-65 6E 64 6F 63 75 6D 65 es:tc:opendocume
0170 6E 74 3A 78 6D 6C 6E 73-3A 6D 65 74 61 3A 31 2E nt:xmlns:meta:1.
0180 30 22 20 78 6D 6C 6E 73-3A 6F 6F 6F 3D 22 68 74 0" xmlns:ooo="ht
0190 74 70 3A 2F 2F 6F 70 65-6E 6F 66 66 69 63 65 2E tp://openoffice.
01a0 6F 72 67 2F 32 30 30 34-2F 6F 66 66 69 63 65 22 org/2004/office"
01b0 20 78 6D 6C 6E 73 3A 67-72 64 64 6C 3D 22 68 74 xmlns:grddl="ht
01c0 74 70 3A 2F 2F 77 77 77-2E 77 33 2E 6F 72 67 2F tp://www.w3.org/
01d0 32 30 30 33 2F 67 2F 64-61 74 61 2D 76 69 65 77 2003/g/data-view
01e0 23 22 20 6F 66 66 69 63-65 3A 76 65 72 73 69 6F #" office:versio
01f0 6E 3D 22 31 2E 32 22 3E-3C 6F 66 66 69 63 65 3A n="1.2"><office:
0200 6D 65 74 61 3E 3C 6D 65-74 61 3A 69 6E 69 74 69 meta<meta:initi
0210 61 6C 2D 63 72 65 61 74-6F 72 3E 66 72 6F 73 74 al-creator>frost
0220 79 20 3C 2F 6D 65 74 61-3A 69 6E 69 74 69 61 6C y </meta:initial
    
```

Cursor pos = 0; clus = 17488728; log sec = 139909824; phy sec = 171154496

sda4_crypt.dd/ubucrypt-root [588412MB]/NONAME [ext4]/[root]/home/frosty/Documents/journal/2012/Q1/January/week 1/Daily.odt

SA-38

03/20/2013

someone posing as me managed to con 38 vendors out of 2 btc each with a fake message about a new silk road posted about cartel formation and not mitigating vendor roundtable leaks.
worked on database error handling in CI

03/21/2013

main server was ddosed and taken offline by host
met with person in tor irc who gave me info on having custom hs guards
buying up servers to turn into hidden service guards

03/22/2013

deployed 2 guards on forum
adjusted check_deposit cron to look further back to catch txns that died with an error

03/23/2013

bought a couple of more servers from new hosts
organized local files
stripped out srsec db naming functions
introduced at least two bugs doing this

03/24/2013

been slowly raising the cost of hedging
organized local files and notes

03/25/2013

server was ddosed, meaning someone knew the real IP. I assumed they obtained it by becoming a guard node. So, I migrated to a new server and set up private guard nodes. There was significant downtime and someone has mentioned that they discovered the IP via a leak from lighttpd.

03/26/2013

private guard nodes are working ok. still buying more servers so I can set up a more modular and redundant server cluster. redid login page.

03/27/2013

set up servers

03/28/2013

being blackmailed with user info. talking with large distributor (hell's angels).

03/29/2013

commissioned hit on blackmailer with angels

04/01/2013

got word that blackmailer was excuted
created file upload script
started to fix problem with bond refunds over 3 months old



04/02/2013

got death threat from someone (DeathFromAbove) [REDACTED].
[REDACTED]. messaged googleyed about it. goog says he doesn't know. user is proolly friend of [REDACTED] who he confided his plan to.
applied fix to bond refund problem
stopped rounding account balance display

SA-39

04/03/2013

spam scams have been gaining traction. limited namespace and locked current accounts.
lots of delayed withdrawals. transactions taking a long time to be accepted into blockchain. Wallet was funded with single large transaction, so each subsequent transaction is requiring change to be verified. lesson: wallets must be funded in small chunks.
got pidgin chat working with inigo and mg

04/04/2013

withdrawals all caught up
made a sign error when fixing the bond refund bug, so several vendors had very negative accounts.
switched to direct connect for bitcoin instead of over ssh portforward
received visual confirmation of blackmailers execution

04/05/2013

a distributor of googleyed is publishing buyer info
mapped out the ordering process on the wiki.
gave angels access to chat server

04/06/2013

made sure backup crons are working
gave angels go ahead to find tony76
cleaned up unused libraries on server
added to forbidden username list to cover I <-> I scam

04/07/2013

moved storage wallet to local machine
refactored mm page

04/08/2013

sent payment to angels for hit on tony76 and his 3 associates
began setting up hecho as standby
very high load (300/16), took site offline and refactored main and category pages to be more efficient

04/09/2013

problem with load was that APC was set to only cache up to 32M of data. Changed to 5G and load is down to around 5/16.
ssbd considering joining my staff
transferring standby data to hecho standby server

04/10/2013

some vendors using the hedge in a falling market to profit off of me by buying from themselves. turned off access log pruning so I can investigate later. market crashed today.
being blackmailed again. someone says they have my ID, but hasn't proven it.

04/11/2013

set up tor relays
asked scout to go through all images on site looking for quickbuy scam remnants
cimon told me of a possible ddos attack through tor and how to mitigate against it.
guy blackmailing saying he has my id is bogus

04/12/2013

removed last remnant of quickbuy scam
implemented new error controller

SA-40

rewrote userpage

04/13/2013

inigo is in the hospital, so I covered his shift today. Zeroed everything and made changes to the site in about 5 hours

04/14/2013

did support. inigo returned.

started rewriting orders->buyer_cancel, been getting error reports about it.

04/15/2013

day off

04/16/2013

rewrote buyer_cancel

04/17/2013

rewrote settings view

04/18/2013

modified PIN reset system

04/19/2013

added blockchain.info as xrate source and modified update_xrate to use both and check for discrepancies and log.

modified PIN reset system

04/20/2013

migrated to different host because current host would not connect to guards. Bandwidth limited and site very slow after migration.

04/21 - 04/30/2013

market and forums under sever DoS attack. Gave 10k btc ransom but attack continued. Gave smed server access. Switched to nginx on web/db server, added nginx reverse proxy running tor hs. reconfigured everything and eventually was able to absorb attack.

05/01/2013

Symm starts working support today. Scout takes over forum support.

05/02/2013

Attack continues. No word from attacker. Site is open, but occasionally tor crashes and has to be restarted.

05/03/2013

helping smed fight off attacker. site is mostly down. I'm sick.

Leaked IP of webserver to public and had to redeploy/shred

promoted gramgreen to mod, now named libertas

05/04/2013

attacker agreed to stop if I give him the first \$100k of revenue and \$50k per week thereafter. He stopped, but there appears to be another DoS attack still persisting.

05/05/2013

Attack is fully stopped. regrouping and prioritizing next actions.

05/06/2013

working with smed to put up more defenses against attack

SA-41

05/07/2013

paid \$100k to attacker

05/08/2013

reconfigured nginx to not time out. almost all errors have disappeared.

05/10/2013

started buying servers for intro/guard nodes

05/11/2012

still buying servers

05/13/2013

helping catch up support
smed demo'ed multi address scheme for the forum

05/15/2013

more servers

05/22/2013

paid the attacker \$50k

05/26/2013

tried moving forum to multi .onion config, but leaked ip twice. Had to change servers, forum was down for a couple of days.

05/28/2013


finished rewriting silkroad.php controller

05/29/2013

rewrote orders page

paid attacker \$50k weekly ransom
\$2M was stolen from my mtgox account by DEA
added smed to payroll
rewrote cart page

05/30/2013



05/31/2013

\$50k xferred to cimon

06/01/2013

someone claiming to be LE trying to infiltrate forum mods

06/02/2013

loaning \$500k to r&w to start vending on SR.

06/03/2013

put cimon in charge of LE counter intel

06/04/2013

SA-42

rewrote reso center

06/05/2013 - 09/11/2013

Haven't been logging. [REDACTED]

[REDACTED] did an interview with andy greenberg from forbes where i said i wasn't the original DPR, went over well with community. [REDACTED]

[REDACTED] r&w flaked out and disappeared with my 1/2 mil. smed has been working hard to develop a monitoring system for the SR infrastructure, but hasn't produced much in actual results. similarly cimon has been working on the mining and gambling projects, but no results forthcoming. created Anonymous Bitcoin Exchange (ABE) and have been trying to recruit tellers. the vendor "gold" is my best lead at the moment. nod is an H dealer on SR who says he has world class it skills and I am giving him a chance to show his stuff with ABE. did a "ratings and review" overhaul. It hasn't gone over too well with the community, but I am still working on it with them and I think it will get there eventually. tor has been clogged up by a botnet causing accessibility issues.

09/12/2013

Got a tip from oldamsterdam that supertrips has been busted. [REDACTED]

09/13/2013

09/11 - 09/18/2013

could not confirm ST bust. [REDACTED]

[REDACTED] Got covered in poison oak trying to get a piece of trash out of a tree in a park nearby and have been moping. went on a first date with amelia from okc.

09/19/2013

red pinged me and asked for meeting tomorrow.

09/19 - 09/25/2013

red got in a jam and needed \$500k to get out. ultimately he convinced me to give it to him, but I got his ID first and had cimon send harry, his new soldier of fortune, to vancouver to get \$800k in cash to cover it. red has been mainly out of communication, but i haven't lost hope. Atlantis shut down. I was messaged by one of their team who said they shut down because of an FBI doc leaked to them detailing vulnerabilities in Tor.

09/30/2013

[REDACTED]. spoke with inigo for a while about the book club and swapping roles with libertas. Had revelation about the need to eat well, get good sleep, and meditate so I can stay positive and productive.

SA-43

The screenshot displays the AccessData FTK Imager 3.0.0.1443 interface. The main window shows a file list with columns for Name, Size, Type, and Date Modified. The file list includes various directories and files such as 'keys', 'wallets', 'collection', 'reference', 'project-references', 'NetWorthCalculator.ods', 'dpridzip.gpg', 'servers_smed.ods', 'sr_accounting.ods', 'todo_monthly', 'someday.txt', 'emergency', 'projects.txt', 'Collection.txt', 'server_config.txt', 'servers.ods', 'todo_westly', 'designated.txt', and 'todo.txt'. The file 'log.txt' is selected, and its content is displayed in the right-hand pane. The content of 'log.txt' is a series of entries dated from 03/20/2013 to 10/1/2013, detailing server management, database errors, and security measures. A Properties window is open at the bottom, showing details for the selected file 'log.txt', including its name, class, size, physical size, start cluster, date accessed, date created, date modified, actual file, UNIX Security Attributes, and Ext2/3/4 Information.

Name	Size	Type	Date Modified
keys	4 KB	Directory	3/28/2013 6:44:02 AM
to write	4 KB	Directory	5/27/2013 5:13:13 AM
wallets	4 KB	Directory	6/22/2013 8:46:27 PM
collection	4 KB	Directory	8/16/2013 1:01:36 AM
to read	4 KB	Directory	9/13/2013 9:25:55 PM
reference	4 KB	Directory	9/27/2013 7:49:25 PM
project-references	4 KB	Directory	10/1/2013 6:42:42 AM
NetWorthCalculator.ods	24 KB	Regular File	12/2/2012 6:01:42 PM
dpridzip.gpg	4 KB	Regular File	6/19/2013 8:38:00 PM
servers_smed.ods	19 KB	Regular File	6/29/2013 9:20:58 PM
sr_accounting.ods	42 KB	Regular File	7/3/2013 7:25:28 PM
todo_monthly	1 KB	Regular File	9/12/2013 10:00:19 PM
someday.txt	1 KB	Regular File	9/13/2013 1:30:21 AM
emergency	1 KB	Regular File	9/15/2013 4:34:25 AM
projects.txt	1 KB	Regular File	9/22/2013 8:35:12 PM
Collection.txt	1 KB	Regular File	9/23/2013 5:48:49 PM
server_config.txt	10 KB	Regular File	9/24/2013 4:08:09 AM
servers.ods	40 KB	Regular File	9/26/2013 2:56:39 AM
todo_westly	2 KB	Regular File	10/1/2013 1:03:06 AM
designated.txt	1 KB	Regular File	10/1/2013 4:37:55 AM
log.txt	10 KB	Regular File	10/1/2013 5:43:24 AM
todo.txt	1 KB	Regular File	10/1/2013 9:45:29 PM

03/20/2013
 someone posting as me managed to con 99 vendors out of 2 btc each with a fake message about a new silk road
 posted about cartel formation and not mitigating vendor roundtable leaks.
 worked on database error handling in CI

03/21/2013
 main server was ddosed and taken offline by host
 met with person in tor irc who gave me info on having custom hs guards
 buying up servers to turn into hidden service guards

03/22/2013
 deployed 2 guards on forum
 adjusted check_deposit cron to look further back to catch txns that died with an error

03/23/2013
 bought a couple of more servers from new hosts
 organized local files
 stripped out srsec db naming functions
 introduced at least two bugs doing this

03/24/2013
 been slowly raising the cost of hedging
 organized local files and notes

03/25/2013
 server was ddosed, meaning someone knew the real IP. I assumed they obtained it by becoming a guard node. So, I migrated to a new se

03/26/2013
 private guard nodes are working ok. still buying more servers so I can set up a more modular and redundant server cluster. redid log

03/27/2013
 set up servers

03/28/2013
 being blackmailed with user info. talking with large distributor (hell's angels).

Properties

General

Name: log.txt
 File Class: Regular File
 File Size: 9,389
 Physical Size: 12,288
 Start Cluster: 87,648,307
 Date Accessed: 10/2/2013 6:00:07 AM
 Date Created: 10/1/2013 5:43:24 AM
 Date Modified: 10/1/2013 5:43:24 AM
 Actual File: True

UNIX Security Attributes

Unix Permissions: -rw-rw-r--
 UID: 1,000
 GID: 1,000

Ext2/3/4 Information

Inode Number: 3,677,791
 Inode Change Time: 10/1/2013 5:43:24 AM

sd4_crypt-dd[ubcrypt-root[589412MB]][NONAME [ext4]][root]/home/frosty/backup/log.txt

SA-44

sr_accounting.ods

date	expense	total expenses	revenue	total_revenue	total	notes
07/17/2010		\$0		\$0	\$0	start
07/18/2010	\$25	\$25		\$0	-\$25	lab clothes, carry over from fall 2009
07/18/2010	\$31	\$56		\$0	-\$56	petri dishes, carry over from fall 2009
07/20/2010	\$89	\$145		\$0	-\$145	hepa filter, carry over from fall 2009
07/21/2010	\$6	\$150		\$0	-\$150	agar, carry over from fall 2009
07/22/2010	\$4	\$154		\$0	-\$154	malt extract, carry over from fall 2009
07/23/2010	\$6	\$160		\$0	-\$160	gas
07/26/2010	\$5	\$165		\$0	-\$165	digital timer
07/26/2010	\$6	\$171		\$0	-\$171	gas
07/26/2010	\$150	\$321		\$0	-\$321	Kelly deposit
07/26/2010	\$80	\$401		\$0	-\$401	pressure cooker
07/27/2010	\$20	\$421		\$0	-\$421	cleaning supplies, misc
07/27/2010	\$6	\$427		\$0	-\$427	gas
07/27/2010	\$452	\$879		\$0	-\$879	rent
07/29/2010	\$37	\$916		\$0	-\$916	misc
07/30/2010	\$6	\$922		\$0	-\$922	gas
07/31/2010	\$6	\$928		\$0	-\$928	gas
07/31/2010	\$46	\$974		\$0	-\$974	jars, deadbolt, propane
08/01/2010	\$33	\$1,007		\$0	-\$1,007	caulk, foil, strainers, tape
08/01/2010	\$6	\$1,013		\$0	-\$1,013	gas
08/01/2010	\$2,000	\$3,013		\$0	-\$3,013	payroll, me
08/01/2010	\$65	\$3,078		\$0	-\$3,078	window ac
08/02/2010	\$6	\$3,084		\$0	-\$3,084	gas
08/02/2010	\$10	\$3,094		\$0	-\$3,094	thermometers
08/06/2010	\$6	\$3,100		\$0	-\$3,100	gas
08/11/2010	\$6	\$3,106		\$0	-\$3,106	gas
						containers, jars, hose, gluegun, plastic sheet, tape, trays, bleach, fan
08/13/2010	\$112	\$3,218		\$0	-\$3,218	gas
08/13/2010	\$6	\$3,224		\$0	-\$3,224	gas
08/15/2010	\$33	\$3,258		\$0	-\$3,258	humidifier
08/16/2010	\$6	\$3,264		\$0	-\$3,264	gas
08/16/2010	\$7	\$3,271		\$0	-\$3,271	gloves, thermometer
08/16/2010		\$3,271	\$22	\$22	-\$3,249	returns
08/20/2010	\$52	\$3,323		\$22	-\$3,301	peat, verm, lime, gypsum
08/20/2010	\$27	\$3,350		\$22	-\$3,328	tyvek
08/21/2010	\$6	\$3,356		\$22	-\$3,334	gas
08/25/2010	\$6	\$3,362		\$22	-\$3,340	gas
08/26/2010	\$6	\$3,368		\$22	-\$3,346	gas
08/27/2010	\$6	\$3,374		\$22	-\$3,352	gas
08/28/2010	\$120	\$3,494		\$22	-\$3,472	blower
08/29/2010	\$6	\$3,500		\$22	-\$3,478	gas
08/29/2010	\$190	\$3,690		\$22	-\$3,668	humidifier
08/30/2010	\$6	\$3,696		\$22	-\$3,674	gas
09/01/2010	\$6	\$3,702		\$22	-\$3,680	gas
09/01/2010	\$2,000	\$5,702		\$22	-\$5,680	payroll, me
09/01/2010	\$410	\$6,112		\$22	-\$6,090	rent
09/04/2010	\$6	\$6,118		\$22	-\$6,096	gas
09/07/2010	\$6	\$6,124		\$22	-\$6,102	gas
						acetone, gtape, measure
09/12/2010	\$22	\$6,146		\$22	-\$6,124	tape, rubberbands
09/12/2010	\$6	\$6,152		\$22	-\$6,130	gas
09/14/2010	\$7	\$6,159		\$22	-\$6,137	denatured alcohol
09/14/2010	\$6	\$6,165		\$22	-\$6,143	gas



SA-45

sr_accounting.ods

date	expense	total expenses	revenue	total_revenue	total	notes
09/15/2010	\$6	\$6,171		\$22	-\$6,149	gas
09/17/2010	\$6	\$6,177		\$22	-\$6,155	gas
09/18/2010	\$6	\$6,183		\$22	-\$6,161	gas
09/19/2010	\$6	\$6,189		\$22	-\$6,167	gas
09/20/2010	\$6	\$6,195		\$22	-\$6,173	gas
09/22/2010	\$6	\$6,201		\$22	-\$6,179	gas
09/22/2010	\$66	\$6,268		\$22	-\$6,246	petri dishes, wash bottles
09/23/2010	\$6	\$6,274		\$22	-\$6,252	gas
09/24/2010	\$6	\$6,280		\$22	-\$6,258	gas
09/25/2010	\$45	\$6,325		\$22	-\$6,303	comp
09/27/2010	\$6	\$6,331		\$22	-\$6,309	gas
09/30/2010	\$6	\$6,337		\$22	-\$6,315	gas
10/01/2010	\$2,000	\$8,337		\$22	-\$8,315	payroll, me
10/04/2010	\$6	\$8,343		\$22	-\$8,321	gas
10/04/2010	\$420	\$8,763		\$22	-\$8,741	rent
10/09/2010	\$70	\$8,833		\$22	-\$8,811	cooler, funnels, trays, mixer
10/09/2010	\$6	\$8,839		\$22	-\$8,817	gas
10/10/2010	\$6	\$8,845		\$22	-\$8,823	gas
10/12/2010	\$6	\$8,851		\$22	-\$8,829	gas
10/12/2010	\$12	\$8,863		\$22	-\$8,841	sheet, tote
10/14/2010	\$6	\$8,869		\$22	-\$8,847	gas
10/14/2010	\$12	\$8,881		\$22	-\$8,859	seed, corn
10/14/2010	\$3	\$8,884		\$22	-\$8,862	trays
10/15/2010	\$6	\$8,890		\$22	-\$8,868	gas
10/15/2010	\$22	\$8,912		\$22	-\$8,890	trays
10/17/2010	\$6	\$8,918		\$22	-\$8,896	gas
10/18/2010	\$6	\$8,924		\$22	-\$8,902	gas
10/20/2010	\$6	\$8,930		\$22	-\$8,908	gas
10/20/2010	\$23	\$8,953		\$22	-\$8,931	propane
10/21/2010	\$6	\$8,959		\$22	-\$8,937	gas
10/22/2010	\$19	\$8,978		\$22	-\$8,956	container, stepstool, pitcher
10/22/2010	\$6	\$8,984		\$22	-\$8,962	gas
10/23/2010	\$6	\$8,990		\$22	-\$8,968	gas
10/25/2010	\$6	\$8,996		\$22	-\$8,974	gas
10/26/2010	\$6	\$9,002		\$22	-\$8,980	gas
10/27/2010	\$6	\$9,008		\$22	-\$8,986	gas
10/27/2010	\$41	\$9,049		\$22	-\$9,027	peat, lime, ph
10/27/2010	\$130	\$9,179		\$22	-\$9,157	usonic humidifier
10/28/2010	\$6	\$9,185		\$22	-\$9,163	gas
10/28/2010	\$195	\$9,380		\$22	-\$9,358	return humidifier
10/29/2010	\$6	\$9,386		\$22	-\$9,364	gas
10/30/2010	\$6	\$9,392		\$22	-\$9,370	gas
10/30/2010	\$50	\$9,442		\$22	-\$9,420	heater, box
10/30/2010	\$3	\$9,445		\$22	-\$9,423	pot
10/31/2010	\$27	\$9,472		\$22	-\$9,450	corn
10/31/2010	\$6	\$9,478		\$22	-\$9,456	gas
11/01/2010	\$2,000	\$11,478		\$22	-\$11,456	payroll, me
11/02/2010	\$6	\$11,484		\$22	-\$11,462	gas
11/02/2010	\$435	\$11,919		\$22	-\$11,897	rent
11/03/2010	\$6	\$11,925		\$22	-\$11,903	gas
11/04/2010	\$6	\$11,931		\$22	-\$11,909	gas
11/05/2010	\$26	\$11,957		\$22	-\$11,935	bucket, dessicant
11/06/2010	\$6	\$11,963		\$22	-\$11,941	
11/07/2010	\$6	\$11,969		\$22	-\$11,947	
11/08/2010	\$6	\$11,975		\$22	-\$11,953	
11/09/2010	\$6	\$11,981		\$22	-\$11,959	

SA-46

sr_accounting.ods

date	expense	total expenses	revenue	total_revenue	total	notes	
11/10/2010	\$20	\$12,001		\$22	-\$11,979	board and misc	
11/10/2010	\$6	\$12,007		\$22	-\$11,985		
11/11/2010	\$6	\$12,013		\$22	-\$11,991		
11/12/2010	\$85	\$12,098		\$22	-\$12,076	silver app fee	
11/12/2010	\$6	\$12,104		\$22	-\$12,082		
11/13/2010	\$6	\$12,110		\$22	-\$12,088		
11/14/2010	\$6	\$12,116		\$22	-\$12,094		
11/15/2010	\$6	\$12,122		\$22	-\$12,100		
11/17/2010	\$6	\$12,128		\$22	-\$12,106		
11/26/2010	\$162	\$12,290		\$22	-\$12,268	humidifier	
12/01/2010	\$2,000	\$14,290		\$22	-\$14,268	payroll, me	
12/03/2010		\$14,290	\$260	\$282	-\$14,008	humidifiers return	
12/03/2010	\$195	\$14,485		\$282	-\$14,203	rent	
12/04/2010	\$30	\$14,515		\$282	-\$14,233	scale	
12/06/2010	\$13	\$14,528		\$282	-\$14,246	shelves	
12/07/2010	\$34	\$14,562		\$282	-\$14,280	container and trays	
01/01/2011	\$2,000	\$16,562		\$282	-\$16,280	payroll, me	
01/02/2011	\$750	\$17,312		\$282	-\$17,030	payroll, da	
01/03/2011	\$469	\$17,781		\$282	-\$17,499	rent, util	
01/08/2011		\$17,781	\$110	\$392	-\$17,389	ian and joseph	
01/08/2011	\$750	\$18,531		\$392	-\$18,139	payroll, da	
02/01/2011	\$2,000	\$20,531		\$392	-\$20,139	payroll, me	
03/01/2011	\$2,000	\$22,531		\$392	-\$22,139	payroll, me	
04/01/2011	\$2,000	\$24,531		\$392	-\$24,139	payroll, me	
04/15/2011	\$500	\$25,031		\$392	-\$24,639	server rent	
05/01/2011	\$2,000	\$27,031		\$392	-\$26,639	payroll, me	
05/05/2011		\$27,031	\$17,569	\$17,961	-\$9,070	sales	
05/15/2011	\$500	\$27,531		\$17,961	-\$9,570	server rent	
05/31/2011		\$27,531	\$13,843	\$31,804	\$4,273	commissions	
06/01/2011	\$2,000	\$29,531		\$31,804	\$2,273	payroll, me	
06/15/2011	\$500	\$30,031		\$31,804	\$1,773	server rent	
07/01/2011	\$2,000	\$32,031		\$31,804	-\$227	payroll, me	
07/15/2011	\$500	\$32,531		\$31,804	-\$727	server rent	
07/25/2011		\$32,531	\$11,488	\$43,292	\$10,761	commissions	
08/01/2011	\$4,000	\$36,531		\$43,292	\$6,761	payroll, me	
08/06/2011		\$36,531	\$17,176	\$60,468	\$23,937	commissions	
08/15/2011	\$500	\$37,031		\$60,468	\$23,437	server rent	
08/28/2011		\$37,031	\$29,642	\$90,110	\$53,079	commissions	
09/01/2011	\$4,000	\$41,031		\$90,110	\$49,079	payroll, me	
09/15/2011	\$500	\$41,531		\$90,110	\$48,579	server rent	
09/21/2011	\$2,000	\$43,531		\$90,110	\$46,579	payroll, utah	
09/30/2011		\$43,531	\$3,180	\$93,290	\$49,759	commissions	
09/30/2011	\$1,000	\$44,531		\$93,290	\$48,759	payroll, utah	
10/01/2011	\$4,000	\$48,531		\$93,290	\$44,759	payroll, me	
10/05/2011		\$48,531	\$3,815	\$97,105	\$48,574	commissions	
10/06/2011		\$48,531	\$6,412	\$103,517	\$54,986	commissions	
10/07/2011	\$1,000	\$49,531		\$103,517	\$53,986	payroll, utah	
10/12/2011		\$49,531	\$10,390	\$113,907	\$64,376	commissions	
10/12/2011		\$49,531	\$3,461	\$117,368	\$67,837	commissions	
10/14/2011	\$1,000	\$50,531		\$117,368	\$66,837	payroll, utah	
10/15/2011	\$4,000	\$54,531		\$117,368	\$62,837	payroll, syg	
10/15/2011	\$1,000	\$55,531		\$117,368	\$61,837	server rent	
10/17/2011		\$55,531	\$1,532	\$118,900	\$63,369	commissions	
10/19/2011		\$55,531	\$37,750	\$156,650	\$101,119	commissions	
10/23/2011	\$500	\$56,031		\$156,650	\$100,619	payroll, utah	
10/25/2011		\$56,031	\$3,216	\$159,866	\$103,835	commissions	
11/01/2011	\$4,000	\$60,031		\$159,866	\$99,835	payroll, me	
11/04/2011	\$1,000	\$61,031		\$159,866	\$98,835	payroll, utah	
11/08/2011		\$61,031	\$46,735	\$206,601	\$145,570	commissions	

SA-47

sr_accounting.ods

date	expense	total expenses	revenue	total revenue	total	notes
11/10/2011		\$61,031	\$2,706	\$209,307	\$148,276	commissions
11/11/2011	\$1,500	\$62,531		\$209,307	\$146,776	payroll, utah
11/15/2011	\$5,000	\$67,531		\$209,307	\$141,776	payroll, syg
11/15/2011	\$1,000	\$68,531		\$209,307	\$140,776	server rent
11/19/2011		\$68,531	\$40,034	\$249,341	\$180,810	commissions
11/19/2011	\$1,000	\$69,531		\$249,341	\$179,810	payroll, utah
11/25/2011	\$1,500	\$71,031		\$249,341	\$178,310	payroll, utah
11/28/2011	\$180	\$71,211		\$249,341	\$178,130	payroll, bounties
11/29/2011	\$330	\$71,541		\$249,341	\$177,800	payroll, bounties
12/01/2011	\$4,000	\$75,541		\$249,341	\$173,800	payroll, me
12/02/2011		\$75,541	\$21,634	\$270,975	\$195,434	commissions
12/04/2011	\$2,000	\$77,541		\$270,975	\$193,434	payroll, utah
12/05/2011	\$500	\$78,041		\$270,975	\$192,934	payroll, da
12/12/2011	\$975	\$79,016		\$270,975	\$191,959	payroll, bounties
12/12/2011	\$500	\$79,516		\$270,975	\$191,459	payroll, da
12/15/2011		\$79,516	\$13,879	\$284,854	\$205,338	commissions
12/15/2011	\$105	\$79,621		\$284,854	\$205,233	payroll, bounties
12/15/2011	\$2,000	\$81,621		\$284,854	\$203,233	payroll, syg
12/15/2011	\$3,000	\$84,621		\$284,854	\$200,233	payroll, utah
12/15/2011	\$1,000	\$85,621		\$284,854	\$199,233	payroll, utah
12/15/2011	\$1,000	\$86,621		\$284,854	\$198,233	server rent
12/18/2011		\$86,621	\$32,729	\$317,583	\$230,962	commissions
12/19/2011	\$500	\$87,121		\$317,583	\$230,462	payroll, da
12/23/2011	\$500	\$87,621		\$317,583	\$229,962	payroll, da
12/24/2011	\$800	\$88,421		\$317,583	\$229,162	payroll, bounties
12/24/2011	\$2,000	\$90,421		\$317,583	\$227,162	payroll, utah
12/25/2011		\$90,421	\$5,000	\$322,583	\$232,162	commissions
12/25/2011		\$90,421	\$34,890	\$357,473	\$267,052	commissions
12/26/2011	\$500	\$90,921		\$357,473	\$266,552	payroll, da
12/31/2011	\$640	\$91,561		\$357,473	\$265,912	payroll, bounties
12/31/2011	\$2,000	\$93,561		\$357,473	\$263,912	payroll, utah
01/01/2012	\$4,000	\$97,561		\$357,473	\$259,912	payroll, me
01/07/2012	\$1,000	\$98,561		\$357,473	\$258,912	donate to torservers
01/07/2012	\$2,000	\$100,561		\$357,473	\$256,912	payroll, utah
01/08/2012	\$630	\$101,191		\$357,473	\$256,282	payroll, bounties
01/08/2012	\$154	\$101,345		\$357,473	\$256,128	payroll, bounties
01/14/2012	\$750	\$102,095		\$357,473	\$255,378	bounties
01/14/2012	\$1,000	\$103,095		\$357,473	\$254,378	donate to torservers
01/14/2012	\$3,750	\$106,845		\$357,473	\$250,628	payroll
01/17/2012	\$1,166	\$108,011		\$357,473	\$249,462	server rent
01/19/2012	\$237	\$108,248		\$357,473	\$249,225	server rent
01/22/2012	\$1,000	\$109,248		\$357,473	\$248,225	donate to torservers
01/22/2012	\$500	\$109,748		\$357,473	\$247,725	server rent
01/28/2012	\$1,000	\$110,748		\$357,473	\$246,725	donate to torservers
01/28/2012	\$4,750	\$115,498		\$357,473	\$241,975	payroll
01/30/2012	\$750	\$116,248		\$357,473	\$241,225	payroll
01/31/2012	\$700	\$116,948		\$357,473	\$240,525	bounties
01/31/2012	\$5,000	\$121,948		\$357,473	\$235,525	payroll (Silk Chat)
02/01/2012	\$15,000	\$136,948		\$357,473	\$220,525	payroll (sr2.0)
02/04/2012	\$1,000	\$137,948		\$357,473	\$219,525	donate to torservers
02/04/2012	\$2,750	\$140,698		\$357,473	\$216,775	payroll
02/04/2012	\$160	\$140,858		\$357,473	\$216,615	server rent
02/05/2012	\$800	\$141,658		\$357,473	\$215,815	bounties
02/11/2012	\$1,000	\$142,658		\$357,473	\$214,815	donate to torservers
02/11/2012	\$2,750	\$145,408		\$357,473	\$212,065	payroll
02/12/2012	\$250	\$145,658		\$357,473	\$211,815	bounties
02/16/2012	\$2,394	\$148,052		\$357,473	\$209,421	server rent
02/17/2012	\$450	\$148,502		\$357,473	\$208,971	payroll
02/18/2012	\$1,000	\$149,502		\$357,473	\$207,971	bounties

SA-48

sr_accounting.ods

date	expense	total expenses	revenue	total revenue	total	notes
02/18/2012	\$1,000	\$150,502		\$357,473	\$206,971	donate to torservers
02/19/2012	\$2,900	\$153,402		\$357,473	\$204,071	payroll
02/21/2012	\$132	\$153,534		\$357,473	\$203,939	server rent
03/02/2012		\$153,534	\$65,933	\$423,406	\$269,872	commissions
03/02/2012	\$2,800	\$156,334		\$423,406	\$267,072	payroll, me
03/03/2012	\$1,000	\$157,334		\$423,406	\$266,072	donate to torservers
03/03/2012	\$3,200	\$160,534		\$423,406	\$262,872	payroll
03/03/2012	\$15,000	\$175,534		\$423,406	\$247,872	payroll (sr2.0)
03/10/2012	\$1,000	\$176,534		\$423,406	\$246,872	donate to torservers
03/10/2012	\$3,200	\$179,734		\$423,406	\$243,672	payroll
03/12/2012	\$200	\$179,934		\$423,406	\$243,472	bounties
03/17/2012	\$200	\$180,134		\$423,406	\$243,272	bounties
03/17/2012	\$1,000	\$181,134		\$423,406	\$242,272	donate to torservers
03/17/2012	\$3,200	\$184,334		\$423,406	\$239,072	payroll
03/23/2012	\$1,400	\$185,734		\$423,406	\$237,672	server rent
03/25/2012	\$3,200	\$188,934		\$423,406	\$234,472	payroll
03/29/2012	\$772	\$189,706		\$423,406	\$233,700	server rent
04/07/2012	\$1,000	\$190,706		\$423,406	\$232,700	donate to torservers
04/07/2012	\$4,000	\$194,706		\$423,406	\$228,700	payroll
04/11/2012		\$194,706	\$87,372	\$510,778	\$316,072	commissions
04/11/2012	\$12,000	\$206,706		\$510,778	\$304,072	payroll, me
04/11/2012	\$37,000	\$243,706		\$510,778	\$267,072	yubikeys
04/13/2012	\$38,000	\$281,706		\$510,778	\$229,072	payroll (sr2.0)
04/14/2012		\$281,706	\$43,000	\$553,778	\$272,072	commissions
04/14/2012	\$1,000	\$282,706		\$553,778	\$271,072	donate to torservers
04/14/2012	\$4,000	\$286,706		\$553,778	\$267,072	payroll
04/16/2012	\$300	\$287,006		\$553,778	\$266,772	bounties
04/21/2012	\$1,000	\$288,006		\$553,778	\$265,772	donate to torservers
04/21/2012	\$4,000	\$292,006		\$553,778	\$261,772	payroll
04/22/2012		\$292,006	\$8,000	\$561,778	\$269,772	commissions
04/23/2012	\$12,000	\$304,006		\$561,778	\$257,772	420 grand prize
04/23/2012	\$800	\$304,806		\$561,778	\$256,972	420 grand prize
04/23/2012	\$32,000	\$336,806		\$561,778	\$224,972	420 prizes
04/25/2012	\$4,000	\$340,806		\$561,778	\$220,972	payroll (forum)
04/25/2012	\$37,000	\$377,806		\$561,778	\$183,972	payroll (sr2.0)
04/28/2012	\$1,100	\$378,906		\$561,778	\$182,872	bounties
04/28/2012		\$378,906	\$90,900	\$652,678	\$273,772	commissions
04/28/2012	\$1,150	\$380,056		\$652,678	\$272,622	laptop
04/28/2012	\$4,000	\$384,056		\$652,678	\$268,622	payroll
04/28/2012	\$350	\$384,406		\$652,678	\$268,272	payroll, me
05/06/2012	\$1,000	\$385,406		\$652,678	\$267,272	donate to torservers
05/06/2012	\$4,000	\$389,406		\$652,678	\$263,272	payroll
05/08/2012	\$20,090	\$409,496		\$652,678	\$243,182	payroll (sr2.0)
05/11/2012	\$4,000	\$413,496		\$652,678	\$239,182	420 grand prize
05/11/2012	\$2,000	\$415,496		\$652,678	\$237,182	donate to torservers
05/11/2012	\$4,000	\$419,496		\$652,678	\$233,182	payroll
05/18/2012		\$419,496	\$142,090	\$794,768	\$375,272	commissions
05/18/2012	\$1,500	\$420,996		\$794,768	\$373,772	donate to torservers
05/18/2012		\$420,996	\$5,000	\$799,768	\$378,772	invest
05/18/2012	\$100,000	\$520,996		\$799,768	\$278,772	op rr
05/18/2012	\$4,000	\$524,996		\$799,768	\$274,772	payroll
05/20/2012		\$524,996	\$76,500	\$876,268	\$351,272	invest
05/20/2012		\$524,996	\$25,500	\$901,768	\$376,772	invest
05/25/2012	\$1,000	\$525,996		\$901,768	\$375,772	donate to torservers
05/25/2012	\$4,000	\$529,996		\$901,768	\$371,772	payroll
06/01/2012		\$529,996	\$10,000	\$911,768	\$381,772	commissions
06/01/2012	\$1,000	\$530,996		\$911,768	\$380,772	donate to torservers
06/01/2012	\$4,000	\$534,996		\$911,768	\$376,772	payroll
06/02/2012	\$40,000	\$574,996		\$911,768	\$336,772	payroll (sr2.0)

SA-49

sr_accounting.ods

date	expense	total expenses	revenue	total revenue	total	notes
06/03/2012		\$574,996	\$26,000	\$937,768	\$362,772	invest
06/05/2012	\$3,000	\$577,996		\$937,768	\$359,772	cp poker promo
06/05/2012	\$3,338	\$581,334		\$937,768	\$356,434	server rent
06/05/2012	\$150	\$581,484		\$937,768	\$356,284	server rent
06/05/2012	\$150	\$581,634		\$937,768	\$356,134	smsdragon
06/08/2012		\$581,634	\$54,238	\$992,006	\$410,372	commissions
06/08/2012	\$2,000	\$583,634		\$992,006	\$408,372	donate to torservers
06/08/2012	\$5,600	\$589,234		\$992,006	\$402,772	payroll
06/12/2012	\$600	\$589,834		\$992,006	\$402,172	bounties
06/16/2012	\$2,000	\$591,834		\$992,006	\$400,172	donate to torservers
06/16/2012	\$4,000	\$595,834		\$992,006	\$396,172	payroll
06/16/2012	\$18,000	\$613,834		\$992,006	\$378,172	payroll (forum)
06/16/2012	\$20,000	\$633,834		\$992,006	\$358,172	payroll (mail)
06/16/2012	\$20,000	\$653,834		\$992,006	\$338,172	payroll (sr2.0)
06/16/2012	\$1,800	\$655,634		\$992,006	\$336,372	server rent
06/17/2012		\$655,634	\$66,400	\$1,058,406	\$402,772	commissions
06/17/2012		\$655,634	\$64,000	\$1,122,406	\$466,772	invest
06/17/2012	\$160	\$655,794		\$1,122,406	\$466,612	server rent
06/18/2012		\$655,794	\$33,713	\$1,156,119	\$500,325	commissions
06/19/2012		\$655,794	\$21,125	\$1,177,244	\$521,450	commissions
06/19/2012	\$3,228	\$659,022		\$1,177,244	\$518,222	server rent
06/20/2012		\$659,022	\$11,960	\$1,189,204	\$530,182	commissions
06/22/2012	\$2,000	\$661,022		\$1,189,204	\$528,182	donate to torservers
06/22/2012	\$4,000	\$665,022		\$1,189,204	\$524,182	payroll
06/30/2012	\$775	\$665,797		\$1,189,204	\$523,407	bounties
07/06/2012		\$665,797	\$13,543	\$1,202,747	\$536,950	commissions
07/06/2012	\$1,000	\$666,797		\$1,202,747	\$535,950	donate to torservers
07/06/2012	\$4,000	\$670,797		\$1,202,747	\$531,950	payroll
07/06/2012	\$1,768	\$672,565		\$1,202,747	\$530,182	server rent
07/14/2012	\$2,000	\$674,565		\$1,202,747	\$528,182	donate to torservers
07/14/2012	\$8,000	\$682,565		\$1,202,747	\$520,182	payroll
07/19/2012	\$14,305	\$696,870		\$1,202,747	\$505,877	payroll, me
07/20/2012	\$2,701	\$699,571	\$32,005	\$1,234,752	\$535,181	commissions
07/20/2012	\$1,000	\$700,571		\$1,234,752	\$534,181	donate to torservers
07/20/2012	\$4,000	\$704,571		\$1,234,752	\$530,181	payroll
07/20/2012	\$2,700	\$707,271		\$1,234,752	\$527,481	server rent
07/27/2012	\$1,000	\$708,271		\$1,234,752	\$526,481	donate to torservers
07/27/2012	\$4,000	\$712,271		\$1,234,752	\$522,481	payroll
08/03/2012	\$1,000	\$713,271		\$1,234,752	\$521,481	donate to torservers
08/03/2012	\$4,000	\$717,271		\$1,234,752	\$517,481	payroll
08/03/2012	\$474	\$717,745		\$1,234,752	\$517,007	server rent
08/11/2012	\$1,000	\$718,745		\$1,234,752	\$516,007	donate to torservers
08/11/2012	\$4,000	\$722,745		\$1,234,752	\$512,007	payroll
08/18/2012	\$1,000	\$723,745		\$1,234,752	\$511,007	donate to torservers
08/18/2012	\$4,000	\$727,745		\$1,234,752	\$507,007	payroll
08/24/2012		\$727,745	\$28,974	\$1,263,726	\$535,981	commissions
08/24/2012	\$10,000	\$737,745		\$1,263,726	\$525,981	donate to torservers
08/24/2012	\$2,000	\$739,745		\$1,263,726	\$523,981	payroll
08/24/2012	\$5,000	\$744,745		\$1,263,726	\$518,981	payroll, me
08/24/2012	\$500	\$745,245		\$1,263,726	\$518,481	server rent
08/29/2012	\$8,000	\$753,245		\$1,263,726	\$510,481	misc
08/29/2012	\$24,000	\$777,245		\$1,263,726	\$486,481	payroll (forum)
08/29/2012	\$16,000	\$793,245		\$1,263,726	\$470,481	payroll (forum) advance
08/29/2012	\$25,000	\$818,245		\$1,263,726	\$445,481	payroll (smed)
08/29/2012	\$30,000	\$848,245		\$1,263,726	\$415,481	payroll (sr2.0, exchange)
08/29/2012	\$10,000	\$858,245		\$1,263,726	\$405,481	slush
08/29/2012	\$17,000	\$875,245		\$1,263,726	\$388,481	travel
08/31/2012	\$2,000	\$877,245		\$1,263,726	\$386,481	donate to torservers
08/31/2012	\$4,000	\$881,245		\$1,263,726	\$382,481	payroll

SA-50

sr_accounting.ods

date	expense	total expenses	revenue	total_revenue	total	notes	
09/06/2012	\$1,000	\$882,245		\$1,263,726	\$381,481	donate to torservers	
09/06/2012	\$4,400	\$886,645		\$1,263,726	\$377,081	payroll	
09/14/2012	\$4,800	\$891,445		\$1,263,726	\$372,281	payroll	
09/14/2012	\$175	\$891,620		\$1,263,726	\$372,106	payroll, bounties	
09/21/2012	\$1,000	\$892,620		\$1,263,726	\$371,106	donate to torservers	
09/21/2012	\$2,000	\$894,620		\$1,263,726	\$369,106	payroll	
09/28/2012		\$894,620	\$152,475	\$1,416,201	\$521,581	commissions	
09/28/2012	\$1,000	\$895,620		\$1,416,201	\$520,581	donate to torservers	
09/28/2012	\$2,100	\$897,720		\$1,416,201	\$518,481	payroll	
10/05/2012	\$1,000	\$898,720		\$1,416,201	\$517,481	donate to torservers	
10/05/2012	\$2,100	\$900,820		\$1,416,201	\$515,381	payroll	
10/12/2012	\$1,000	\$901,820		\$1,416,201	\$514,381	donate to torservers	
10/12/2012	\$4,400	\$906,220		\$1,416,201	\$509,981	payroll	
10/12/2012	\$8,000	\$914,220		\$1,416,201	\$501,981	payroll, me	
10/26/2012	\$500	\$914,720		\$1,416,201	\$501,481	donate to btccharts	
10/26/2012	\$4,000	\$918,720		\$1,416,201	\$497,481	payroll	
10/26/2012	\$1,000	\$919,720		\$1,416,201	\$496,481	donate to torservers	
11/03/2012	\$4,400	\$924,120		\$1,416,201	\$492,081	payroll	
11/03/2012	\$1,000	\$925,120		\$1,416,201	\$491,081	donate to torservers	
11/16/2012	\$2,400	\$927,520		\$1,416,201	\$488,681	payroll	
11/16/2012	\$2,000	\$929,520		\$1,416,201	\$486,681	donate to torservers	
11/16/2012	\$93,150	\$1,022,670		\$1,416,201	\$393,531	cimon debacle, development	
11/17/2012		\$1,022,670	\$128,050	\$1,544,251	\$521,581	commissions	
11/18/2012	\$25,000	\$1,047,670		\$1,544,251	\$496,581	pay off hacker	
11/23/2012	\$1,800	\$1,049,470		\$1,544,251	\$494,781	payroll	
11/23/2012	\$2,000	\$1,051,470		\$1,544,251	\$492,781	donate to torservers	
11/30/2012	\$1,800	\$1,053,270		\$1,544,251	\$490,981	payroll	
11/30/2012	\$1,000	\$1,054,270		\$1,544,251	\$489,981	donate to torservers	
11/30/2012	\$500	\$1,054,770		\$1,544,251	\$489,481	server rent	
11/30/2012	\$2,500	\$1,057,270		\$1,544,251	\$486,981	server rent	
12/07/2012	\$1,400	\$1,058,670		\$1,544,251	\$485,581	payroll	
12/07/2012	\$1,000	\$1,059,670		\$1,544,251	\$484,581	donate to torservers	
12/07/2012	\$1,030	\$1,060,700		\$1,544,251	\$483,551	server rent	
12/14/2012	\$1,900	\$1,062,600		\$1,544,251	\$481,651	payroll	
12/14/2012	\$1,000	\$1,063,600		\$1,544,251	\$480,651	donate to torservers	
12/14/2012		\$1,063,600	\$40,930	\$1,585,181	\$521,581	commissions	
12/15/12	25000	\$1,088,600		\$1,585,181	\$496,581	pay off hacker	
12/20/2012	\$1,900	\$1,090,500		\$1,585,181	\$494,681	payroll	
12/24/2012	\$1,000	\$1,091,500		\$1,585,181	\$493,681	donate to torservers	
12/24/2012	\$3,159	\$1,094,659		\$1,585,181	\$490,522	server rent	
12/27/2012	\$2,000	\$1,096,659		\$1,585,181	\$488,522	payroll	
12/27/2012	\$1,000	\$1,097,659		\$1,585,181	\$487,522	donate to torservers	
01/03/2013	\$2,300	\$1,099,959		\$1,585,181	\$485,222	payroll	
01/04/2013	\$500	\$1,100,459		\$1,585,181	\$484,722	payroll, me	
01/07/2013	\$537	\$1,100,996		\$1,585,181	\$484,185	server rent	
01/10/2013	\$2,200	\$1,103,196		\$1,585,181	\$481,985	payroll	
01/10/2013	\$1,000	\$1,104,196		\$1,585,181	\$480,985	donate to torservers	
01/14/2013	\$4,500	\$1,108,696		\$1,585,181	\$476,485	server rent	
01/17/2013	\$3,170	\$1,111,866		\$1,585,181	\$473,315	server rent	
01/18/2013	\$60,000	\$1,171,866		\$1,585,181	\$413,315	payroll smed and dev team	
01/24/2013	\$160,000	\$1,331,866		\$1,585,181	\$253,315	fpga's	10k btc

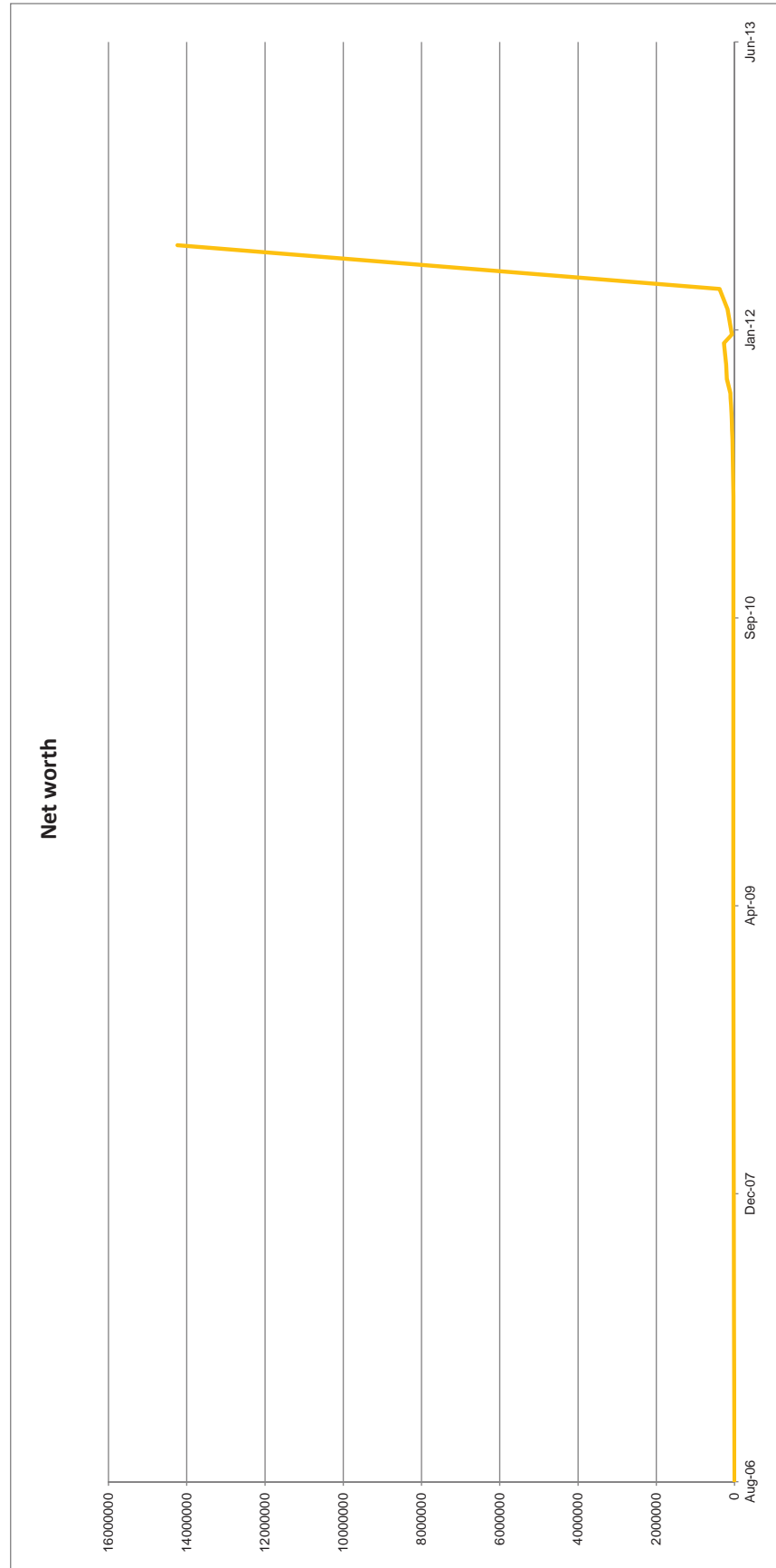
SA-51

sr_accounting.ods

date	expense	total expenses	revenue	total revenue	total	notes
01/24/2013	\$2,200	\$1,334,066		\$1,585,181	\$251,115	payroll
01/24/2013	\$1,000	\$1,335,066		\$1,585,181	\$250,115	donate to torservers
01/24/2013	\$777	\$1,335,843		\$1,585,181	\$249,338	server rent
01/31/2013	\$2,400	\$1,338,243		\$1,585,181	\$246,938	payroll
01/31/2013	\$1,000	\$1,339,243		\$1,585,181	\$245,938	donate to torservers
02/05/2013	\$480	\$1,339,723		\$1,585,181	\$245,458	server rent
02/07/2013	\$1,200	\$1,340,923		\$1,585,181	\$244,258	payroll
02/07/2013	\$948	\$1,341,871		\$1,585,181	\$243,310	server rent
02/07/2013	\$1,000	\$1,342,871		\$1,585,181	\$242,310	donate to torservers
02/10/2013	\$474	\$1,343,345		\$1,585,181	\$241,836	server rent
02/14/2012	\$1,200	\$1,344,545		\$1,585,181	\$240,636	payroll
02/21/2013	\$1,800	\$1,346,345		\$1,585,181	\$238,836	payroll
02/21/2013	\$162,000	\$1,508,345		\$1,585,181	\$76,836	op greenville
02/21/2013		\$1,508,345	\$444,745	\$2,029,926	\$521,581	commissions
02/28/2013	\$2,200	\$1,510,545		\$2,029,926	\$519,381	payroll
03/01/2013	\$537	\$1,511,082		\$2,029,926	\$518,844	server rent
03/01/2013	\$2,742	\$1,513,824		\$2,029,926	\$516,102	server rent
03/07/2013	\$2,200	\$1,516,024		\$2,029,926	\$513,902	payroll
03/13/2013	\$2,733					server rent
03/21/2013	\$2,500					payroll
03/26/2013	\$5,000					server rent
04/04/2013	\$3,000					payroll
04/11/2013	\$2,500					payroll
04/12/2013	\$15,000					payroll, me
04/19/2013	\$2,500					payroll
04/26/2013	\$2,500					payroll
05/03/2013	\$3,000					payroll
05/07/2013	\$50,000					to cimon for fpga
05/08/2013	\$100,000					pay off hacker
05/08/2013	\$3,500					payroll
05/11/2013	\$530					server rent
05/15/2013	\$2,000,000					theft from mtgox
06/02/2013	\$500,000					loan to r&w
06/05/2013	\$50,000					pay off hacker
06/12/13	\$50,000					pay off hacker
06/19/2013	\$50,000					pay off hacker
06/26/2013	\$50,000					pay off hacker
07/03/2013	\$50,000					pay off hacker
07/03/2013	\$57,000					to cimon

SA-54

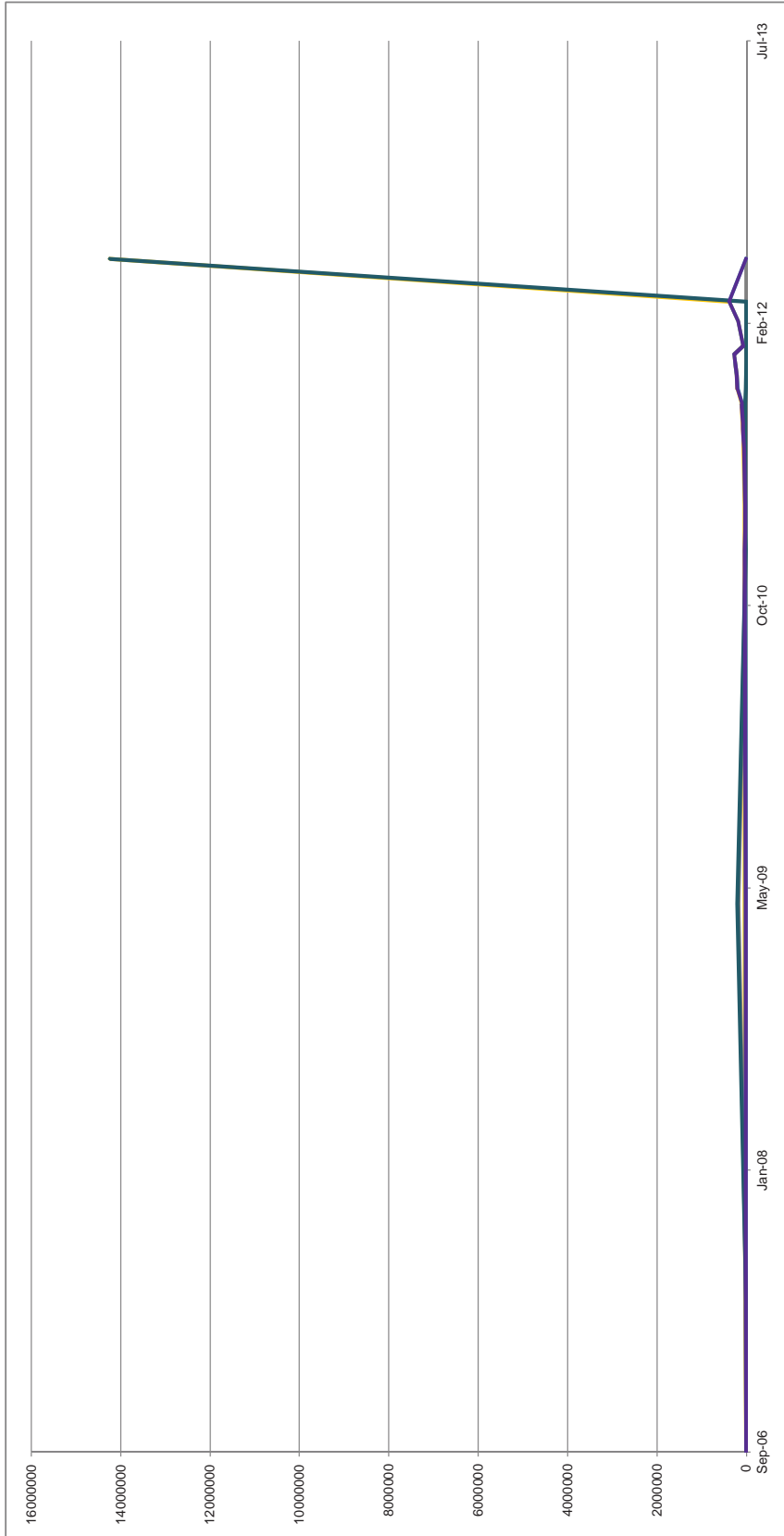
NetWorthCalculator.ods



SA-55

NetWorthCalculator.ods

Cumulative



SA-57

pay employees

inigo - \$1500
libertas - \$1500
batman73 - \$1000 // ssbd
cirrus - \$1000
smedley - \$2500
spock8642 - \$500 // drx
albertpacino - \$500 // pacino

check emails

safe-mail.net
dianewallace - bora
donaldboone - loup
nnsWp4tsgjrdhG3L, jKsbyiWqsAS6Gxo6 - maiden
fastmail
salesdept@ftml.net, sdept66 - btc
mail.com
jordanlind@linuxmail.org, RPGLdgjjveBtHpEN - lam

check server expirations

add 1 month if within 1 month

update and test servers

bora
loup
btc
lam

check for CI update (currently 2.1.4)

<http://ellislab.com/codeigniter>
</var/www/market/system/core/Input.php>
+ Line 313 \$this->ip_address = '127.0.0.1';
+ Line 358 \$this->ip_address = '127.0.0.1';
+ Line 359 //
+ Line 361 \$this->ip_address = '127.0.0.1';

check for smf update (currently 2.0.5)

<http://download.simplemachines.org/>

post on forum

post on twitter

review personal organization

clear collection
review projects
review someday
review references
review "to read"

pay off bugger

17LqFWnkP48nkgBsxt6fAtX1GJXBBTeRxc
\$55k



SA-58

write weekly summary

MEMORIZE

memorize backup login

memorize cimon email and dprid password

memorize inigo handshake

read any good books lately?

anything by rothbard

how much were you fined for possession

\$200

SA-59

The screenshot displays the AccessData FTK Imager interface. The main window shows a file list with columns for Name, Size, Type, and Date Modified. The file 'todo_weekly' is selected, and its properties are shown in the bottom right pane.

Name	Size	Type	Date Modified
keys	4 KB	Directory	3/28/2013 6:44:02 AM
to write	4 KB	Directory	5/27/2013 5:13:43 AM
wallets	4 KB	Directory	6/22/2013 8:46:27 PM
collection	4 KB	Directory	8/16/2013 1:01:36 AM
to read	4 KB	Directory	9/13/2013 9:25:55 PM
reference	4 KB	Directory	9/27/2013 7:49:25 PM
project references	4 KB	Directory	10/1/2013 6:42:42 AM
NetworkCalculators	24 KB	Regular File	12/2/2012 6:01:42 PM
dpridzip.gpg	4 KB	Regular File	6/19/2013 8:38:00 PM
server_smed.ods	19 KB	Regular File	6/29/2013 9:20:58 PM
sr_accounting.ods	42 KB	Regular File	7/3/2013 7:25:28 PM
todo_monthly	1 KB	Regular File	9/12/2013 10:00:19 PM
someday.bt	1 KB	Regular File	9/13/2013 1:30:21 AM
emergency	1 KB	Regular File	9/15/2013 4:34:25 AM
projects.bt	1 KB	Regular File	9/22/2013 8:35:12 PM
collection.bt	1 KB	Regular File	9/23/2013 5:48:49 PM
server.config.txt	10 KB	Regular File	9/24/2013 4:08:09 AM
server.ods	40 KB	Regular File	9/26/2013 2:56:39 AM
todo_weekly	2 KB	Regular File	10/1/2013 1:03:06 AM
designated.bt	1 KB	Regular File	10/1/2013 4:37:55 AM
log.bt	10 KB	Regular File	10/1/2013 5:43:24 AM
todo.bt	1 KB	Regular File	10/1/2013 9:45:29 PM


```

pay employees
inigo - $1500
libertas - $1500
batman73 - $1000 // sabd
cirrus - $1000
smedley - $2500
spock$642 - $500 // drx
albertpacino - $500 // pacino

check emails
safe-mail.net
dianewallace - borz
donaldboone - loup
ms0$4tsgjrdh$3L, jKsbyWgs$5Gx06 - maiden
fastmail
salesdept@fmi.net, sdept66 - btc
mail.com
jordanlind@imuxmail.org, RPLdgdjyve$tpcEN - lam

check server expirations
add 1 month if within 1 month

update and test servers
boxa
loup
btc
lam

check for CI update (currently 2.1.4)
http://gillieab.com/codeigniter
+ Line 313 $this->ip_address = '127.0.0.1';
+ Line 358 $this->ip_address = '127.0.0.1';
+ Line 359 //
+ Line 361 $this->ip_address = '127.0.0.1';

check for smf update (currently 2.0.5)
http://download.simplemachines.org/
post on forum
post on twitter

-review personal organization
-clear collection
-review projects
-review someday
-review references
-review "co read"
-review backup/todo_weekly
  
```


Properties

General

Name	todo_weekly
File Class	Regular File
File Size	1,269
Physical Size	4,096
Start Cluster	133,982,721
Date Accessed	10/2/2013 2:00:35 AM
Date Created	10/1/2013 1:03:06 AM
Date Modified	10/1/2013 1:03:06 AM
Actual File	True

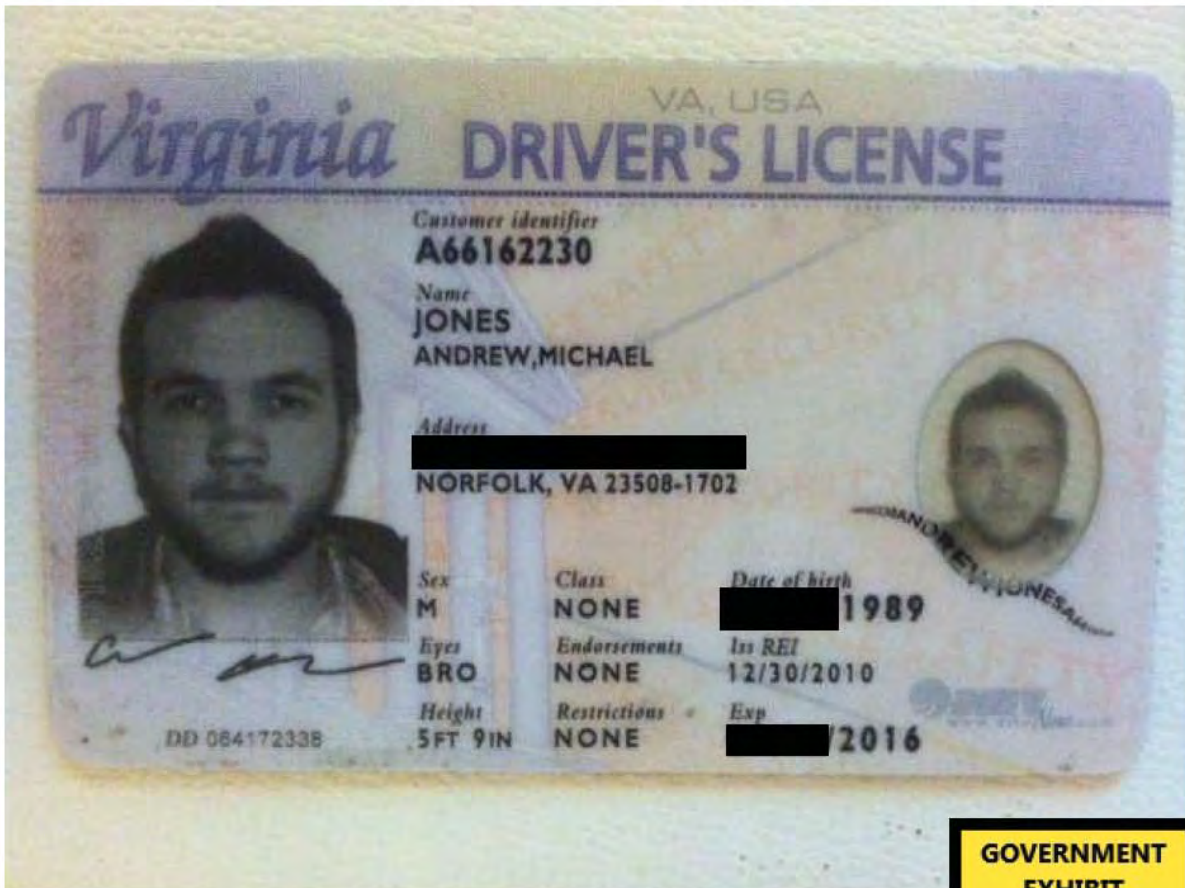
UNIX Security Attributes

Unix Permissions	-rwxrwt--
UID	1,000
GID	1,000

Ext2/3/4 Information

Inode Number	3,677,785
Inode Change Time	10/1/2013 1:03:06 AM

SA-60



**GOVERNMENT
EXHIBIT
256**
14 Cr. 68 (KBF)

SA-61

The screenshot displays the AccessData FTK Imager 3.0.0.1443 interface. The main window shows a file system view of 'evidence1' with a list of files and folders. The 'Files' pane on the left lists items such as 'nbi', 'netbeans-7.3.1', 'netbeans', 'cache', 'compz-1', 'sfh', 'thunderbird', 'gconf', 'gstreamer-0.10', 'local', 'temp', 'mission-control', 'purple', 'Desktop', 'filezilla', 'Skype', 'elinks', 'wineshark', 'gifs', 'backup', 'to write', 'to read', 'collection', 'reference', 'by me', 'by others', 'SOEs', 'reports', 'politics', 'orbid security', 'midnap', 'fromRK', 'cutout', 'project references', 'keys', 'wds', 'gms', 'launchd', 'netbeans', 'lib64', 'sys', 'sv', and 'out'.

The 'Files' pane on the right shows a list of files with columns for Name, Type, Size, and Date Modified:

Name	Type	Size	Date Modified
fromRK	Directory	4 KB	4/30/2012 12:05:32 AM
cutout	Directory	4 KB	6/28/2013 6:24:43 PM
ingo.jpg.jpg	Regular File	112 KB	10/26/2012 9:57:08 PM
Symantec.jpg	Regular File	307 KB	5/1/2013 6:00:39 PM
Libertat.jpg.jpg	Regular File	3,516 KB	6/5/2013 9:03:57 PM
circus.jpg.jpg	Regular File	150 KB	7/11/2013 10:34:39 PM
████████.jpg.jpg	Regular File	393 KB	8/14/2013 5:54:01 AM
picstar.jpg.jpg	Regular File	662 KB	8/14/2013 6:45:14 AM

The 'Properties' window for 'ingo.jpg.jpg' is open, showing the following details:

- General:** Name: ingo.jpg.jpg, File Class: Regular File, File Size: 114,561, Physical Size: 114,688, Start Cluster: 17,867,464, Date Accessed: 10/1/2013 11:00:06 PM, Date Created: 10/26/2012 9:57:08 PM, Date Modified: 10/26/2012 9:57:08 PM, Actual File: True.
- UNIX Security Attributes:**
 - Unix Permissions: -rw-rw-r--
 - UID: 1,000
 - GID: 1,000
 - inode Number: 4,456,838
 - Inode Change Time: 7/12/2013 4:38:20 AM

The main window also displays a large block of hex-encoded data, which is a representation of the file's contents in hexadecimal format.

SA-62

The screenshot displays a forensic analysis environment with three main components:

- File Explorer (Left):** Shows a directory tree for 'Evidence Tree' and a 'File List' table. The 'File List' table contains the following data:

Name	Size	Type	Date Modified
captcha	4 KB	Directory	9/19/2013 10:45:12 PM
fonts	4 KB	Directory	12/26/2012 10:52:50 PM
images	4 KB	Directory	7/14/2013 12:54:29 AM
styles	4 KB	Directory	8/31/2013 12:40:27 AM
user_images	4 KB	Directory	8/20/2013 9:54:56 PM
closed.php	28 KB	Regular File	7/31/2013 6:28:06 PM
favicon.ico	2 KB	Regular File	3/17/2011 11:20:32 PM
index.php	7 KB	Regular File	7/11/2013 9:09:01 PM
- Web Browser (Center):** Displays a maintenance message for 'Silk Road anonymous market'. The message states: 'Silk Road is down for maintenance. More information can be found on the forum here: <http://dkn255hzz62ypml.onion/index.php?topic=193835.0>'.
- Properties Window (Bottom Right):** Shows details for the file 'closed.php':

General	
Name	closed.php
File Class	Regular File
File Size	28,046
Physical Size	28,672
Start Cluster	22,583,992
Date Accessed	10/1/2013 11:00:22 PM
Date Created	7/31/2013 6:28:06 PM
Date Modified	7/31/2013 6:28:06 PM
Actual File	True
UNIX Security Attributes	
Unix Permissions	-rwx-rw-r--
UID	1,000
GID	1,000
Ext2/3/4 Information	
Inode Number	35,390,209
Inode Change Time	7/31/2013 6:28:06 PM

SA-64



SA-65**MONTHLY TRANSACTION SUMMARY**

ICELAND "BTC" SERVER/PHILADELPHIA "BACKUP" SERVER TO ULBRICHT LAPTOP WALLETS

MONTH	TRANSACTIONS	BTC RECEIVED	USD EQUIVALENT*
Sep-12	596	300,482	\$3,695,190.46
Oct-12	279	146,839	\$1,877,974.64
Nov-12	6	42,264	\$514,382.79
Dec-12	1	5,275	\$66,880.98
Jan-13	14	87,000	\$1,529,030.00
Feb-13	24	72,000	\$1,530,750.00
Mar-13	2	7,134	\$467,440.84
Apr-13	1	3,900	\$526,500.00
Jul-13	2,834	27,000	\$2,219,594.95
Aug-13	3	8,362	\$931,807.95
Grand Total	3,760	700,254	\$13,359,552.62



SA-66

4a0a5b6036c0da84-c3ab8c2a88-4b6ad72416d1756470e19fb1d2fa2e145b5601 2013-03-31 15:57:51

1Hhckdfu1m61wx8B1MbKH14W1WUP34dTn6
 19hK8YqPZN9zhTnN6kxBSqoPeapoiJbY19
 1FQgZUT2uWiraUXYkKfETGrrmWjqjHfmub
 18PsOyJqCLZN15T59JKrtio1x57bRdFHW

1MwvS1dEevZ5gd428TjL3hB2kHaBH9WTL
1,670 BTC

1,670 BTC

laptop addr unique list.txt

1Hhckdfu1m61wx8B1MbKH14W1WUP34dTn6

1H5XCuAyDc5fxArc54JawPVbvJ6vqcDH
 1HHAvtg3pvyeMZGrrGzN1b8Z1YfSp4Uv6
 1Hhckdfu1m61wx8B1MbKH14W1WUP34dTn6
 1HH0wFP8f045LVL661E5E3JmKtP3ESPEb
 1HhGNa49pT5TKHPG8zpD13o6G1PAEK1Tze

laptop addr unique list.txt

19hK8YqPZN9zhTnN6kxBSqoPeapoiJbY19

19h8Y53pbne18JM9X13vE2wrhvuyJG9YRi
 19HA8qMF1Wk1tv4mX1T4LCOqqpE8qsuvzQ
 19hdAEYj0nkacsxLa3JqjB5fJt5GszQZ5
 19hK8YqPZN9zhTnN6kxBSqoPeapoiJbY19
 19hn9VxHQW08xcQAAczf5xXE53udJcdh5M

laptop addr unique list.txt

1FQgZUT2uWiraUXYkKfETGrrmWjqjHfmub

1FqgWvB86Yop3UuNz43qJXDL8e58YUCu
 1F0ghrYndquGABzGXzqyn1V2D2r4HVBX5Q
 1F0gZUT2uW1raUXYkKfETGrrmWjqjHfmub
 1F0Hes8Wf5iUKYztp5GJncu0PmNut62Fb
 1FQJ19tsrT19jPcBnqwkZp4nYJ1xo3uhb

laptop addr unique list.txt

18PsOyJqCLZN15T59JKrtio1x57bRdFHW

18Pp0NzAYPKppTD4P6vM08Kk1ZcR55qGA
 18PS4V69RBwZv8hA1VD152snQJfV2ZyoV3
 18Ps0yJqCLZN15T59JKrtio1x57bRdFHW
 18psxkt42VzZyazGjCKBxG31L2NEoZAY
 18ptJt2h3YugK2J79acK1UNoepm1Tm1k

**GOVERNMENT
EXHIBIT
630
14 Cr. 68 (KBF)**

SA-67

2013-04-08 17:47:20

1MwvS1dEevZ5gq428TjL5hB2kHaBH9WTL
3,000 BTC

1EQ04LWWSfQWQu4xGSeyzq2pWAq8xueRrv
188je5YJwEMQRxzGPqVs5NnxFBGPrP2G5b
1345EoikBYbJcgNNFGxUATEZWVXzjjKUXB

laptop addr unique list.txt

1EQ04LWWSfQWQu4xGSeyzq2pWAq8xueRrv 1

1EC0BfpK2T.iSYGkELKcHCZCA1mu.fwWpWkP.
1EcPSJwgZmFFXKkktH7oBPvWLPow3uh36j
1EQ04LWWSfQWQu4xGSeyzq2pWAq8xueRrv
1ECSTGcLBWKTtzvDfTmxCYTNNczjZGyn7D
1EcsstwJaroxGvi.i5N2ZbKaY5T.cUfrvCNm5.

laptop addr unique list.txt

188je5YJwEMQRxzGPqVs5NnxFBGPrP2G5b 1

1882HVCVKxi.iTGUsDpk563Vn53wVZG0Fzu
1886TUMxdShSfP.rnAtdvSRpCrnX4BVGpwU
188je5YJwEMQRxzGPqVs5NnxFBGPrP2G5b
188QH8d8wWnQ7Xgj1qmNRBnsLzD6ewrRnP.
188UKrWcNMy4q74z9k88EBzLMtHFqQJUXf.

laptop addr unique list.txt

1345EoikBYbJcgNNFGxUATEZWVXzjjKUXB 1

133urdSgfnANWfy.fR27fS3DQCkkyvuVoj.
133wBzty263nhb4DEvdZS7YGLi.fZr4hvhMH
1345EoikBYbJcgNNFGxUATEZWVXzjjKUXB
1346m0qvhlm3iUuXDJier4xuvLRdYnycq
1348JEc1ecEw2efqe8uTqAh1YhKbXSKGnR

GOVERNMENT EXHIBIT 631 14 Cr. 68 (KBF)

SA-68

	Seizure Number	Purchase Date	Vendor	Date Analyzed	Net Weight (g)	Drug Detected
1	20123901-00022501	1/8/2012	JUERGEN2001	2/15/2012	0.98	MDMA
2	20123901-10252601	1/8/2012	CHEMICAL BROTHERS	2/17/2012	1	MDMA
3	20123901-00022401	1/8/2012	JUERGEN2001	3/1/2012	0.85	Amphetamine
4	20123901-10261601	1/8/2012	AMSTERDAMGOODS	2/15/2012	1	MDMA
5	20123901-00023701	1/8/2012	SESAMPINO	2/15/2012	0.97	MDMA
6	20123901-00025901	1/8/2012	MDMATE	2/15/2012	1	MDMA
7	20123901-00025601	1/8/2012	NAMASTE	2/16/2012	0.31	MDMA
8	20123901-00024401	1/8/2012	STREET PHARMACY	2/21/2012	2.6	MDMA
9	20123901-00023701	1/8/2012	SESAMPINO	2/28/2012	1.1	Cocaine Hydrochloride
10	20123901-00023301	1/8/2012	MROUID	3/1/2012	11.1	Meth Hydrochloride
11	20123901-10263901	1/8/2012	SUNSHINE	3/6/2012	0.1	2C-B
12	20123901-00023801	1/8/2012	PEACE AND LOVE	3/6/2012	0.13	Oxycodone
13	20123901-00026501	1/8/2012	WALTER	3/6/2012	0.19	DMT
14	20123901-00024501	1/8/2012	HASHUK	3/13/2012	1	Marijuana
15	20123901-00023401	1/8/2012	ALTEREGO	3/16/2012	19.2	Morphine, Codine, Thebaine
16	20123901-00023501	1/8/2012	CRIPLED CRANIUM	3/16/2012	0.011	LSD
17	20123901-00025801	1/8/2012	YESHUA	3/21/2012	1.2	Bufotenine
18	20123901-10390601	3/1/2012	DUTCHAANBOD	4/10/2012	0.61	Cocaine Hydrochloride
19	20123901-00037201	3/1/2012	IVORY	5/4/2012	0.24	2C-B/MDMA
20	20123901-10390801	3/1/2012	NORIEGA	5/7/2012	0.49	Heroin Hydrochloride
21	20123901-10390701	3/1/2012	MADE IN HOLLAND	5/11/2012	0.35	MDMA
22	20123901-10390901	3/1/2012	DRJOHNHALPERN	5/11/2012	0.27	MDMA
23	20123901-00037601	3/1/2012	SKYY	5/14/2012	1.3	MDMA/MDDMA
24	20123901-00037901	3/1/2012	DOPEYDWARF	5/14/2012	0.24	MDMA
25	20123901-00038001	3/1/2012	DAGOBERT	5/14/2012	0.28	MDMA
26	20123901-00038101	3/1/2012	MITANOX	5/14/2012	1	MDMA
27	20123901-00039301	3/1/2012	BLAATZOR	5/4/2012	0.93	Amphetamine
28	20123901-00039401	3/1/2012	MISTERSAFE	5/14/2012	1.7	MDMA
29	20123901-00042101	3/1/2012	MRNICE1	5/14/2012	0.1	Heroin
30	20123901-00042201	3/1/2012	GOOGLEYED	6/1/2012	16	(No Controlled Substance)
31	20123901-00055901	5/18/2012	KITTYCAT	7/24/2012	0.34	MDMA
32	20123901-00056101	5/29/2012	DUTCHQUALITYBEANS	7/24/2012	2	MDMA
33	20123901-00056201	5/18/2012	MAGICALBONNY	7/24/2012	0.63	MDMA
34	20123901-00056401	5/18/2012	CLOUDSURFER	7/24/2012	1	MDMA
35	20123901-00056501	5/18/2012	SCHIZOFREEN	7/25/2012	0.3	MDMA
36	20123901-00056501	5/18/2012	SCHIZOFREEN	7/25/2012	0.93	MDMA
37	20123901-00056301	5/18/2012	AMSTERDOPE	8/22/2012	0.97	Amphetamine
38	20123901-00062001	5/18/2012	ABZU	7/25/2012	1	MDMA
39	2013390100044601	3/6/2013	BEST DUTCH DRUGS	4/26/2013	1.1	MDMA
40	2013390100044701	3/6/2013	EMONKEY	4/26/2013	1.2	MDMA
41	2013390100045401	3/6/2013	CHEMICALSISTERS	4/26/2013	0.47	MDMA
42	2013390100045101	3/6/2013	UGLYDOLL	5/17/2013	0.21	Heroin/MDMA
43	2013390100044201	3/6/2013	HAPPYTIMEZZ	5/23/2013	0.44	Cocaine Base
44	2013390100044401	3/6/2013	CHARLIEANDMOLLIE	5/23/2013	0.49	Cocaine Hydrochloride
45	2013390100044501	3/6/2013	ABZU	7/18/2013	1	Amphetamine
46	2013390100045201	3/7/2013	THE DUTCH GUY	7/18/2013	0.089	DMT
47	2013390100044301	3/6/2013	FREDTHEBAKER	8/1/2013	0.014	LSD
48	2013390100045301	3/6/2013	AAKOVEN	8/1/2013	0.032	LSD
49	2013390100048201	3/6/2013	NEVITA	7/31/2013	1	25i-NBOMe
50	2013390100049301	3/6/2013	MERCURY 31	4/26/2013	2.1	MDMA
51	2013390100049401	3/6/2013	DUTCHFLOWERS	4/29/2013	1.3	MDMA
52	2013390100061401	4/11/2013	AMSTERDOPE	8/1/2013	0.1	5-MeO-DMT


SA-69

Undercover Purchases from Silk Road Made by DEA New York Field Office

Purchase Date	Vendor	Drug Ordered	Delivery Date	Lab Test Date	Net Weight (g)	Drug Detected
9/22/2011	ITALIANPILOT	heroin	10/4/2011	10/11/2011	0.21 g	heroin
1/3/2012	PAPERCHASING	heroin	1/12/2012	1/19/2012	0.39 g	heroin
2/10/2012	PHARMVILLE	oxycodone	2/15/2012	5/10/2012	5.7 g	oxycodone
3/6/2012	PHARMVILLE	oxycodone	3/11/2012	6/21/2012	26.3 g	oxycodone
3/6/2012	PHARMERJOHN	heroin	3/9/2012	6/21/2012	2.9 g	heroin
5/4/2012	HYPERCITY	amphetamine	5/11/2012	8/31/2012	0.46 g	amphetamine
5/31/2012	KALONJI	crack cocaine (cocaine base)	6/8/2012	12/3/2012	5.3 g	cocaine base
6/18/2012	VICODIN	oxycodone	6/28/2012	1/24/2013	0.54 g	oxycodone
8/16/2012	VICODIN	oxycodone	8/21/2012	3/11/2013	2.7 g	oxycodone
9/14/2012	MOXYCOTTON	oxycodone	9/26/2012	4/4/2013	2.3 g	oxycodone
9/14/2012	DEADHEAD777	heroin	9/26/2012	3/29/2013	0.52 g	heroin
10/19/2012	MOXYCOTTON	oxycodone	10/25/2012	4/10/2013	2.3 g	oxycodone
5/14/2013	NOD	cocaine	5/21/2013	8/29/2013	7.0 g	cocaine

**GOVERNMENT
EXHIBIT
802
14 Cr. 68 (KBF)**

SA-70



Silk Road
anonymous market

messages 0 | orders 0 | account \$0.0000


Search

Hi, FBINY [logout](#)


the Dread Pirate Roberts [few words from](#)

From the forum


- DPR's Book Club: Cast your vote!
- Feedback system changes
- HOW TO: Run your own relay and help the Tor network!
- Ask a drug expert physician about drugs and health
- Winning the war on drugs




White DMT crystals 200 mg
\$0.2424




1G Mephedrone 4-MMC, 4-Methylmethcathinone 99.8%
\$0.2243




French Seller Pure HC Flake Cocaine 0.5 Gr (500mg)
\$0.7216




Tramadol generic 100mg 100 count
\$0.4585




~100% pure MDMA capsules (x4) ~
\$0.5506




Anavar 100 tabs @ 20mg
\$0.9830




Sildenafil Citrate 25g. - - - - -
- \$ From EU \$
\$0.6572




Modafinil 200mg 100 pills
Tracking + Free ship
\$0.7121




500mg NN-DMT - High Quality Wash!
\$0.5346



3.5g DMT - Majestic and High quality!
\$4.7925



1 gr of AFGHAN OPIUM, Limited Stock.
\$0.5835



MDMA Lowest Price Grams
\$0.4182

Shop by Category

- Drugs 13,802
- Cannabis 2,906
- Disassociatives 203
- Ecstasy 1,304
- Intoxicants 71
- Opioids 365
- Other 82
- Precursors 62
- Prescription 4,650
- Psychedelics 1,746
- Stimulants 1,644
- Tobacco 218
- Apparel 753
- Art 14
- Books 1,322
- Collectibles 26
- Computer equipment 100
- Custom Orders 87
- Digital goods 892
- Drug paraphernalia 496
- Electronics 239
- Erotica 584
- Fireworks 34
- Food 13
- Forgeries 156
- Hardware 35
- Home & Garden 28
- Jewelry 104
- Lab Supplies 30
- Lotteries & games 169
- Medical 56
- Money 269
- Musical instruments 7
- Packaging 91
- Services 171
- Sporting goods 3
- Tickets 4
- Writing 7

\$1 = \$1.0000

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GOVERNMENT EXHIBIT 910
14 Cr. 68 (KBF)

SA-71



messages 0 | orders 0 | account ₪0.0000

Hi, FBINY
logout











Shop by Category

- Drugs 13,802
- Stimulants 1,644
 - Cocaine 643
 - Candies 3
 - Coca leaves 12
 - Crack 32
 - 2-DPMP 1
 - 3,4DMMC 17
 - 4-EMC 3
 - 4-MEC 24
 - 6-APB 36
 - A-PVP 35
 - Caffeine 11
 - D2PM 2
 - Dimethocaine 2
 - Ephedrine 39
 - Ethylphenidate 10
 - FAs 40
 - FMAs 22
 - FMCs 1
 - Khat 1
 - MDPPP 8
 - MDPV 60
 - Mephedrone 101
 - Meth 261
 - MOPPP 1
 - Pentadrone 17
 - Speed 266
- Cannabis 2,906
- Dissociatives 203
- Ecstasy 1,304
- Intoxicants 71
- Opioids 365
- Other 82
- Precursors 62
- Prescription 4,650
- Psychedelics 1,746
- Tobacco 218
- Apparel 753
- Art 14
- Books 1,322
- Collectibles 26
- Computer equipment 100
- Custom Orders 87
- Digital goods 892
- Drug paraphernalia 496
- Electronics 239
- Erotica 584
- Fireworks 34
- Food 13
- Forgeries 156
- Hardware 35
- Home & Garden 28
- Jewelry 104
- Lab Supplies 30
- Lotteries & games 169
- Medical 56
- Money 269
- Musical instruments 7
- Packaging 91

sort by: Domestic only











GOVERNMENT EXHIBIT 911 A
14 Cr. 68 (KBF)

discuss this category 57










	COCAINE 1G seller: dispater 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪0.7996 add to cart
	1 gram high quality cocaine seller: Lloydsbrothers 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪1.3394 add to cart
	GRAND OPENING SALE! PURE UN CUT COCA FISHSCALE 3.5G seller: JustSmuggledN 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪2.3522 add to cart
	1G Pure Cocaine Cristal!!!!!! seller: c63amg 0.0 ships from: Netherlands	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪0.7388 add to cart
	Symbiosis - 1g high quality uncut Cocaine flake seller: Symbiosis 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪1.3132 add to cart
	8Ball (3.5g) of Cocaine seller: CheapestCocaine 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪1.5893 add to cart
	1g Clean Columbian Cocaine - beautiful seller: DrCol 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪1.3064 add to cart
	1 gram PURE RAW COLUMBIAN COCAINE - HQ GEAR seller: MeeKovn 0.0	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	₪1.2937 add to cart

SA-72

Electronics 209
 Erotica 584
 Fireworks 34
 Food 13
 Forgeries 156
 Hardware 35
 Home & Garden 28
 Jewelry 104
 Lab Supplies 30
 Lotteries & games 169
 Medical 56
 Money 269
 Musical instruments 7
 Packaging 91
 Services 171
 Sporting goods 3
 Tickets 4
 Writing 7

	1g Clean Columbian Cocaine - beautiful seller: DrCol 0.0 ships from: United Kingdom	5 4 3 2 1	\$1.3064 add to cart
	1 gram PURE RAW COLUMBIAN COCAINE - HQ GEAR seller: Meerkovo 0.0 ships from: United Kingdom	5 4 3 2 1	\$1.2937 add to cart
	GRAND OPENING SALE! PURE UNCUT COCAINE, FISHSCALE seller: JustSmuggledN 0.0 ships from: United States of America	5 4 3 2 1	\$0.8214 add to cart
	1 GR. Pure Cocaine seller: FrankMatthews 0.0 ships from: Netherlands	5 4 3 2 1	\$0.8594 add to cart
	1 gram Cocaine Powder High Quality Peru Import seller: OZconnection 0.0 ships from: Australia	5 4 3 2 1	\$2.4297 add to cart
	5G Pure Cocaine Cristal !!!!! seller: c63amg 0.0 ships from: Netherlands	5 4 3 2 1	\$3.1278 add to cart
	1g (1000mg) Pure Peruvian Cocaine (Zero Cutter) seller: dryice 0.0 ships from: Australia	5 4 3 2 1	\$3.3907 add to cart
	1gr UNCUT Crystal Cocaine!! seller: HappyTimezz 0.0 ships from: Netherlands	5 4 3 2 1	\$0.7551 add to cart
	1 GRAM ULTRA PURE COCAINE- LAB TESTED 90%+ PURITY seller: shine69 0.0 ships from: United Kingdom	5 4 3 2 1	\$1.3132 add to cart
	1 Gr Premium Fishscale Cocaine seller: lexq 0.0 ships from: Canada	5 4 3 2 1	\$0.9017 add to cart

SA-73

	1.5g Premium Fishscale Cocaine seller: lexq 0.0 ships from: Canada	<input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.9017 add to cart
	3.5g of Cocaine **FAST SHIPPING** seller: nationchemz 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿1.4188 add to cart
no image	7g of Amazing uncut Fishscale Cola seller: JustSmuggledN 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿4.4803 add to cart
	3.5 GRAMS OF GOOD QUALITY COCAINE CHEAPEST IN UK! seller: shine69 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿2.2169 add to cart
	COCAINE 3.5G seller: dispater 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿2.5533 add to cart
	10G Pure Cocaine Cristal !!!!! seller: c63amg 0.0 ships from: Netherlands	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿6.1074 add to cart
	3.5 GRAMS ULTRA PURE COCAINE- LAB TESTED 90%+ seller: shine69 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿3.8710 add to cart
	1 gram ***HIGH GRADE PREMIUM QUALITY COCAINE*** seller: BestPricePills 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿1.1452 add to cart
	1Gr High Quality Cocaine from UK delivery 2 days seller: FPUK 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿1.1719 add to cart
	3.5 grams High quality cocaine seller: Lloydbrothers 0.0 ships from: United Kingdom	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿4.0125 add to cart

1 2 3 > Last >

SA-74



messages 0 | orders 0 | account \$0.0000



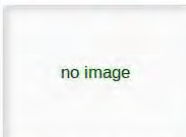




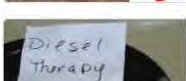
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Shop by Category








- Drugs 13,802
- Opioids 365
- Heroin 205
 - Black tar 13
 - Brown 48
 - White 23
- AH-7921 16
- Kratom 18
- Opium 44
- Cannabis 2,906
- Dissociatives 203
- Ecstasy 1,304
- Intoxicants 71
- Other 82
- Precursors 62
- Prescription 4,650
- Psychedelics 1,746
- Stimulants 1,644
- Tobacco 218
- Apparel 753
- Art 14
- Books 1,322
- Collectibles 26
- Computer equipment 100
- Custom Orders 87
- Digital goods 892
- Drug paraphernalia 496
- Electronics 239
- Erotica 584
- Fireworks 34
- Food 13
- Forgeries 156
- Hardware 35
- Home & Garden 28
- Jewelry 104
- Lab Supplies 30
- Lotteries & games 169
- Medical 56
- Money 269
- Musical instruments 7
- Packaging 91
- Services 171
- Sporting goods 3
- Tickets 4
- Writing 7

sort by: <input type="text" value="bestselling"/>	<input type="checkbox"/> Domestic only	<input type="button" value="update"/>		discuss this category 22
	Heroin China White One Gram	GOVERNMENT EXHIBIT 911 B 14 Cr. 68 (KBF)	seller: supremesmoke 0.0 ships from: United States of America	5 4 3 2 1 \$1.8303 add to cart
	HIGH QUALITY #4 HEROIN ALL ROCK DIRECTLY FROM KEY		seller: gotsitall 0.0 ships from: United States of America	5 4 3 2 1 \$1.6858 add to cart
	East Coast Style Heroin Stamps x10 (3 FREE!!!)		seller: deezletime 0.0 ships from: United States of America	5 4 3 2 1 \$0.7388 add to cart
	0.5g Golden Triangle Heroin #4 AUSTRALIAN DEALER		seller: ozexpress 0.0 ships from: Australia	5 4 3 2 1 \$1.9105 add to cart
	1G Afghan Heroin (Light Brown Powder #3) Strong!		seller: c63amg 0.0 ships from: Netherlands	5 4 3 2 1 \$0.8089 add to cart
	1g Golden Triangle Heroin #4 AUSTRALIAN DEALER		seller: ozexpress 0.0 ships from: Australia	5 4 3 2 1 \$3.6248 add to cart
	2.5G Afghan Heroin (Light Brown Powder #3) Strong!		seller: c63amg 0.0 ships from: Netherlands	5 4 3 2 1 \$1.8544 add to cart
	Gram of Heroin		seller: DieselTherapy 0.0	5 4 3 2 \$0.5228

SA-75

	Gram of Heroin seller: DieselTherapy 0.0 ships from: United States of America	5 4 3 2 1	\$0.5228 add to cart
	Heroin China White 1/2 Gram seller: supremesmoke 0.0 ships from: United States of America	5 4 3 2 1	\$1.2261 add to cart
no image	Blue Diamond Heroin 1 Gram seller: DieselTherapy 0.0 ships from: United States of America	5 4 3 2 1	\$0.8588 add to cart
	1/2 GR- # 4 AFGHAN HEROIN - US XPRESS seller: subsgood 0.0 ships from: United States of America	5 4 3 2 1	\$0.9708 add to cart
no image	HEROIN 1G seller: dispater 0.0 ships from: United Kingdom	5 4 3 2 1	\$0.7999 add to cart
no image	East Coast Style Heroin Stamps x 50 Bags (1 Brick) seller: deezletime 0.0 ships from: United States of America	5 4 3 2 1	\$2.5888 add to cart
	JIMMY BOYLE my mid priced batch. HIGH QUALITY heroin no3. 0.5g seller: jimmy boyle 0.0 ships from: United Kingdom	5 4 3 2 1	\$0.7147 add to cart
	1 gram of #4 SE Asian White Rock Heroin seller: OZconnection 0.0 ships from: Australia	5 4 3 2 1	\$2.5888 add to cart
	Uncut Raw brown Heroin #4 1 Gram WARNING UN-CUT RAW seller: FreeWay 0.0 ships from: United States of America	5 4 3 2 1	\$1.9505 add to cart
	1g #3 Afghan Brown Heroin, FAST shipping seller: JunkieXXL 0.0 ships from: Germany	5 4 3 2 1	\$0.6315 add to cart
no image	Blue Diamond Stamp Bags seller: DieselTherapy 0.0	5 4 3 2	\$0.0897

SA-76

	1g #3 Afghan Brown Heroin, FAST shipping seller: JunkieXXL 0.0 ships from: Germany	5 4 3 2 1	฿0.6315 add to cart
no image	Blue Diamond Stamp Bags seller: DieselTherapy 0.0 ships from: United States of America	5 4 3 2 1	฿0.0897 add to cart
	5G Afghan Heroin (Light Brown Powder #3) Strong!!! seller: c63amg 0.0 ships from: Netherlands	5 4 3 2 1	฿3.5775 add to cart
no image	1 gram afghan h #4 seller: Tomorrowman 0.0 ships from: Canada	5 4 3 2 1	฿1.7098 add to cart
	NYC HEROIN STAMPS seller: deluxedelivery 0.0 ships from: United States of America	5 4 3 2 1	฿0.1651 add to cart
	Pure, Uncut Black Tar Heroin (BTH) 1 Gram seller: purest 0.0 ships from: United States of America	5 4 3 2 1	฿1.4281 add to cart
	0.5G Afghan Heroin (Light Brown Powder #3) Strong! seller: c63amg 0.0 ships from: Netherlands	5 4 3 2 1	฿0.4937 add to cart
	1/2 Gram Pure, Uncut Black Tar Heroin seller: purest 0.0 ships from: United States of America	5 4 3 2 1	฿0.7796 add to cart
	Heroin Stamp Bags seller: DieselTherapy 0.0 ships from: United States of America	5 4 3 2 1	฿0.0598 add to cart

1 2 3 > Last >

SA-77



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Search

Go

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Shop by Category

- Drugs 13,802
 - Psychedelics 1,746
 - LSD 305
 - Blotter 225
 - Candy 2
 - Liquid 17
 - Microdots 14
 - 2C family 299
 - 3C family 13
 - 4-AcO family 52
 - 4-HO family 24
 - 5-MeO family 85
 - AL-LAD 8
 - AMT 5
 - Bufotenin 1
 - DMT 164
 - DOx 44
 - DPT 12
 - Entheogens 9
 - Ibogain 8
 - LSA 5
 - LSZ 16
 - Mescaline 47
 - MET 1
 - Mimosa Hostilis 11
 - Muscimol 2
 - NBOMe 375
 - Salvia 31
 - Shrooms 195
 - TMA Family 1
- Cannabis 2,906
- Dissociatives 203
- Ecstasy 1,304
- Intoxicants 71
- Opioids 365
- Other 82
- Precursors 62
- Prescription 4,650
- Stimulants 1,644
- Tobacco 218
- Apparel 753
 - Art 14
 - Books 1,322
 - Collectibles 26
 - Computer equipment 100
 - Custom Orders 87
 - Digital goods 892
 - Drug paraphernalia 496
 - Electronics 239
 - Erotica 584
 - Fireworks 34
 - Food 13
 - Forgeries 156
 - Hardware 35
 - Home & Garden 28
 - Jewelry 104
 - Lab Supplies 30
 - Lotteries & games 169
 - Medical 56
 - Money 269
 - Musical instruments 7
 - Packaging 91
 - Services 171
 - Sporting goods 3
 - Tickets 4
 - Writing 7











sort by: Domestic only

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	<p>10 hits of POTENT and CLEAN LSD - White label</p> <p>seller: Tessellated 0.0 ships from: Canada</p>	<p>5 4 3 2 1</p>	<p>\$0.9708 add to cart</p>
	<p>10 x 120 mic LSD Tabs. PROMO PRICE. Trusted Vendor</p> <p>seller: alaska 0.0 ships from: Germany</p>	<p>5 4 3 2 1</p>	<p>\$0.8438 add to cart</p>
	<p>10 x 150ug LSD Blotters - PURE, CLEAN and POTENT</p> <p>seller: Peaceful 0.0 ships from: Australia</p>	<p>5 4 3 2 1</p>	<p>\$1.0487 add to cart</p>
	<p>25 x120 mic LSD Tabs. FULL PICTURE. Trusted Vendor</p> <p>seller: alaska 0.0 ships from: Germany</p>	<p>5 4 3 2 1</p>	<p>\$1.6459 add to cart</p>
	<p>20 x 150ug LSD Blotters - PURE, CLEAN and POTENT</p> <p>seller: Peaceful 0.0 ships from: Australia</p>	<p>5 4 3 2 1</p>	<p>\$1.9225 add to cart</p>
	<p>10 blotters *Dalai Lama LAB TESTED @ 210ug*</p> <p>seller: FatBomber 0.0 ships from: Netherlands</p>	<p>5 4 3 2 1</p>	<p>\$0.9830 add to cart</p>
	<p>25 hits of POTENT and CLEAN LSD - White label</p> <p>seller: Tessellated 0.0 ships from: Canada</p>	<p>5 4 3 2 1</p>	<p>\$2.3522 add to cart</p>
	<p>50 x DUTCH Premium LSD - Clean REAL - Lab test</p> <p>seller: HollandOnline 0.0 ships from: Netherlands</p>	<p>5 4 3 2 1</p>	<p>\$1.9185 add to cart</p>
	<p>200 x120 mic LSD Tabs. PROMO PRICE. Trusted Vendor</p> <p>seller: alaska 0.0 ships from: Germany</p>	<p>5 4 3 2 1</p>	<p>\$8.9672 add to cart</p>

SA-78

Services 171
 Sporting goods 3
 Tickets 4
 Writing 7

	<p>200 x120 mic LSD Tabs. PROMO PRICE. Trusted Vendor</p> <p>seller: alaska 0.0 ships from: Germany</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿8.9672 add to cart</p>
	<p>Haizenberg Hoffman HQ LSD 100UG x10 blotters</p> <p>seller: Haizenberg 0.0 ships from: Czech Republic</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿0.5755 add to cart</p>
	<p>25 blotters *Dalai Lama LAB TESTED @ 210ug*</p> <p>seller: FartBomber 0.0 ships from: Netherlands</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿2.0306 add to cart</p>
	<p>5 blotters *Dalai Lama LAB TESTED @ 210ug*</p> <p>seller: FartBomber 0.0 ships from: Netherlands</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿0.5346 add to cart</p>
	<p>Haizenberg Hoffman LSD x5 Blotters -100UG !</p> <p>seller: Haizenberg 0.0 ships from: Czech Republic</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿0.3296 add to cart</p>
	<p>100 x DUTCH Premium LSD - Clean REAL - Lab test</p> <p>seller: HollandOnline 0.0 ships from: Netherlands</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿3.7562 add to cart</p>
	<p>50 hits of POTENT and CLEAN LSD - White label</p> <p>seller: Tessellated 0.0 ships from: Canada</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿4.4803 add to cart</p>
	<p>Haizenberg Hoffman HQ LSD 100UG x25 blotters</p> <p>seller: Haizenberg 0.0 ships from: Czech Republic</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿1.2666 add to cart</p>
	<p>LSD - RED MICRODOTS - 120/125UG x100 DOTS</p> <p>seller: jerseycow 0.0 ships from: Ireland</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿4.7258 add to cart</p>
	<p>100x LSD blotter WoW</p> <p>seller: OrderOfThePhoenix 0.0</p>	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	<p>฿4.6670 add to cart</p>

SA-79

	100x LSD blotter WoW seller: OrderOfThePhoenix 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$4.6670 add to cart
	50x LSD blotter WoW 100ug seller: OrderOfThePhoenix 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$2.4642 add to cart
	10 x DUTCH Premium LSD - Clean 8 REAL - Lab test seller: HollandOnline 0.0 ships from: Netherlands	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$0.5705 add to cart
	LSD - RED MICRODOTS - 120/125UG x10 DOTS seller: jerseycow 0.0 ships from: Ireland	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$0.7612 add to cart
	4 Potent LSD blotters seller: Clearance 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$0.4281 add to cart
	25x LSD blotter WoW 100ug seller: OrderOfThePhoenix 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$1.4935 add to cart
	50 x 150ug LSD Blotters - PURE, CLEAN and POTENT seller: Peaceful 0.0 ships from: Australia	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$3.8450 add to cart
	3 blotters *Dalai Lama LAB TESTED @ 210ug* seller: FartBomber 0.0 ships from: Netherlands	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	\$0.3337 add to cart

1 2 3 > Last >

SA-80



Silk Road
anonymous market

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Shop by Category

- Drugs 13,802
- Stimulants 1,644
 - Meth 261
 - 2-DPMP 1
 - 3,4DDMC 17
 - 4-EMC 3
 - 4-MEC 24
 - 6-APB 36
 - A-PVP 35
 - Caffeine 11
 - Cocaine 643
 - D2PM 2
 - Dimethocaine 2
 - Ephedrine 39
 - Ethylphenidate 10
 - FAs 40
 - FMA's 22
 - FMCS 1
 - Khat 1
 - MDPPP 8
 - MDPV 60
 - Mephedrone 101
 - MOPPP 1
 - Pentadone 17
 - Speed 266
- Cannabis 2,906
- Dissociatives 203
- Ecstasy 1,304
- Intoxicants 71
- Opioids 365
- Other 82
- Precursors 62
- Prescription 4,650
- Psychedelics 1,746
- Tobacco 218
- Apparel 753
- Art 14
- Books 1,322
- Collectibles 26
- Computer equipment 100
- Custom Orders 87
- Digital goods 892
- Drug paraphernalia 496
- Electronics 239
- Erotica 504
- Fireworks 34
- Food 13
- Forgeries 156
- Hardware 35
- Home & Garden 28
- Jewelry 104
- Lab Supplies 30
- Lotteries & games 169
- Medical 56
- Money 269
- Musical instruments 7
- Packaging 91
- Services 171
- Sporting goods 3
- Tickets 4
- Writing 7

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	3.5 Grams (Ball) Pure Crystal Methamphetamine seller: chaletta 0.0 ships from: United States of America	5 4 3 2 1	\$1.4935 add to cart
	ICE / 5 POINTS (0.5G) seller: AUSexpress 0.0 ships from: Australia	5 4 3 2 1	\$1.9575 add to cart
	0.5g High Quality Chinese Ice/Meth seller: Ice/ce/ce 0.0 ships from: Australia	5 4 3 2 1	\$2.3518 add to cart
	0.25g High Quality Chinese Ice/Meth seller: Ice/ce/ce 0.0 ships from: Australia	5 4 3 2 1	\$1.2812 add to cart
	7 Grams Pure Crystal Methamphetamine seller: chaletta 0.0 ships from: United States of America	5 4 3 2 1	\$2.8002 add to cart
	14 Grams Pure Crystal Methamphetamine seller: chaletta 0.0 ships from: United States of America	5 4 3 2 1	\$5.2271 add to cart
	1g High Quality Chinese Ice/Meth seller: Ice/ce/ce 0.0 ships from: Australia	5 4 3 2 1	\$4.2735 add to cart
	One gram High Quality Crystal Meth (ICE) seller: have a puff 0.0 ships from: Australia	5 4 3 2 1	\$3.8450 add to cart
	Half Gram (0.5g) High Quality Crystal Meth (ICE) seller: have a puff 0.0	5 4 3 2 1	\$2.0274

SA-81

writing /

	Half Gram (0.5g) High Quality Crystal Meth (ICE) seller: have a puff 0.0 ships from: Australia	5 4 3 2 1	฿2.0274 add to cart
	Tina .5g (Half Gram) Just imported huge shards! seller: mmerlin25 0.0 ships from: United Kingdom	5 4 3 2 1	฿1.2100 add to cart
	0.25 imported meth seller: tucksh0p 0.0 ships from: Australia	5 4 3 2 1	฿1.3070 add to cart
	0.1 POINT - ICE. METHAMPHETAMINE. HIGH GRADE. seller: SydneysFinest 0.0 ships from: Australia	5 4 3 2 1	฿0.4544 add to cart
	ICE / 8 BALL (3.5G) seller: AUSexpress 0.0 ships from: Australia	5 4 3 2 1	฿11.0110 add to cart
	1.0g Crystal Meth Ice Shards seller: MarijuanaIsMyMuse 0.0 ships from: Canada	5 4 3 2 1	฿0.8214 add to cart
	1 Gram Pure Crystal Methamphetamine seller: chaletta 0.0 ships from: United States of America	5 4 3 2 1	฿0.6721 add to cart
	0.5G PURE METHAMPHETAMINE UNCUT +++ seller: BreakingEven 0.0 ships from: Australia	5 4 3 2 1	฿1.9225 add to cart
	XXX 3.5g High Quality Chinese Ice/Meth XXX seller: Icecelce 0.0	5 4 3 2 1	฿12.5420

SA-82

	<p>XXX 3.5g High Quality Chinese Ice/Meth XXX</p> <p>seller: IceIceIce 0.0 ships from: Australia</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿12.5420 add to cart</p>
	<p>XXX 1.75g High Quality Chinese Ice/Meth XXX</p> <p>seller: IceIceIce 0.0 ships from: Australia</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿6.9947 add to cart</p>
	<p>0.50 imported meth</p> <p>seller: tucksh0p 0.0 ships from: Australia</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿2.2703 add to cart</p>
	<p>1 gram imported meth</p> <p>seller: tucksh0p 0.0 ships from: Australia</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿4.0098 add to cart</p>
	<p>0.5 HALF GRAM - ICE. METHAMPHETAMINE. HIGH GRADE.</p> <p>seller: SydneysFinest 0.0 ships from: Australia</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿1.7477 add to cart</p>
	<p>crystal methamphetamines .25 gram</p> <p>seller: xinhai 0.0 ships from: United States of America</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿0.2241 add to cart</p>
	<p>ICE / Quater Oz (7.0G)</p> <p>seller: AUSexpress 0.0 ships from: Australia</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿20.9730 add to cart</p>
	<p>7g Pure Methamphetamine Ice + Free Shipping!</p> <p>seller: AmericaOnDrugs 0.0 ships from: United States of America</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿2.9865 add to cart</p>
	<p>NEW! 1 GR. High Quality Meth/ICE/Bohemian Cuisine</p> <p>seller: icemancz 0.0 ships from: Germany</p>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<p>฿0.8869 add to cart</p>

1 2 3 > Last >

SA-83



messages 0 | orders 0 | account \$0.0000


the Dread Pirate Roberts

Search Go

Hi, **FBINY**
logout

- Shop by Category
- Forgeries 156
 - Passports 10
 - Fake IDs 55
 - Apparel 753
 - Art 14
 - Books 1,322
 - Collectibles 26
 - Computer equipment 100
 - Custom Orders 87
 - Digital goods 892
 - Drug paraphernalia 496
 - Drugs 13,802
 - Electronics 239
 - Erotica 584
 - Fireworks 34
 - Food 13
 - Hardware 35
 - Home & Garden 28
 - Jewelry 104
 - Lab Supplies 30
 - Lotteries & games 169
 - Medical 56
 - Money 269
 - Musical instruments 7
 - Packaging 91
 - Services 171
 - Sporting goods 3
 - Tickets 4
 - Writing 7

sort by: **bestselling** Domestic only discuss this category 0



EU Passport Scan - Customised HQ

seller: starlight 0.0
ships from: Netherlands

5

4


3

2

1

\$0.6314

add to cart



NEW USA PASSPORT CUSTOM SCAN, ANY NAME, ANY PIC

seller: perfectscans 0.0
ships from: United States of America

5

4


3

2

1

\$0.7393

add to cart



UK British Passport Custom Scan Any Name/Pic

seller: perfectscans 0.0
ships from: United Kingdom

5

4

3

2

1

\$0.7393

add to cart



((AUSTRALIAN PASSPORT SCAN, ANY NAME, ANY PIC

seller: perfectscans 0.0
ships from: Australia

5

4


3

2

1

\$0.9633

add to cart



USA Custom Passport/SSN ID Any Name, Any Pic

seller: perfectscans 0.0
ships from: United States of America

5

4


3

2

1

\$0.9334

add to cart



NEW USA PASSPORT CUSTOM SCAN, ANY NAME, ANY PIC

seller: perfectscans 0.0
ships from: United Kingdom

5

4

3

2

1

\$0.7393

add to cart

no image

100% REAL! USA PASSPORT! AUCTION! MAKE AN OFFER!!

seller: Rapid RX 0.0
ships from: United States of America

5

4

3

2

1

\$5.1853

add to cart

no image

Romania / Romanian passport - valid, OK for travel

seller: EuHighz 0.0
ships from: Hungary

5

4


3

2

1

\$11.7470

add to cart



Real Passport/New Identity in 30 days RUSH SERVICE

seller: IdentitySource 0.0
ships from: undeclared

5

4


3

2

1

\$156.0700

add to cart



A Real Passport, A New Identity in 45 days

seller: IdentitySource 0.0
ships from: undeclared

5

4

3

2

1

\$120.0500

add to cart

GOVERNMENT EXHIBIT 914
14 Cr. 68 (K8F)

SA-84



messages 0 | orders 0 | account \$0.0000

the Dread Pirate Roberts

Search Go

Hi, FBINY [logout](#)



Europe Fake documents Passports, ID, DL, Diplomas!

\$19.4570

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:	
seller	vengativ0 0.0
ships from	undeclared
ships to	Worldwide
category	Forgeries

postage options:
UPS EMS (\$0.7468) ?

Description

SERVICE REAL/FAKE DOCUMENTS (NOT SCANS!)

Passports (from 900 eur-1500 eur)

Denmark, Latvia, Poland, Sweden, Holland, Lithuania

NEW - we Can make according to your desire passports which won't be in a loss some time - month, Two, half a year, year or even.

Driver license (from 150 eur- 300 EUR)
(with real data info 500 EUR)

USA DL (PA, FL, IL, NJ) all security , UV, helograms, barcode , magnetic line

Germany, Bulgaria, Romania, Slovakia, Portugal, Spain, Poland, Estonia, Czech Republic, England old , England new, Uk Permit, International DL, Cscs UK, Lithuania, Israel - (with helograms , UV security)

Holland , Denmark - cheaper (without helograms)

Lithuania - cheaper (without helograms)

Personal Identity Card (from 150 eur- 300 EUR) (with real data info 500 EUR)

Germany, Spain, Portugal ,Latvia, Poland, Slovakia, Estonia, Lithuania - (Helograms , UV security)

Lithuania, France - cheaper , (without helograms)

(from 350 eur- 800 EUR)

University certificates Lithuanian, School certificates
Car documents - FRANCE , HOLLAND , LITHUANIA , GERMANY - (fake and originals)
We can do all stamps !

There was a possibility to help people to leave to Europe Russia, Ukraine, Англия, Cyprus, Mexico.....
Let's help with the visa as with passports which won't be in a loss.
All passports will be Valid while you won't arrive into place where it is necessary to you.
Also we can help to leave or arrive to you to the necessary country, all depends on complexity of reception of the visa
etc., all is discussed separately with each client.

Reviews:

sort by: ?

#1 = \$1.0000

**GOVERNMENT
EXHIBIT
915 B
14 Cr. 68 (KBF)**

[community forums](#) | [wiki](#) | [support](#)

SA-85



messages 0 | orders 0 | account \$0.0000

a few words from the Dread Pirate Roberts



Search

Go

Hi, FBINY
logout



Shop by Category



New York Driver's License (Hologram + Scannable)

\$1.4935

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller	KingOfClubs 0.0
ships from	undecared
ships to	Worldwide
category	Fake IDs

postage options:

Regular (\$0.0000) ?



Description

Need a second piece?

NYIT & Penn State Student Cards Available, purchase the listing below

Driver's License & Student Card Combo: <http://silkroadvb5piz3r.onion/index.php/silkroad/item/cd7328a483>

(Whatever info you provide below will be the same info that goes on the card, please double check to make sure there are no mistakes)

Name:

Date of Birth:

Height:

Weight:

Hair Color:

Eye Color:

Issue Date: (If you don't provide an issue date i'll make one up for you)

Address: (If you don't provide an address ill make one up for you)

-Attach 1 photo taken with a digital camera, against a white wall, from the shoulders up

-If you want your own signature, draw your sig in black ink on white paper, take a close up pic of the sig with a digital camera (preferably with the flash off), attach the image file to the email, if you don't send a sig i'll make one up for you

SA-86

What is the best way to send the ID form + pic?

Fill out your ID form, provide an Anonfiles picture link and send it in an PGP encrypted message at checkout. If you don't know how to encrypt yet use privnote.com to upload the ID form along with the Anonfiles picture link.

Anonfiles URL: anonfiles.com

Privnote URL: privnote.com

For those who want to start PGP encrypting, download the program GPG4USB, its the easiest encryption tool to use

GPG4USB URL: <http://gpg4usb.cpunk.de/>

Include shipping details at checkout

-----BEGIN PGP PUBLIC KEY BLOCK-----

Version: GnuPG v1.4.11 (MingW32)

```
mQGIBFBInv4RBACiMKVLxmpgiuaH9ZRLonOn2V+1MVGnJkqqpK77XH+bGGSiYvzi
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DAAKCRcQda8F7pGKlviCAKCBJCKAR/F2D76uD/8qxr5S1Dby9wCfWJGJyQrW9J9S
ELuFH6y5RtX4+TU=
```

=t1H/

-----END PGP PUBLIC KEY BLOCK-----

Reviews:

SA-87

Reviews:

sort by:

irepdaronx orders spent vendors 1+ #1+ 1+	<i>review for: New York Driver's License (Hologram + Scannable)</i> qty: 1 price: #1+	1y 4m old 5 of 5
	Very honest seller. As straight up as you can get in an industry where I have only encountered the opposite! Would recommend!! 5/5	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 5m old 5 of 5
	Awesome as always :)	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 6m old 1 of 5
	Terrible quality, looks 0 fake, got denied twice, doesn't even scan. Made me FE now I can't get my money back, don't even think about buying from this guy.	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 6m old 2 of 5
	I gave him over 2 weeks in advanced notice and told him I did not want it unless it was here in time. Claims to have sent out the package on friday although the tracking states that the post office did not receive it until the following Tuesday. I am very upset I worked with this vendor. I do not recommend. The only reason why he gets a 2 is because he did send it.	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 6m old 3 of 5
	took forever but refunded so its all good	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 6m old 4 of 5
	Quality not quite the same as original, but the vendor made me a deal on another product.	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 7m old 5 of 5
	great communication, cant wait!	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 7m old 5 of 5
	Great response times and photo! Guy is legit, don't waste your time with anyone else.	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 7m old 5 of 5
	Looks amazing. Great communication and service. Will be back! 5/5	
alias hidden stats: (hidden)	<i>review for: New York Driver's License (Hologram + Scannable)</i>	1y 7m old 5 of 5
	FE	

1 2 3 >

#1 = #1.0000

community forums | wiki | support

Pennsylvania Drivers License (Holograms+Scannable)

\$1.4935

[add to cart](#) | [bookmark](#) | [discuss 1](#) | [report](#)

Item info:

seller	KingOfClubs 0.0
ships from	undecided
ships to	Worldwide
category	Fake IDs

postage options:
 Regular (#0.00000)



Description

ID Form:

(Whatever info you provide below will be the same info that goes on the card, please double check to make sure there are no mistakes)

Name:

Date of Birth (MM/DD/YY):

Height:

Weight:

Hair Color:

Eye Color:

Issue Date: (If you don't provide an issue date, i'll make one up for you)

Address: (If you don't provide an address, i'll make one up for you)

-Take 1 photo taken with a digital camera against a wall, from the shoulders up. (The better the pic the better the ID, you can also get passport photos done and scan them, up to you)

Try to avoid having shadows in the pictures, if there is a shadow I will do my best to edit accordingly

-If you want your own signature, draw your signature on paper, take a pic and attach it. (If you don't send a signature or if the signature you sent isn't usable, i'll make one up for you.)

SA-89

What is the best way to send the ID form + pic?

Fill out your ID form, provide an Anonfiles picture link and send it in an PGP encrypted message at checkout. If you don't know how to encrypt yet use [privnote.com](http://anonfiles.com) to upload the ID form along with the Anonfiles picture link.

Anonfiles URL: anonfiles.com
Privnote URL: privnote.com

For those who want to start PGP encrypting, download the program GPG4USB, its the easiest encryption tool to use

GPG4USB URL: <http://gpg4usb.cpunk.de/>
Include shipping details at checkout

-----BEGIN PGP PUBLIC KEY BLOCK-----
Version: GnuPG v1.4.11 (MingW32)

```
mQGIBFBinv4RBACiMKVLxmpgiuaH9ZRLonOn2v+1MVGnJkqppK77XH+bGGSIWzi
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ELuFH6y5RtX4+TU=
=11H/
```

-----END PGP PUBLIC KEY BLOCK-----

Reviews:

SA-90

Reviews:

sort by:

alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> good communication quality ID	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> good communication, quality ID	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> quick, good product, responsive seller	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> Leave feedback here	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> Looks great!	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> not bad. quickly corrected an error. little smaller than original. all in all, good transaction	1y 7m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> Good vendor. There had been a minor issue with the photo, but he fixed it and sent me a replacement.	1y 8m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> Great Communicator, F.E. Will update.	1y 8m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> Super helpful and sample pics look excellent. FE early and will update when I receive it	1y 9m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Pennsylvania Drivers License (Holograms+Scannable)</i> Easy to work with, great communication .will update soon.	1y 9m old 5 of 5

SA-91

Tennessee Driver's License (Holograms + Scannable)

\$1.4935

[add to cart](#) |
 [bookmark](#) |
 [discuss 0](#) |
 [report](#)

Item info:	
seller	KingOfClubs 0.0
ships from	undclared
ships to	Worldwide
category	Fake IDs

postage options:

Regular (#0.0000)



Description

Price Includes Free Regular Shipping Worldwide

ID FORM:

(Whatever info you provide below will be the same info that goes on the card, please double check to make sure there are no mistakes)

Name:

Date of Birth (MM/DD/YY):

Height:

Weight:

Hair Color:

Eye Color:

Issue Date: (If you don't provide an issue date i'll make one up for you)

Address: (If you don't provide an address ill make one up for you)

-Attach 1 photo taken with a digital camera, against a white wall, from the shoulders up

-If you want your own signature, draw the sig in black ink on white paper, take a closeup pic of the sig with a digital camera. If you don't send a sig, i'll make one up for you.

Please only send high quality pictures

SA-92

What is the best way to send the ID form + pic?

Fill out your ID form, provide an Anonfiles picture link and send it in an PGP encrypted message at checkout. if you don't know how to encrypt yet use privnote.com to upload the ID form along with the Anonfiles picture link.

Anonfiles URL: anonfiles.com

Privnote URL: privnote.com

For those who want to start PGP encrypting, download the program GPG4USB, its the easiest encryption tool to use

GPG4USB URL: <http://gpg4usb.cpunik.de/>

Include shipping details at checkout

Please provide your ID form before or during checkout, this avoids possible late/cancelled orders (it's difficult to keep track of orders on my end when the ID form hasn't been sent by the buyer), also remember to include your shipping details at checkout

-----BEGIN PGP PUBLIC KEY BLOCK-----

Version: GnuPG v1.4.11 (MingW32)

```
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iLmRapwS8WW7x1JIKlhlPflUPf9ABRD1B/peEY/pat9TattdgH7QIS2luZ09mQ2x1
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ou+gdDOCU5VDF4WWNVagnRe7SLf8yZNVpih5SjTixNLEAHgD18UllwVAnPmRFBP
X+FJZSza9xYhCUdYwNgpz7VAoPazCRPAVKqurLzvTtk5nhcX2XDxngpIOuCoHGF
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cf1U37WdfUqA+hNo+LQMpUonz//dJMRsTyq5df116Dh39W32Y4o0P9MD50WQrWSc
wI2XLSjPpIQSnLvaEdF0U14uTYfwLwjiMzonmWnzdfNW2iOBm9lORSei+y6ao8l
f2Vmg7Q6u+x+waBumPvmPgEiYksqv3whzPGMLA85DWTnFVJS9mH0dZwQWvPrZKr
ZvKfLl3aikVheCR32LpUzIFODNDZg+3HrQc7l1L6G5pUGwCM7SFovER6yMawgB
MVp6w2vSHXke2AJYnvh1JeO+HxnVR4ATM2CS9qlYGOISQQYEQIACQUCUGKe/glb
DAAKCRcqda8F7pGKlMCAKCBJCKAR/F2D76uD/8qx75S1DbY9wCfWJGjYQrW9J9S
ELUfH6y6RtX4+TU=
```

=1LH/

-----END PGP PUBLIC KEY BLOCK-----

SA-93

Reviews:

sort by:



1y 5m old | 5 of 5

review for: Tennessee Driver's License (Holograms + Scannable)

Great ID and fast

alias hidden

stats: (hidden)

1y 6m old | 5 of 5

review for: Tennessee Driver's License (Holograms + Scannable)

Leave feedback here

alias hidden

stats: (hidden)

1y 8m old | 5 of 5

review for: Tennessee Driver's License (Holograms + Scannable)

Finalized early but was sent picture of final product. Looks like great work in the picture. So far so good

alias hidden

stats: (hidden)

1y 8m old | 5 of 5

review for: Tennessee Driver's License (Holograms + Scannable)

Seems like a good seller,good communication

alias hidden

stats: (hidden)

1y 9m old | 5 of 5

review for: Tennessee Driver's License (Holograms + Scannable)

remarkable pkg eager to try

alias hidden

stats: (hidden)

#1 = #1.0000

[community forums](#) | [wiki](#) | [support](#)

SA-94



Silk Road
anonymous market

messages 0 | orders 0 | account **฿0.0000**

few words from
the Dread Pirate Roberts



Search

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Shop by Category



New South Wales Driving License (Holograms+Scans)

฿1.4935

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Item info:

seller	KingOfClubs 0.0
ships from	undecleared
ships to	Worldwide
category	Fake IDs

postage options:

Regular (฿0.0000)

Description

Do you need a Medicare Card as well?

Driver's Licence & Health Card Combo: <http://silkkroadvb5piz3r.onion/silkkroad/item/16ee29bc70>

****Price Includes Free Regular Shipping Worldwide****

ID FORM:

(Whatever info you provide below will be the same info that goes on the card, please double check to make sure there are no mistakes)

Class: Full (Yellow Top) or Provisional (Red Top)

Name:

Date of Birth (MM/DD/YY):

Address: (If you don't provide an address ill make one up for you)

-Attach 1 photo taken with a digital camera, against a white wall, from the shoulders up

-If you want your own signature, draw the sig in black ink on white paper, take a closeup pic of the sig with a digital camera. If you don't send a sig, i'll make one up for you.

****Please only send high quality pictures****

What is the best way to send the ID form + pic?

Fill out your ID form, provide an Anonfiles picture link and send it in an PGP encrypted message at checkout. If you don't know how to encrypt yet use privnote.com to upload the ID form along with the Anonfiles picture link.

Anonfiles URL: anonfiles.com

Privnote URL: privnote.com

For those who want to start PGP encrypting, download the program GPG4USB, its the easiest encryption tool to use

GPG4USB URL: <http://gpg4usb.cpunk.de/>

Include shipping details at checkout

**GOVERNMENT
EXHIBIT
915 F
14 Cr. 68 (KBF)**

****Please provide your ID form before or during checkout, this avoids possible late/cancelled orders (it's difficult to keep track of orders on my end when the ID form hasn't been sent by the buyer), also remember to include your shipping details at checkout****

SA-95

Public Key:

-----BEGIN PGP PUBLIC KEY BLOCK-----

Version: GnuPG v1.4.11 (MingW32)

```

mQGibFBinV4RBACiMKVLxmpgiuaH9ZRLonOn2V+1MVGnJkqgpK77XH+bGGSiYvzi
l3fasWYeF6m1g97vafpB9Q/H+d75RfXBMsN+g0i29jQR4/iXw/ZwzUitG+rAerCL
LH/YfUDP2AePya+2KtKSFUJrSuHagh0wj8V/ri52P149UtAi8Q/qArWtiwCg51vM
qWjLEWJSAWQkr0Z YvZGcZXUD/0HkRTxy5pU7HFgK0kBMqdOJ5XSXLIBk8TyQBlea
dJY07tiI5zXuYmhxAUkxKdzzVvXSgJKBD0mNPGpTHJgUesvmEMKhTZrmebCuMqI/
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FphHA/9f7RKERPSaWHLHK6g30a2zsPbdf5yFSuC5JlqvGj0lqtci7ap4XjSDV6zth
n4znmix+Peo66VtBC2pq1o/zf6PF/QEEAuY8lUbgG TinOqXWxgv4FffUJkVqO7Gd
iLmRapW8WW7x1KIhLPfIUPf9ABRD1B/peEYlpat9TattdgH7QlS2luZ09mQ2x1
YnMgPGtpbmdvZmNsdWJzQHRvcm1haWwub3JnPhihBBMRAGAiBQJQYp7+AhsjBgsJ
CAcDagYVCAIJCgsEFgIDAQIeAQI XgAAKCRcQda8F7pGKIk1RAKCOkSNTqAhorXHu
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GfK7QJ3tfsRv8AHGIFHuKeO7kPuilzSTPf97C34Zgy0o2vUQ1HtkrTqNsSAW5OJ+
ou+gdDOCU5Vdf4WVNVagnRe7SLfa8yzNvPih5SjTixNLEAHgD18UllwVAnPmRFBP
X+FJZSza9xYhCudYwNgpz7VAoPazCRPAVKqurLzvTtk5nhCx2XzDxnngplOuCoHGF
W9Ki6KaE8SzXwOH2GmbLqAREEHWJqWuMU8Z4Py8kYiTi6yQXilxF7+lj5njR1Vv
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w2XLsjPpIQSnLvVaEdFU0i4uTFYgwLwjlMzonmWnZdNW2iOBm9iORSei+y6ao8l
f2Vmg7Q6u+x+waBumPvmPgElyksqv3whzPGMLA85DWTnFVJS9mH0d2WQQWvPrzKr
ZVKfLfl3aikVheCR32LpFUZIFodNDZg+3HrQc7l1L6G5pUGwCM7SFovER6yMawGB
MVP6w2vSHXke2AJCYnh1JeO+HxnVR4ATM2Cs9qLYGOISQQYEQIACQUUGKe/gIb
DAAKCRcQda8F7pGKlviCAKCBJCKAR/F2D76uD/8qxr5S1Dby9wCfWJGJyQrw9J9S
ELuFH6y5RX4+TU=
=t1H/
-----END PGP PUBLIC KEY BLOCK-----

```

Reviews:

sort by: 

Unknown yallllllll

orders spent vendors
10+ \$1+ 1+

review for: *New South Wales Driving License (Holograms+Scans)* qty: 1 price: \$1+

1y 3m old | 4 of 5

Turn around was good enough wouldnt complain. ID is possibly passable corners are very very suspicious looks as if they were cut with scissors (makes slightly squarish corners). All in all would recommend as the price isnt to bad and it is excellent for what you pay.

SA-96

ausdream420 orders spent vendors 1+ \$10+ 1+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 3m old 5 of 5
	FE, Will update when product arrives. Looks very nice in the preview, vendor very helpful. Will be getting more once this one tested.	
	5/5	
Ozdeliver orders spent vendors 10+ \$10+ 10+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 3m old 5 of 5
	2weeks to get to aus ID looks good hopefully it works well thanks mate	
Aussiebonghead90 orders spent vendors 10+ \$10+ 10+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 3m old 5 of 5
	It has been 25 days and still hasn't arrived to Aus, am trying to sort out a fair resolution will update with results	
dosandroz orders spent vendors 1+ \$1+ 1+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 4m old 5 of 5
	Speedy Work, superior product	
zidn99 orders spent vendors 10+ \$100+ 10+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 4m old 5 of 5
	excellent service!! trusted recommended vendor!! A++ service	
Butters1 orders spent vendors 1+ \$1+ 1+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 4m old unrated
	FE early... great communication. nice person. hopefully it arrives.	
Assymetry orders spent vendors 10+ \$100+ 10+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 4m old 5 of 5
	Slight mishap but KingOfClubs was quick to respond and sort the situation out. Very communicative. Second order I've had with them/him/her.	
	ID's are pretty well made and IMO would pass for most necessary things. Stopping short of somewhere that may scrutinize them heavily under policy (maybe high end stores, banks, birth deaths and marriages ect?). Post Offices and the like they have all worked flawlessly.	
TheDarkKnight123 orders spent vendors 1+ \$1+ 1+	<i>review for: New South Wales Driving License (Holograms+Scans)</i> qty: 1 price: \$1+	1y 4m old 5 of 5
	This vendor is great, would definitely recommend for speedy processing.. Haven't yet received item but I have enough faith from my last transaction	
alias hidden stats: (hidden)	<i>review for: New South Wales Driving License (Holograms+Scans)</i>	1y 4m old 5 of 5
	Satisfied with product, delivery was longer than expected, but communication from vendor was reassuring.	

1 2 3 > Last >

\$1 = \$1.0000

community forums | wiki | support

SA-98

-----BEGIN PGP PUBLIC KEY BLOCK-----

Version: BCPG C# v1.6.1.0

```

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=dqgo

```

-----END PGP PUBLIC KEY BLOCK-----

Below are some of my most popular items:

⌘ Forged Rite Aid Prescription Rx Labels ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/36a29435a8>

⌘ Forged WalMart Prescription Rx Labels ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/5be03cf610>

⌘ Forged Walgreens Prescription Rx Labels ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/e1dfe73823>

⌘ Forged Binghamton University Student ID ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/68e8ca3e17>

⌘ Forged Hawaii Drivers License Digital Copy ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/1bc67ddaf>

⌘ Forged Florida Drivers License Digital Copy ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/6697040cb4>

⌘ Forged Auto Insurance Card - Allstate ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/1abf67932f>

⌘ Forged Proof of Auto Insurance Card State Farm ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/6e697780de>

⌘ AAA Emergency Road Service Mebership Card ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/68be66ab9d>

⌘ Forged W-2 Tax Form ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/5587e9f674>

⌘ Forged Service Dog ID / Fake Guide Dog ID Card ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/ffe011cc42>

⌘ Forged American Red Cross Cards All Classes! ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/cfa5bbbedb5>

⌘ 50 Opium Poppy Seeds - (Papaver Somniferum) ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/08281d97eb>

⌘ 100 Opium Poppy Seeds - (Papaver Somniferum) ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/23d2460b8e>

⌘ 1000 Opium Poppy Seeds - (Papaver Somniferum) ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/dda19aa671>

⌘ Forged Prescription Rx Labels - Customized! ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/1ee45cc6d1>

⌘ Adobe Photoshop CS6 ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/f0bfa9d54d>

⌘ Adobe Photoshop CS5 ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/be21463e1d>

⌘ Adobe Dreamweaver CS5 ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/f26bf2e692>

⌘ Adobe Illustrator CS5 ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/5249680d2b>

⌘ Adobe Illustrator CS6 ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/0bb00cedc9>

⌘ Adobe Fireworks CS3 ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/38982a22b0>

⌘ Adobe Acrobat Pro 10 ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/ff3a0e64a4>

⌘ MDMA Synthesis Instructions eBook ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/198434ed95>

⌘ Organic Chemistry Laboratory Survival Manual ⌘

<http://silkroadvb5piz3r.onion/index.php/silkroad/item/beddd07685>

⌘ Guide to Postal Smuggling eBook ⌘

<http://silkroadvb5piz3r.onion/silkroad/item/d94a013127>

Metta Tags: cannabis, oxycontin, bicoins, BTC, MDMA, speed, spores, heroin, methamphetamine, cash, vicodin, oxycodone, morphine, weed, marijuana, ebook, methadone, NMDA, PCP, GHB, viagra, levitra, cialis, Vardenafil, Sildenafil, Seroquel, Quetiapine, norco, lortab, watson, 10mg, 5mg, 40mg, xanax, .5mg, 1mg, 2mg, alprazolam, benzos, benzodiazepines, klonopin, valium, diazepam, pill cutter, apple bags, drug baggies, ziplock, red dice, Pseudoephedrine, merchandise, silk road, adobe, illustrator, photoshop, acrobat, pro, dreamweaver, CS3, CS4, CS5, CS6, CS7, M357, depakote, Wellbutrin, Bupopion, Divalproex Sodium, fireworks, qvar, Beclomethasone Dipropionate, thailand, redbull, original, synthesis, flexeril, cyclobenzaprine, epipen, shot, Adrenaline, Epinephrine, leaf, yellow bus, neon, orange, stash can, free, organic, chemistry, ID, service dog, guide, badge, fake, drivers license, passport, social security, hacking, internet, cyber, American Red Cross, CPR, First Aid, AED, auto, insurance, digital copy, florida, hawaii, binghamton university, new york, student, staff, geico, postal, smuggling, tax, taxes, money, laundering, alibi, doctors note, receipt, credit, card, WalMart, CVS, Costco, Rite Aid, QFC, safeway, AAA, triple A, roadside assistance, coupon, discount, w-2, tax, taxes, employment, paystub, express

SA-99

Reviews:

sort by:

- | | | |
|---|---|--------------------|
| msnastytime69
orders spent vendors
10+ \$1+ 10+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
thanks. :) | 1y 3m old 5 of 5 |
| MaBell
orders spent vendors
1+ \$1+ 1+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
Absolutely amazing. I made a mistake and the vendor worked with me and even provided an extra card.

This is my new go to guy for ID forgeries | 1y 3m old 5 of 5 |
| MyAliasName
orders spent vendors
10+ \$10+ 10+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
I am impressed! I just did a side by side check with the real deal version of this era card...and it is a very nice product!
The only problem you could possibly have if ever using this card in person, it that it simply looks brand new for a card that has not been issued for several years now. But most are using it for scans, etc...so no problems there.

BONUS: The vendor is kind enough include several copies with your order (Props To This Vendor). It is very helpful that several copies are included, bc I can try different aging methods on one or two of the cards to try and make it look a bit older and beat up...like an authentic card issued in this era.

Will definitely do business with again! | 1y 3m old 5 of 5 |
| Christian Slater
orders spent vendors
10+ \$100+ 10+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
These will pass with no problems. Thank you. | 1y 3m old 5 of 5 |
| jamesh4nd
orders spent vendors
1+ \$0+ 1+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
Came packaged like a pro! Look pretty good as well! Thanks ND! | 1y 3m old 5 of 5 |
| happynolucky
orders spent vendors
1+ \$1+ 1+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
Very quick shipping, and the cards look great! Thanks a ton! | 1y 3m old 5 of 5 |
| yankees25
orders spent vendors
10+ \$100+ 10+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
+++++++AAAAA+++++++ Vendor. Great fakes, super turnaround time and extras, if you pay the express amt.

Perfect to back up my fake license. | 1y 4m old 5 of 5 |
| swishaman
orders spent vendors
1+ \$1+ 1+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
Super Fast Super Stealth shipping. SS card is damn near the real thing. I cant tell not a single difference from the original. Seller is highly recommended and will be my go to go for any of his forgeries. If you go anywhere but him first you are try losing out. Did I mention he was also kind enough to give me four for the price of one. On top of that the item was half off. You will not find a better more legit seller then this one. Thanks again | 1y 4m old 5 of 5 |
| dannyvermin
orders spent vendors
1+ \$0+ 1+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
Excellent product, looks totally real. Seller was very responsive. | 1y 4m old 4 of 5 |
| KushDragon420
orders spent vendors
10+ \$10+ 1+ | <i>review for:</i> Forged Social Security Card qty: 1 price: \$0+
Shipping is quick, contact is straight to business. But the quality is not at all what I was expecting. | 1y 4m old 2 of 5 |

1 2 3 > Last >

\$1 = \$1.0000

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SA-100



messages 0 | orders 0 | account **฿0.0000**

a few words from the Dread Pirate Roberts



Hi, **FBINY**
logout

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Go

Shop by Category



RAT + Setup Guide

฿0.0187

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller **sniffsniff 0.0**
ships from **undeclared**
ships to **Worldwide**
category **Digital goods**

postage options:

DO NOT SEND ME AD ?

GOVERNMENT EXHIBIT 916 D
14 Cr. 68 (KBF)

Description

Looking to access sensitive files on someone else's PC? A RAT can help you do this and more!

This listing will include a fresh download to the best RAT on the market, DarkComet [current version].

A complete setup tutorial will also be sent.

Please note that this RAT only works on Windows/Linux.

BE CAREFUL if downloading DarkComet somewhere else; there is no official download page, and 95% of the download links on Google are infected.

If you have any questions, feel free to send me a message.

~sniffsniff

Reviews:

sort by:

[go](#)



- | | | |
|---|--|--------------------|
| asslias
orders spent vendors
10+ ฿10+ 10+ | <i>review for: RAT + Setup Guide</i> qty: 1 price: ฿0+
everything explained very well. great seller | 1y 3m old 5 of 5 |
| SuperAlias
orders spent vendors
10+ ฿1+ 1+ | <i>review for: RAT + Setup Guide</i> qty: 1 price: ฿0+
Insanely fast delivery, good communication! Will update after testing the product. | 1y 4m old 5 of 5 |
| alias hidden
stats: (hidden) | <i>review for: RAT + Setup Guide</i>
good communication | 1y 4m old 5 of 5 |
| alias hidden
stats: (hidden) | <i>review for: RAT + Setup Guide</i>
Good information. Got exactly what was described. Thanks | 1y 4m old 5 of 5 |
| alias hidden
stats: (hidden) | <i>review for: RAT + Setup Guide</i>
Wicked, everybody stop reading feedback and BUY FROM THIS GUY, thanks again man :) | 1y 4m old 5 of 5 |
| alias hidden
stats: (hidden) | <i>review for: RAT + Setup Guide</i>
Great information, thanks. | 1y 4m old 5 of 5 |
| alias hidden
stats: (hidden) | <i>review for: RAT + Setup Guide</i>
Leave feedback here | 1y 5m old 5 of 5 |
| alias hidden
stats: (hidden) | <i>review for: RAT + Setup Guide</i>
Fast delivery. Really nice vendor! will be back | 1y 5m old 5 of 5 |

SA-101



Android RAT + Tutorial

\$0.0187

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller	sniffsniff 0.0
ships from	undeclared
ships to	Worldwide
category	Digital goods

postage options:

Description

This listing will be for an Android RAT and setup tutorial. Please only purchase if you have previous experience with RATs. Here is some of the media it's capable of stealing:

- Contacts
- Personal information
- Phone call logs
- Pictures
- SMS messages (sent & received)
- WhatsApp messages

Here are the some of the other features:

- Microphone streaming
- Real-time location via GPS/3G/4G
- Real-time phone status (missed call, missed SMS message, etc)
- Real-time SMS message monitoring
- Remote camera control
- Remote phone calling
- Remote SMS sending
- Remote URL opening
- Remote vibrations
- Video streaming

I will also throw in an Android APK binder for a limited time (allows you to execute the stealer when the victim opens the binded Android app). If you have any questions, feel free to send me a message.

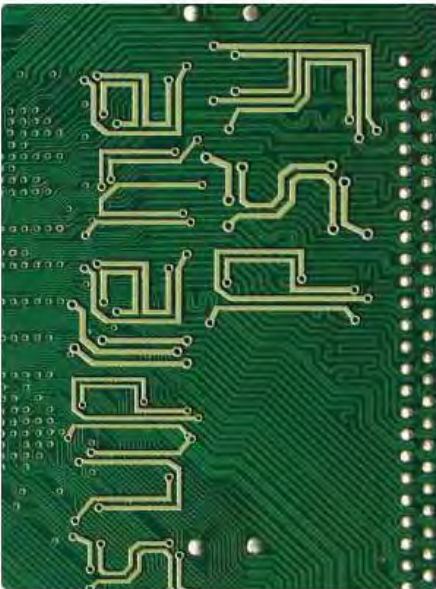
-sniffsniff

Reviews:

sort by:



GOVERNMENT EXHIBIT 916 E
 14 Cr. 68 (KBF)



Email Account Cracker - BeST PRICE on SR!!!!

\$0.0746

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:	
seller	mesa235z 0.0
ships from	United States of America
ships to	Worldwide
category	Digital goods

postage options:
Digital Download (\$0.)



Description

This tool will allow you to crack nearly any email account. All you need to know is the smtp sever and port (a quick google search can solve that). It's extremely easy to use and I'll even throw in a little .gif image showing you how to use it.

This can crack:
gmail
hotmail
yahoo
email
and any others you need.

Reviews:
sort by: freshness

WakeTheEiffUp
orders spent vendors
10+ \$100+ 10+

review for: *Email Account Cracker - BeST PRICE on SR!!!!* qty: 1 price: \$0+
Nothing but a few .exe thrown into a zip file. No instructions or directions from the vendor included.
P.S. - 3 different Anti Virus programs said 2 or 3 of the files were backdoors!
Terrible transaction - would not recommend to ANYONE unless you want to allow this vendor to "pwn" your computer!

1y 4m old | 1 of 5

SA-103


Silk Road
 anonymous market
 Shop by Category

messages 0 | orders 0 | account \$0.0000
 Search Go

the Dread Pirate Roberts
 Hi, FBINY [logout](#)

Hack Facebook Twitter and YouTube Accounts

Item info:	
seller	optiman 0.0
ships from	undecleared
ships to	Worldwide
category	Services

postage options:
Free (\$0.0000)

\$0.1404

[add to cart](#) | [bookmark](#) | [discuss 2](#) | [report](#)



Description

*For Android Devices only (Cellphones, Tablets etc)

Get accounts sessions over connected WiFi and Access to Facebook, Twitter, YouTube, Google, WhatsApp, and More social webs like you're the account owner.

You can Read, Write, Upload, Delete, View All Personal Info, Messages, Photos, Friends, Comments, etc...

YOU GET 6 APPS

- 2 Similar Apps for get accounts sessions.
- 1 App for only get Facebook account sessions.
- 2 App for spy WhatsApp messages transfers.
- 1 App to protect yourself from such attacks.

* You may need a rooted device. The file weight is 2.4MB.

Feel free to ask any questions.
Optiman

Reviews:

sort by: freshness go [?](#)

SA-104

1y 3m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts* qty: 1 price: \$0+

really one of the best sellers i came across at SR.

AviadOoo
orders spent vendors
1+ \$0+ 1+

1y 4m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

Great deal! Seller is really supportive.

alias hidden
stats: (hidden)

1y 4m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

Fast and Good seller

alias hidden
stats: (hidden)

1y 4m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

as always great seller

alias hidden
stats: (hidden)

1y 4m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

Leave feedback here

alias hidden
stats: (hidden)

1y 5m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

Looks good will update once I play with it

alias hidden
stats: (hidden)

1y 5m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

Leave feedback here

alias hidden
stats: (hidden)

1y 5m old | 3 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

not bad.

alias hidden
stats: (hidden)

1y 5m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

fast handling!

alias hidden
stats: (hidden)

1y 5m old | 5 of 5

review for: *Hack Facebook Twitter and YouTube Accounts*

thanks

alias hidden
stats: (hidden)

1 2 3 > Last >

#1 = \$1,000

community forums | wiki | support

SA-105



messages 0 | orders 0 | account **฿0.0000**

a few words from the Dread Pirate Roberts



Search

Hi, **FBINY**
logout



Shop by Category



I Will Crack ANY Username+Password

฿0.0747

[add to cart](#) | [bookmark](#) | [discuss 3](#) | [report](#)

Item info:

seller	sniffsniff 0.0
ships from	undeclared
ships to	Worldwide
category	Services

postage options:

Description

This listing will be for a list of contacts that can crack random accounts on any website that has a login page.

Please note that I will not crack any finance-related website accounts.

If you are interested in having a specific account cracked, get in touch with me and we can make a deal.

If you have any questions, feel free to send me a message.

~sniffsniff

GOVERNMENT EXHIBIT
916 K
14 Cr. 68 (KBF)

Reviews:

sort by:

blindio222 orders spent vendors 10+ ฿10+ 10+	<i>review for: I Will Crack ANY Username+Password</i> qty: 1 price: ฿0+ write your review here	1y 3m old 5 of 5
alias hidden stats: (hidden)	<i>review for: I Will Crack ANY Username+Password</i> fe'd but this guy is good for it	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: I Will Crack ANY Username+Password</i> this time, it was not possible, vendor provided 100% refund, very nice guy	1y 8m old 5 of 5
alias hidden stats: (hidden)	<i>review for: I Will Crack ANY Username+Password</i> AWESOME VENDOR, GREAT FEEDBACK QUICK TURNAROUND. WILL DEFF COME BACK FOR NEW BUSINESS.	1y 8m old 5 of 5

฿1 = ฿1.0000

[community forums](#) | [wiki](#) | [support](#)

SA-106


Silk Road
 anonymous market
 Shop by Category

messages 0 | orders 0 | account \$0.0000
 Search Go

Hi, **FBINY**
[logout](#)



Email Cracking Tool

\$0.0187

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:	
seller	sniffsniff 0.0
ships from	undclared
ships to	Worldwide
category	Digital goods

postage options:
DO NOT SEND ME AD ?

Description

This program is capable of cracking almost any email account (provided you know SMTP and port). I will include 2-3 word lists as well as an updated list of SMTP and ports for 30+ email providers. If you have any questions, feel free to send me a message.

~sniffsniff



Reviews:

sort by: freshness go ?

ahotboy3k

orders: spent vendors
10+ \$10+ 10+

review for: *Email Cracking Tool* qty: 1 price: \$0+

great dude with great software gonna be keeping a eye on this dude for the futuree

1y 3m old | 5 of 5

alias hidden

stats: (hidden)

review for: *Email Cracking Tool*

You the man! Great stuff :)

1y 4m old | 5 of 5

SA-107

alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> FE, was messaged almost instantly. (:	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> awesome!	1y 5m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> Leave feedback here	1y 5m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> 5/5 vendor helped me with some questions	1y 5m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> superb as always!!	1y 5m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> Leave feedback here	1y 5m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> Seems to be working, thank you.	1y 5m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Email Cracking Tool</i> item came, works as expected.	1y 5m old 5 of 5

1 2 3 > Last >

#1 = #1,0000

[community forums](#) | [wiki](#) | [support](#)

SA-108


Silk Road
 anonymous market

messages 0 | orders 0 | account \$0.00000

Search

a few profiles from the Dread Pirate Roberts

Hi, **FBINY** [logout](#)

GOVERNMENT EXHIBIT
916 P
 14 Cr. 68 (KBF)



Keylogger

~~\$~~0.0414

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller: supremePSY 0.0
 ships from: United States of America
 ships to: Worldwide
 category: Digital goods

postage options:
 none (\$0.0000)

Description

This will not keylog your computer. You have my word as a trusted seller. This will however make your antivirus throw up some red flags, so before you download it turn it OFF.

The link that I will send you will be a keylogger creator. The .exe file is not the keylogger, it only creates the keylogger for you to then run on someone elses computer. You can PM me if you have any issues with how to use it. It is pretty easy to use and self explanatory.

Reviews:

sort by:

zapadlos
 orders spent vendors
 10+ \$1+ 1+

review for: **Keylogger** qty: 1 price: \$0+
 it's really easy to use, thanks

1y 3m old | 5 of 5

SA-109

alias hidden stats: (hidden)	<i>review for: Keylogger</i> Fast and very helpful, definitely treats his customers with great care	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i> thanks received . will try	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i> Leave feedback here	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i> quick and easy peasy	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i> dumbass confusing on my part, either way this guy is the man -- helpful and legit. 5/5.	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i>	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i> Fast and smooth transaction!	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i> Perfect!	1y 7m old 5 of 5
alias hidden stats: (hidden)	<i>review for: Keylogger</i> Just what I needed! THANKS!	1y 7m old 5 of 5

1 2 3 >

SA-110



Professional DDoS Service (70+ Gbps)

\$0.0374

add to cart | bookmark | discuss 0 | report

Item info:	
seller	sniffsniff 0.0
ships from	undeclared
ships to	Worldwide
category	Services

postage options:
DO NOT SEND ME AD

Description

"In computing, a denial-of-service attack (DoS attack) or distributed denial-of-service attack (DDoS attack) is an attempt to make a machine or network resource unavailable to its intended users. Although the means to carry out, motives for, and targets of a DoS attack may vary, it generally consists of efforts to temporarily or indefinitely interrupt or suspend services of a host connected to the Internet." - Wikipedia

I will be using multiple attack methods capable of taking down anything from a home connection to well-protected business websites.

This listing is for the consultation only. After we agree on a price, I will set up a custom listing and when I'm finished, you will leave feedback here.

Pricing will range anywhere from \$5 to \$200 an hour, depending on the type of connection and if it's protected by CloudFlare, etc.

If you have any questions, feel free to send me a message.

~sniffsniff

Reviews:

sort by: freshness



SA-111


Silk Road
anonymous market
 Shop by Category

messages 0 | orders 0 | account \$0.00000
 Search Go

the Dread Pirate Roberts
 Hi, FBINY [logout](#)

Distributed Denial Of Service on 1 IP for 48h

\$3.8764

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller [druqks 0.0](#)
 ships from [Italy](#)
 ships to [Worldwide](#)
 category [Services](#)

postage options:
 setup (\$0.0000)

Description

Distributed Denial Of Service on 1 IP for 48h

F.E. REQUIRED - if the host don't go down.. 100% REFOUND or feedback me as a scammer.

<http://silkroad/vb5piz3r.onion/silkroad/item/ae95aa85aa> <- Denial Of Service for 96 h

Other Customer reviews:

rating review freshness
 5 of 5 FE 2 months
 5 of 5 FE on request 3 months

<http://silkroad/vb5piz3r.onion/silkroad/item/c6ba1005c4> <- Denial Of Service for 48 h

Other Customer reviews:

rating review freshness
 5 of 5 Updating feedback. If you ever need a ddos - USE this guy. Absolutely fucking brilliant service. Cant thank you enough. 3 months

Reviews:

sort by: freshness



SA-112



messages 0 | orders 0 | account \$0.0000

Hi, FBINY
logout

Search Go

Shop by Category










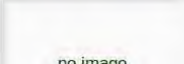
- Money 269
- Bullion 27
- Digital currencies 48
- Apparel 753
- Art 14
- Books 1,322
- Collectibles 26
- Computer equipment 100
- Custom Orders 87
- Digital goods 892
- Drug paraphernalia 496
- Drugs 13,802
- Electronics 239
- Erotica 594
- Fireworks 34
- Food 13
- Forgeries 156
- Hardware 35
- Home & Garden 28
- Jewelry 104
- Lab Supplies 30
- Lotteries & games 169
- Medical 56
- Musical instruments 7
- Packaging 91
- Services 171
- Sporting goods 3
- Tickets 4
- Writing 7

sort by: **bestselling** Domestic only discuss this category 9









	\$1,000 US Dollars (10 \$100 bills) seller: gold 0.0 ships from: United States of America	5 4 3 2 1	\$9.3597 add to cart
	\$10,000 US Dollars (100 \$100 bills) seller: gold 0.0 ships from: United States of America	5 4 3 2 1	\$91.6370 add to cart
	\$100 US Dollars (1 \$100 bill) seller: gold 0.0 ships from: United States of America	5 4 3 2 1	\$0.9830 add to cart
	\$1000 USD Cash AND 1 Ounce Amer. Buffalo Gold Coin seller: gold 0.0 ships from: United States of America	5 4 3 2 1	\$19.9820 add to cart
	£100 - Tesco Vouchers UK seller: Mr BlackHat 0.0 ships from: United Kingdom	5 4 3 2 1	\$0.3050 add to cart
	\$100 Bill seller: CashExpress 0.0 ships from: United States of America	5 4 3 2 1	\$0.9180 add to cart
	ANONYMOUS VISA ATM CARD EUR/ USD + Bank ACC seller: BioCanna 0.0 ships from: Poland	5 4 3 2 1	\$0.3421 add to cart
	ANONYMOUS VISA ATM DEBIT CARD EUR/USD/GBP	5 4 3 2 1	\$0.1380 add to cart

GOVERNMENT EXHIBIT 917
14 Cr. 68 (KBF)

SA-113

	ANONYMOUS VISA ATM DEBIT CARD EUR/USD/GBP	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.1380 add to cart
	Australian Bank account 4.4k a day withdraw limit.	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿19.4570 add to cart
	\$100 Green Dot Moneypak	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.9098 add to cart
	ATM Cash Machine Hack...	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.6000 add to cart
	BTC loaded on Anonymous Inter. Checking/ATM Cards	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.9981 add to cart
	\$1000 cash (10 x \$100s) Express shipping available	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿8.5890 add to cart
	\$100 Increment Vanilla Visa Pre-Paid or Moneypaks	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.8692 add to cart
	ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.2863 add to cart
	Anonymous EUR Visa debit card w IBAN 4 ATM cashout	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.4166 add to cart
	Sell your Moneypak for quick BTC here	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/>	฿0.2063

SA-114

	Cashout seller: starlight 0.0 ships from: Netherlands	<input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.4166 add to cart
no image	Sell your Moneypak for quick BTC here seller: freemoney 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.2063 add to cart
	VERIFIED BITSTAMP ACCOUNT IBAN AND VISA ATTACHED seller: fake 0.0 ships from: undeclared	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿1.4860 add to cart
	BTC Cashout 2 private Anon Bank Acct w ATMBankcard seller: PureO 0.0 ships from: undeclared	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿8.1675 add to cart
no image	1 Troy Ounce Gold Coin S. African Kruggerand seller: gold 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿12.1140 add to cart
	Make STEALTH PAYPAL and withdraw 100% anonymous \$ seller: NoQuarter 0.0 ships from: undeclared	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.0826 add to cart
	BTC to Cashout 10% deposit seller: PureO 0.0 ships from: undeclared	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.1007 add to cart
	1/10 Troy Ounce Gold Coin American Eagle Bullion seller: gold 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿1.3555 add to cart
	ATM Cash Machine Hack... ++CHEAPEST on SR++ seller: mesa235z 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.4853 add to cart
	PATRIOT ACT PROOF MONEY LAUNDERING PROCEDURE!!! seller: delmar813 0.0 ships from: United States of America	<input type="text" value="5"/> <input type="text" value="4"/> <input type="text" value="3"/> <input type="text" value="2"/> <input type="text" value="1"/>	฿0.2886 add to cart

1 2 3 > Last >

15-1815

United States Court of Appeals

FOR THE SECOND CIRCUIT

Docket No. 15-1815



UNITED STATES OF AMERICA,

—v.—

Appellee,

ROSS WILLIAM ULBRICHT,

also known as Dread Pirate Roberts, also known as Silk Road,
also known as Sealed Defendant 1, also known as DPR,

Defendant-Appellant.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SUPPLEMENTAL APPENDIX

PREET BHARARA,
*United States Attorney for the
Southern District of New York,
Attorney for the United States
of America.*

One St. Andrew's Plaza
New York, New York 10007
(212) 637-2200

SA-115

Silk Road
anonymous market

Shop by Category

messages 0 | orders 0 | account \$0.00000

Search

Hi, **FBINY** [logout](#)

as leav... from the Dread Pirate Roberts



\$10,000 delivered

\$78.8240

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller	rickcrossgold 0.0
ships from	United States of America
ships to	Worldwide
category	Money

postage options:
Domestic w Tracking (?)

Description

\$10000 delivered to your doorstep in the form of 100 \$100 bills (or US bills of your choosing). You will be mailed genuine US currency that has not been altered or linked to criminal activity.

Reviews:

sort by: Freshness ?



SA-116



Silk Road
anonymous market

messages 0 | orders 0 | account #0.0000

3 keywords from
the Dread Pirate Roberts



Search

Go

Hi, **FBINY**
logout



Shop by Category

VENDORS CASH IN UR COINS 4 Packs (3% fee)

#0.0001

add to cart | bookmark | discuss 0 | report

**GOVERNMENT
EXHIBIT
917 B
14 Cr. 68 (KBF)**

Item info:

seller	AlwaysReliable7 0.0
ships from	United States of America
ships to	EU, USA, and Canada
category	Money

postage options:

Free (#0.0000) ?

Description

Hello my good friends!

this is a listing for anyone to cash in their coins for moneypaks, REloadits, Vanilla Reloads, and netspends.

This means you give us your coins and we give you one of these packs.

We have changed the fee from 5% to 3% because of how many orders we're getting from customers trying to cash their packs in for coins.

Our fees are low because it's more of a service for the community. We know how difficult it can be for some people to get coins or packs (not to mentioned we've been scammed out of cashing in our coins by other vendors and thought it was complete bullshit and wanted to give the community some honesty and loyalty)

The rates are the same all the way up no matter what. 3%

500\$ pack costs 515\$ coins
100\$ pack costs 103\$ in coins.
you get the picture.

Please place the order and let us know know in the description what type of pack you would like and how much in \$ worth you would like.

We are fair and understanding.

Please be ready to load the packs on to whatever card you're using within hours because we have customers on the other side waiting for their coins and they won't get them until you've loaded them.

thank you all very much!

SA-117

Reviews:

sort by: 

fernieburnie123 orders spent vendors 10+ \$10+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> Awesome. Can't beat 3%! Thanks AR	1y 3m old 5 of 5
Gil Kerlikowske orders spent vendors 10+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> I needed a cash-out fast and out of several vendors, AlwaysReliable7 was the one who responded in minutes. It was literally less than 20 minutes between first and final contact. Thank you Mr. Reliable!	1y 3m old 5 of 5
kappagrande orders spent vendors 10+ \$10+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> I've been a vendor on SR for 10 months and a customer much longer. There is no exception to the fact that it is hard to maintain a high rating w/so many discerning requests from sometime difficult to handle people. However, I think this vendor has the recipe.....GREAT COMMUNICATION, EXCELLENT CUSTOMER SERVICE and PROMPT DELIVERY. There is no one else on SR that I would trust my BTC transactions to...I suggest you make the same declaration.	1y 3m old unrated
Zoomazoom orders spent vendors 10+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> Perfect yet again.... Please consider these nice folks for your cash out needs and with just a 3% fee you cant find a better deal! Beautiful!	1y 3m old 5 of 5
Gil Kerlikowske orders spent vendors 10+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> Just like his name says. Extremely fast for a small transaction as well.	1y 3m old 5 of 5
Zoomazoom orders spent vendors 10+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> Perfect again.... Go nowhere else folks these guys are FAST!	1y 3m old 5 of 5
Zoomazoom orders spent vendors 10+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> Just perfect! Very fast and really nice folks... wouldn't go anywhere else for my MP or Reloadit needs....Thanks guys!	1y 4m old 5 of 5
Zoomazoom orders spent vendors 10+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> These guys were just GREAT! They helped me in a matter of seconds after my questions and order. I will be using these very nice people again as soon as I can! Thanks again AlwaysReliable7!	1y 4m old 5 of 5
bulkReup orders spent vendors 100+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> quick bitcoins! Great deal trusted seller! Got bitcoins for my moneypak fast!	1y 4m old 5 of 5
Gil Kerlikowske orders spent vendors 10+ \$100+ 10+	<i>review for: VENDORS CASH IN UR COINS 4 Packs (3% fee) qty: 1 price: \$0+</i> AlwaysReliable was was very friendly, even in the face of delays caused myself. Excellent customer service, and he responds very quickly when online. I look forward to future business.	1y 4m old 5 of 5

1 2 >

#1 = \$1,0000

community forums | wiki | support

SA-118

ANONYMOUS VISA ATM CARD EUR USD PLN + Bank ACC

฿0.2913

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)



Item info:

seller	fake 0.0
ships from	undeclared
ships to	Worldwide
category	Money

postage options:

unsigned delivery no €

Description

Get your own anonymous reloadable ATM physical plastic VISA debit card, with sealed PIN code, shipped by me from EU, bank will never know your name.

Available in USD , EUR and PLN currency , please tell us what you need, if you never ask for a specific currency we will send random.

USD and EUR currency cards have no chip, PLN cards have the chip.

There is no name attached to the account and are fully anonymous!

I ship the card to you, the bank will never know your name and address, 100% safe.

You can attach the card to bitstamp.net and reload it anonymously with bitcoin, transfer take 1 day



SA-119

Fees:

First load fee: 1.00 EUR (free anytime after)
Loading by IBAN transfer: FREE!
Checking balance: FREE every 24 hours!
Online Purchase: FREE!
Currency Conversion: 2.8%
ATM Withdrawal: 2.5 EUR / 3 USD / 2 GBP
Monthly Fee: 0.25 EUR

Limits:

Transaction Limit: 1000 EUR / 1300 USD / 800 GBP
Total that can be loaded in one year: 2500 EUR / 3500 USD / 2100 GBP
Maximum Balance: 2500 EUR / 3500 USD / 2100 GBP
Daily withdrawal Limit: 150 EUR / 200 USD / 130 GBP

Bank: bre bank
SWIFT (BIC code): BREXPLPWMBK
IBAN: PLXXXXXXXXXXXXXXXXXXXXXXXXXX - 26 digits from the back side of the VISA card.

to check movements simply go here and enter card details:

<https://www.ibre.com.pl/mt/fragments/prepaid/prepaidLogin.jsp?lang=en>

you have not to enter any other details, 100% anonymous

You can use this card abroad with no limit, it can't be blocked.

Withdrawing in ATM costs you 2.5 euro, payig in shops has no fee.

Reviews:

sort by: go 

hotrocks12

orders spent vendors

1+ €1+ 1+

1y 3m old 5 of 5

qty: 1 price: €0+

review for: ANONYMOUS VISA ATM CARD EUR USD PLN + Bank ACC

FE- will update on arrival

alias hidden

stats: (hidden)

1y 4m old 5 of 5

review for: ANONYMOUS VISA ATM CARD EUR USD PLN + Bank ACC

arrived

SA-120



ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY

\$0.2863

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller	DrugsAndCash 0.0
ships from	Germany
ships to	Worldwide
category	Money

postage options:

ADDITIONAL PRODU(?)

GOVERNMENT EXHIBIT 917 D
14 Cr. 68 (KBF)

Description

.Anonymous Debit Master Card/Visa Electron

.....WHY TO CHOOSE ME?

Only my cards work all around the world even in Canada. I can guarantee you, if it won't work I will refund you. if you buy from me you will get information how to exchange bitcoins with this card within 3 hours ! 3 HOURS AND MONEY FROM BITCOINS IS ON YOUR CARD!
 For small additional fee I will help you with doing paypal/ebay scam and frauds with this card, will provide you ID of money mule so you will be able to create identity, my cards has got access to online terminal so you can verify your paypal account with it.

How does it work?

- it's normal debit card but hasn't got your personal information, it's totally anonymous. it's connected with IBAN bank account number so you can transfer money on this card.

Is it really safe and anonymous?

- Yes, only you can be wack party of this mechanism if you for example break law send money on card and try to buy on petrol station and camera record your face. In other ways it's totally anonymous, but remember to hide your face.

UPDATE ! Frequently Asked Questions by customers!

SA-121

- Can I make a paypal on this card? Yes, you can purchase products in internet and card will verify your paypal. Buy VPN to this card and get anonymous paypal account.
- Will card work all around the world? Yes, but I won't ship everywhere. I won't ship to Cosovo, Nigeria due to nigerian scam/fraud, Vietnam, China, Cuba because this countries can be blocked. Apart of that, everywhere like USA, Australia, New Zeland, Sweden, France, UK, Spain, Germany will work fine.
- Does 1 card accept all currencies? Yes and no, it accept all incoming transfers in every currency and all outcoming transfers but if main currency is euro and you withdraw dollars you will pay extra 2% fee for exchange in ATM. If you order euro and withdraw euro only 2.5 EURO fee.
- What is expiration date? it's usually 2 years, sometimes 2 and half or 2 and 7 months. Not long period but you can exchange and withdraw a lot of bitcoins. You can use it for long time and have fun because no one see that you use it. Enjoy !

ADVANTAGES:

- you can withdraw money from all ATM around the world anonymously
- card is available in 3 currencies: USD, GBP, EUR
- you can transfer black money on this card and noone will spy it
- you can withdraw money from bitcoins anonymously
- very low fees only 2.5 EUR when you withdraw money from ATM
- checking balance and list of transactions by text message

DISADVANTAGES:

- you can withdraw only 120 EUR a day
- your account balance cannot be higher than 1000 EUR
- you have year limit 2500 EUR balance so if you have big money, you have to order few cards

I give you discounts for bulk ammounts of cards.

Feel free to ask me any questions !

.....: Finalized Early and other info:.....

In order details please choose card currency you prefer from USD, GBP, EUR, PLN and notice if you want additional option 1. work in Canada 2. for paypal/ebay and other scam because we have special prepared cards for scam and special different cards for Canada buyers
FINALIZED EARLY IS NOT REQUIRED

Reviews:

sort by:

mdmAmin89
orders spent vendors
1+ #0+ 1+

review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY
qty: 1 price: #0+
never ordering here again! item never arrived! if u send me the item i would give u a better review!!

1y 3m did | 1 of 5

SA-122

pingpo	orders spent vendors 10+ #10+ 10+	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY qty: 1 price: #0+ Received downloaded promptly within a couple of hours of placing the order. Guide is clear and information looks good. Will try out some of the methods. Thanks	1y 3m old 5 of 5
Alias89	orders spent vendors 10+ #10+ 10+	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY qty: 1 price: #0+ Product never received. Poor communication from seller, SR finally resolved	1y 4m old 2 of 5
automenu	orders spent vendors 1+ #0+ 1+	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY qty: 1 price: #0+ got it. Thanks	1y 4m old 5 of 5
alias hidden	stats: (hidden)	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY	1y 4m old 5 of 5
alias hidden	stats: (hidden)	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY SELECTIVE SCAMMER!!! Provided no tracking number and ignored communication!	1y 4m old 1 of 5
alias hidden	stats: (hidden)	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY super fast	1y 4m old 5 of 5
alias hidden	stats: (hidden)	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY Everything arrived perfect. Thanks!	1y 4m old 5 of 5
alias hidden	stats: (hidden)	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY Took some time to get it to scandinavia, but all as promised1 (Y)	1y 4m old 5 of 5
alias hidden	stats: (hidden)	review for: ANONYMOUS VISA/MASTER CARD BTC WASH WITHDRAW MONEY Arrived in good time, thanks :)	1y 4m old 5 of 5

1 2 3 > Last >

#1 = #1.0000

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SA-123



 a few miles from

 the Dread Pirate Roberts

 Hi, **FBINY**

[logout](#)

messages 0 | orders 0 | account \$0.0000

Search

\$100 Green Dot Moneypak

\$0.9098

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)



Item info:

seller	freemoney 0.0
ships from	United States of America
ships to	Worldwide
category	Money

postage options:
 via PM (\$0.0000)



Description

Optimal: Contact me on TorChat to receive your code: km6zzhrcgncpq7i2
 I need up to 24 hrs to buy these at the store, then I'll just PM you the card code and you can load it onto paypal, credit cards, online bank, or whatever as if you had bought it yourself.
 Multiples will be combined into 1 unless you specify otherwise.
 The Green Dot website might give you a free debit card to load the moneypak onto, just ask them.
 Also available as CASH IN MAIL (if you have good buyer stats), or other gift cards (Reloadit, etc.).

Reviews:

sort by:

SA-124

Magnoleah orders spent vendors 10+ #1+ 10+	<i>review for: \$100 Green Dot Moneypak qty: 1 price: #0+</i> Very fast. Honest. great communication. Excellent service- highly recommend	1y 3m old 5 of 5
bobjenkins orders spent vendors 10+ #1+ 1+	<i>review for: \$100 Green Dot Moneypak qty: 1 price: #0+</i> A+	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: \$100 Green Dot Moneypak</i> Smooth as silk.	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: \$100 Green Dot Moneypak</i> Quick, easy transaction! Will use again.	1y 4m old 5 of 5
alias hidden stats: (hidden)	<i>review for: \$100 Green Dot Moneypak</i> Perfect	1y 5m old 5 of 5
alias hidden stats: (hidden)	<i>review for: \$100 Green Dot Moneypak</i> The one guy as a Vendor I trust with my funds. If your cashing out and moneypak is how you do it this guys the way to go.	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: \$100 Green Dot Moneypak</i> Leave feedback here	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: \$100 Green Dot Moneypak</i> Fast and reliable as always!!!!	1y 6m old 5 of 5
alias hidden stats: (hidden)	<i>review for: \$100 Green Dot Moneypak</i> smooth easy and quick	1y 6m old 5 of 5

1 2 3 >


Silk Road
 anonymous market

Shop by Category

messages 0 | orders 0 | account \$0.00000

Search Go

the Dread Pirate Roberts

Hi, FBINY [logout](#)

[BTC] Bitcion Laundry (Highly Anonymous, Impossible)

\$1.3057

[add to cart](#) | [bookmark](#) | [discuss 0](#) | [report](#)

Item info:

seller	sh4d3r1950 0.0
ships from	undclared
ships to	Worldwide
category	Money

postage options:

[Download Link on PM](#) ?



Description

Ever worried & paranoid about your unaccounted dirty money to be painful for you at some point ? then right now you are in the right listing, buy this listing & PM me... I will provide you fresh, washed, clean bitcoins in your BTC wallet in just 24 hours, making it completely anonymous and never be able to trace by using my own methods of mixing algorithm.

[b]1) What is this?[/b]

[i]The bitcoin network might be anonymous in terms of single-handedly revealing your ip address, but the transaction history is recorded in the block chain and is publically available, which makes your anonymity very vulnerable. officials could easily track your money around the network. [/i]

[b]2) Ok, I know that already, explain me more. [/b]

[i]Knowing your transaction history, connecting your bitcoin addresses to real you is possible, because you will at some point need to exchange your bitcoins to or from a fiat currency using a bank account number, a credit card, LR account or similar service which is much less anonymous than the bitcoin network. [/i]

SA-126

[b]3) Hmmm, now what you do for that? [b] [i] I am providing a solution for this, using my service you mix up your bitcoins on my own mixing algorithm and get paid back to other addresses from my service, which, if properly done by you can eliminate any chance of finding your payments and making it impossible to prove any connection between a deposit and a withdraw inside my service and my system. [i]

[b]4) How your service works? [b] [i] You place this listing as order, I will provide you a Wallet address to deposit bitcoins, I will also ask you to place your fresh & new bitcoin address/addresses for receiving clean money. With in 24 hours of time you will have clean, washed, fresh Bitcoins on your new wallet. and you are safe and anonymous, now nobody can trace real you by using transactions. officials will never know the in & out trace of my system. So clean exit. [i]

[b] Cost: [b] This Listing price + 5% of the amount.

[b] Anonymous Type: [b] Highly Anonymous and impossible to trace the real you by using the BTCs.

[b] Time Limit: [b] within 24 to 30 hours of passing me the amount to my provided wallet. you will have clean, washed, fresh money in your new address/addresses.

[b] Minimum BTC Limit for mixing: [b] 1 BTC

[b] Proof of Anonymity: [b] You can check the publicly available blockchains regarding your deposit address, but [u] BET [u] you will never find a trace of exit address/addresses by tracking deposit address. So your profit of complete stealth, anonymous, & safe.

Your money is safe. I guarantee and confirm about your anonymity. I will not take more than 5%. My system is Legit Legit Legit. PM me in case you need amount figure calculations after mixing BTC or for more info if you have questions/doubts.

Reviews:

sort by: freshness

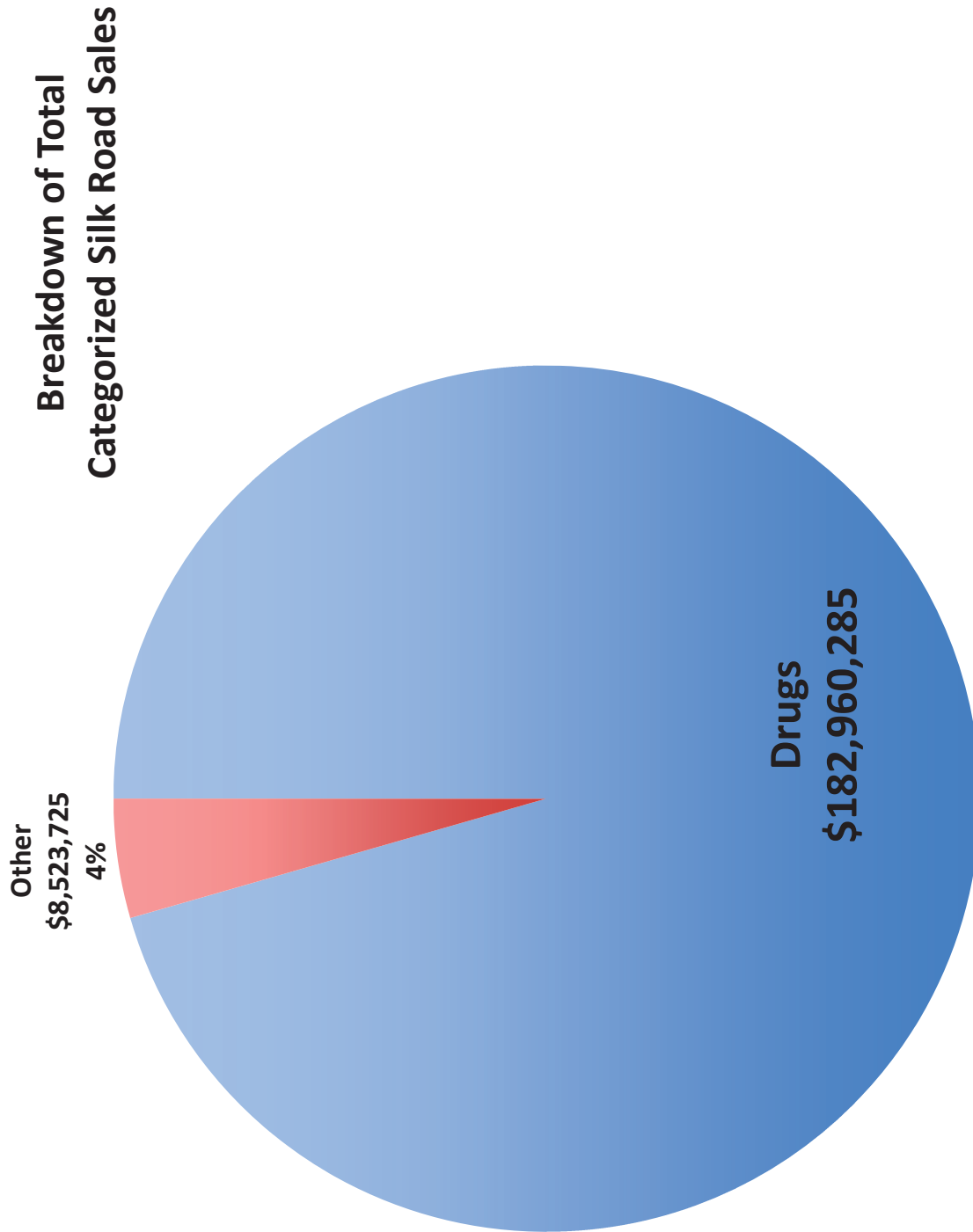
go



฿1 = ฿1.0000

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SA-127



SA-128

Sales of Fake IDs, Forgeries & Passports

	Total Number of Sales	Total Sales Revenue
Fake IDs	3,642	\$ 699,053
Forgeries	3,487	\$ 197,291
Passports	103	\$ 105,292
TOTAL	7,232	\$ 1,001,636



SA-129**Sales in Money-Related Categories**

	Total Number of Sales	Total Sales Revenue
Money	14,345	\$ 2,846,025
Digital Currencies	18,134	\$ 177,167
Gold	81	\$ 159,944
Bullion	122	\$ 80,952
Silver	138	\$ 9,746
TOTAL	32,820	\$ 3,273,833



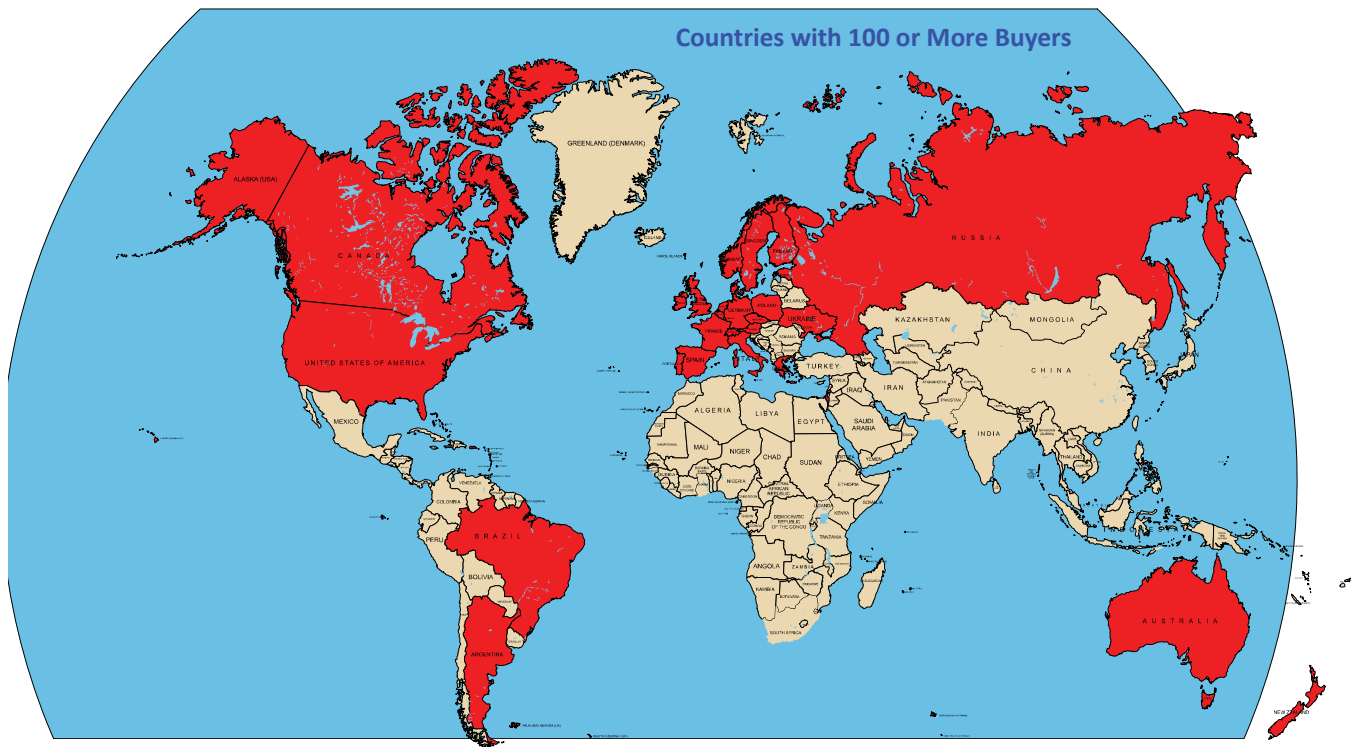
SA-131

Total Silk Road Sales of Selected Drugs

	Total Number of Sales	Total Sales Revenue
Heroin	53,649	\$ 8,930,657
Cocaine	82,582	\$ 17,386,917
Methamphetamine	34,689	\$ 8,110,453
LSD	54,567	\$ 7,073,838

**GOVERNMENT
EXHIBIT
940 E
14 Cr. 68 (KBF)**

SA-133



**GOVERNMENT
EXHIBIT
940G
14 Cr. 68 (KBF)**

SA-134

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 1 of 95

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of California

FILED

MAR 25 2015

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA



United States of America

v.

CARL MARK FORCE IV, et al

Case No.

3-15-70370

Defendant(s)

CRIMINAL COMPLAINT

MEJ

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2012 through 2013 in the county of San Francisco in the Northern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Section 641	Theft of Government Property
18 U.S.C. Section 1343	Wire Fraud
18 U.S.C. Section 1956(h)	Money Laundering
18 U.S.C. Section 208	Conflict of Interest

This criminal complaint is based on these facts:

See Affidavit of Special Agent Tigran Gambaryan (attached)

Approved as to form:

AUSA Kathryn Haun

Continued on the attached sheet.

Complainant's signature

S/A Tigran Gambaryan, IRS-Criminal Investigations

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/25/2015

Judge's signature

City and state: San Francisco, CA

Hon. Maria-Elena James, U.S. Magistrate Judge

Printed name and title

1-MJJ

SA-135

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 2 of 95

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15 Attorneys for United States of America

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION
19

20 UNITED STATES OF AMERICA,

21 v.

22 CARL M. FORCE IV and
SHAUN W. BRIDGES,

23 Defendants.
24

) AFFIDAVIT OF SPECIAL AGENT TIGRAN
) GAMBARYAN IN SUPPORT OF CRIMINAL
) COMPLAINT



25
26 I, Tigran Gambaryan, being first duly sworn, hereby depose and state as follows:
27
28

SA-136

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 3 of 95

I. INTRODUCTION AND AGENT BACKGROUND

1
2 The following affidavit is made in support of a criminal complaint and arrest warrant for Carl
3 Mark FORCE IV ("FORCE") for violations of 18 U.S.C. Section 1343 (Wire Fraud); 18 U.S.C. Section
4 641 (Theft of Government Property); 18 U.S.C. Section 1956 (Money Laundering); and 18 U.S.C.
5 Section 208 (Conflict of Interest) and also in support of a criminal complaint and arrest warrant for
6 Shaun W. BRIDGES ("BRIDGES") for violations of 18 U.S.C. Section 1343 (Wire Fraud) and 18
7 U.S.C. Section 1956 (Money Laundering).

8 I am a Special Agent with the Criminal Investigation Division of the Internal Revenue Service
9 (IRS), in the Northern District of California and have been since 2011. I am currently the group's Cyber
10 Crimes Unit Liaison. Prior to that, my background was as an auditor for California's Franchise Tax
11 Board where I investigated abusive tax shelters. My training and experience includes, but is not limited
12 to, investigations involving money laundering, white collar fraud, public corruption, organized crime,
13 and violations of the Bank Secrecy Act and tax code. I have developed a specialty in cyber and digital
14 currency crimes.

15 I am involved in an investigation into members of the Baltimore Silk Road Task Force to include
16 former Drug Enforcement Administration Agent Carl Mark FORCE IV (FORCE) and former Secret
17 Service Agent Shaun BRIDGES (BRIDGES). This is a bicoastal investigation that is based in San
18 Francisco, being handled by the U.S. Attorney's Office for the Northern District of California and the
19 Public Integrity Section in Washington D.C.

20 In this investigation, I am joined by several co-case agents, to include Special Agents and a Staff
21 Operations Specialist from the Federal Bureau of Investigation (FBI) San Francisco Division's Public
22 Corruption Squad, which investigates abuse of public office in violation of criminal law to include
23 fraud, bribery, extortion, conflicts of interest, and embezzlement. I am also joined in this investigation
24 by the Department of Justice's Office of the Inspector General (DOJ OIG) and the Department of
25 Homeland Security's Office of the Inspector General (DHS OIG), both of which investigate and
26 prosecute fraud and abuse by federal officials.

27 The facts in this affidavit come from my personal observations, my training and experience, and
28 information obtained from other agents and witnesses. This affidavit is intended to show merely that

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

SA-137

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 4 of 95

1 there is sufficient probable cause for the requested complaint and warrants and does not set forth all of
2 my knowledge about this matter.

II. SUMMARY

3
4 The government had multiple investigations into the Silk Road marketplace, an underground
5 black market that allowed vendors and buyers to conduct illegal transactions over the internet. One of
6 these investigations was conducted in the Southern District of New York, and the other was conducted
7 out of Baltimore in the District of Maryland. Both FORCE and BRIDGES were assigned to the
8 Baltimore investigation and not the New York investigation. The two investigations were conducted
9 independently of each other.

10 Throughout 2012 and 2013, both FORCE and BRIDGES had significant responsibilities related
11 to Baltimore's investigation. In this capacity, FORCE was the lead undercover agent in communication
12 with DPR, the owner, administrator and operator of the Silk Road website.¹ BRIDGES was the
13 computer forensics expert on the Baltimore investigation. In their capacity as members of the Baltimore
14 Silk Road Task Force, both FORCE and BRIDGES had significant exposure to and developed expertise
15 in the digital currency known as Bitcoin.

16 As will be described further herein, FORCE and BRIDGES abused their positions as federal
17 agents and engaged in a scheme to defraud a variety of third-parties, the public, and the government, all
18 for their own financial enrichment. With respect to former Drug Enforcement Administration (DEA)
19 Special Agent FORCE, the investigation has revealed among other things that:

- 20 a. FORCE created certain fictitious personas -- that were not officially sanctioned -- to
21 communicate with DPR, the target of FORCE's investigation. Using one of these
22 personas, FORCE sought to extort DPR by seeking monetary payment, offering in
23 exchange not to provide the government with certain information if DPR paid \$250,000;
- 24 b. FORCE acted outside the scope of his official role on the Baltimore Silk Road Task
25 Force and created a fictitious persona named "French Maid." Operating as "French
26

27 ¹ Until October 1, 2013, DPR was known to FORCE and the rest of the Baltimore Silk Road
28 Task Force only by his online moniker "Dread Pirate Roberts" or "DPR." Ulbricht was known on the
Silk Road site by the moniker "Dread Pirate Roberts" (DPR) and is referred to hereafter interchangeably
as "DPR" and "Ulbricht."

SA-138

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 5 of 95

1 Maid,” FORCE fraudulently represented to DPR certain information concerning “French
2 Maid’s” true identity and offered to sell DPR information about the government’s
3 investigation into Silk Road in exchange for approximately \$100,000 worth of bitcoin,
4 which DPR paid and FORCE deposited into his own personal accounts;

5 c. FORCE stole and converted to his own personal use a sizeable amount of bitcoins that
6 DPR sent to FORCE in FORCE’s official undercover capacity and rather than turning
7 those bitcoin over to the government, FORCE deposited them into his own personal
8 accounts;

9 d. FORCE engaged in a series of complex transactions between various Bitcoin accounts
10 (known as Bitcoin addresses), his personal digital currency accounts, and his personal
11 bank accounts, including a \$235,000 wire to an overseas account in Panama, all in an
12 effort to launder and conceal the true source of the ill-gotten proceeds;

13 e. FORCE used his official position as a DEA agent to illegally run criminal history checks
14 on individuals for the benefit of a third-party digital currency exchange company,
15 CoinMKT, in which FORCE had personally invested approximately \$110,000 worth of
16 bitcoin;

17 f. FORCE functioned as the de facto Chief Compliance Officer for CoinMKT all the while
18 employed as a DEA agent, even allowing himself to be featured in CoinMKT’s “pitch
19 decks” to venture capital investors and allowing himself to be listed as CoinMKT’s anti-
20 money laundering and/or compliance officer in order to benefit CoinMKT (a company in
21 which FORCE had invested);

22 g. FORCE improperly directed CoinMKT to freeze one of its individual customer’s
23 accounts containing a large amount of digital currency, worth approximately \$297,000,
24 even though he lacked a sufficient legal basis on which to do so, and FORCE then
25 illegally seized those funds and transferred them into his own personal account; and

26 h. FORCE used his supervisor’s signature stamp, without authorization, on an official U.S.
27 Department of Justice subpoena and sent the subpoena to a payments company, Venmo,
28 directing the company to unfreeze his own personal account, which had been previously

SA-139

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 6 of 95

1 frozen due to certain suspicious activity. FORCE then sought to conceal evidence of his
2 improper use of an official subpoena by directing the company not to contact the DEA
3 and attempting to destroy copies of the subpoena. When the company did not comply,
4 FORCE asked another agent on the Baltimore Silk Road Task Force, an IRS agent, to
5 collaborate with him on seizing that company's bank accounts.

6 With respect to former U.S. Secret Service (USSS) Special Agent BRIDGES, the investigation
7 has revealed among other things that:

- 8 a. In late January 2013, members of the Baltimore Silk Road Task Force, to include
9 BRIDGES and FORCE, gained access to a Silk Road website administrator account as a
10 result of the arrest of a former Silk Road employee. On January 25, 2013, the Silk Road
11 website suffered a sizeable theft of bitcoins, bitcoins which were moved into Mt. Gox, a
12 digital currency exchange based in Japan;
- 13 b. On February 12, 2013, BRIDGES formed and registered a personal limited liability
14 company called "Quantum International Investments, LLC," (Quantum), and on February
15 22, 2013, BRIDGES opened an account at Fidelity Investments (Fidelity) in the name of
16 Quantum;
- 17 c. According to records obtained from Fidelity, BRIDGES funded his Quantum Fidelity
18 account exclusively with wire deposits from Mt. Gox in Japan. Specifically, between
19 March 6, 2013 through May 7, 2013, BRIDGES' Quantum Fidelity account in the United
20 States received nine wire transfers from Mt. Gox totaling approximately \$820,000;
- 21 d. Despite having personally benefitted in the amount of \$820,000 from a Mt. Gox account
22 and receiving a large wire on May 7, 2013 from Mt. Gox, just two days later on May 9,
23 2013, BRIDGES served as the affiant on a multi-million dollar seizure warrant for Mt.
24 Gox and its owner's bank accounts; and
- 25 e. Upon learning of the government's criminal investigation into the Baltimore Silk Road
26 Task Force based in the Northern District of California, and following an interview by
27 the FBI as part of the criminal investigation, BRIDGES transferred over \$250,000 out of
28

SA-140

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 7 of 95

1 his Quantum Fidelity account via wire transfers into another bank account held by
2 himself and a third-party.

3 Because this affidavit is for the limited purpose of establishing probable cause for the crimes
4 proposed to be charged at the present time, it does not include certain additional facts known to me and
5 the government's investigation continues.

III. RELEVANT STATUTES

6
7 Based on my training and experience and the facts as set forth in this affidavit, there is probable
8 cause to believe that FORCE has committed violations of law to include Title 18, United States Code,
9 Section 1343 (Wire Fraud), Title 18, United States Code, Section 641 (Theft of Government Property),
10 Title 18, United States Code, Section 1956 (Money Laundering), and Title 18, United States Code,
11 Section 208 (Conflict of Interest). There is also probable cause to believe that BRIDGES has committed
12 violations of law to include Title 18, United States Code, Section 1343 (Wire Fraud) and Title 18,
13 United States Code, Section 1956 (Money Laundering).

14 **Title 18 U.S.C. § 641** prohibits embezzling, stealing, or converting any property belonging to the
15 United States worth more than \$1,000. The essential elements of this offense are: (1) the defendant
16 knowingly embezzled, stole, or converted to the defendant's use or the use of another the money or
17 property of value with the intention of depriving the owner of the use or benefit of the money or
18 property; (2) the money or property belonged to the United States; and (3) the value of the money or
19 property was more than \$1,000. See Ninth Circuit Instruction 8.39.

20 **Title 18 U.S.C. § 1343** prohibits wire fraud. The essential elements of this offense are: (1) the
21 defendant knowingly participated in, devised or intended to devise a scheme or plan to defraud, or a
22 scheme or plan for obtaining money or property by means of false or fraudulent pretenses,
23 representations, or promises; (2) the statements made or facts omitted as part of the scheme were
24 material, that is they had a natural tendency to influence, or were capable of influencing, a person to part
25 with money or property; (3) the defendant acted with the intent to defraud, that is, the intent to deceive
26 or cheat; and (4) the defendant used, or caused to be used, a wire communication to carry out, or attempt
27 to carry out an essential part of the scheme. See Ninth Circuit Instruction 8.124.

SA-141

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 8 of 95

1 **Title 18 U.S.C. § 1956(a)(1)(B)(i)** prohibits the laundering of proceeds from “specified unlawful
2 activity” (SUA). The essential elements are: (1) the defendant conducted or intended to conduct a
3 financial transaction involving property that represented the proceeds of specified unlawful activity; (2)
4 the defendant knew that the property represented the proceeds of specified unlawful activity; (3) the
5 defendant knew the transaction was designed in whole or in part to conceal or disguise the nature,
6 location, source, ownership, or control of the proceeds of the specified unlawful activity; and (4) the
7 defendant did something that was a substantial step toward committing the crime. See Ninth Circuit
8 Model Jury Instruction 8.147. The money laundering statute specifically identifies both § 1343 wire
9 fraud and § 641 theft of government property as “specified unlawful activity.”

10 **Title 18 U.S.C. § 208** prohibits federal employees from taking certain acts affecting a personal
11 financial interest. Although there is no Ninth Circuit model instruction for this statute, caselaw
12 establishes that the essential elements are: (1) the defendant was an officer or employee of the Executive
13 Branch of the United States; (2) the defendant participated personally and substantially as a government
14 employee through decision, approval, disapproval, recommendation, rendering of advice, investigation
15 or otherwise in a matter; and (3) the defendant knew that he had a financial interest in the particular
16 matter in which he was participating.

IV. BACKGROUND

17
18 FORCE was employed as a DEA Special Agent for approximately 15 years. He began his career
19 with the DEA in September 1999 and served in Denver, Puerto Rico, and Baltimore. FORCE resigned
20 on May 4, 2014, shortly after law enforcement began the current investigation.

21 FORCE received approximately \$150,000 in annual salary from the DEA. Based on my
22 investigation, during the relevant timeframe of 2012 into 2014, his wife was a homemaker and the
23 household had no significant outside income.

24 FORCE used one of his personal bank accounts to receive several large international and
25 domestic wire and Automated Clearing House (ACH) transfers throughout the latter half of 2013 and
26 first half of 2014. I have reviewed FORCE’s bank records, and two personal checking accounts in
27 FORCE’s name reveal incoming deposits totaling at least approximately \$757,000 for the roughly year
28

SA-142

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 9 of 95

1 long period beginning April 2013 through May 2014.² This does not include amounts deposited from
2 May 2014 onward. I have also learned through my investigation that during this timeframe FORCE
3 paid off his mortgage, a government thrift savings plan loan, and wrote several very large checks for
4 tens of thousands of dollars. In 2014, FORCE made investments in real properties, in businesses, and
5 wired hundreds of thousands of dollars into an overseas account.

6 From 2013 through the present, FORCE has held numerous accounts in his own name and with
7 his own personal identifiers³ at a variety of digital currency exchanges around the world, including in the
8 Northern District of California. Moreover, in April 2014, FORCE established a company called Engedi,
9 LLC. According to documents filed with the Maryland Secretary of State, Engedi, LLC's purpose is to
10 speculate and invest in Bitcoin.

11 Like FORCE, BRIDGES was a member of the Baltimore Silk Road Task Force. Until his abrupt
12 resignation on March 18, 2015, after learning he was a subject of this investigation, BRIDGES was
13 employed as a U.S. Secret Service (USSS) Special Agent for approximately six years. He began his
14 career with USSS in October 2009 and served in its Baltimore Field Office. After the Baltimore Silk
15 Road Task Force ended, BRIDGES remained part of the USSS Electronic Crimes Task Force in
16 Maryland. In this role, he served as the affiant on numerous seizure warrants.

17 On January 25, 2013, the Silk Road website suffered a sizeable theft of Bitcoin, a theft with
18 which BRIDGES was associated. For reasons discussed below, I believe the proceeds of this theft were
19 transferred to the Mt. Gox exchange in Japan. On February 12, 2013, not long after the Silk Road thefts
20 occurred, BRIDGES formed a company called Quantum International Investments, LLC (Quantum).
21 On February 22, 2013, BRIDGES established a personal investment account at Fidelity Investments
22 (Fidelity) in the name of Quantum.

23 BRIDGES used that Fidelity account to receive several large international wire transfers from
24 Japan, specifically from Mt. Gox, throughout the March through May 2013 timeframe. There were nine
25

26
27 ² Approximately \$330,000 was deposited in 2013 and approximately \$427,000 was deposited in
28 2014. This does not include the deposits made after this period that are discussed further below.

³ These personal accounts use FORCE's home address, and link to his personal bank and email
account information.

SA-143

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 10 of 95

1 wire transfers from Mt. Gox to BRIDGES' Quantum Fidelity account, and each was just under
2 \$100,000. This account was funded exclusively with deposits from Mt. Gox.

3 Just two days after receiving his last Mt. Gox wire on May 7, 2013, BRIDGES served in his
4 official capacity as the affiant on a May 9, 2013 seizure warrant where he seized over \$2.1 million from
5 Mt. Gox, under the theory Mt. Gox was operating in violation of 18 U.S.C. Section 1960, which
6 prohibits the operation of an unregistered money service business.

7 After learning of this investigation into the Baltimore Silk Road Task Force and after being
8 interviewed by federal law enforcement in the summer of 2014, BRIDGES transferred via two separate
9 interstate wires over \$250,000 from his Quantum Fidelity account into an account at another bank that
10 was held in his own name and in the name of a third-party (with whom BRIDGES has a personal
11 relationship).

V. BITCOIN BACKGROUND

12
13 Bitcoin⁴ is a form of decentralized, convertible virtual currency that exists through the use of an
14 online, decentralized ledger system. While Bitcoin mainly exists as an internet-based form of currency,
15 it is possible to "print out" the necessary information and exchange Bitcoin via physical medium. The
16 currency is not issued by any government, bank, or company, but rather is generated and controlled
17 through computer software operating via a decentralized network. To acquire bitcoins, a typical user
18 will purchase them from a Bitcoin seller or "exchanger." It is also possible to "mine" bitcoin by
19 verifying other users' transactions. Bitcoin is just one form of digital currency, and there are a
20 significant number of other varieties of digital currency.

21 Bitcoin exchangers typically accept payments of fiat currency (currency which derives its value
22 from government regulation or law), or other convertible virtual currencies in order to obtain bitcoins.
23 When a user wishes to purchase bitcoins from an exchanger, the user will typically send payment in the
24 form of fiat or other convertible virtual currency to an exchanger, usually via wire or ACH, for the
25 corresponding number of bitcoins based on a fluctuating exchange rate. The exchanger, often for a
26

27 ⁴ Since Bitcoin is both a currency and a protocol, capitalization differs. Accepted practice is to
28 use "Bitcoin" (singular with an upper case letter B) to label the protocol, software, and community, and
"bitcoin" or "bitcoins" (with a lower case b) to label units of the currency and that practice is adopted
here.

SA-144

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 11 of 95

1 commission, will then typically attempt to broker the purchase with another user of the exchange that is
2 trying to sell bitcoins, or, in some instances, will act as the seller itself. If the exchanger can place a
3 buyer with a seller, then the transaction can be completed.

4 When a user acquires bitcoins, they are sent to the user's Bitcoin address. This is somewhat
5 analogous to a bank account number, which is comprised of a case-sensitive string of letters and
6 numbers amounting to a total of 26 to 35 characters. The user can then conduct transactions with other
7 Bitcoin users, by transferring bitcoins to their Bitcoin addresses, via the internet.

8 Little to no personally identifiable information about the payer or payee is transmitted in a
9 Bitcoin transaction. Bitcoin transactions occur using a public key and a private key. A public key is
10 used to receive bitcoins and a private key is used to allow withdrawals from a Bitcoin address. Only the
11 Bitcoin address of the receiving party and the sender's private key are needed to complete the
12 transaction, which by themselves rarely reflect any identifying information.

13 All Bitcoin transactions are recorded on what is known as the block chain. This is essentially a
14 distributed public ledger that keeps track of all Bitcoin transactions, incoming and outgoing, and updates
15 approximately six times per hour. The block chain records every Bitcoin address that has ever received
16 a bitcoin and maintains records of every transaction and all the known balances for each Bitcoin address.

17 Digital currencies, including Bitcoin, have many known legitimate uses. However, much like
18 cash, bitcoins can be used to facilitate illicit transactions and to launder criminal proceeds, given the
19 ease with which they can be used to move money anonymously. As is demonstrated herein, however, in
20 some circumstances bitcoin payments may be traced to accounts at traditional financial institutions using
21 the block chain.

VI. SILK ROAD BACKGROUND

22
23 The Silk Road website was established in early 2011 and operated until on or about October 2,
24 2013, when it was seized by law enforcement. The illegal nature of the commerce hosted on Silk Road
25 was readily apparent to anyone visiting the site. The vast majority of the goods for sale consisted of
26 illegal drugs of nearly every variety, openly advertised on the site as such and prominently visible on the
27 home page. The only form of payment accepted on Silk Road was Bitcoin.

SA-145

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 12 of 95

1 Silk Road was only accessible through the TOR network, a special network on the internet
 2 designed to conceal the true IP addresses of the computers on the network, and, thereby, the identities of
 3 the network's users. TOR stands for "The Onion Router."

4 Every Silk Road user had at least one Bitcoin address associated with the user's Silk Road
 5 account, where deposits to the account could be sent. To make purchases on the site, the user first had
 6 to obtain Bitcoin (for example, from an exchanger) and have them sent to the bitcoin deposit address
 7 associated with the user's Silk Road account. After thus funding the account, the user could make
 8 purchases from Silk Road vendors.

9 A federal grand jury sitting in the Southern District of New York indicted Ross William
 10 Ulbricht, also known as "DPR," as being the creator of Silk Road and engaging in a drug conspiracy in
 11 violation of 21 U.S.C. Section 846, among other charges. The matter proceeded to a multi-week trial in
 12 January 2015 before U.S. District Judge Katherine B. Forrest. Evidence at that trial, and other evidence
 13 of which I am aware, establishes that from late 2012 through his arrest on October 1, 2013, Ulbricht
 14 (DPR) was residing in and ran the Silk Road from San Francisco. On or about February 4, 2015, a
 15 federal jury sitting in the Southern District of New York convicted Ulbricht of all counts with which he
 16 was charged. Sentencing is set for May 15, 2015. ADDITIONAL PARAGRAPH PROVIDED TO
 17 COURT IN SEPARATE UNDER SEAL FILING IS REDACTED HERE.

18 Aside from the New York case, on October 1, 2013, the District of Maryland charged Ulbricht
 19 with murder-for-hire and related drug-conspiracy charges.⁵ It is the District of Maryland's investigation
 20 and case in which FORCE and BRIDGES were involved.

21 **VII. FORCE PROBABLE CAUSE**

22 **FORCE's Official Undercover Role On Baltimore's Silk Road Task Force**

23 As described above, FORCE, BRIDGES, and other law enforcement agents from the Department
 24 of Homeland Security, Internal Revenue Service, and the U.S. Postal Inspection Service,⁶ worked on a
 25

26 ⁵ The District of Maryland had previously charged "John Doe a/k/a Dread Pirate Roberts" with
 27 these charges on or about May 1, 2013, at which time the District of Maryland was unsure of the true
 identity of DPR. The District of Maryland subsequently charged Ulbricht with these offenses after an
 IRS Special Agent on the Southern District of New York's investigation identified DPR as Ulbricht.

28 ⁶ The Bureau of Alcohol, Tobacco & Firearms (ATF) was part of the Baltimore Silk Road Task
 Force early on, but their involvement did not last long.

SA-146

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 13 of 95

1 task force out of Baltimore dedicated to identifying and apprehending DPR, later determined to be Ross
2 Ulbricht.

3 As part of his official role in the Baltimore Silk Road investigation, FORCE communicated with
4 DPR using an undercover identity, hereafter referred to as "Nob." Nob (FORCE) and DPR
5 communicated throughout 2012 and 2013 using a variety of methods of communication, including on a
6 private messaging system on the Silk Road website and on chat programs that operated over the TOR
7 network. Their communications reveal that DPR believed Nob to be a drug smuggler operating in the
8 United States with connections to criminal organizations throughout the world. In reality, of course,
9 Nob was FORCE, an undercover DEA agent. Many but not all of their communications were encrypted,
10 as discussed further below.

11 Some portion of the communications between DPR and Nob (FORCE) are memorialized in
12 FORCE's official case file, preserved in what are known as DEA 6s, which are official reports of the
13 DEA's investigation. Some of the communications are also preserved on FORCE's official computers.
14 However, not all of the communications between DPR and Nob (FORCE) were memorialized.

15 At the time of Ulbricht's arrest, law enforcement seized a laptop computer from Ulbricht's
16 person. This computer has been forensically analyzed. It, too, contained evidence of communications
17 between DPR and Nob (FORCE). It also contained certain communications between DPR and FORCE
18 that FORCE did not memorialize in his official reports or as part of his official case file.

19 Ulbricht's computer also contained a handful of files that appear to be Ulbricht's notes to
20 himself. One such file is named "LE counterintel" which your affiant believes stands for "Law
21 Enforcement Counterintelligence" and contains information that DPR was receiving from purported
22 "inside" law enforcement sources. I have reviewed these files and believe that they contain information
23 that came from a person or persons inside law enforcement, in part because of their substance and in part
24 because of their use of certain terminology and acronyms that are not widely known by the public.

SA-147

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 14 of 95

1 Prior to his arrest, DPR was known to have been hiding his true identity and location from law
2 enforcement, so information concerning the government's investigation was material and valuable to
3 him.

4 I have reviewed many of the communications between DPR and Nob (FORCE) that are
5 available. At some point, Nob (FORCE) and DPR began encrypting certain of these communications
6 using what is known as PGP encryption. PGP stands for "pretty good privacy" and is an encryption
7 algorithm that allows its users to send encrypted conversations through messaging or chat services.
8 Much like the way bitcoins are controlled, PGP too uses a system of public keys and private keys. With
9 PGP, a public key is used to encrypt a message for a specific user to read, and a private key is used by
10 the recipient to decrypt the message. In addition to needing a private key to decrypt a message, a user
11 must also possess a unique password that was established at the time of creation to decrypt or sign a
12 message.

13 A review of FORCE's official case file does not contain any of the private PGP keys or
14 passwords needed to decrypt FORCE's encrypted communications with DPR. Nor did FORCE provide
15 these private PGP keys to the prosecutor on the Baltimore case or to those in his chain-of-command.
16 Instead, FORCE appears to have been the only individual to have possessed the private PGP keys and
17 passwords needed to unlock his communication with DPR. This is notable, because as a law
18 enforcement agent, I know that one of the chief concerns in working an investigation and building
19 evidence is the ability to obtain decipherable, admissible evidence for use in later proceedings.

20 Despite his involvement in the Baltimore Silk Road investigation, and knowledge that other law
21 enforcement would be unable to read encrypted communications without the private PGP keys, FORCE,
22 acting as Nob, specifically instructed DPR to use PGP to encrypt messages relating to the investigation.
23 While this request may have enhanced Nob's (FORCE's) credibility to DPR as a "criminal," thereby
24 furthering his cover, it would have made it difficult for FORCE to document the communications,
25 communications that would be of use to law enforcement making a case against DPR at a later date.
26 Even if encrypting messages to DPR would make Nob more credible, the communications should have
27 been documented, in deciphered form, and memorialized in the case file.

SA-148

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 15 of 95

1 I have conferred with other law enforcement agents who conduct online undercover operations
2 and believe the failure to preserve the private PGP keys while simultaneously directing a target to use
3 PGP to encrypt messages makes little sense in the context of a law enforcement investigation,
4 particularly taking into account that this task force involved multiple law enforcement officers, all of
5 whom might require access to the evidence FORCE gathered in his dealings with DPR: In the event
6 FORCE were to lose the PGP private keys, or that something were to happen to FORCE, any evidence
7 contained in the encrypted PGP format would effectively be lost and unusable without the private key.
8 FORCE's apparent failure to document the private PGP keys for his communications with DPR
9 anywhere in his case file, or to provide them to others at the DEA or to the prosecutor, leads me to
10 believe he did not want anyone other than himself (FORCE) to be able to decrypt certain of those
11 communications, and that, as a result, he sought deliberately to undermine the integrity of the ongoing
12 Baltimore Silk Road Task Force investigation.

13 Although in the beginning of his time communicating with DPR, FORCE (as Nob) occasionally
14 provided certain decrypted communications to others on the Task Force, including the prosecutor with
15 whom he was working, FORCE did not provide all communications in decrypted form. This was
16 despite the fact that the prosecutor with whom FORCE was working repeatedly emphasized the need for
17 FORCE to provide all encrypted communications. In fact, toward the end of the timeframe in which
18 Nob (FORCE) was in relatively heavy communication with DPR, FORCE increasingly was not
19 providing the decrypted versions of their communication.

20 **FORCE's Theft of 525 Bitcoins Coming from Ulbricht, a/k/a "DPR"**

21 In his communications with DPR, Nob (FORCE) created the fiction that Nob had sensitive
22 information that he would provide to DPR, often in exchange for payment, including law enforcement
23 sensitive information.

24 One of the cover stories that Nob (FORCE) created with DPR was that Nob had access to a
25 corrupt government employee, fictionally named "Kevin." Ironically, "Kevin" was supposed to be a
26 corrupt Department of Justice case agent on the government's Silk Road investigation and
27 simultaneously on Nob's payroll, who would feed Nob information about law enforcement's
28

SA-149

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 16 of 95

1 investigation into the Silk Road. FORCE memorialized this cover story concerning “Kevin” in a DEA 6
2 dated August 1, 2013 (the “August DEA 6”).

3 DPR subsequently paid Nob (FORCE) in bitcoins on at least two occasions. One payment was
4 in June 2013 for 400 bitcoins⁷ for fraudulent identification documents that Nob was supposed to provide
5 to DPR. A second payment was in August 2013 for 525 bitcoins for “Kevin’s” inside law enforcement
6 information. At the time of the payments, 400 bitcoins would have been worth approximately \$40,000
7 and 525 bitcoins would have been worth approximately \$50,000.⁸ Both the June 400 bitcoin payment
8 and the August 525 bitcoin payment became official government property once DPR made the
9 payments: they were received as part of FORCE’s official undercover role from the target of a federal
10 investigation and therefore became undercover proceeds.

11 As is described further below, rather than properly documenting these payments, and
12 safeguarding them in a government account, FORCE took custody of the payments and deposited the
13 bulk of the 400 bitcoin payment and all of the 525 bitcoin payment into his own personal account.
14 Records received from a digital currency exchange, CampBX, reveal that FORCE maintained a personal
15 account there that was linked directly to two additional personal accounts belonging to FORCE: (1)
16 FORCE’s account at another digital currency exchange, Bitstamp, and (2) FORCE’s account at a
17 payments processing account, Dwolla, neither of which were government or official accounts.⁹

18 In the August DEA 6, FORCE memorialized the fact that he, acting as Nob, sent a PGP-
19 encrypted communication to DPR. According to the August DEA 6, Nob (FORCE) “advised DPR that
20

21 ⁷ The 400 bitcoin payment was actually an 800 bitcoin payment but Nob (FORCE) refunded
DPR 400 bitcoins because the deal for the fraudulent identification documents allegedly fell through.

22 ⁸ These are very conservative estimates and the actual loss amount is likely greater than these
23 amounts: FORCE himself valued the 400 bitcoin payment as being equal to \$76,800 on October 22,
24 2013, and not \$40,000 as described here. The reason for the difference concerns the fluctuating value of
25 bitcoin during this timeframe. The value of bitcoin at the time of the June 2013 payment was
26 approximately \$100 per bitcoin, yielding the \$40,000 approximation provided here. However, the value
at the time of FORCE’s own valuation of the 400 bitcoin payment in October 2013 was approximately
\$192 per bitcoin. It should also be noted that during the time that FORCE was liquidating bitcoins
through his own personal accounts, the value of bitcoin fluctuated dramatically ranging from less than
\$300 per bitcoin to over \$1100 per bitcoin.

27 ⁹ FORCE maintained a separate account at Dwolla in the name of his official undercover
28 identity. In contrast, FORCE’s personal account at Dwolla was in his own name and established using
his own personal identifiers such as Social Security number, home address, personal email and date of
birth.

SA-150

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 17 of 95

1 'Kevin' wanted a 'donation' of bitcoins from DPR, the inference being that the information on the Silk
2 Road investigation is valuable." The August DEA 6 further specifies that "Special Agent FORCE
3 provided a Bitcoin wallet address" for DPR to deposit the Bitcoin payment for "Kevin's" information.
4 However, FORCE made an "Agent's Note" at the bottom of the August DEA 6 explicitly stating that
5 DPR never made the payment, writing "**AGENT'S NOTE: DPR made no such payment.**" (emphasis
6 added).

7 The August DEA 6 is also notable for what information it does not contain. It does not include
8 the actual Bitcoin public address that Nob (FORCE) provided to DPR to receive payment for "Kevin's"
9 information. Including this information would have allowed other law enforcement agents to trace any
10 payment if made. Nor does the August DEA 6 list or document the PGP encryption password that
11 would be subsequently needed to decipher the encrypted communication between DPR and Nob
12 (FORCE) concerning "Kevin's" information or the information surrounding the payment for that
13 information.

14 However, certain communications between Nob (FORCE) and DPR were maintained on the
15 server that hosted the Silk Road website, which the FBI imaged as part of the Southern District of New
16 York investigation. I have obtained and reviewed a copy of that server and it contains the
17 communications between Nob (FORCE) and DPR, including certain communications that FORCE does
18 not appear to have memorialized in the official case file. The server contains a chain of messages
19 between DPR and Nob (FORCE) from July 31, 2013 through August 4, 2013. With the exception of
20 one message DPR authored, the messages in the chain are completely encrypted.

21 That sole unencrypted message in this chain is from DPR to Nob (FORCE). It is dated August 4,
22 2013, and concerns a payment DPR made for "Kevin's" information. Specifically, DPR wrote: "I could
23 not decrypt your second message, got an error. I could decrypt the first, **and have sent the 525 btc as**
24 **requested.** Please keep me posted and you have my word that no one else knows anything about this.
25 I'm sorry I didn't know how much to send before. I was afraid of offending if I sent too little and
26 looking foolish if I sent too much. I hope I didn't make things too difficult for you." (emphasis added).

27 Within approximately two hours of DPR sending the message described above, Nob (FORCE)
28

SA-151

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 18 of 95

1 responded to DPR with an encrypted message but containing the unencrypted subject line, "use PGP!"
2 As noted, PGP stands for "Pretty Good Privacy," an encryption mechanism. In other words, FORCE
3 was directing DPR to encrypt his messages. Following the message containing the unencrypted subject
4 line were a series of additional back and forth encrypted PGP messages between Nob (FORCE) and
5 DPR.

6 I know from other law enforcement agents who conduct undercover operations on TOR and
7 black market sites that there is little reason to direct a target who is using clear communication to instead
8 use encrypted communication, and no reason to fail to document a decryption mechanism in the case file
9 or share it with other agents, management, or the prosecutor.

10 Again, FORCE did not memorialize the PGP private encryption key that could be used to
11 decipher the July 31-August 4, 2013, encrypted communication chain between himself and DPR
12 anywhere in his case file or provide it to anyone else at the DEA or to the prosecutor with whom he was
13 working. Furthermore, the last mention of DPR's payment for "Kevin's" information in FORCE's
14 official DEA case file is the August DEA 6, in which FORCE specifically stated that no payment was
15 ever received. Nor are there any subsequent DEA 6s correcting or amending this. In fact, a review of
16 FORCE's official case file reveals that FORCE never documented having received a 525 Bitcoin
17 payment from DPR, as DPR's August 4, 2013, communication to Nob (FORCE) states had occurred.

18 I believe that FORCE, acting as Nob, instructed DPR to use PGP encryption in part to conceal
19 the fact that DPR actually had made a 525 bitcoin payment to Nob (FORCE) that FORCE was not
20 detailing in his official law enforcement reports. This conclusion is bolstered by the fact that in the
21 August DEA 6 FORCE took care to explicitly note the fact in the "AGENT'S NOTE: DPR made no
22 such payment," and there is no subsequent DEA 6 in which FORCE states that DPR did transmit a 525
23 bitcoin payment. It is further bolstered by the fact that FORCE does not appear to have memorialized
24 the PGP encryption keys for his communications with DPR anywhere in the official case file. Finally,
25 when DPR mentioned the 525 bitcoin payment in the August 4 communication, the first response
26 FORCE acting as Nob gave was "use PGP!"

27 Notably, by late July 2013, the Baltimore Silk Road Task Force had been made aware that the
28 FBI was seeking to obtain an image of the Silk Road server, and therefore FORCE may have had reason

SA-152

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 19 of 95

1 to fear that any communications between himself and DPR would be accessible to the FBI in the event
2 the FBI was successful in imaging the server.

3 Records obtained from FORCE's personal digital currency account at a digital currency
4 exchange company, CampBX, reveal that on September 27, 2013, FORCE deposited the precise amount
5 of 525 bitcoins into his own personal account at CampBX.¹⁰

6 I have performed an analysis of the block chain as it concerns the 525 bitcoin deposit to
7 FORCE's personal CampBX account. The analysis reveals that the 525 bitcoins FORCE received into
8 his own personal CampBX account was directly linked, through a series of transactions, to the 525
9 bitcoin payment that DPR made on August 4, 2013, i.e. the same day DPR communicated to Nob
10 (FORCE) that he had "sent the 525 BTC as requested."

11 Records from the Silk Road servers establish that this 525 bitcoin payment originated from
12 DPR's Silk Road account on August 4, 2013. Specifically, the 525 bitcoin payment was split into four
13 smaller payments and made in the following manner:

- 14 a. On August 4, 2013 at 22:05 UTC a payment of 203 bitcoins
- 15 b. On August 4, 2013 at 22:05 UTC a payment of 134 bitcoins
- 16 c. On August 4, 2013 at 22:05 UTC a payment of 61 bitcoins
- 17 d. On August 4, 2013 at 22:01 UTC a payment of 127 bitcoins

18 The 525 bitcoin payment went from four addresses and ultimately landed in a single pass-
19 through account on September 1, 2013. The 525 bitcoin remained in the pass-through account from
20 September 1, 2013 until September 27, 2013, when they were transferred into FORCE's personal
21 account at CampBX. These transactions are depicted on "Trace of 525 Bitcoin Payment," attached as
22 Exhibit B.

23 Notably, FORCE treated DPR's June 400 bitcoin payment differently from the way he treated
24 the August 525 bitcoin payment. To be sure, FORCE wrongfully deposited substantial portions of both
25

26 ¹⁰ The September 27, 2013 date has significance because email records I have reviewed indicate
27 that, at the latest on September 27, 2013, FORCE learned that DPR was about to be apprehended as part
28 of the separate New York investigation into the Silk Road. In response to learning this information,
FORCE wrote to the prosecutor with whom he was working inquiring as to the true name and
identifying information of DPR. To my knowledge, FORCE was not provided with that information on
September 27, 2013 in response to his inquiry.

SA-153

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 20 of 95

1 payments into his own personal account at CampBX, and later transferred them to another of his
2 personal accounts at Bitstamp, another digital currency exchange where FORCE maintained a personal
3 account. However, FORCE memorialized the 400 bitcoin payment in a DEA 6 (albeit many months
4 after the June 400 bitcoin payment was made) and in January 2014 attempted to put together a seizure
5 warrant for that 400 bitcoin payment. He did not do any of this for the 525 bitcoin payment.

6 And as part of the process of putting together a seizure warrant for the 400 bitcoin payment, the
7 federal prosecutor with whom FORCE was working emailed FORCE on January 16, 2014, and asked
8 him a series of questions, including where the 400 bitcoins physically were. FORCE replied in an email
9 later that day that the 400 bitcoins were "at the DEA." Based on my review of records and an analysis
10 of the block chain, this was not true. And, with respect to the 525 bitcoins, FORCE never made any
11 attempt to memorialize the payment or to prepare a seizure warrant. The federal prosecutor with whom
12 FORCE was working was unaware of any 525 bitcoin payment ever having been made, as were
13 FORCE's superiors at the DEA.

14 As part of this investigation, a federal search warrant was issued to search various personal email
15 facilities belonging to FORCE. One such email account contained what appears to be a note to himself
16 saved in a drafts folder. This note references two transfers of bitcoin payments from DPR, one made in
17 "June/July 2013 for the fraudulent UK identification" and one made on August 4, 2013, the same date
18 that DPR transferred 525 bitcoins to Nob (FORCE). See Exhibit C attached ("Draft Note"). In other
19 words, FORCE's own saved email note indicates there was a payment from DPR on August 4, 2013.¹¹
20 The note also appears to attempt to justify FORCE's conduct, noting that the government actually made
21 money during the time FORCE retained the payments (presumably given the fluctuating value of
22 Bitcoin).

23 At the time of the 525 bitcoin payment and during the time of the communications between Nob
24 (FORCE) and DPR, I have confirmed via internet service provider records and a variety of other means
25 that DPR (Ross Ulbricht) was physically located in San Francisco, in the Northern District of California.
26

27
28 ¹¹ For reasons that are currently unknown to me, FORCE characterized the August 4, 2013
payment as being for 200 bitcoins. However, as demonstrated above, the August 4, 2013 payment was
for 525 bitcoins.

SA-154

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 21 of 95

1 Based on the fact that DPR paid 525 bitcoins to Nob (FORCE) in FORCE's official government
2 capacity as an undercover agent on Baltimore's Silk Road case, and based on the fact that the 525
3 bitcoins ultimately ended up in FORCE's personal account with CampBX, **there is probable cause to**
4 **believe that FORCE embezzled, converted, or stole government property in violation of 18 U.S.C.**
5 **Section 641.** Given that these bitcoins went through several different accounts, often for short periods
6 of time, as depicted in Exhibit B, and sat idle in a pass-through account from September 1, 2013 through
7 September 27, 2013, before making their way to FORCE's personal account with CampBX on
8 September 27, 2013, **there is also probable cause to believe that FORCE was attempting to conceal**
9 **the source of the true source of the proceeds, in violation of 18 U.S.C. Section 1956.**

10 **FORCE's Fraud as "French Maid"**

11 The only officially-sanctioned undercover identity for FORCE to communicate with DPR was as
12 Nob. Nob was the persona that was discussed in FORCE's official reports. "Nob" was also the persona
13 of which others in FORCE's chain-of-command and the federal prosecutor on the Baltimore Silk Road
14 case were aware.

15 When DPR was arrested in San Francisco, he was caught literally in the act of running the Silk
16 Road on a laptop computer. The FBI seized and forensically examined that laptop and its contents were
17 part of the government's proof at trial against Ulbricht. As discussed above, Ulbricht's laptop contained
18 a text document entitled "LE counterintel," a record of sorts that he maintained about information he
19 was receiving from apparent law enforcement "insiders" purporting to have knowledge about the
20 government's investigation into the Silk Road. The file appears to contain cut and pasted sections of
21 what the insiders were relaying to him through online chats or private messages.

22 One such insider used the moniker "French Maid." Notes in a file from Ulbricht's computer
23 indicate that he paid "French Maid" approximately \$100,000 worth of bitcoin in exchange for a name
24 that he was told Mark Karpeles had provided to law enforcement. Mark Karpeles was at the time the
25 CEO of the now-defunct Mt. Gox digital currency exchange. The Baltimore Silk Road Task Force was
26 attempting to arrange an interview of Karpeles during the July to August 2013 timeframe, in order to
27 obtain any information Karpeles might have had concerning the operator of Silk Road.

SA-155

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 22 of 95

1 Specifically, in a text document recovered from Ulbricht's computer titled "log," there is an
2 entry dated September 13, 2013, in which Ulbricht wrote: "French Maid claims that mark karpeles has
3 given my name to DHLS [sic]. I offered him \$100K for the name." Days later,¹² Ulbricht wrote "I paid
4 French Maid \$100K for the name given to DHLS by karpeles." Our investigation has revealed that there
5 is probable cause to believe that FORCE was "French Maid," a source that Ulbricht paid for inside
6 information.

7 I have reviewed private messages between "French Maid" (FORCE) and DPR obtained from the
8 Silk Road server imaged by the FBI. The messages span from August 26, 2013 through September 14,
9 2013. The bulk of the messages are encrypted with PGP keys, but some early messages are not
10 encrypted. In the first message in this thread, dated August 26, 2013, "French Maid" wrote to DPR: "I
11 have received important information that you need to know asap. Please provide me with your public
12 key for PGP. Carl." (Emphasis added).

13 Just four hours later, "French Maid" sent a follow-up message to DPR with the subject line
14 "**Whoops!**" and a message stating "I am sorry about that. My name is Carla Sophia and I have many
15 boyfriends and girlfriends on the market place. DPR will want to hear what I have to say ;) xoxoxo."
16 (Emphasis added).

17 What follow are a series of back and forth encrypted messages between DPR and "French
18 Maid." Of particular note, there are several encrypted messages between DPR and "French Maid" on
19 September 13, 2013, with "French Maid" including the subject line "Hope you like." It is unclear
20 whether "French Maid" ever provided DPR with any name. In the "log" file recovered from Ulbricht's
21 computer, after the entry stating that he had "paid French maid \$100k for the name given to DHLS by
22 karpeles," there is an entry stating: "He hasn't replied for 4 days." There is no further entry in the "log"
23 file regarding "French Maid."

24 The fact that the Baltimore Silk Road Task Force was attempting to arrange an interview with
25 Karpeles was not widely known in law enforcement circles. In other words, "French Maid" could not
26 have been just anyone out of the universe of law enforcement. It had to have been someone who knew

27
28 ¹² The entry gives only the date range of "September 11-September 18" and does not provide an exact date.

SA-156

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 23 of 95

1 about Baltimore's attempt to arrange an interview with Karpeles.¹³ Based on emails I have reviewed,
2 FORCE was one of a small group of individuals that knew of those discussions.

3 Additional pieces of circumstantial evidence prove that FORCE is "French Maid." Both "French
4 Maid" and FORCE (operating as "Nob") used the exact same brand of PGP software, a free brand called
5 GnuPG. There are different brands of PGP software so it is noteworthy that both FORCE (operating as
6 "Nob") and "French Maid" used the same brand. Not only did FORCE and "French Maid" both use the
7 same brand of PGP software, they also both used the same outdated version of that software, 1.4.12.
8 Version 1.4.12 was released on January 2012, and was replaced with a new version by December 2012,
9 and was one of several versions of GnuPG software.¹⁴ As such, both "French Maid" and FORCE (as
10 Nob) were using a specific, older version of the GnuPG software, and neither of them replaced it with
11 the other (free) versions of GnuPG that came out thereafter.

12 I know based on conversations with another federal agent who is involved in undercover
13 investigations that among TOR users and consumers of PGP software, v1.4.12 version was somewhat
14 outdated by late August 2013 when "French Maid" appeared in communication with DPR for the first
15 time. This is not akin, for example, to two people using the same model of mobile phone but both
16 having software that is out of date. Rather, the outdated version that both "French Maid" and FORCE
17 (as Nob) used is more of a "signature" given the greater number of versions available.

18 There are also additional similarities between FORCE's (Nob's) and "French Maid's" PGP
19 patterns. Both "Nob" and "French Maid" left certain default settings on their PGP software. For one
20 thing, both "French Maid" and FORCE (Nob) left a "tag" that appeared on every message authored from
21 their PGP key revealing the brand and version of PGP software they were using. This is akin to, for
22 example, leaving the phrase "sent from my iPhone" on the bottom of one's emails but with greater
23 detail: it would be akin to leaving a phrase like "sent from my iPhone 6 IOS 8.0.1." Leaving this "tag"
24 on typically reveals that one is dealing with a fairly inexperienced user of PGP, because someone that
25 regularly uses PGP to communicate would normally have changed their settings to omit this tag. After
26

27 ¹³ My understanding is that that the interview with Karpeles never materialized.

28 ¹⁴ FORCE's investigation into Silk Road began in approximately February 2012 and he began
using PGP as "Nob" sometime by approximately April 2012.

SA-157

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 24 of 95

1 all, the entire point behind PGP software is anonymity, so if a user leaves the brand, version, bit, and
2 release date of software on a message this is revealing something about the sender and undermines the
3 goal of remaining 100% anonymous. One of the first things many PGP forums or regular users of PGP
4 software instruct is that a user disable this feature. Moreover, PGP offers choices of 1024, 2048, 3072
5 or 4096 bit encryption keys, with the higher keys giving greater protection. Many of the regular PGP
6 users that were active on the Silk Road chose the 4096 bit keys because of the additional protection the
7 larger key provided. Here both FORCE (as Nob) and “French Maid” used the 2048 bit default
8 encryption key.

9 In addition to the PGP similarities, additional evidence that FORCE is “French Maid” is that the
10 770 bitcoin payment DPR made to “French Maid,” worth approximately \$98,000 at the time, ended up
11 in FORCE’s own personal digital currency account at CampBX. Specifically, Silk Road server data
12 reveals that DPR made a payment on September 15, 2013, for 770 bitcoins. As noted, this is the same
13 time frame when Ulbricht wrote in his journal that he had “paid French Maid \$100K for the name that
14 [K]arpeles provided to DHLS.”

15 An analysis of the block chain reveals that the 770 bitcoin payment was broken up into four
16 separate bitcoin addresses and funneled through a series of pass-through accounts in September 2013.
17 Between September 23, 2013 and September 29, 2013, those four addresses all came together to deposit
18 770 bitcoins in FORCE’s personal account at CampBX. For a detailed analysis of these complex
19 transactions, see attached Exhibit E (“Trace and Analysis of DPR September 2013 Payment to French
20 Maid”). Records obtained from CampBX demonstrate that this was an account held in FORCE’s
21 personal capacity.

22 Moreover, throughout November 2013, a substantial portion (at least 600 bitcoins) of the
23 bitcoins in FORCE’s CampBX account moved to FORCE’s personal account at Bitstamp, a global
24 digital currency exchange. Again here, records obtained from Bitstamp demonstrate that FORCE used
25 his personal identifiers, home address, date of birth, personal bank account, and personal email address
26 in connection with his Bitstamp account. As is discussed further below, FORCE subsequently
27 liquidated hundreds of thousands of dollars worth of bitcoin from this Bitstamp account by having the
28 proceeds wired into his personal checking account.

SA-158

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 25 of 95

1 From having reviewed the entries from the “log” file on Ulbricht’s computer and the
2 unencrypted portion of the “French Maid” and DPR messages, I believe that FORCE’s statement to
3 DPR that he was “Carla Sophia,” a user on the “market place” with “many girlfriends and boyfriends,”
4 and FORCE’s omission of his true identity, was a material misrepresentation. I believe this information
5 influenced or was capable of influencing DPR whether to part with property, in this case 770 bitcoins,
6 had DPR known that he was not communicating with a female named “Carla Sophia” but instead a male
7 named Carl FORCE who was in fact a federal agent.

8 When DPR made the 770 bitcoin payment and when the communications between “French
9 Maid” (FORCE) and DPR occurred, I have confirmed via internet service provider records and a variety
10 of other means that DPR (Ulbricht) was physically located in San Francisco, in the Northern District of
11 California. Based on the fact FORCE fraudulently told DPR via the use of interstate wires that he was
12 “Carla Sophia,” and that this fact was material, and given that on that basis DPR paid 770 bitcoins to
13 “French Maid” for information, and that FORCE’s personal accounts received 770 bitcoins from DPR
14 during the same September 2013 timeframe, **there is probable cause to believe that FORCE**
15 **committed wire fraud in violation of 18 U.S.C. Section 1343.** Given that, for example 194 bitcoins of
16 this 770 payment went through several different accounts, as depicted in Exhibit E, from September 15,
17 2013 through September 22, 2013, before making its way to FORCE’s personal account with CampBX
18 on September 23, 2013, **there is also probable cause to believe that FORCE was attempting to**
19 **conceal the true source of the proceeds, in violation of 18 U.S.C. Section 1956.**

20 **FORCE’s Extortion of DPR As “Death From Above”**

21 From reviewing one of FORCE’s official reports dated November 12, 2012, I know that around
22 that time FORCE obtained information from Homeland Security Investigations (HSI) about an
23 individual then being considered as a possible suspect for DPR. The individual was named “AA.”
24 [actual name omitted here for confidentiality.] Due to its law-enforcement sensitive nature, FORCE was
25 not permitted to share this information with individuals outside the government.

26 On or about April 1, 2013, FORCE created a fictitious persona on the Silk Road website named
27 “Death from Above.” FORCE, using the “Death from Above,” moniker, solicited a \$250,000 payment
28 from DPR and provided DPR the AA name and personal identifying details. Specifically, on April 1,

SA-159

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 26 of 95

1 2013, "Death from Above" wrote DPR a message on the Silk Road server stating, "I know that you had
2 something to do with [C.G.'s] disappearance and death. Just wanted to let you know that I'm coming
3 for you. Tuque. You are a dead man. Don't think you can elude me. De Oppresso Liber."¹⁵

4 On April 6, 2013, DPR replied: "I don't know who you are or what your problem is but let me
5 tell you one thing: I've been busting my ass every god damn day for over two years to make this place
6 what it is. I keep my head down, I don't get involved with the drama . . . somehow psychotic people
7 still turn up at my doorstep . . . I've been hacked, I've had threats made against the site and now, thanks
8 to you, I've had threats made against my life. I know I am doing a good thing running this site. Your
9 threats and all of the other psychos aren't going to deter me . . . stop messaging me and go find
10 something else to do."

11 Later that day "Death From Above" (FORCE) replied to DPR, this time dropping a reference to
12 AA's name, stating "It's not that easy [AA]. I'm legit. Green Beret. Friend of [C.G.]. I have access to
13 TS/SCI files that FBI, DEA, AFP, SOCA would kill for. In fact, that is what I do . . . kill. The only
14 thing that I do . . . Don't worry DoD has no interest in you and your little website. North Korea and Iran
15 are a lot more important. In fact, as far as the Army and Navy are concerned you are a nobody. Petty
16 drug dealer. But, [C.G.] was somebody. So tell me where he is and we will be done with this."

17 On April 10, 2013, "Death from Above" (FORCE) wrote to DPR again, this time giving DPR
18 details concerning AA including full name, date of birth, citizenship, address, and other personal
19 identifying details. DPR stated, "Is that enough to get your attention? After watching you, there is no
20 way you could have killed [C.G.]. But I think you had something to do with it. So, \$250,000 in U.S.
21 cash/bank transfer and I won't give your identity to law enforcement. Consider it punitive damages.
22 Death From Above."

23 This payment appears to have never materialized, apparently because DPR did not believe
24 "Death From Above's" information: in April 2013 Ulbricht wrote in the "log" file found on his laptop
25

26
27
28 ¹⁵ The entire series of messages that "Death From Above" sent to DPR is not included here for
brevity. The reference to C.G. [N.B. actual name omitted here for confidentiality] was a reference to an
employee of DPR whom DPR had sought to have murdered in January 2013, as explained further below.

SA-160

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 27 of 95

1 that he was “being blackmailed again. Someone says they have my ID, but hasn’t proven it.” Then, on
2 April 11, 2013, Ulbricht wrote “guy blackmailing me who says he has my ID is bogus.”

3 There appears to be no mention of “Death From Above” anywhere in FORCE’s official DEA 6
4 reports. However, FORCE’s case file contains several DVDs of video taken with FORCE’s official
5 DEA laptop with a screen-recording program that shows certain communications with DPR. At some
6 point in that several hours’ worth of video footage there is a clip of a message being typed on the Silk
7 Road using the “Death From Above” account. A screenshot from that video is attached as Exhibit A.
8 Therefore, I believe FORCE was “Death From Above.” Death From Above was not known to
9 FORCE’s superiors at the DEA, or the prosecutor assigned to the investigation, and FORCE was not
10 authorized to disclose information concerning persons under investigation to anyone outside the
11 investigative team, including, of course, disclosing information to the target himself as part of an
12 unsanctioned extortion effort.

13 FORCE’s acting as “Death From Above” demonstrates that FORCE had a history of: (1) creating
14 fictitious personas that he did not memorialize in his official reports or apprise his superiors at the DEA
15 or the prosecutor of; (2) soliciting payments from DPR; and (3) providing law-enforcement sensitive
16 information to outside individuals when the disclosure of such information was not authorized and not
17 memorialized in any official report.

FORCE’s Conflict of Interest with CoinMKT

18
19 CoinMKT is a California-based digital currency exchange company that supports trading
20 between Bitcoin and other cryptocurrencies. I have reviewed a number of emails between FORCE and
21 CoinMKT personnel, including its CEO and Co-Founder. These communications demonstrate that
22 FORCE had a two-fold relationship with CoinMKT: he was both a major investor as well as its de facto
23 compliance officer – all while he was employed as a full-time DEA agent who was investigating digital
24 currency users and providers.

25 According to the emails, in November 2013 FORCE invested approximately \$110,000 worth of
26 bitcoin in CoinMKT in two installments. First, on or about November 8, 2013, FORCE invested
27 approximately \$10,000 worth of bitcoin in CoinMKT. Second, on or about November 25, 2013,
28 FORCE invested approximately \$100,000 more worth of bitcoin in CoinMKT. According to CoinMKT,

SA-161

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 28 of 95

1 the amount of FORCE's investment made him one of the top four investors in its first seed round of
2 fundraising.

3 In addition to his investor status, FORCE was engaged in negotiations with CoinMKT to become
4 its Chief Compliance Officer. Early on in their communications, CoinMKT's CEO flagged the
5 possibility of a conflict with FORCE simultaneously being a DEA agent and serving as CoinMKT's
6 compliance officer, noting in a November 1, 2013 email, "Just FYI if there's a work conflict – I'm not
7 interested in doing anything illegal, so if we have to wait until you're not officially an employee [with
8 DEA] or whatever, then let me know, you're the best judge of that...."

9 On November 16, 2013, CoinMKT's CEO wrote to FORCE asking a few questions. For
10 example:

11 CoinMKT: Where would you work? Would you retain your old job?

12 FORCE: I would work here in Baltimore. I'm not sure how much longer I will be staying
13 here at DEA.

14 CoinMKT: What connections can you bring to the table to help us with compliance?

15 FORCE: I have numerous contacts with IRS-Criminal Investigations, and my Intel Analyst
16 (among others have direct access to FinCEN [Financial Crimes Enforcement
17 Network]) . . . plus I can run queries in criminal databases [database name
omitted] for suspect members of CoinMKT.

18 I know from my training and experience as a law enforcement officer that running checks in
19 government databases such as the one FORCE referred to by name in the email above is strictly
20 forbidden if not for an official law enforcement purpose. In fact, misuse of a government database may
21 violate federal law and expose the offender to potential criminal liability. Nor does it appear that
22 FORCE was speaking in the future tense about what he could do for CoinMKT down the road in the
23 event he left the DEA and had full-time employment with CoinMKT, because his offer to run checks in
24 criminal databases such as the one he mentioned by name would have been contingent upon his
25 remaining an agent in order to have access to such databases.

26 Moreover, FORCE explicitly indicated that he would remain at DEA and simultaneously
27 perform compliance work for CoinMKT. In a November 23, 2013, email FORCE stated "you know for
28 right now, I think it would be better if you just pay me in stock options. I will stay on with DEA until

SA-162

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 29 of 95

1 [CoinMKT] hits it 'big time' I have a lot of down time at DEA so I am confident that I can handle all
2 that needs to be done regarding Legal and Compliance on a daily basis.”

3 CoinMKT has advised that it needed a bank account in order to be successful in the digital
4 currency field. On November 25, 2013, CoinMKT's CEO wrote to FORCE stating that a primary anti-
5 money laundering (AML) contact was needed and asking if CoinMKT could list FORCE as its AML
6 point of contact. Subsequently, on January 13, 2014, CoinMKT advised FORCE it was listing FORCE
7 as its Compliance Officer for purposes of contact with a bank. FORCE responded the next day, “All
8 right...let's hope this goes.” Again, this was while FORCE was still employed as a DEA agent.

9 During the latter part of 2013, FORCE and CoinMKT continued to discuss FORCE's role as a
10 Compliance Officer. By January 2014, email correspondence indicates that CoinMKT thought of and
11 included FORCE as part of its core team, including him on internal emails. For example, in a January
12 20, 2014, email CoinMKT's CEO sent to about 11 employees describing each employee's job
13 description, FORCE was listed as the third person after the two founders as “compliance extraordinaire.”
14 Although CoinMKT authored this email, other communications demonstrate that FORCE thought of
15 himself as one of the CoinMKT team and encouraged CoinMKT to use his status, his name, bio, and
16 photo in their company materials. For example, on February 19, 2014, FORCE provided CoinMKT a
17 headshot and bio to include in pitch decks for investors.¹⁶ And on January 25, 2014, FORCE wrote
18 inquiring if CoinMKT was registered with appropriate authorities and offering guidance about money
19 transmission laws. In his email inquiry, FORCE used phrasing that suggested he was part of the
20 company: “this will keep us from having the Feds seize any monies from us under 18 U.S.C. Section
21 1960 . . . eventually when we hit the big time, we are going to have to get a license from each state that
22 we have customers in...” (emphasis added).

23 CoinMKT has provided numerous emails between CoinMKT and FORCE's personal email
24 account. A search warrant was also obtained and served on Microsoft (which hosts Outlook email) for
25 FORCE's personal emails. Some of the emails between FORCE and CoinMKT were included in the
26 Microsoft production. However, several other of the emails that CoinMKT provided were not included
27

28 ¹⁶ CoinMKT has confirmed that they used FORCE's bio and profile, and solicited venture
fundraising in the San Francisco Bay Area, within the Northern District of California.

SA-163

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 30 of 95

1 in the production that Microsoft made, including many of the emails excerpted above. The FBI has
2 conferred with Microsoft about this issue, and was advised that all emails from FORCE's personal email
3 were provided and that any emails that were missing likely meant that the user had deleted those emails.
4 In other words, it appears to me that FORCE may have selectively deleted certain inculpatory emails
5 between himself and CoinMKT.

FORCE's Unlawful Seizure of R.P.'s Funds

6
7 R.P. was a California resident who held an account at CoinMKT during at least 2013 and 2014.
8 R.P. maintained cash in his account with CoinMKT as well as various brands of digital currency to
9 include bitcoin, litecoin, feathercoin, and worldcoin.

10 On February 5, 2014, CoinMKT emailed FORCE regarding what it initially believed to be
11 suspicious activity by R.P, noting that R.P. had withdrawn "\$10,000 three times instead of once for
12 \$30,000." CoinMKT sought direction from FORCE on how to proceed, noting R.P. had approximately
13 128 bitcoin (approximately \$109,000 at the time) in his account with CoinMKT.

14 On February 8, 2014, FORCE emailed CoinMKT directing them to suspend R.P.'s account and
15 to "tell [R.P.] that the federal government is investigating him for federal violations of 18 USC 1956
16 (money laundering) and 18 USC 1960 (unlicensed money transmitter) and 31 USC 5324
17 (structuring).....I will seize the 128 btc federally and do all the paperwork...."

18 On or about February 7, 2014, FORCE instructed a DEA intelligence analyst to run a criminal
19 history check on R.P., noting that the purpose was to uncover illegal activity on R.P. According to a
20 subsequent report FORCE authored, the only information found on R.P. was that he had previously
21 withdrawn \$17,000, had a felony conviction for vandalism, and was a self-employed actor.
22 Nonetheless, on February 8, 2014, at FORCE's direction, CoinMKT froze R.P.'s account.

23 On February 10, 2014, FORCE, now using his official DOJ account instead of the personal email
24 account he had historically used to communicate with CoinMKT, served an administrative subpoena on
25 CoinMKT requesting that they provide all information regarding R.P. FORCE also sent the subpoena to
26 CoinMKT by facsimile later that day. CoinMKT's facsimile services are hosted by "Hello Fax," a
27 company based in San Francisco within the Northern District of California.
28

SA-164

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 31 of 95

1 On February 11, 2014, CoinMKT's CEO emailed FORCE to relay that "some feedback from
2 other users . . . may throw off our thesis about this user's [R.P.'s] activity. Let's talk when you can, I'm
3 glad I caught this." CoinMKT's CEO has explained that he learned that a glitch in CoinMKT's system
4 was not permitting users to withdraw more than \$10,000 worth of currency at a time, thereby
5 diminishing the earlier suspicion that R.P. was structuring transactions or doing anything criminal.
6 FORCE replied to this email, inquiring whether CoinMKT had frozen R.P.'s account and seeking
7 information concerning R.P.'s digital currency balances, noting that R.P. may have a mental condition.

8 On March 1, 2014, R.P. wrote to CoinMKT advising that he had not been able to log in to his
9 account. CoinMKT replied to R.P. that his account had been "suspended due to suspicious activity.
10 Under government subpoena, we have been instructed to forward your communication to authorities.
11 We have cc'd Mr. Carl FORCE who will be your point of contact, please send further communication to
12 him to resolve this issue."

13 A Report of Investigation FORCE authored states that on February 26, 2014 and March 6, 2014,
14 FORCE attempted to contact R.P. stating "I have attempted to contact you numerous times via telephone
15 and emails, yet have received no response. I am trying to ascertain if your suspicious financial
16 transactions at CoinMKT have a legitimate explanation. The facts show that you are structuring
17 deposits and withdrawals. In addition, virtual currencies have been linked to illicit activities such as
18 illegal narcotics transactions, money laundering, child pornography, etc. As such, I am starting the legal
19 process to seize your Real Money Balances at CoinMKT. A negative response to this email will be
20 evidence that you are abandoning your assets at CoinMKT."

21 Over the coming weeks, FORCE directed CoinMKT to seize R.P.'s account. CoinMKT has
22 expressed it was hesitant to do so, but did not want to draw the ire of federal law enforcement, especially
23 given that the digital currency field was already subject to fairly intense law enforcement scrutiny.
24 CoinMKT also felt it prudent to defer to the direction of a federal law enforcement agent, and trusted
25 that if FORCE was telling CoinMKT that R.P. was using their company as a platform for illegal
26 activities, it was not in a position to second guess that conclusion. Nonetheless, CoinMKT requested
27 something in writing from FORCE before seizing R.P.'s account.

SA-165

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 32 of 95

1 During this March 2014 timeframe, R.P.'s account with CoinMKT contained two forms of
2 currency. First, it contained approximately \$37,000 in cash. Second, it contained approximately
3 \$297,000 in four forms of different digital currencies (bitcoin, litecoin, feathercoin, and worldcoin).

4 FORCE instructed CoinMKT to seize R.P.'s balances. CoinMKT effectuated this seizure by
5 creating an entirely new account with the name "R_seized."

6 On March 12, 2014, CoinMKT emailed FORCE, carbon copying others at the DEA, stating that
7 it had created the "R_seized" account, providing the login and password information and asking FORCE
8 to "please advise when you would like us to move the funds" from the R.P. account into the R_seized
9 account. Later that same day FORCE replied to CoinMKT, including none of the other recipients on the
10 original message in his reply, "Transfer them now please."

11 On March 23, 2014, using his official DEA email account with no one carbon copied, FORCE
12 emailed CoinMKT noting that "we checked the balances this morning [in the R_seized account] and the
13 coins are still not there. Is everything okay?" CoinMKT replied later that same day that they had
14 experienced some logistical issues in effectuating the transfer of digital currency from R.P.'s account to
15 the R_seized account.

16 On March 26, 2014, CoinMKT emailed FORCE stating "the [R.P.] funds should be in your
17 account. We made the move 2 days ago but please confirm on your end that you have received them."
18 FORCE replied, from his official DEA email account with no one carbon copied, "Yes they are in
19 DEA's account now. Thank you very much!" I have confirmed that no such digital currency funds
20 were received in any official DEA account, but instead went into FORCE's own personal account with
21 Bitstamp, as described further below.

22 On April 3, 2014, FORCE emailed CoinMKT from his official DEA account, this time carbon
23 copying three other DEA employees including his supervisor, directing CoinMKT to "please convert the
24 \$37,051.08 that has been seized from R.P. into a certified check and forward it to DEA ... please make
25 the certified check payable to the U.S. Marshals Service." CoinMKT did so and sent the government a
26 certified check for \$37,051.08, representing that portion of R.P.'s account that had been in cash.

27 In a Report of Investigation dated March 11, 2014, FORCE wrote that "on March 13, 2014, DEA
28 seized the following: 179.7977 bitcoin; 3,417.565 Litecoin; 366,511.2876 feathercoin; and

SA-166

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 33 of 95

1 621,439,7182 worldcoin from [R.P.] for violations of the Bank Secrecy Act statutes, more specifically
2 structuring financial transactions and money laundering. [R.P.] was exploiting CoinMKT to launder his
3 illicit proceeds.” FORCE did not attempt to translate these various digital currency balances to any
4 approximate dollar values as he had done in other instances. In a Report of Investigation dated April 3,
5 2014, FORCE made reference to the earlier March 11 Report of Investigation and noted that “on April
6 4, 2014, DEA seized \$37,206.30 from [R.P]. . . FORCE directed CoinMKT to forward a certified check
7 for \$37,206.30 to the U.S. Marshal’s Service.”

8 A Standard Seizure Form (SSF) is a government form that is typically completed by the DEA
9 when funds are seized. FORCE prepared two SSFs relative to R.P.: (1) an SSF dated April 3, 2014, for
10 the approximately \$37,000 in cash that was seized from R.P.’s account; and (2) an SSF dated March 12,
11 2014, for the approximately \$297,000 worth of digital currency that was seized from R.P.’s account.
12 However, FORCE instructed the DEA Asset Forfeiture Specialist not to input the digital currency SSF
13 into the government’s computer tracking system for seized funds, the Consolidated Asset Tracking
14 System (CATS), but rather to “hold” it for “a few months” or until further notice. The DEA Asset
15 Forfeiture Specialist made a handwritten note on the digital currency SSF noting that FORCE had
16 expressly directed it not be input at that time. FORCE included a copy of the SSF relating to the cash in
17 the official case file of the Silk Road investigation.¹⁷ However, he did not include a copy of the SSF
18 relating to the digital currency in that same case file.

19 It appears that FORCE “papered up” the seizure of the digital currency portion of R.P.’s account
20 in such a way that he may have thought he would be covered in the event anyone ever asked any
21 questions about it being documented, but at the same time in a way that made it appear as if the
22 approximately \$37,000 in cash was the sum total of all that was seized from R.P. Telling in this regard
23 is that (1) when FORCE emailed from his official DEA account about the approximately \$37,000 in
24 cash he carbon copied numerous individuals; the same was not true when he emailed about the
25 approximately \$297,000 worth of digital currency; (2) FORCE’s co-case agent has advised that she was
26

27 ¹⁷ My investigation confirmed with FORCE’s then-supervisor that the R.P. “case” had no known
28 connection to the Silk Road.

SA-167

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 34 of 95

1 of the belief that only approximately \$37,000 total was seized from R.P.'s account, and was unaware of
2 the remaining approximately \$297,000 in digital currency that had been seized from R.P.'s account; (3)
3 FORCE completed SSFs for both the cash and digital currency seizures but did not include the SSF for
4 the digital currency in the case file; and (4) FORCE directed that the digital currency SSF be held.

5 In sum, I believe the way in which FORCE documented the R.P. seizure was FORCE's attempt
6 to give himself plausible deniability by memorializing the digital currency seizure in both a Report of
7 Investigation and SSF, albeit in a fashion that did not draw attention to the fact that it was worth
8 approximately \$297,000. The documentation is particularly oblique for someone unfamiliar with digital
9 currency, as many in FORCE's chain of command were.

10 The approximately \$297,000 worth of digital currency funds¹⁸ from R.P.'s CoinMKT account did
11 not make it to any official DEA or government account. Instead, that amount ultimately went into
12 FORCE's personal Bitstamp account and was subsequently liquidated into U.S. dollars into FORCE's
13 personal checking account. Specifically, on April 14, 2014, the funds moved from the R_Seized
14 account that CoinMKT had set up into a pass-through account. Then, on April 16, 2014, those funds
15 moved from the pass-through account to FORCE's personal Bitstamp account. In late April 2014,
16 FORCE made a withdrawal request of approximately \$201,000 from his Bitstamp account to his
17 personal checking account. I have also confirmed with DEA that no case was ever opened against R.P.
18 I am aware of no legal basis on which FORCE seized R.P.'s balances.

19 Within days of the seizure of the approximately \$297,000 in digital currency funds from R.P.,
20 FORCE launched his own personal limited liability company dedicated to the investment in and
21 speculation of digital currency, Engedi, LLC.

FORCE's Use of Official Subpoena for His Own Financial Gain

22 Venmo is a payments platform company that enables person-to-person and merchant payment
23 transactions using an application on mobile phones or other internet connected devices. Venmo is a
24 subsidiary of PayPal, based in San Jose, California, and as discussed, relevant personnel from Venmo's
25 compliance division are based in San Francisco, California, both within the Northern District of
26

27
28 ¹⁸ The precise deposit amount was 222.9989 bitcoins.

SA-168

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 35 of 95

1 California. On or about February 12, 2012, FORCE opened a Venmo account with the user name
2 “cforce.” That same day, a user by the name of “R.R.” also opened a Venmo account.

3 Also on or about February 12, 2014, “R.R.” initiated a payment to FORCE using Venmo’s
4 platform. The note on the transaction to FORCE stated: “Reversing payment #7163719 for \$2500.00
5 from user [R.R.] to user better bitcoin.” Venmo’s fraud controls identified high risk payment activity
6 and blocked both FORCE’s and R.R.’s accounts.

7 On February 13, 2014, FORCE contacted Venmo by email from one of his personal email
8 addresses to request, among other things, that his account with Venmo be unlocked so he could
9 withdraw \$2,500. FORCE informed Venmo that R.R. was the target of a federal undercover
10 investigation for which FORCE was the assigned case agent and the payment was for an undercover
11 Bitcoin transaction. FORCE attached a copy of his badge and credentials in this email, and also
12 mentioned in a post-script that he was interested in partnering with Venmo for employment
13 opportunities.

14 On or about February 17, 2014, with his account at Venmo still blocked, FORCE served an
15 administrative subpoena on Venmo from his official DOJ email account, Carl.M.Force@usdoj.gov, with
16 a carbon copy to one of his personal email addresses. In this email, FORCE stated: “Please comply to
17 the attached subpoena! If you should have any questions, please call me at 443.324.[XXXX].” The
18 attached subpoena commanded the production of documents related to R.R. and directing Venmo’s
19 administrator to “lift the ‘freeze’ on the account of Carl Force, effective immediately.” The subpoena
20 itself contained a specific case matter number and grand jury number. FORCE sent this subpoena to
21 Venmo’s law enforcement contact within its compliance division, who was based in San Francisco,
22 within the Northern District of California.

23 Given Venmo’s belief that FORCE’s request to unfreeze a personal account was not a proper use
24 of an official government administrative subpoena, and given FORCE’s repeated contact with Venmo
25 from his personal email address, Venmo did not lift the freeze on FORCE’s account and instead notified
26 FORCE’s superiors in the DEA. On February 24, 2014, FORCE emailed Venmo’s compliance team in
27 San Francisco and instructed them to disregard the subpoena.
28

SA-169

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 36 of 95

1 On March 4, 2014, FORCE asked one of his co-case agents on the Baltimore Silk Road Task
2 Force to run a query in a law enforcement database for Venmo, stating that he wanted to collaborate “on
3 a suspicious money remitter, Venmo, Inc. Venmo has since registered with FinCEN, but I want to know
4 if they have state money license remitting licenses in California and New York. Can you check? If not,
5 I want to seize their bank accounts (need to identify them) á la BRIDGES and [M.M.’s] seizure warrants
6 for Mt. Gox.” In other words, FORCE appears to have been targeting Venmo for seizure after the
7 company rebuffed his attempts to use a subpoena for his own personal matter.

8 On March 13, 2014, FORCE again used his personal email account to email Venmo’s support
9 division. In that email, FORCE advised Venmo that if they refused to unfreeze his account, he would
10 retain an attorney and file a civil lawsuit. In another email FORCE sent to Venmo later that same day,
11 FORCE explained the funds in his Venmo account were personal and stolen by R.R., and “As such, this
12 \$2,500 has nothing to do with DEA, it was my personal assets that were stolen by [R.R.]” On March
13 14, 2014, FORCE, again using his personal email address, directed Venmo not to contact the DEA
14 again.

15 The administrative subpoena addressed to Venmo contains DEA Special Agent A.P.’s signature
16 stamp on the signature line. A.P. was FORCE’s acting supervisor during the relevant timeframe of the
17 subpoena. A.P. stated he did not review or sign the subpoena and believes that FORCE, without A.P.’s
18 knowledge, used A.P.’s signature stamp to execute the subpoena.

19 Following FORCE’s submission of his letter of resignation on May 4, 2014, described above,
20 another DEA employee witnessed FORCE taking boxes into a room where documents are taken to be
21 permanently burned or destroyed. The contents of FORCE’s burn boxes have since been seized and
22 analyzed. Among other documents, these burn boxes contained copies of the administrative subpoena to
23 Venmo. However, FORCE’s superior reported that there are no copies of this subpoena in the Baltimore
24 Silk Road case file.

25 Based on the foregoing, FORCE issued and used an official government subpoena for his own
26 personal financial gain and transmitted it to a third party. By doing so, **there is probable cause to**
27 **believe that FORCE committed a violation of the conflict of interest statute, in violation 18 U.S.C.**
28 **Section 208.** I also believe FORCE was trying to cover up evidence of his use of the subpoena by

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

SA-170

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 37 of 95

1 placing the copies in his burn box instead of the official case file. Furthermore, I believe that by
2 directing Venmo to ignore the subpoena and not to contact the DEA, FORCE was attempting to obstruct
3 justice by concealing his wrongful use of an official government subpoena for a personal matter.

4 **Additional Evidence Concerning Bitstamp**

5 Bitstamp is a global digital currency exchange headquartered in Europe with a limited U.S.
6 presence in San Francisco, within the Northern District of California. On October 12, 2013, FORCE
7 attempted to create an account with Bitstamp using identification documents in the name of his DEA-
8 issued undercover identity. Bitstamp's verification process rejected these documents as not genuine.

9 FORCE thereafter provided Bitstamp with his own personal identification documents and his
10 true and correct name, and Bitstamp created an account in FORCE's name. FORCE's Bitstamp account
11 is associated with a single bank account and with two email personal addresses. One of the personal
12 email addresses contains the moniker "fiat broker," which refers to someone who trades in currency.
13 The account is associated with FORCE's personal checking account at M&T Bank.

14 On approximately November 9, 2013, FORCE made his first withdrawal request from Bitstamp
15 for approximately \$34,000 worth of bitcoins.¹⁹ I have reviewed FORCE's personal bank records and see
16 an incoming international wire transfer to FORCE's bank account in the amount of approximately
17 \$34,000 on November 13, 2013. Thereafter, FORCE made a second withdrawal request of Bitstamp for
18 approximately \$96,000 worth of bitcoins. This withdrawal request triggered Bitstamp to conduct a
19 Know Your Customer (KYC) check, also referred to as enhanced due diligence, on approximately
20 November 20, 2013. This check essentially involved Bitstamp asking for more information from
21 FORCE.

22 Throughout the latter part of November 2013, FORCE had a series of back and forth exchanges
23 with Bitstamp using his personal email account. FORCE responded to Bitstamp's know-your-customer
24 queries stating, among other things, the following: "I am a Special Agent with the Drug Enforcement
25 Administration . . . and learned about Bitcoin through my investigation of SILK ROAD. I have attached
26 a copy of my resume and a scanned copy of my badge and credentials."

27
28 ¹⁹ All of these amounts represented in dollars from Bitstamp were in bitcoin based on their value
at the time of the transfers.

SA-171

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 38 of 95

1 It appears that FORCE's account with Bitstamp remained active after these initial know-your-
2 customer checks, as his personal M&T bank records reveal two incoming deposits from his account with
3 Bitstamp in January 2014 for approximately \$57,000 and \$50,000.

4 On April 18, 2014, FORCE requested a withdrawal from his account with Bitstamp of
5 approximately \$80,000 to be deposited into his M&T bank account. Bitstamp flagged this request and
6 conducted additional know-your-customer checks. Bitstamp's review showed that FORCE's account
7 had been accessed using TOR. Given this, Bitstamp blocked FORCE's account.²⁰

8 To unblock his account, FORCE made the following statements via an online support ticket with
9 Bitstamp:

10 I am a U.S. Department of Justice – Drug Enforcement Administration (DEA), Special
11 Agent who worked the original SILK ROAD website and corresponding investigation. I
12 learned about Bitcoin through my investigation of DREAD PIRATE ROBERTS and
13 SILK ROAD. I am attaching a scanned copy of my DEA credentials and badge to verify
14 my status as Law Enforcement.

15 Again I obtained my bitcoin from investing a couple thousand dollars in the virtual
16 currency in the beginning of 2012 when they were selling at \$4 a coin from exchanges
17 such as GetBitcoin LLC (small "mom and pop" exchanges). Also, I have increased my
18 holding of bitcoin through trading, the buying and selling, of the cryptocurrency.

19 I trade in Bitcoin. As such, I am constantly buying, shorting, selling, transferring,
20 purchasing other assets such as real estate through RealtyShares and gold through
21 goldsilverbitcoin.

22 I plan to continue to utilize Bitstamp to purchase and sell Bitcoin at a profit.

23 On April 24, 2014, as part of Bitstamp's fraud and theft prevention procedures, Bitstamp
24 inquired why FORCE accessed his account through TOR and FORCE responded via the support ticket:

25 ²⁰ Within a day after Bitstamp froze FORCE's account on April 18, 2014, FORCE sent an e-mail
26 on April 19, 2014 to another DEA Special Agent whose primary responsibility was to account for
27 undercover funds DEA had expended. FORCE's e-mail indicated that the Baltimore Silk Road Task
28 Force had hundreds of bitcoin that they want to put into "service" and requested the creation of a DEA
account with an exchange to liquidate bitcoin into U.S. dollars. That Special Agent advises that
FORCE's April 19 e-mail was unusual because it was sent on a Saturday evening and there was a
significant delay in time from when FORCE had acquired the bitcoin to when he sent the e-mail. I
believe, based on my investigation, that the timing of FORCE's April 19 email was not coincidental
given that Bitstamp had frozen his account earlier that day and he may have suspected that law
enforcement had discovered that the bitcoins in his personal account were not his property. By sending
such an e-mail, FORCE would be able to later maintain that he had tried to return the bitcoin to the
government.

SA-172

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 39 of 95

1 “I utilize TOR for privacy. Don’t particularly want NSA looking over my shoulder :)” The following
2 day, a member of Bitstamp’s management learned of FORCE’s comments and thought it was strange
3 that a government official would make such a statement. FORCE’s account was blocked again.

4 On April 28, 2014, FORCE made another withdrawal request from his account at Bitstamp of
5 approximately \$201,000 worth of bitcoin to his personal bank account. It is clear that FORCE’s account
6 with Bitstamp was frozen and unfrozen numerous times during the April timeframe after FORCE
7 verified his identity. After speaking with another then-member of federal law enforcement, BRIDGES,
8 Bitstamp subsequently processed the withdrawal request, and FORCE’s bank records reveal that he
9 received approximately \$201,000 to his M&T bank account on May 6, 2014.

10 Based on my investigation described above, I believe that some if not all of the bitcoins that went
11 into FORCE’s account with Bitstamp was property that belonged to the government and/or third parties
12 and that FORCE had come into possession of in his capacity as a DEA Special Agent, and not his own
13 personally-acquired bitcoins, as he told Bitstamp.

14 On or about May 2, 2014, FORCE emailed Bitstamp to request that they delete all transaction
15 history associated with his account. I believe, based on my investigation and the timing of FORCE’s
16 request, that this was an attempt by FORCE to conceal his activity.

17 **Evidence of FORCE’s Improved Financial Picture**

18 I have reviewed many but not all of FORCE’s bank records from 2009 to present. I have also
19 reviewed a financial analysis the FBI prepared of FORCE’s financial history. Based on these sources,
20 FORCE’s financial situation and spending increased dramatically during 2013 and 2014, i.e., the
21 timeframe of the wrongdoing described herein.

22 In summary, for the nearly two year period before FORCE worked the Silk Road case, FORCE
23 deposited a total of approximately \$250,000 into his bank accounts, an amount consistent with his
24 federal salary. In contrast to that, the bank records show that in the just over two-year timeframe from
25 FORCE’s joining the Silk Road case to his May 2014 resignation, FORCE deposited approximately
26 \$776,000 into his bank accounts, an amount that represented solely his liquidation of bitcoins.

27 On or about February 17, 2012, FORCE began working on the Silk Road investigation.
28 Thereafter, his financial situation improved markedly. In 2013 and 2014, FORCE had total deposits that

SA-173

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 40 of 95

1 I have traced as bitcoin liquidation proceeds worth over approximately \$776,000. This includes, for
2 example, six sizeable deposits into FORCE's checking accounts from his Bitstamp account totaling
3 approximately \$518,000. There were also approximately \$118,000 worth of deposits from Coinbase,
4 another San Francisco-based digital currency exchange company where FORCE had a personal account.

5 FORCE's spending also increased after his involvement on the Baltimore Silk Road Task Force.
6 Aside from his approximately \$110,000 bitcoin investment into CoinMKT, FORCE paid off a \$22,000
7 government loan on November 19, 2013. On December 2, 2013, he paid off his mortgage in full, which
8 was approximately \$130,000 outstanding. On February 18, 2014, FORCE signed a "Purchaser
9 Agreement" with RealtyShares, Inc., listing his net worth in excess of \$1 million, and providing a
10 \$15,000 investment in three real properties.

11 On or about May 8, 2014, presumably after learning of the government's investigation and after
12 he had resigned, FORCE wired \$235,000 to an offshore account in Panama. Records that I have
13 recovered reveal that this wire was ultimately destined for BTC-e, a digital currency exchange outside
14 the U.S. and that is not registered with the Department of the Treasury's Financial Crimes Enforcement
15 Network ("FinCEN"). Based on evidence discussed further below, I believe that the vast majority – if
16 not all – of this wire represented proceeds of illegal activities.

17 Other ways that FORCE appears to have spent some of the proceeds of his ultra vires activities
18 include payments in the tens of thousands of dollars for the following:

- 19 • A June 2014 payment for the purchase of a company franchise;
- 20 • An August 2014 payment to a "Scottrade" account;
- 21 • A September 2014 transfer to an E*Trade account;
- 22 • A September 2014 check payable to "Cash"

23 These are illustrative examples and not all of the financial outlays known to the government. Moreover,
24 FORCE appears to have funded the business he opened on the side for speculating in Bitcoin, Engedi,
25 LLC, with money from his personal checking accounts into which he had transferred ill-gotten proceeds.
26 On May 7, 2014, FORCE opened a new bank account with Gardner Bank in the Engedi, LLC name,
27 funding it 20 days later with an \$8,000 check from FORCE's personal M&T checking account. And on
28

SA-174

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 41 of 95

1 July 28, 2014, FORCE transferred \$93,000 from his personal M&T checking account to the Engedi
2 account at Gardner Bank.

3 **FORCE's False Statements and Obstructive Conduct**

4 Upon learning he was the subject of this investigation, FORCE, through counsel, approached the
5 government about meeting for a voluntary interview. FORCE signed the Northern District of California
6 and Public Integrity Section's standard form Proffer Agreement, sometimes known as a "Queen for a
7 Day" letter. This Agreement is standard in criminal investigations and provided, among other things,
8 that if FORCE was truthful, the government could not make direct use of the information FORCE
9 provided against him in a future case-in-chief. An important exception to the protections of the Proffer
10 Agreement was that FORCE could be prosecuted for perjury, obstruction of justice, or false statements
11 in the event he was untruthful during the session.

12 Pursuant to the Proffer Agreement, FORCE met with representatives from the U.S. Attorney's
13 Office for the Northern District of California, the Public Integrity Section, the FBI, IRS, and DOJ OIG,
14 on May 30, 2014. During that proffer session, FORCE was specifically asked whether he had ever used
15 the moniker "French Maid." FORCE denied that he had. As demonstrated above, this was not truthful
16 as FORCE had operated as "French Maid" in communications with DPR, among other personas.

17 Additionally, FORCE's conduct throughout the investigation obstructed the real proper purpose
18 of the Baltimore Silk Road Task Force which was to identify, locate and arrest DPR and other Silk Road
19 users. At numerous points, FORCE corruptly obstructed the lawful investigation into DPR and Silk
20 Road by pursuing his own personal and unlawful goals.

21 **VIII. BRIDGES PROBABLE CAUSE**

22 **Bridges' Background**

23 Former Secret Service Special Agent BRIDGES was also on the Baltimore Silk Road Task Force
24 and worked alongside FORCE. Until March 18, 2015, before he abruptly resigned, BRIDGES had been
25 assigned to the Secret Service's Electronic Crimes Task Force. His specialty was in computer forensics
26 and anonymity software derived from TOR. Another member of the Baltimore Silk Road Task Force
27 that has been interviewed confirmed that BRIDGES was the Task Force's subject matter expert in
28 Bitcoin.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

SA-175

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 42 of 95

1 In these roles, BRIDGES had access to and used digital currency and was the affiant on various
2 seizure warrants pertaining to digital currency. In fact, on May 9, 2013, BRIDGES was the affiant on
3 one of the largest-ever seizures from a digital currency exchange. This was an approximately \$2.1
4 million seizure pertaining to the digital currency exchange Mt. Gox, purportedly because Mt. Gox had
5 violated 18 U.S.C. Section 1960 by failing to register with the Financial Crimes Enforcement Network
6 (FinCEN) and thus was engaged in operating an unlicensed money service business. This is not the only
7 matter on which BRIDGES served as the affiant.

8 **The Silk Road Theft and BRIDGES' Fidelity Account**

9 C.G. was one of DPR's employees and functioned as a Silk Road customer support
10 representative, under the username "Flush." In this role, C.G. had administrator access to the Silk Road
11 website,²¹ meaning C.G. had certain administrative privileges on the Silk Road website, including the
12 ability to access vendor accounts and reset Silk Road user and vendor passwords and pins.

13 On or about January 17, 2013, FORCE and BRIDGES were part of a team that apprehended
14 C.G. in a controlled delivery for a kilogram of cocaine. C.G. was arrested and soon thereafter began to
15 cooperate with law enforcement, turning over his Silk Road login credentials in the process to members
16 of the Baltimore Silk Road Task Force. During this same timeframe C.G. also turned over access to his
17 account and passwords to other digital currency accounts to include his Mt. Gox and Dwolla accounts.
18 As a result of this controlled delivery, C.G. was charged with federal criminal narcotics charges.²²

19 One of the accounts that C.G. provided access to was a Silk Road administrator account named
20 "Flush." C.G. acted as a Customer Service representative on the Silk Road site using the account name
21 "Flush." But on January 17, 2013, C.G. turned over access to the "Flush" account to members of the
22 Baltimore Silk Road Task Force. C.G. also executed several consent forms authorizing law enforcement
23 to use and assume the "Flush" identity.²³

24
25 ²¹ This should not be construed as someone who had root access to the server.

26 ²² It should be noted that C.G. is cooperating with law enforcement and is hoping for leniency in
27 sentencing as a part of his cooperation. C.G.'s criminal history includes convictions for filing a
28 fraudulent insurance claim and acquiring a controlled substance by prescription alteration.

²³ Because of concerns about C.G.'s whereabouts, DPR at some point cut off the "Flush"
account's access, but through communications with DPR, C.G. was able to regain access to the account
on January 20, 2013, and pass that information onto the Baltimore Silk Road Task Force.

SA-176

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 43 of 95

1 On January 25, 2013, C.G. debriefed with FORCE, BRIDGES, and other members of the
2 Baltimore Silk Road Task Force. According to BRIDGES' report of the interview, C.G. showed them
3 how to log into Silk Road vendor accounts and reset passwords, how to change the status of a seller to a
4 vendor, how to reset pins, and information about how the Silk Road administrative functions worked.
5 BRIDGES' text messages indicate that he left the proffer session after one day, and a Silk Road Task
6 Force member stated that BRIDGES told him that he left the latter part of the January 25, 2013,
7 proffer.²⁴

8 On January 25, 2013, during the afternoon and into the night, the Silk Road website suffered a
9 series of sizeable thefts. These thefts affected certain Silk Road vendors and overlapped with the time of
10 the C.G. proffer session. The thefts were accomplished through a series of vendor password and pin
11 resets, something that could be accomplished with the administrator access that C.G. had given to the
12 Baltimore Silk Road Task Force.

13 On January 26, 2013, the proffer of C.G. continued. BRIDGES left early and did not participate
14 on this day. At some point during that day, DPR communicated to Nob (FORCE) that Silk Road had
15 suffered thefts and that those thefts were associated with C.G.'s account. Law enforcement questioned
16 C.G. about this, and C.G. denied that he had committed the thefts. According to chats I have reviewed
17 from the Silk Road servers and from Ulbricht's laptop (as well as communications between DPR and
18 one of his employees at the time of the January 25, 2013 thefts) it appears that DPR and the employee
19 believed C.G. was responsible for the thefts, because they managed to associate C.G.'s account, "Flush,"
20 with the theft.²⁵ As a result of DPR's belief that C.G. was responsible for the thefts, DPR communicated
21 with Nob (FORCE) – whom he believed to be a major drug dealer with the ability to procure hit men –
22 and hired Nob to have his associates kill C.G. DPR also communicated with another individual and
23 commissioned a hit on C.G. For the hit that Nob's associates were to perform, DPR paid Nob a total of
24 approximately \$80,000 through a bank wire transfer for the murder. FORCE and C.G., together with
25 assistance from others on the Baltimore Silk Road Task Force, then faked C.G.'s death to make it look
26

27 ²⁴ This Task Force member was not present for the C.G. debrief but indicated that BRIDGES had
told him this information.

28 ²⁵ On or about January 26, 2013, according to chats between DPR and another employee,
"Flush's" administrative account was shut down in order to prevent further theft.

SA-177

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 44 of 95

1 as if Nob's associates had killed C.G. BRIDGES was to assist with perpetrating this supposed murder-
2 for-hire by working on "proof of death" photographs of C.G. that Nob (FORCE) was to send to DPR.

3 Based on my review of the data from the Silk Road servers, I believe the initial Silk Road thefts
4 were likely committed by whoever was controlling a Silk Road account with the username "Number13."
5 Prior to January 25, 2013, "Number13" had been an ordinary buyer account on Silk Road. On January
6 25, 2013, however, "Number13" was given vendor privileges. Also on January 25, 2013, the "Flush"
7 account made a transfer of approximately 900 bitcoins into account "Number13." This appears to have
8 been the first of multiple thefts that occurred that day from the Silk Road website.

9 My analysis of both the block chain and data recovered from the Silk Road servers reveals that,
10 also on January 25, 2013, a single Bitcoin address received no less than 20,000 bitcoins.²⁶ The first
11 transaction into that Bitcoin address was a deposit by account "Number13." These transactions are
12 demonstrated on the attached Exhibit F ("Liquidation of Silk Road Theft Proceeds").

13 I believe that BRIDGES controlled and/or had access with others to "Number13," the account
14 that appears to have initiated the sizeable bitcoin thefts. I believe this for at least two reasons. First, in a
15 DEA 6 that FORCE authored dated January 23, 2013, FORCE described how he had transferred 60
16 bitcoins into a DEA-controlled account known as "TrustUsJones." Data from the Silk Road servers
17 demonstrates that on that January 23, 2013 date, there was a 60 bitcoin transfer from "Number13" into
18 "TrustUsJones." Second, in an email dated January 23, 2013, FORCE emailed BRIDGES requesting
19 that BRIDGES deposit bitcoins to replenish the "TrustUsJones" account. In other words, BRIDGES, in
20 consultation with FORCE, appears to have been controlling "Number13" during the late January 2013
21 timeframe.

22 On January 26, 2013, my analysis of the block chain reveals that at least 2,430 of the bitcoins
23 stolen from the Silk Road went into another single Bitcoin wallet address. These transactions are also
24 depicted on the attached Exhibit F. I have conferred with an individual who has a substantial
25

26 ²⁶ I believe that the aggregate total of the thefts was approximately 20,000 bitcoin. The dollar
27 value of 20,000 bitcoin would have varied dramatically depending on when the value was calculated due
28 to the fluctuating value of bitcoin. At the time of thefts in January 2013, 20,000 bitcoin would have
been worth approximately \$350,000. At its peak price, however, it would have been worth far more, in
excess of approximately \$20 million.

SA-178

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 45 of 95

1 background in block chain analysis who advised me that this wallet funded a Mt. Gox exchange account
2 totaling 2,430 bitcoins. As noted, Mt. Gox was the world's largest digital currency exchange based in
3 Japan.

4 Chats I have reviewed between DPR and one of his employees indicate that DPR and the
5 employee launched an internal investigation into who was responsible for the January 25, 2013 theft.
6 Those chats reveal that DPR's own internal investigation initially led him to account "Number13" as
7 being associated with the thefts. Chats further reveal that "Number13" sent DPR a chat on January 27,
8 2013 saying "Whats [sic] going on . . . I really need that money back. What has happened to all my
9 BC? Within the past day someone withdrawled [sic]²⁷ all my bc from my account without my
10 permission. The fact they must have had a pin really confuses me and makes me think it was something
11 on your end." This caused DPR to reply to "Number13" stating "Your account is under investigation
12 I'm afraid. What is your relationship with the user [omitted]?" During a back and forth between the
13 two, "Number13" wrote, "I don't know what any of that other crap in my history is. Look at my history,
14 I am a buyer not a seller. What is going on man?" This caused DPR to reply, "You're all set, sorry for
15 the trouble." DPR was physically present in San Francisco on the date of these communications with
16 "Number13."

17 The Silk Road thefts were completed on January 25, 2013. Within days, BRIDGES began to
18 text FORCE asking that FORCE (as Nob) get advice from DPR about liquidating bitcoins into dollars.
19 For example, on January 30, 2013, BRIDGES texted FORCE: "Next time you chat with DPR do you
20 think he would touch on the topic of how he moves bitcoins, meaning what exchange he uses? He
21 should have some advise [sic] if you will be doing big drug deals on how to exchange all that back into
22 US dollars." FORCE replied that he had asked DPR that before and DPR would not provide an answer.
23 BRIDGES replied, "Roger. Just curious."

24 Approximately two weeks after the Silk Road thefts, on February 12, 2013, BRIDGES formed
25 "Quantum International Investments, LLC," (Quantum) and registered it with the Maryland Secretary of
26

27 ²⁷ The individual controlling "Number13" on this date spelled withdrawal as "withdrewled."
28 When BRIDGES texted FORCE on February 23, 2013, as discussed herein, BRIDGES also spelled the
word withdrawal incorrectly using the slightly different "withdrowlaed."

SA-179

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 46 of 95

1 State. On February 22, 2013, BRIDGES established a personal investment account at Fidelity in the
2 Quantum name. That account was associated with BRIDGES' Social Security number and other
3 accounts in BRIDGES' name. That day and the next, BRIDGES began to text with FORCE about
4 getting C.G.'s help and transferring bitcoins. Specifically, BRIDGES texted FORCE on February 22,
5 2013: "Whenever you are working next can we talk. [The prosecutor] said you have the gift of
6 convincing [C.G.] to do things and we need you to convince him to do something. Whenever your [sic]
7 available can we chat." Then on February 23, 2013, BRIDGES texted FORCE: "Need your help with
8 DPR if you can. I am trying to transfer out our USSS Bitcoins and they have not shown up in over 30
9 hours after being withdrawlaed [sic]. Can you hit up DPR and say one of your workers or financial guys
10 bitcoins are not showing up? I am going to get my butt kicked if this money is missing. After 30 hours
11 I am getting really concerned. Our one UC account is '[omitted name]' Can you use your raport [sic]
12 and help me out? I did the transfer yesterday morning."

13 It is clear that during this time period both BRIDGES and FORCE were actively monitoring the
14 price of bitcoin. On February 24, 2013, BRIDGES texted FORCE, "If you got bitcoins on SR [Silk
15 Road] get them off...." By the end of March, BRIDGES and FORCE were texting about the value of
16 bitcoin. On March 20, 2013, FORCE texted BRIDGES "Bitcoin just hit \$63 . . . what the slip [sic]?" to
17 which BRIDGES replied "Ya!" and then FORCE replied, "[sp]eculation about big investors going in
18 later this month. Along with the demand is exceeding supply." Then on March 21, 2013, BRIDGES
19 texted FORCE "75 dollars now" and FORCE replied "Geez."

20 I have obtained and reviewed Fidelity records for BRIDGES' Quantum account. Those records
21 demonstrate that between March 6, 2013 and May 7, 2013, the account received nine separate wire
22 transfers originating from Mt. Gox in Japan. The wires totaled in excess of \$820,000, and were each
23 less than \$100,000. Fidelity has confirmed that BRIDGES' Quantum account was funded solely by
24 deposits from Mt. Gox and no other source.

25 The final wire from Mt. Gox to BRIDGES' Quantum account was on May 7, 2013. Just two
26 days later, BRIDGES served as the affiant on a seizure warrant for \$2.1 million in Mt. Gox accounts. I
27 know from my training and experience as a law enforcement officer that the process of putting together
28 an affidavit in support of a warrant is time consuming and often takes several days, if not longer, to

SA-180

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 47 of 95

1 prepare. In serving as an affiant for Mt. Gox bank accounts a mere two days after he had personally
2 received a wire from Mt. Gox (the latest in a series of wires), BRIDGES had a conflict of interest.

3 In early 2015, by which time BRIDGES knew of the Northern District of California's
4 investigation into the Baltimore Silk Road Task Force, BRIDGES was working on an unrelated
5 investigation. Under the guise of that other investigation, BRIDGES contacted Coinbase, a digital
6 currency exchange based in San Francisco. However, instead of asking only questions concerning the
7 other investigation, Coinbase representatives report that BRIDGES engaged them in a series of
8 questions about whether and how Mt. Gox accounts could be traced. Coinbase found this odd, given
9 that the stated purpose of BRIDGES' calls concerned an unrelated investigation.

10 Based on the foregoing, I believe that BRIDGES, or someone acting on his behalf, utilized the
11 "Flush" and "Number13" accounts, but particularly the "Flush" account to fraudulently act as an
12 administrator to reset pins and passwords on various Silk Road vendors' accounts, and then caused
13 bitcoins to be moved from those accounts into a particular wallet and then into the Mt. Gox exchange.
14 Moreover, I believe that BRIDGES, and/or someone working with him or acting on his behalf, used the
15 "Number13" account to communicate with DPR and fraudulently represent that "Number13" was a
16 buyer account on Silk Road who had nothing to do with the theft to stave off DPR's investigation into
17 "Number13" and its activity. I believe these communications were material. At the time of these
18 communications, DPR was in the Northern District of California, and the Bitcoin stolen as a result of the
19 Silk Road thefts was in a Bitcoin address and had not yet been transferred to Mt. Gox. For all of these
20 reasons, **there is probable cause to believe that BRIDGES committed wire fraud, in violation of 18**
21 **U.S.C. Section 1343.**

22 **BRIDGES' Conduct During The Investigation**

23 On April 29, 2014, Bitstamp's General Counsel advised BRIDGES by telephone from the
24 Northern District of California that Bitstamp suspected FORCE of wrongdoing and intended to formally
25 bring it to the attention of law enforcement via a Bank Secrecy Act filing. Bitstamp did so on May 1,
26 2014. By May 4, 2014, FORCE submitted a letter of resignation after 15 years of service to be effective
27 later that month.

SA-181

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 48 of 95

1 On approximately May 2, 2014, the U.S. Attorney's Office for the Northern District of
2 California opened an official investigation into FORCE concerning his activities with his Bitstamp
3 account and bitcoin holdings. On approximately May 4, 2014, the Public Integrity Section opened an
4 official investigation into FORCE concerning his improper use of a subpoena to Venmo. On May 8,
5 2014, the Northern District of California and Public Integrity investigations were merged.

6 Between April 29, 2014 and May 5, 2014, an analyst with whom BRIDGES worked at the Secret
7 Service, E.P., ran several queries in a government database looking for Bank Secrecy Act filings on both
8 FORCE and BRIDGES. That analyst later ran another query on BRIDGES on or about June 27, 2014,
9 this time using BRIDGES' Social Security number. I know from my training and experience that access
10 to certain government databases is restricted and may not be used for personal matters. Based on my
11 investigation, I believe that BRIDGES may have directed the analyst to conduct these queries because
12 he was worried that a financial institution may have made a Bank Secrecy Act filing on him given the
13 multiple transfers from Japan into his Quantum Fidelity account.²⁸

14 On May 28, 2014, BRIDGES was telephonically interviewed by a Special Agent with the FBI's
15 Public Corruption Squad in San Francisco, as part of the Northern District of California's investigation.
16 BRIDGES was joined by an attorney representing him and also by a high-level superior from the U.S.
17 Secret Service. BRIDGES was advised of the nature of the interview and of the identity of the
18 interviewer. During that interview, BRIDGES stated that although he knew FORCE through their work
19 on the Baltimore Silk Road Task Force, they had minimal contact, and BRIDGES had no knowledge of
20 any of FORCE's activity related to the purchase of bitcoins. BRIDGES added that FORCE was
21 unprofessional and that after learning of the Bank Secrecy Act filing of which FORCE was a subject,
22 BRIDGES briefed the most senior manager in his office, the Special Agent in Charge (SAC) of the
23 Baltimore Field Office. The SAC told BRIDGES not to discuss the matter with anyone. BRIDGES
24 specifically denied during the May 28, 2014, interview that he ever told FORCE about the Bank Secrecy
25 Act filing. He also denied having owned any Bitcoin in over a year.

26
27
28 ²⁸ I believe that the analyst, E.P., ultimately confirmed that she ran BRIDGES in the database,
but essentially stated that she could not remember whether BRIDGES had specifically asked her to do
so. E.P. had BRIDGES' Social Security number for the second query she ran.

SA-182

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 49 of 95

1 On November 13, 2014, BRIDGES was again interviewed as part of the Northern District of
2 California's investigation, this time by representatives from the Justice Department's Public Integrity
3 Section and Office of the Inspector General. BRIDGES was advised of the nature of the interview and
4 of the identity of the interviewers. BRIDGES advised he had been an affiant on a \$2.1 million seizure
5 of accounts belonging to Mt. Gox, a digital currency exchange. He described himself as a subject matter
6 expert on TOR, and stated that other members of the Silk Road Task Force would routinely consult him
7 on security and undercover-type questions associated with ongoing Silk Road investigations. During
8 this interview he reiterated what he had told the FBI Special Agent previously on May 28, 2014, namely
9 that he and FORCE did not have a close working relationship. When questioned about Quantum
10 International Investments, LLC, BRIDGES acknowledged that he created the LLC as a personal
11 business venture, but stated that he had requested and obtained specific approval from the Secret Service
12 Office of General Counsel (OGC) to establish the LLC and use it for investment purposes.

13 In contrast to what BRIDGES stated during these interviews, my investigation has revealed that
14 several of BRIDGES' statements were not accurate. These statements were capable of and did influence
15 the government's investigation.

16 On March 18, 2015, BRIDGES resigned after being told he was being suspended. USSS
17 personnel advised BRIDGES to leave behind his two government-issued computers in the evidence
18 vault. Although he properly tendered one computer where directed, he placed a second Apple brand
19 laptop computer in a cabinet directly above an area that USSS Baltimore personnel use as a "wipe"
20 station.²⁹ I do not believe BRIDGES would have any reason to store the laptop in this area, other than
21 for it to be in close proximity to computers to be wiped, as USSS personnel has advised this is not a
22 storage area for laptops. Moreover, after BRIDGES was advised of his suspension, he asked his
23 supervisor if he could access his Dell laptop computer to copy electronic receipts of personal items he
24 had purchased from internet merchants. However, instead of copying receipts, BRIDGES began
25 copying a folder entitled "Bitstamp." Upon noticing what BRIDGES was copying, his supervisor
26 secured the laptop and did not allow BRIDGES further access.

27
28 ²⁹ Computers were left in the "wipe" station for the purpose of having their hard drives permanently erased.

SA-183

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 50 of 95

BRIDGES' Money Laundering

1
2 On June 2, 2014, just days after being interviewed by the FBI Special Agent in this matter,
3 BRIDGES wired approximately \$225,000 in criminal proceeds from his Fidelity Quantum account to an
4 account at PNC Bank. He later wired another approximately \$30,000 from the Fidelity Quantum
5 account to the PNC account on or about July 7, 2014. The PNC account was in the name of a third-
6 party with whom BRIDGES had a personal relationship, and BRIDGES' name was also on the account.
7 As described above, BRIDGES' Quantum Fidelity only contained funds transferred from Mt. Gox, and
8 based on the evidence described in the "Silk Road Theft" section above, I believe the Mt. Gox transfers
9 represented criminal proceeds. Given that BRIDGES wired \$225,000 in criminal proceeds from his
10 Quantum Fidelity account (representing proceeds of wire fraud, a specified unlawful activity) into a
11 different account in the name of a third-party at another financial institution just days after being
12 questioned in this matter, I believe that BRIDGES was attempting to conceal the source and nature of
13 the proceeds and further impede the investigation. Given the foregoing, **there is probable cause to**
14 **believe that BRIDGES' \$225,000 wire constituted money laundering in violation of 18 U.S.C.**
15 **§ 1956.**

CONCLUSION

16
17 Based on my training and experience and the facts as set forth in this affidavit, there is probable
18 cause to believe that FORCE has committed violations of law to include Title 18, United States Code,
19 Section 641 (Theft of Government Property), Title 18, United States Code, Section 1343 (Wire Fraud),
20 and Title 18, United States Code, Section 1956 (Money Laundering), and Title 18, United States Code,
21 Section 208 (Conflict of Interest). There is also probable cause to believe that BRIDGES has committed
22 violations of law to include Title 18, United States Code, Section 1343 (Wire Fraud) and Title 18,
23 United States Code, Section 1956 (Money Laundering). I therefore request that you issue the attached
24 arrest warrants and criminal complaint.
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SA-184

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 51 of 95

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REQUEST FOR SEALING

I further request that the Court order that all papers in support of this affidavit, including the affidavit and criminal complaint, be sealed until further order of the Court or until the apprehension and/or surrender of the subjects, whichever is earlier. These documents discuss an ongoing criminal investigation that is neither public nor known to all involved in the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may jeopardize that investigation by alerting the subjects in advance of apprehension and/or surrender. In addition, for the reasons stated in the attached Paragraph meant for inclusion at Page 11 of the Affidavit, I request that that Paragraph be sealed until further Order of this Court. The government will move to unseal that Paragraph as soon as practicable, as detailed in the sealed portion of that Paragraph attached. A Proposed Order is attached.

Respectfully submitted,



TIGRAN GAMBARYAN
Special Agent
Internal Revenue Service

Subscribed and sworn to before me on this 25th day of March, 2015


HONORABLE MARIA-ELENA JAMES
UNITED STATES MAGISTRATE JUDGE

SA-185


Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 52 of 95

A

SA-186

DeathFromAbove message to DPR

[Most Visited](#)
[SILK ROAD](#)
[BTC](#)
[Mic](#)
[Tor Mail](#)
[Background Search](#)
[TorDir](#)
[Bulk](#)
[Hidden Wiki](#)
[PGP](#)


Silk Road
anonymous market


[Shop by Category](#)
[Send a message to SR Support](#)
[for Dread Pirate Roberts](#)

[messages 0](#)
[orders 0](#)
[account \\$0.00](#)
[Search](#)

[the Dread Pirate Roberts](#)
Hi, DeathFromAbove
[logout](#)

[Go](#)

Dread Pirate Roberts,
 I know that you had something to do with Curtis' disappearance and death. Just wanted to let you know that I'm coming for you. Tuque. You are a dead man. Don't think you can elude me.
De Oppresso Liber



Connecting to silkroad.tor2gk.net...

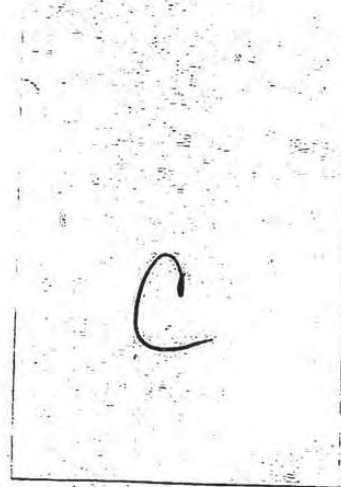
SA-187

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 54 of 95

B

SA-189

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 56 of 95



SA-190

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 57 of 95

Exhibit C (email).txt

280.8822 times \$607 = \$170,495

PATNO

regarding the seizure of 200 Bitcoin from DREAD PIRATE ROBERTS

the value of one Bitcoin on the date of transfer, August 4, 2013, was \$96.877083,
that value times the 200 bitcoin equals \$19,735.4166

today Bitcoin is selling at \$607 ... times the 200 bitcoin which is the equivalent
of \$121,400

here the government earned \$101,665

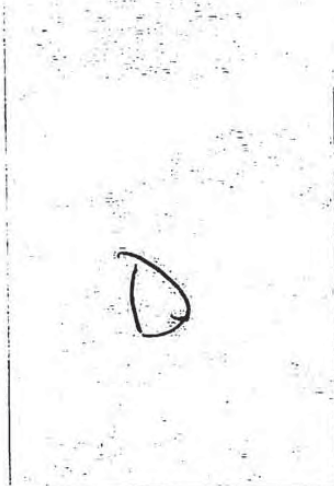
the 400 bitcoin that was paid by DREAD PIRATE ROBERTS in June/July of 2013 for the
fraudulent UK identification was worth approximately \$44,000

today that same 400 bitcoin which is sitting out there in an on-line wallet is now
worth \$242,800 (400 times \$607)

So the U.S. Government has made, to date, in appreciation \$198,800

SA-191

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 58 of 95



SA-192

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wire Out	Bitcoin Price	Fee	Notes
0	10.004	10/15/2013 22:28	10.004							\$-	0	
1	10	10/17/2013 18:31								\$-	0	
0	78	11/07/2013 1:16	67.999							\$-	0	
0	103.56	11/08/2013 17:45	25.56147247							\$-	0	From CampBX
0	188.57	11/08/2013 22:57	85.00359468							\$-	0	From CampBX
2	179.81	11/08/2013 23:05				-8.75552	\$2,889.42			\$330.00	14.45	
2	175.36	11/08/2013 23:05				-1	\$330.00			\$330.00	1.46	
2	173.36	11/08/2013 23:05				-3.45437	\$1,139.94			\$330.00	5.02	
2	172.86	11/08/2013 23:06				-2	\$660.00			\$330.00	2.78	
2	162.86	11/08/2013 23:06				-0.5	\$165.00			\$330.00	0.7	
2	138.57	11/08/2013 23:06				-10	\$3,300.00			\$330.00	13.86	
2	89.35	11/08/2013 14:01				-24.2898	\$8,015.84			\$330.00	32.07	
2	88.57	11/09/2013 14:05				-49.2182	\$17,472.46			\$355.00	62.91	
0	91.9	11/11/2013 2:31	3.33135603			-0.78181	\$277.54			\$355.00	0.89	
0	139.68	11/11/2013 2:37	47.77669137							\$-	0	
1	169.97	11/11/2013 10:19			0					\$-	0	
0	169.97	11/11/2013 20:27	30.28967964							(\$34,085.16)	30.7	
2	169.96	11/12/2013 0:51				-0.00451	\$1.55			\$343.77	0.01	
2	162.05	11/12/2013 0:51				-7.916	\$2,721.28			\$343.77	8.17	
2	142.05	11/12/2013 0:51				-20	\$6,875.40			\$343.77	22.01	
2	141.55	11/12/2013 0:51				-0.5	\$171.88			\$343.77	0.52	
2	121.55	11/12/2013 0:51				-20	\$6,875.40			\$343.77	20.63	
2	118.86	11/12/2013 0:51				-2.68754	\$923.90			\$343.77	2.59	
0	128.28	11/12/2013 0:58	10.41990035							\$-	0	From CampBX
2	118.86	11/12/2013 15:46				-10.4199	\$3,656.24			\$350.89	10.24	
0	214.15	11/12/2013 19:19	95.63891829							\$-	0	From CampBX
2	210.2	11/12/2013 23:21				-0.35	\$123.95			\$354.14	0.35	
2	210.2	11/12/2013 23:21				-3.94183	\$1,395.92			\$354.13	3.91	
2	210.2	11/12/2013 23:21				-0.01009	\$5.57			\$354.13	0.01	
2	195.9	11/12/2013 23:21				-14.3	\$5,084.06			\$354.13	14.18	
2	180.9	11/12/2013 23:22				-15	\$5,311.95			\$354.13	14.88	
2	180.78	11/12/2013 23:22				-0.11	\$36.95			\$354.13	0.11	
2	162.78	11/12/2013 23:22				-0.005	\$1.77			\$354.13	0.01	
2	162.7	11/12/2013 23:23				-18	\$6,374.34			\$354.13	16.58	
2	151.7	11/12/2013 23:23				-0.08432	\$29.66			\$354.13	0.08	
2	145.7	11/12/2013 23:25				-11	\$3,895.43			\$354.13	10.13	
2	145	11/12/2013 23:25				-6	\$2,124.78			\$354.13	5.1	
2	135	11/12/2013 23:25				-0.7	\$247.89			\$354.13	0.6	
2	134.61	11/12/2013 23:26				-10	\$3,541.30			\$354.13	8.5	
2	134.61	11/12/2013 23:27				-0.1004	\$35.55			\$354.13	0.09	
2	118.86	11/12/2013 23:28				-0.28103	\$99.52			\$354.13	0.24	
0	164.35	11/13/2013 19:23	45.488			-15.7573	\$5,580.12			\$354.13	13.4	
2	162.51	11/13/2013 19:26				-0.332	\$129.97			\$391.48	0.32	
2	161.93	11/13/2013 19:26				-1.5	\$887.22			\$391.48	1.41	
2	159.58	11/13/2013 19:26				-0.58086	\$227.39			\$391.48	0.55	
2	159.08	11/13/2013 19:27				-2.34797	\$919.18			\$391.48	2.21	
2	159.08	11/13/2013 19:27				-0.5	\$195.74			\$391.48	0.47	

SA-193

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wire Out	BitC Price	Fee	Notes
2	156.4	11/13/2013 19:27				-2.88555		\$1,051.26		\$391.48	2.53	
2	156.39	11/13/2013 19:27				-0.01		\$3.91		\$391.48	0.01	
2	154.5	11/13/2013 19:27				-1.89254		\$740.89		\$391.48	1.78	
2	154.33	11/13/2013 19:28				-0.17015		\$66.61		\$391.48	0.16	
2	153.83	11/13/2013 19:28				-0.5		\$195.74		\$391.48	0.47	
2	150.16	11/13/2013 19:28				-3.66695		\$1,435.54		\$391.48	3.45	
2	149.04	11/13/2013 19:29				-0.5		\$195.74		\$391.48	0.47	
2	149.04	11/13/2013 19:29				-0.62		\$242.72		\$391.48	0.59	
2	147.16	11/13/2013 19:30				-1.38		\$540.24		\$391.48	1.3	
2	146.57	11/13/2013 19:30				-0.5		\$195.74		\$391.48	0.47	
2	143.8	11/13/2013 19:30				-0.58282		\$232.00		\$391.48	0.56	
2	143.19	11/13/2013 19:45				-2.76599		\$1,082.83		\$391.48	2.6	
2	140.72	11/13/2013 19:45				-0.60843		\$237.40		\$391.48	0.57	
2	137.77	11/13/2013 19:45				-2.47349		\$968.32		\$391.48	2.33	
2	137.27	11/13/2013 19:47				-2.95103		\$1,155.27		\$391.48	2.78	
2	137.21	11/13/2013 19:47				-0.5		\$195.74		\$391.48	0.47	
2	136.71	11/13/2013 19:48				-0.06358		\$24.89		\$391.48	0.06	
2	136.7	11/13/2013 19:48				-0.5		\$195.74		\$391.48	0.47	
2	126.41	11/13/2013 19:48				-0.0102		\$3.99		\$391.48	0.01	
2	126.37	11/13/2013 19:49				-10.2854		\$4,026.53		\$391.48	8.86	
2	118.86	11/13/2013 19:49				-0.03848		\$15.06		\$391.48	0.04	
0	183.86	11/14/2013 2:10	64.9998			-7.51497		\$2,941.96		\$391.48	6.48	
0	225.86	11/14/2013 2:18	41.9999							\$-	0	
2	225.64	11/14/2013 15:22				-0.213		\$88.43		\$415.16	0.2	
2	217.64	11/14/2013 15:23				-8		\$3,321.28		\$415.16	7.31	
2	217.14	11/14/2013 15:23				-0.5		\$207.58		\$415.16	0.46	
2	217.1	11/14/2013 15:24				-0.04491		\$18.84		\$415.16	0.05	
2	196.9	11/14/2013 15:36				-20.2		\$8,386.23		\$415.16	18.45	
2	196.4	11/14/2013 15:36				-0.5		\$207.58		\$415.16	0.46	
2	195.89	11/14/2013 15:36				-0.51		\$211.73		\$415.16	0.47	
2	183.46	11/14/2013 15:36				-2.4305		\$1,009.05		\$415.16	2.22	
2	186.46	11/14/2013 15:36				-7		\$2,906.12		\$415.16	6.4	
2	185.85	11/14/2013 15:36				-0.60547		\$251.37		\$415.16	0.56	
2	182.04	11/14/2013 15:36				-3.80923		\$1,581.44		\$415.16	3.48	
2	181.54	11/14/2013 15:37				-0.5		\$207.58		\$415.16	0.46	
2	178.54	11/14/2013 15:37				-3		\$1,245.48		\$415.16	2.75	
2	178.04	11/14/2013 15:38				-0.5		\$207.58		\$415.16	0.46	
2	177.75	11/14/2013 15:38				-0.29502		\$207.58		\$415.16	0.27	
2	177.41	11/14/2013 15:38				-0.33812		\$122.48		\$415.16	0.27	
2	175.9	11/14/2013 15:38				-1.51059		\$627.14		\$415.16	0.31	
2	158.77	11/14/2013 15:39				-17.1335		\$7,113.16		\$415.16	1.38	
2	158.27	11/14/2013 15:40				-0.5		\$207.58		\$415.16	0.46	
2	152.05	11/14/2013 15:40				-6.21923		\$2,581.98		\$415.16	5.69	
2	152	11/14/2013 15:40				-0.04384		\$18.20		\$415.16	0.05	
0	200	11/15/2013 17:03	47.9994							\$-	0	
2	199.5	11/15/2013 17:09				-0.5		\$214.06		\$428.13	0.48	
2	194.17	11/15/2013 17:09				-5.33415		\$2,263.71		\$428.13	5.03	
2	163.96	11/15/2013 17:09				-30.2135		\$12,935.32		\$428.13	28.46	
2	158.56	11/15/2013 17:09				-4.4		\$1,883.77		\$428.13	3.77	

SA-194

Appendix B
 CARL M FORCE BITStamp Account Analysis

Type	Daily Balance	Datetime	BITC Deposit	BITC Withdraw	BITC Purchase	BITC Sold	USD Used to Purchase BITC	USD from Sales to BITC	Wires Out	BITC Price	Fee	Notes
2	123.59	11/15/2013 17:09				-35.97		\$15,399.84		\$428.13	30.8	
2	111.98	11/15/2013 17:09				-11.6065		\$4,969.10		\$428.13	9.94	
2	109.98	11/15/2013 17:09				-2		\$856.26		\$428.13	1.72	
2	109.42	11/15/2013 17:10				-0.56071		\$240.06		\$428.13	0.49	
2	105.11	11/15/2013 17:10				-4.31016		\$1,845.31		\$428.13	3.7	
2	100.11	11/15/2013 17:10				-5		\$2,140.65		\$428.13	4.29	
2	100	11/15/2013 17:10				-0.10492		\$44.92		\$428.13	0.09	
0	130	11/15/2013 17:47	29.9999									
2	230	11/15/2013 22:07			100		(\$40,000.00)			\$400.00	80	
2	225.78	11/17/2013 0:29				-4.22117		\$1,848.87		\$438.00	3.7	
2	130	11/17/2013 0:30				-95.7788		\$41,951.13		\$438.00	83.91	
0	162	11/17/2013 2:09	31.9999									
0	211	11/18/2013 14:33	49									
0	268.5	11/21/2013 19:37	57.4998									
0	309.54	11/21/2013 19:37	41.0411									
1	309.54	11/26/2013 13:04			0							
0	366.54	11/26/2013 16:05	56.9988						(\$85,913.60)		86.4	
2	317	11/26/2013 18:27										
2	279.45	11/28/2013 12:10				-49.5401		\$41,861.38		\$845.00	83.73	
2	275.25	11/28/2013 12:10				-37.5544		\$37,554.36		\$1,000.00	75.11	
2	270.25	11/28/2013 12:10				-4.2		\$4,200.00		\$1,000.00	8.4	
2	259.24	11/28/2013 12:10				-5		\$5,000.00		\$1,000.00	10	
2	217	11/28/2013 12:10				-11.0075		\$11,007.48		\$1,000.00	22.02	
0	265.5	11/28/2013 20:57	48.4993			-42.2362		\$42,238.16		\$1,000.00	84.48	
0	310.5	11/29/2013 14:42	44.9998									
2	210.5	11/29/2013 21:11				-100						
2	232.32	12/01/2013 18:34			21.81291384		(\$20,722.27)	\$110,000.00		\$1,100.00	220	
2	233.12	12/01/2013 18:34			0.8		(\$760.00)			\$950.00	41.45	
2	233.62	12/01/2013 18:34			0.5		(\$475.00)			\$950.00	1.52	
2	234.62	12/01/2013 18:34			1		(\$950.00)			\$950.00	0.95	
2	239.62	12/01/2013 18:34			5		(\$4,750.00)			\$950.00	1.9	
2	293.63	12/01/2013 18:34			54.01322617		(\$51,312.56)			\$950.00	9.5	
2	307.5	12/01/2013 18:34			13.86627786		(\$13,172.96)			\$950.00	102.63	
2	307.55	12/01/2013 18:34			0.05		(\$47.50)			\$950.00	26.35	
2	308.54	12/01/2013 18:34			0.998		(\$948.10)			\$950.00	0.1	
2	308.79	12/01/2013 18:34			0.25		(\$237.50)			\$950.00	1.9	
2	310.5	12/01/2013 18:34			1.70958213		(\$1,624.10)			\$950.00	0.48	
2	317.04	12/01/2013 19:12			6.53299793		(\$5,455.05)			\$950.00	3.25	
2	360.5	12/01/2013 19:12			43.46700207		(\$36,294.95)			\$835.00	10.92	
2	363.4	12/01/2013 23:04			2.897508		(\$2,796.10)			\$965.00	72.59	
2	378.07	12/01/2013 23:04			14.56904268		(\$14,155.63)			\$965.00	5.6	
2	379.48	12/01/2013 23:04			1.40764285		(\$1,358.38)			\$965.00	28.32	
2	381.95	12/01/2013 23:05			2.474267		(\$2,387.67)			\$965.00	2.72	
2	418.05	12/01/2013 23:05			36.10733017		(\$34,843.57)			\$965.00	4.78	
2	422.22	12/01/2013 23:05			4.15796731		(\$4,012.44)			\$965.00	69.69	
2	425.25	12/01/2013 23:05			3.03473875		(\$2,928.52)			\$965.00	8.03	
2	433.48	12/01/2013 23:05			8.22535683		(\$7,937.47)			\$965.00	5.86	
2	439.94	12/01/2013 23:05			6.45931108		(\$6,233.24)			\$965.00	15.88	
2	440.94	12/01/2013 23:05			1		(\$965.00)			\$965.00	12.47	
2	450.94	12/01/2013 23:05			10		(\$9,650.00)			\$965.00	1.93	
2										\$965.00	18.3	

SA-195

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdrawal	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires Out	BitC Price	Fee	Notes
2	474.5	12/01/2013 23:05			23.56683502		(\$22,742.00)			\$965.00	45.48	
2	460.67	12/02/2013 14:13				-13.8287		\$13,635.11		\$986.00	27.28	
2	460.57	12/02/2013 14:13				-0.10803		\$106.52		\$986.00	0.22	
2	449.43	12/02/2013 14:13				-11.141		\$10,985.03		\$986.00	21.98	
2	445.39	12/02/2013 14:13				-4.03661		\$3,980.10		\$986.00	7.97	
2	443.44	12/02/2013 14:13				-1.94766		\$1,920.29		\$986.00	3.85	
2	374.94	12/02/2013 14:14				-68.5049		\$67,545.85		\$986.00	135.1	
2	361.59	12/02/2013 14:15				-13.3453		\$13,158.42		\$986.00	26.32	
2	360.91	12/02/2013 14:15				-0.68324		\$673.67		\$986.00	1.35	
2	344.85	12/02/2013 14:15				-16.0619		\$15,837.01		\$986.00	31.68	
2	334.94	12/02/2013 14:15				-9.90774		\$9,769.03		\$986.00	19.54	
2	301.53	12/02/2013 14:15				-33.4089		\$32,941.16		\$986.00	65.89	
2	299.37	12/02/2013 14:15				-2.15684		\$2,126.74		\$986.00	4.26	
2	295.06	12/02/2013 14:15				-4.31465		\$4,254.24		\$986.00	8.51	
2	279.27	12/02/2013 14:15				-15.7913		\$15,570.21		\$986.00	31.15	
2	274.5	12/02/2013 14:16				-4.76331		\$4,696.63		\$986.00	9.4	
2	276.01	12/05/2013 8:51			1.51053612		(\$1,435.01)			\$950.00	2.88	
2	286.01	12/05/2013 8:51			10		(\$9,500.00)			\$950.00	19	
2	287.1	12/05/2013 8:51			1.08645454		(\$1,032.13)			\$950.00	2.07	
2	296.84	12/05/2013 8:52			8.74273684		(\$9,255.60)			\$950.00	18.52	
2	301.84	12/05/2013 8:52			5		(\$4,750.00)			\$950.00	9.5	
2	348.16	12/05/2013 8:52			46.31604		(\$44,000.24)			\$950.00	88.01	
2	348.18	12/05/2013 8:52			0.02		(\$19.00)			\$950.00	0.04	
2	350.68	12/05/2013 8:52			2.5		(\$2,375.00)			\$950.00	4.75	
2	352.01	12/05/2013 8:52			1.33348379		(\$1,266.81)			\$950.00	2.54	
2	354.01	12/05/2013 8:52			2		(\$1,900.00)			\$950.00	3.8	
2	354.03	12/05/2013 8:52			0.02		(\$19.00)			\$950.00	0.04	
2	356.01	12/05/2013 8:52			1.98		(\$1,881.00)			\$950.00	3.77	
2	356.51	12/05/2013 8:52			0.5		(\$475.00)			\$950.00	0.95	
2	357.11	12/05/2013 8:52			0.6001176		(\$570.11)			\$950.00	1.15	
2	372.14	12/05/2013 8:52			15.03227		(\$14,280.66)			\$950.00	28.57	
2	372.18	12/05/2013 8:52			0.03657777		(\$34.75)			\$950.00	0.07	
2	372.2	12/05/2013 8:52			0.02		(\$19.00)			\$950.00	0.04	
2	372.22	12/05/2013 8:52			0.023		(\$21.85)			\$950.00	0.05	
2	472.22	12/05/2013 8:52			100		(\$95,000.00)			\$950.00	190	
2	474.05	12/05/2013 8:52			1.823		(\$1,731.85)			\$950.00	3.47	
2	474.48	12/05/2013 8:52			0.43578334		(\$413.99)			\$950.00	0.83	
2	474.5	12/05/2013 8:52			0.02		(\$19.00)			\$950.00	0.04	
0	874.5	12/06/2013 3:03	400							\$-	0	
2	864.85	12/07/2013 1:26				-8.65217		\$7,480.43		\$775.00	14.97	
2	862.35	12/07/2013 1:26				-2.5		\$1,937.50		\$775.00	3.88	
2	853.65	12/07/2013 1:30				-8.701		\$6,743.28		\$775.00	13.49	
2	807.59	12/07/2013 2:18				-46.0559		\$35,693.31		\$775.00	71.39	
2	806.63	12/07/2013 2:18				-0.96548		\$748.25		\$775.00	1.5	
2	753.87	12/07/2013 2:19				-52.7594		\$40,888.54		\$775.00	81.78	
2	674.5	12/07/2013 2:20				-79.3661		\$61,508.69		\$775.00	123.02	
2	670.98	12/10/2013 0:05				-3.52285		\$3,258.64		\$925.00	6.52	
2	669.48	12/10/2013 0:05				-1.5		\$1,387.50		\$925.00	2.78	
2	666.83	12/10/2013 0:05				-2.64548		\$2,447.07		\$925.00	4.9	
2	666.52	12/10/2013 0:05				-0.31		\$286.75		\$925.00	0.58	

SA-196

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdrawal	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires Out	BitC Price	Fee	Notes
2	846.52	12/10/2013 0:05				-20		\$18,500.00		\$925.00	37	
2	610.89	12/10/2013 0:06				-35.6345		\$32,961.89		\$925.00	65.93	
2	610.78	12/10/2013 0:06				-0.1077		\$98.62		\$925.00	0.2	
2	605.78	12/10/2013 0:06				-5		\$4,625.00		\$925.00	9.25	
2	560.68	12/10/2013 0:06				-45.1		\$41,717.50		\$925.00	83.44	
2	474.5	12/10/2013 0:06				-86.1795		\$79,716.03		\$925.00	159.44	
0	979.5	12/10/2013 23:36	505							\$-	0	
2	985.47	12/11/2013 10:05			5.96900788		(\$5,342.26)			\$895.00	10.69	
2	995.97	12/11/2013 10:05			10.5		(\$9,397.50)			\$895.00	18.8	
2	1179.5	12/11/2013 10:05			183.5308921		(\$164,260.24)			\$895.00	328.53	
2	1356.95	12/19/2013 16:51			177.4514061		(\$117,117.93)			\$660.00	234.24	
2	1368.52	12/19/2013 16:51			1.56188975		(\$1,030.85)			\$660.00	2.07	
2	1401.79	12/19/2013 16:52			43.27658887		(\$28,562.55)			\$660.00	57.13	
2	1429.5	12/19/2013 16:52			27.71011532		(\$18,288.68)			\$660.00	36.58	
2	1410.48	12/19/2013 20:06				-19.0256		\$12,937.44		\$680.00	25.88	
2	1406.5	12/19/2013 20:06				-3.9774		\$2,704.63		\$680.00	5.41	
2	1373.17	12/19/2013 20:07				-33.3341		\$22,667.22		\$680.00	45.34	
2	1373.16	12/19/2013 20:07				-0.00535		\$3.64		\$680.00	0.01	
2	1364.4	12/19/2013 20:07				-8.75726		\$5,954.94		\$680.00	11.91	
2	1363.67	12/19/2013 20:07				-0.73207		\$497.81		\$680.00	1	
2	1179.5	12/19/2013 20:07				-184.168		\$125,234.33		\$680.00	250.47	
2	1184.87	12/20/2013 19:57			15.3685139		(\$9,835.85)			\$640.00	19.68	
2	1261.95	12/20/2013 20:00			67.08258157		(\$42,932.85)			\$640.00	85.87	
2	1272.18	12/20/2013 20:01			10.23043183		(\$6,547.48)			\$640.00	13.1	
2	1272.19	12/20/2013 20:01			0.006493		(\$4.16)			\$640.00	0.01	
2	1277.19	12/20/2013 20:01			5		(\$3,200.00)			\$640.00	6.4	
2	1278.19	12/20/2013 20:01			2		(\$1,280.00)			\$640.00	2.56	
2	1278.86	12/20/2013 20:01			0.66658783		(\$426.62)			\$640.00	0.86	
2	1300.97	12/20/2013 20:02			21.11489405		(\$13,513.53)			\$640.00	27.03	
2	1301	12/20/2013 20:02			0.0289		(\$18.50)			\$640.00	0.04	
2	1307	12/20/2013 20:02			6		(\$3,840.00)			\$640.00	7.68	
2	1317	12/20/2013 20:02			10		(\$6,400.00)			\$640.00	12.8	
2	1339.35	12/20/2013 20:02			22.3467777		(\$14,301.94)			\$640.00	28.61	
2	1340.35	12/20/2013 20:02			1.00690194		(\$644.42)			\$640.00	1.29	
2	1361.08	12/20/2013 20:02			20.72339		(\$13,262.97)			\$640.00	26.53	
2	1364.08	12/20/2013 20:02			3		(\$1,920.00)			\$640.00	3.84	
2	1366.64	12/20/2013 20:02			2.56		(\$1,638.40)			\$640.00	3.28	
2	1370.64	12/20/2013 20:02			4		(\$2,560.00)			\$640.00	5.12	
2	1370.67	12/20/2013 20:02			0.0289		(\$18.50)			\$640.00	0.04	
2	1380.67	12/20/2013 20:02			10		(\$6,400.00)			\$640.00	12.8	
2	1383.67	12/20/2013 20:02			3		(\$1,920.00)			\$640.00	3.84	
2	1393.91	12/20/2013 20:03			10		(\$6,400.00)			\$640.00	12.8	
2	1400.36	12/20/2013 20:03			0.24268132		(\$155.32)			\$640.00	0.32	
2	1400.82	12/20/2013 20:03			6.44927		(\$4,127.53)			\$640.00	8.26	
2	1400.85	12/20/2013 20:03			0.4586923		(\$293.56)			\$640.00	0.59	
2	1403.13	12/20/2013 20:03			0.0289		(\$18.50)			\$640.00	0.04	
2	1405.13	12/20/2013 20:03			2.27991858		(\$1,459.15)			\$640.00	2.92	
2	1413.53	12/20/2013 20:03			2		(\$1,280.00)			\$640.00	2.56	
2	1414.53	12/20/2013 20:03			8.40774347		(\$5,380.96)			\$640.00	10.77	
2					1		(\$640.00)			\$640.00	1.28	

SA-197

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitcoin Deposit	Bitcoin Withdrawal	Bitcoin Purchase	Bitcoin Sell	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wire(s) Out	Bitcoin Price	Fee	Notes
2	1414.73	12/20/2013 20:03			0.2004008		(\$128.26)			\$640.00	0.26	
2	1424.83	12/20/2013 20:03			10.1		(\$6,464.00)			\$640.00	12.93	
2	1426.44	12/20/2013 20:03			1.61003965		(\$1,030.43)			\$640.00	2.07	
2	1426.47	12/20/2013 20:03			0.0289		(\$18.50)			\$640.00	0.04	
2	1428.34	12/20/2013 20:03			1.86220627		(\$1,191.81)			\$640.00	2.39	
2	1429.5	12/20/2013 20:03			1.166687579		(\$746.80)			\$640.00	1.5	
2	1179.5	12/22/2013 8:23				-250		\$172,500.00		\$690.00	345	
1	1010	12/22/2013 23:18		-169.4989				\$-			0	
2	1008.33	12/23/2013 0:42				-1.67808		\$1,060.55		\$632.00	2.13	
2	1003.33	12/23/2013 0:42				-4.98282		\$3,155.46		\$632.00	6.32	
2	953.77	12/23/2013 1:19				-49.5655		\$31,325.39		\$632.00	62.66	
2	953.76	12/23/2013 1:19				-0.00581		\$3.67		\$632.00	0.01	
2	952.08	12/23/2013 1:19				-1.0292		\$650.45		\$632.00	1.31	
2	950.13	12/23/2013 1:20				-0.65		\$410.80		\$632.00	0.83	
2	950.05	12/23/2013 2:13				-1.94771		\$1,230.95		\$632.00	2.47	
2	948.61	12/23/2013 2:13				-0.08737		\$55.22		\$632.00	0.12	
2	948.41	12/23/2013 2:13				-1.43518		\$907.03		\$632.00	1.82	
2	926.31	12/23/2013 2:13				-0.2		\$126.40		\$632.00	0.26	
2	925.51	12/23/2013 2:13				-22.1		\$13,967.20		\$632.00	27.94	
2	847.35	12/23/2013 2:13				-0.07427		\$46.94		\$632.00	0.1	
2	847.16	12/23/2013 2:14				-0.73261		\$463.01		\$632.00	0.93	
2	818.23	12/23/2013 2:14				-78.1828		\$49,392.56		\$632.00	98.79	
2	808.22	12/23/2013 2:14				-0.19282		\$121.86		\$632.00	0.25	
2	803.48	12/23/2013 2:14				-28.7301		\$18,157.42		\$632.00	36.32	
2	803.25	12/23/2013 2:14				-0.2		\$126.40		\$632.00	0.26	
2	802.94	12/23/2013 2:14				-4.00552		\$2,531.49		\$632.00	5.07	
2	771.94	12/23/2013 2:14				-6		\$3,792.00		\$632.00	7.59	
2	771.71	12/23/2013 2:14				-2		\$1,264.00		\$632.00	2.53	
2	761.71	12/23/2013 2:14				-2.7433		\$1,733.76		\$632.00	3.47	
2	761.48	12/23/2013 2:14				-0.23		\$145.36		\$632.00	0.3	
2	760.86	12/23/2013 2:14				-0.315		\$199.08		\$632.00	0.4	
2	760.85	12/23/2013 2:14				-31		\$19,592.00		\$632.00	39.19	
2	735.82	12/23/2013 2:15				-0.22576		\$142.68		\$632.00	0.29	
2	735.82	12/23/2013 2:15				-10		\$6,320.00		\$632.00	12.64	
2	714.22	12/23/2013 2:15				-0.23		\$145.36		\$632.00	0.3	
2	710	12/23/2013 2:15				-0.311		\$196.55		\$632.00	0.4	
2	971.21	12/27/2013 2:10			261.2074141		(\$192,771.07)			\$738.00	385.55	
2	971.35	12/27/2013 2:12			0.1369616		(\$101.08)			\$738.00	0.21	
2	973.64	12/27/2013 2:13			0.03198572		(\$23.61)			\$738.00	0.05	
2	973.69	12/27/2013 2:13			2.26429855		(\$1,671.05)			\$738.00	3.35	
2	974.86	12/27/2013 2:15			0.04269106		(\$31.51)			\$738.00	0.07	
2	1010	12/27/2013 2:15			1.17309414		(\$865.74)			\$738.00	1.74	
2					35.14354486		(\$25,935.94)			\$738.00	51.88	

SA-198

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used for Purchase	USD from Sales of BitC	Wire Out	BitC In	Fee	Notes
2	1082.78	12/29/2013 21:46			72.78043528		(\$2,693.04)			\$724.00	105.39	
2	1088.66	12/29/2013 21:48			5.87132586		(\$4,250.84)			\$724.00	8.51	
2	1091.64	12/29/2013 21:48			2.982		(\$2,158.97)			\$724.00	4.32	
2	1104.69	12/29/2013 21:49			13.05119		(\$9,448.06)			\$724.00	18.9	
2	1110	12/29/2013 22:07			5.31504888		(\$3,848.10)			\$724.00	7.7	
2	1106.13	12/30/2013 1:57				-3.87284		\$2,846.39		\$735.00	5.7	
2	1105.13	12/30/2013 1:58				-1		\$735.00		\$735.00	1.47	
2	1090.87	12/30/2013 1:58				-14.2596		\$10,480.78		\$735.00	20.97	
2	1089.87	12/30/2013 1:58				-1		\$735.00		\$735.00	1.47	
2	1089.67	12/30/2013 1:58				-0.2		\$147.00		\$735.00	0.3	
2	1088.67	12/30/2013 1:58				-1		\$735.00		\$735.00	1.47	
2	1088.41	12/30/2013 1:58				-0.00679		\$4.99		\$735.00	0.01	
2	1082.41	12/30/2013 1:58				-1.25759		\$924.33		\$735.00	1.85	
2	1070.91	12/30/2013 1:58				-5		\$3,675.00		\$735.00	7.35	
2	1021.21	12/30/2013 2:00				-11.5		\$8,452.50		\$735.00	16.91	
2	1021.21	12/30/2013 2:00				-49.6836		\$36,524.79		\$735.00	73.05	
2	1021.2	12/30/2013 2:00				-0.00317		\$2.33		\$735.00	0.01	
2	1015.9	12/30/2013 2:32				-0.00679		\$4.99		\$735.00	0.01	
2	1010	12/30/2013 2:32				-5.3018		\$3,896.82		\$735.00	7.8	
2	1155.83	12/31/2013 1:54			145.8247988		(\$105,722.98)			\$725.00	211.45	
2	1260	12/31/2013 1:54			104.1752012		(\$75,527.02)			\$725.00	151.06	
2	1260	01/01/2014 1:57				-10		\$7,420.00		\$742.00	14.84	
2	1081.62	01/01/2014 1:57				-168.386		\$124,942.71		\$742.00	249.89	
2	1076.62	01/01/2014 1:58				-4.99389		\$3,705.46		\$742.00	7.42	
2	1073.42	01/01/2014 1:58				-3.2001		\$2,374.47		\$742.00	4.75	
2	1010	01/01/2014 2:01				-63.4196		\$47,057.95		\$742.00	94.12	
2	869.37	01/02/2014 19:05				-140.63		\$108,003.79		\$768.00	216.01	
2	869.16	01/02/2014 19:05				-0.21		\$161.28		\$768.00	0.33	
2	865.76	01/02/2014 19:05				-3.4		\$2,611.20		\$768.00	5.23	
2	860.63	01/02/2014 19:05				-5.12956		\$3,839.50		\$768.00	7.88	
2	856.21	01/02/2014 19:06				-4.41995		\$3,394.52		\$768.00	6.79	
2	855.22	01/02/2014 19:06				-0.9994		\$767.54		\$768.00	1.54	
2	854.1	01/02/2014 19:06				-1.12		\$860.16		\$768.00	1.73	
2	844.53	01/02/2014 19:06				-9.57		\$7,349.76		\$768.00	14.7	
2	834.54	01/02/2014 19:06				-9.9851		\$7,668.56		\$768.00	15.34	
2	802.15	01/02/2014 19:06				-32.3901		\$24,875.62		\$768.00	49.76	
2	796.95	01/02/2014 19:07				-5.1969		\$3,991.22		\$768.00	7.99	
2	779.41	01/02/2014 19:26				-17.5415		\$13,471.91		\$768.00	26.95	
2	771.31	01/02/2014 19:26				-8.09862		\$6,219.74		\$768.00	12.44	
2	765.56	01/02/2014 19:38				-5.7511		\$4,416.84		\$768.00	8.84	
2	760.56	01/02/2014 19:38				-5		\$3,840.00		\$768.00	7.68	
2	738.98	01/02/2014 19:38				-21.58		\$16,573.44		\$768.00	33.15	
2	738.72	01/02/2014 19:39				-0.26042		\$200.00		\$768.00	0.4	
2	734.72	01/02/2014 19:39				-4		\$3,072.00		\$768.00	6.15	
2	730.61	01/02/2014 19:39				-4.10776		\$3,154.76		\$768.00	6.31	
2	730.41	01/02/2014 19:39				-0.2		\$153.60		\$768.00	0.31	
2	712.99	01/02/2014 19:39				-17.425		\$13,382.40		\$768.00	26.77	
2	710	01/02/2014 19:39				-2.98458		\$2,292.16		\$768.00	4.59	
2	723.54	01/03/2014 16:28			13.54031563		(\$10,859.33)			\$802.00	21.72	

SA-199

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	Bitc Deposit	Bitc Withdraw	Bitc Purchase	Bitc Sold	USD Used to Purchase Bitc	USD from Sales of Bitc	Wire In/Out	Bitc In/Out	FEE	Notes
2	723.64	01/03/2014 16:28			286.3596842	0.1	(\$229,660.47)			\$802.00	0.17	
2	1010	01/03/2014 18:52				-12.5377		\$10,216.56		\$815.00	459.33	
2	997.47	01/04/2014 16:12				-0.1		\$81.50		\$815.00	0.17	
2	997.37	01/04/2014 16:12				-0.1		\$81.50		\$815.00	0.17	
2	997.27	01/04/2014 16:12				-10.6061		\$8,643.95		\$815.00	17.29	
2	986.66	01/04/2014 16:12				-1.87975		\$1,532.00		\$815.00	3.07	
2	984.78	01/04/2014 16:12				-0.1		\$81.50		\$815.00	0.17	
2	984.68	01/04/2014 16:12				-1.49494		\$1,216.38		\$815.00	2.44	
2	983.19	01/04/2014 16:13				-0.1		\$81.50		\$815.00	0.17	
2	982.55	01/04/2014 16:13				-0.53806		\$438.52		\$815.00	0.88	
2	982.45	01/04/2014 16:13				-0.1		\$81.50		\$815.00	0.17	
2	982.35	01/04/2014 16:13				-0.1		\$81.50		\$815.00	0.17	
2	982.25	01/04/2014 16:13				-0.1		\$81.50		\$815.00	0.17	
2	982.23	01/04/2014 16:13				-0.02008		\$16.37		\$815.00	0.04	
2	982.2	01/04/2014 16:13				-0.027		\$22.00		\$815.00	0.05	
2	982.1	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	952.1	01/04/2014 16:14				-30		\$24,450.00		\$815.00	48.9	
2	952	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	890.7	01/04/2014 16:14				-61.3039		\$49,962.68		\$815.00	99.93	
2	890.6	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	888.8	01/04/2014 16:14				-1.8		\$1,467.00		\$815.00	2.94	
2	877.45	01/04/2014 16:14				-11.35		\$9,250.25		\$815.00	18.51	
2	876.14	01/04/2014 16:14				-1.31217		\$1,069.42		\$815.00	2.14	
2	876.04	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	875.94	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	875.25	01/04/2014 16:14				-0.68844		\$561.08		\$815.00	1.13	
2	874.25	01/04/2014 16:14				-1		\$815.00		\$815.00	1.63	
2	848.82	01/04/2014 16:14				-25.4294		\$20,724.93		\$815.00	41.45	
2	848.72	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	762.72	01/04/2014 16:14				-86		\$70,090.00		\$815.00	140.18	
2	762.62	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	758.5	01/04/2014 16:14				-4.11842		\$3,356.51		\$815.00	6.72	
2	752.22	01/04/2014 16:14				-6.28412		\$5,121.56		\$815.00	10.25	
2	752.12	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	744.8	01/04/2014 16:14				-7.32		\$5,965.80		\$815.00	11.94	
2	742.72	01/04/2014 16:14				-2.07218		\$1,688.83		\$815.00	3.38	
2	742.62	01/04/2014 16:14				-0.1		\$81.50		\$815.00	0.17	
2	712.62	01/04/2014 16:14				-30		\$24,450.00		\$815.00	48.9	
2	710	01/04/2014 16:14				-2.61884		\$2,135.17		\$815.00	4.28	
2	709.83	01/05/2014 12:41				-0.1768		\$149.40		\$845.00	0.3	
2	705.06	01/05/2014 12:41				-4.72256		\$3,980.57		\$845.00	7.98	
2	704.74	01/05/2014 12:41				-0.32169		\$272.00		\$845.00	0.07	
2	702.74	01/05/2014 12:42				-2		\$1,690.00		\$845.00	3.38	
2	702.7	01/05/2014 12:42				-0.04		\$33.80		\$845.00	0.07	
2	702.66	01/05/2014 12:42				-0.04		\$33.80		\$845.00	0.07	
2	702.62	01/05/2014 12:43				-0.04		\$33.80		\$845.00	0.07	
2	692.62	01/05/2014 12:43				-10		\$8,450.00		\$845.00	16.9	
2	690.62	01/05/2014 12:43				-2		\$1,690.00		\$845.00	3.38	

SA-200

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires Out	BitC Price	Fee	Notes
2	690.52	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	690.42	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	690.32	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	690.28	01/05/2014 12:43				-0.04		\$33.80		\$845.00	0.07	
2	690.18	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	690.08	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	689.98	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	689.88	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	689.78	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	689.68	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	689.41	01/05/2014 12:43				-0.27258		\$230.33		\$845.00	0.47	
2	689.31	01/05/2014 12:43				-0.1		\$84.50		\$845.00	0.17	
2	689.24	01/05/2014 12:43				-0.06592		\$55.70		\$845.00	0.12	
2	689.18	01/05/2014 12:43				-0.06592		\$55.70		\$845.00	0.12	
2	689.17	01/05/2014 12:43				-0.01		\$8.45		\$845.00	0.02	
2	689.16	01/05/2014 12:43				-0.01		\$8.45		\$845.00	0.02	
2	689.09	01/05/2014 12:43				-0.06592		\$55.70		\$845.00	0.12	
2	689.03	01/05/2014 12:43				-0.06592		\$55.70		\$845.00	0.12	
2	689.02	01/05/2014 12:43				-0.01		\$8.45		\$845.00	0.02	
2	688.92	01/05/2014 12:44				-0.0924		\$78.08		\$845.00	0.16	
2	688.83	01/05/2014 12:44				-0.0924		\$78.08		\$845.00	0.16	
2	688.74	01/05/2014 12:44				-0.0924		\$78.08		\$845.00	0.16	
2	688.65	01/05/2014 12:44				-0.0924		\$78.08		\$845.00	0.16	
2	688.55	01/05/2014 12:44				-0.0924		\$78.08		\$845.00	0.16	
2	688.46	01/05/2014 12:44				-0.0924		\$78.08		\$845.00	0.16	
2	688.37	01/05/2014 12:44				-0.0924		\$78.08		\$845.00	0.16	
2	685.83	01/05/2014 12:44				-2.53812		\$2,144.71		\$845.00	4.29	
2	675.83	01/05/2014 12:44				-10		\$8,450.00		\$845.00	16.9	
2	675.73	01/05/2014 12:44				-0.1		\$84.50		\$845.00	0.17	
2	675.63	01/05/2014 12:44				-0.1		\$84.50		\$845.00	0.17	
2	675.53	01/05/2014 12:44				-0.1		\$84.50		\$845.00	0.17	
2	675.43	01/05/2014 12:44				-0.1		\$84.50		\$845.00	0.17	
2	675.33	01/05/2014 12:44				-0.1		\$84.50		\$845.00	0.17	
2	674.77	01/05/2014 12:44				-0.465		\$392.92		\$845.00	0.79	
2	674.73	01/05/2014 12:44				-0.04		\$33.80		\$845.00	0.07	
2	674.63	01/05/2014 12:44				-0.1		\$84.50		\$845.00	0.17	
2	674.53	01/05/2014 12:44				-0.1		\$84.50		\$845.00	0.17	
2	673.59	01/05/2014 12:44				-0.93827		\$792.84		\$845.00	1.59	
2	655.42	01/05/2014 12:45				-18.1684		\$15,352.34		\$845.00	30.71	
2	655.38	01/05/2014 12:45				-0.04		\$33.80		\$845.00	0.07	
2	652.38	01/05/2014 12:45				-3		\$2,535.00		\$845.00	5.07	
2	649.38	01/05/2014 12:45				-3		\$2,535.00		\$845.00	5.07	
2	649.34	01/05/2014 12:45				-0.04		\$33.80		\$845.00	0.07	
2	644.34	01/05/2014 12:45				-5		\$4,225.00		\$845.00	8.45	
2	643.92	01/05/2014 12:45				-0.418		\$353.21		\$845.00	0.71	
2	643.51	01/05/2014 12:45				-0.415		\$350.68		\$845.00	0.71	
2	434.52	01/05/2014 12:45				-208.993		\$176,591.05		\$845.00	353.19	
2	360	01/05/2014 12:45				-74.5194		\$62,968.85		\$845.00	125.94	
2	390.05	01/06/2014 18:27			30.04616398		(\$28,093.16)			\$935.00	56.19	

SA-201

Appendix B
 CARL M FORCE BITStamp Account Analysis

Type	Daily Balance	Date/Time	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Bitcoin Price	Fee	Notes
2	390.25	01/06/2014 18:27			0.2		(\$187.00)		\$935.00	0.38	
2	380.41	01/06/2014 18:27			0.16		(\$149.60)		\$935.00	0.3	
2	409.01	01/06/2014 18:28			18.6		(\$17,391.00)		\$935.00	34.79	
2	410.51	01/06/2014 18:29			1.5		(\$1,402.50)		\$935.00	2.81	
2	437.24	01/06/2014 18:36			26.73059564		(\$24,983.11)		\$935.00	49.99	
2	455.6	01/06/2014 18:37			18.35667325		(\$17,163.49)		\$935.00	34.33	
2	460	01/06/2014 18:37			4.40656713		(\$4,120.14)		\$935.00	8.25	
2	485.13	01/07/2014 19:18			25.12621229		(\$20,704.00)		\$824.00	41.41	
2	486.11	01/07/2014 19:18			0.98190905		(\$809.09)		\$824.00	1.62	
2	488.11	01/07/2014 19:18			2		(\$1,648.00)		\$824.00	3.3	
2	489.3	01/07/2014 19:18			1.18903226		(\$979.76)		\$824.00	1.96	
2	508.97	01/07/2014 21:43			19.66440521		(\$16,203.47)		\$824.00	32.41	
2	508.97	01/07/2014 21:43			0.00265		(\$2.18)		\$824.00	0.01	
2	515.81	01/07/2014 21:44			6.84408879		(\$5,639.53)		\$824.00	11.28	
2	520.04	01/07/2014 21:44			4.2296		(\$3,485.19)		\$824.00	6.98	
2	520.04	01/07/2014 21:44			0.0028		(\$2.14)		\$824.00	0.01	
2	524.94	01/07/2014 21:44			4.9		(\$4,037.60)		\$824.00	8.08	
2	524.95	01/07/2014 21:44			0.00267		(\$2.20)		\$824.00	0.01	
2	524.95	01/07/2014 21:44			0.00269		(\$2.22)		\$824.00	0.01	
2	525.45	01/07/2014 21:44			0.5		(\$412.00)		\$824.00	0.83	
2	526.44	01/07/2014 21:44			0.0027		(\$2.22)		\$824.00	0.01	
2	552.44	01/07/2014 21:44			0.988		(\$814.11)		\$824.00	1.63	
2	564.44	01/07/2014 21:45			26		(\$21,424.00)		\$824.00	42.85	
2	574.44	01/07/2014 21:45			12		(\$9,888.00)		\$824.00	18.78	
2	605.85	01/07/2014 21:45			10		(\$8,240.00)		\$824.00	16.48	
2	606.85	01/07/2014 21:45			31.41154777		(\$25,883.12)		\$824.00	51.77	
2	608.05	01/07/2014 21:45			1		(\$824.00)		\$824.00	1.65	
2	626.88	01/07/2014 21:45			1.2		(\$988.80)		\$824.00	1.98	
2	637.01	01/07/2014 21:45			18.82401		(\$15,510.98)		\$824.00	31.03	
2	662.83	01/07/2014 21:45			10.13		(\$8,347.12)		\$824.00	16.7	
2	680.46	01/07/2014 21:45			25.82507353		(\$21,279.86)		\$824.00	42.56	
2	681.35	01/07/2014 21:45			17.63244897		(\$14,529.14)		\$824.00	29.06	
2	681.85	01/07/2014 21:45			0.89		(\$733.36)		\$824.00	1.47	
2	681.9	01/07/2014 21:45			0.49999		(\$411.89)		\$824.00	0.83	
2	701.9	01/07/2014 21:45			0.05		(\$41.20)		\$824.00	0.09	
2	702	01/07/2014 21:45			20		(\$16,480.00)		\$824.00	32.96	
2	702.05	01/07/2014 21:45			0.0999999		(\$82.40)		\$824.00	0.17	
2	702.1	01/07/2014 21:45			0.05		(\$41.20)		\$824.00	0.09	
2	705.3	01/07/2014 21:45			0.04409		(\$36.33)		\$824.00	0.08	
2	807.9	01/07/2014 21:46			3.204		(\$2,640.10)		\$824.00	5.29	
2	808.39	01/07/2014 21:46			102.5974		(\$84,540.26)		\$824.00	169.09	
2	808.79	01/07/2014 21:46			0.494052		(\$407.10)		\$824.00	0.82	
2	808.82	01/07/2014 21:46			0.3999999		(\$329.60)		\$824.00	0.66	
2	809.22	01/07/2014 21:46			0.03		(\$24.72)		\$824.00	0.05	
2	809.27	01/07/2014 21:46			0.3999999		(\$329.60)		\$824.00	0.69	
2	809.77	01/07/2014 21:46			0.05		(\$41.20)		\$824.00	0.08	
2	810	01/07/2014 21:46			0.49999		(\$411.99)		\$824.00	0.83	
1	810	01/10/2014 13:04			0.23084043		(\$190.21)		\$824.00	0.39	
1	790	01/10/2014 17:24		-20	0			\$-	\$-	51.64	
										0	

SA-202

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	BitC:Deposit	BitC:Withdraw	BitC:Purchase	BitC:Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires (in)	BitC Price	Fee	Notes
1	790	01/15/2014 14:14			0					\$-	45	
2	791.7	01/18/2014 15:54			1.7		(\$1,358.30)			\$799.00	2.72	
2	810.63	01/18/2014 16:01			18.92660967		(\$15,122.36)			\$799.00	30.25	
2	814.18	01/18/2014 16:02			3.55330179		(\$2,839.09)			\$799.00	5.68	
2	814.74	01/18/2014 16:04			0.55126889		(\$440.46)			\$799.00	0.89	
2	814.83	01/18/2014 16:05			0.0918625		(\$73.40)			\$799.00	0.15	
2	890	01/18/2014 16:30			75.17695715		(\$60,066.39)			\$799.00	120.14	
2	848.8	01/19/2014 14:43				-41.2069		\$33,789.69		\$820.00	67.58	
2	832.41	01/19/2014 14:43				-16.3866		\$13,437.00		\$820.00	26.86	
2	827.47	01/19/2014 14:43				-4.93619		\$4,047.67		\$820.00	8.1	
2	813.09	01/19/2014 14:43				-14.3824		\$11,793.54		\$820.00	23.59	
2	808.09	01/19/2014 14:43				-5		\$4,100.00		\$820.00	8.2	
2	807.09	01/19/2014 14:43				-1		\$820.00		\$820.00	1.64	
2	794.1	01/19/2014 14:43				-12.9889		\$10,651.70		\$820.00	21.31	
2	790	01/19/2014 14:43				-4.09805		\$3,360.41		\$820.00	6.73	
2	980	01/22/2014 11:21			200		(\$162,000.00)			\$810.00	324	
1	890	01/23/2014 13:07		-100				\$-		\$-	0	
1	790	01/23/2014 13:14		-100				\$-		\$-	0	
2	756.1	01/25/2014 17:15				-33.9083		\$27,126.61		\$800.00	54.26	
2	752.1	01/25/2014 17:16				-3		\$2,400.00		\$800.00	4.8	
2	744.6	01/25/2014 17:16				-7.49631		\$5,997.05		\$800.00	1.6	
2	744.35	01/25/2014 17:16				-0.25		\$2,000.00		\$800.00	0.4	
2	742.35	01/25/2014 17:16				-2		\$1,600.00		\$800.00	3.2	
2	741.81	01/25/2014 17:16				-0.53876		\$431.01		\$800.00	0.87	
2	741.56	01/25/2014 17:17				-0.249		\$199.20		\$800.00	0.4	
2	616.55	01/25/2014 17:17				-125.01		\$100,008.00		\$800.00	200.02	
2	616.53	01/25/2014 17:17				-0.02164		\$17.31		\$800.00	0.04	
2	611.53	01/25/2014 17:17				-5		\$4,000.00		\$800.00	8	
2	606.46	01/25/2014 17:17				-5.07135		\$4,057.08		\$800.00	8.12	
2	606.14	01/25/2014 17:17				-0.32295		\$256.36		\$800.00	0.52	
2	605.63	01/25/2014 17:17				-0.50445		\$403.56		\$800.00	0.81	
2	605.13	01/25/2014 17:17				-0.5		\$400.00		\$800.00	0.8	
2	604.13	01/25/2014 17:17				-1		\$800.00		\$800.00	1.6	
2	603.66	01/25/2014 17:18				-0.476		\$380.80		\$800.00	0.77	
2	591.99	01/25/2014 17:18				-11.6636		\$9,330.89		\$800.00	18.67	
2	588.54	01/25/2014 17:18				-3.44894		\$2,759.15		\$800.00	5.52	
2	584.54	01/25/2014 17:18				-4		\$3,200.00		\$800.00	6.4	
2	513.68	01/25/2014 17:18				-70.8616		\$56,689.28		\$800.00	113.38	
2	511.56	01/25/2014 17:18				-2.12419		\$1,699.35		\$800.00	3.4	
2	508.56	01/25/2014 17:18				-3		\$2,400.00		\$800.00	4.8	
2	505.85	01/25/2014 17:18				-2.69488		\$2,155.90		\$800.00	4.32	
2	503.26	01/25/2014 17:18				-2.6		\$2,080.00		\$800.00	4.16	
2	501.26	01/25/2014 17:18				-2		\$1,600.00		\$800.00	3.2	
2	496.19	01/25/2014 17:18				-5.07557		\$4,060.46		\$800.00	8.13	
2	495.52	01/25/2014 17:18				-0.66698		\$533.58		\$800.00	1.07	
2	494.52	01/25/2014 17:18				-1		\$800.00		\$800.00	1.6	
2	490	01/25/2014 17:18				-4.51562		\$3,612.42		\$800.00	7.23	
2	777.57	01/27/2014 18:41			287.5661893		(\$225,738.66)			\$785.00	451.48	
2	780.46	01/27/2014 18:46			2.89357067		(\$2,271.45)			\$785.00	4.55	

SA-203

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wire(s) Out	BitC Price	Fee	Notes
2	780.95	01/27/2014 18:46			0.48694503		(\$382.25)			\$785.00	0.77	
2	783.58	01/27/2014 18:46			2.6314813		(\$2,065.71)			\$785.00	4.14	
2	790	01/27/2014 18:46			6.42280374		(\$5,041.90)			\$785.00	10.09	
2	568.08	01/27/2014 22:21				-221.923		\$167,996.02		\$757.00	336	
2	567.91	01/27/2014 22:21				-0.1702		\$128.84		\$757.00	0.26	
2	555.26	01/27/2014 22:21				-12.6525		\$9,577.94		\$757.00	19.16	
2	551.01	01/27/2014 22:21				-4.25		\$3,217.25		\$757.00	6.44	
2	516.01	01/27/2014 22:22				-35		\$26,495.00		\$757.00	52.99	
2	515.21	01/27/2014 22:22				-0.79466		\$601.55		\$757.00	1.21	
2	511.21	01/27/2014 22:22				-4		\$3,028.00		\$757.00	6.06	
2	502.51	01/27/2014 22:22				-8.7		\$6,585.90		\$757.00	13.18	
2	490.51	01/27/2014 22:22				-12		\$9,084.00		\$757.00	18.17	
2	490	01/27/2014 22:22				-0.50924		\$385.49		\$757.00	0.78	
2	490.18	01/27/2014 23:28			0.1795423		(\$130.69)			\$727.91	0.27	
2	494.18	01/27/2014 23:28			4		(\$2,912.00)			\$728.00	5.83	
2	500.7	01/27/2014 23:28			6.51840952		(\$4,745.40)			\$728.00	9.5	
2	501.23	01/27/2014 23:28			0.52429304		(\$381.69)			\$728.00	0.77	
2	573.53	01/27/2014 23:28			72.30268508		(\$52,636.35)			\$728.00	105.28	
2	581.95	01/28/2014 1:02			8.42116813		(\$6,290.61)			\$747.00	12.59	
1	481.95	01/28/2014 2:01		-100				\$-		\$-	0	
2	690	01/28/2014 5:44			208.0539019		(\$155,416.26)			\$747.00	310.84	
0	909.5	01/31/2014 5:16		219.5			\$-			\$-	0	
2	662.86	01/31/2014 16:53				-246.646		\$199,289.68		\$808.00	398.58	
2	638.7	02/02/2014 7:56				-24.1587		\$19,929.27		\$825.00	39.86	
2	638.18	02/02/2014 7:56				-0.51806		\$427.40		\$825.00	0.86	
2	620.65	02/02/2014 7:57				-17.537		\$14,468.04		\$825.00	28.94	
2	615.15	02/02/2014 7:57				-5.5		\$4,537.50		\$825.00	9.08	
2	614.63	02/02/2014 7:58				-0.51806		\$427.40		\$825.00	0.86	
2	600.48	02/02/2014 8:00				-14.1522		\$11,675.56		\$825.00	23.36	
2	580.91	02/02/2014 8:00				-19.5667		\$16,142.49		\$825.00	32.29	
2	462.86	02/02/2014 8:00				-118.051		\$97,392.35		\$825.00	194.79	
2	501.39	02/04/2014 9:55			38.53189607		(\$30,825.52)			\$800.00	61.66	
2	580.74	02/04/2014 9:58			79.35075207		(\$63,480.60)			\$800.00	126.97	
2	695.5	02/04/2014 9:58			114.76299		(\$91,810.39)			\$800.00	183.63	
2	709.5	02/04/2014 9:58			14		(\$11,200.00)			\$800.00	22.4	
2	1034.5	02/05/2014 19:29			325		(\$260,000.00)			\$800.00	520	
2	1034.48	02/06/2014 1:12				-0.02		\$15.53		\$776.60	0.04	
2	1034.42	02/06/2014 1:12				-0.0677		\$62.60		\$777.00	0.11	
2	1034.29	02/06/2014 1:12				-0.1278		\$99.40		\$777.00	0.2	
2	1034.03	02/06/2014 1:12				-0.263		\$204.38		\$777.11	0.41	
2	1033.76	02/06/2014 1:12				-0.263		\$204.21		\$776.46	0.41	
2	1033.28	02/06/2014 1:12				-0.48178		\$374.72		\$777.77	0.75	
2	1032.8	02/06/2014 1:12				-0.4824		\$374.72		\$776.77	0.75	
2	1032.3	02/06/2014 1:12				-0.5		\$388.50		\$777.00	0.78	
2	1031.68	02/06/2014 1:12				-0.61983		\$482.10		\$777.79	0.97	
2	1021.68	02/06/2014 1:12				-10		\$7,772.00		\$777.20	15.55	
2	1000.6	02/06/2014 1:12				-21.0785		\$16,394.20		\$777.77	32.79	
2	950.6	02/06/2014 1:12				-50		\$38,851.00		\$777.02	77.71	
2	950.58	02/06/2014 1:12				-0.02		\$15.52		\$776.10	0.04	
2	950.18	02/06/2014 1:12				-0.4		\$310.45		\$776.13	0.63	

SA-204

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitc:Deposit	Bitc:Withdraw	Bitc:Purchase	Bitc:Sold	USD Used to Purchase Bitc	USD from Sales of Bitc	Wires Out	Bitc Price	Fee	Notes
2	949.68	02/06/2014 1:12				-0.5		\$388.12		\$776.23	0.78	
2	949.05	02/06/2014 1:12				-0.82894		\$488.08		\$776.03	0.98	
2	946.72	02/06/2014 1:12				-2.33188		\$1,809.62		\$776.10	3.62	
2	944.37	02/06/2014 1:12				-2.34771		\$1,821.87		\$776.02	3.65	
2	941.72	02/06/2014 1:12				-2.64832		\$2,056.36		\$776.10	4.12	
2	936.72	02/06/2014 1:12				-5		\$3,880.05		\$776.01	7.77	
2	929.89	02/06/2014 1:12				-6.83765		\$5,306.16		\$776.02	10.62	
2	921.28	02/06/2014 1:12				-8.60508		\$6,677.54		\$776.00	13.36	
2	876.26	02/06/2014 1:12				-45		\$34,920.00		\$776.00	69.84	
2	876.57	02/06/2014 1:12				-0.21346		\$165.54		\$776.00	0.34	
2	874.57	02/06/2014 1:12				-0.5		\$388.00		\$776.00	0.78	
2	867.72	02/06/2014 1:13				-1		\$776.00		\$776.00	1.56	
2	867.72	02/06/2014 1:13				-6.83765		\$5,306.02		\$776.00	10.62	
2	855.04	02/06/2014 1:13				-0.01		\$7.76		\$776.00	0.02	
2	434.5	02/06/2014 1:13				-12.6792		\$9,839.03		\$776.00	19.68	
2	1034.5	02/06/2014 7:32			600	-420.536		\$326,336.21		\$766.00	652.68	
2	979.41	02/06/2014 13:37				-55.0905	(\$459,600.00)	\$43,521.46		\$790.00	87.05	
2	807.6	02/06/2014 21:57				-171.81		\$131,606.83		\$766.00	263.22	
2	807.09	02/06/2014 21:58				-0.51366		\$393.45		\$766.00	0.79	
2	801.96	02/06/2014 21:59				-5.12616		\$3,926.64		\$766.00	7.86	
2	801.69	02/06/2014 21:59				-0.06794		\$52.04		\$766.00	0.11	
2	799.82	02/06/2014 21:59				-0.20699		\$156.55		\$766.00	0.32	
2	798.74	02/06/2014 21:59				-1.871		\$1,433.19		\$766.00	2.87	
2	648.74	02/06/2014 22:00				-1.07624		\$823.63		\$766.00	1.65	
2	630.67	02/06/2014 22:00				-150		\$114,900.00		\$766.00	229.8	
2	629.61	02/06/2014 22:00				-18.0765		\$13,846.61		\$766.00	27.7	
2	562.72	02/06/2014 22:00				-0.0514		\$39.37		\$766.00	0.08	
2	555.92	02/06/2014 22:00				-1		\$766.00		\$766.00	1.54	
2	490.77	02/06/2014 22:00				-66.763		\$51,140.42		\$766.00	102.29	
2	479.59	02/06/2014 22:00				-0.13		\$89.58		\$766.00	0.2	
2	423.41	02/06/2014 23:49			51.68905747			\$3,830.00		\$766.00	7.66	
2	477.49	02/06/2014 23:49			2.38807176			\$1,378.80		\$766.00	2.76	
2	477.54	02/06/2014 23:49			0.05			\$49,908.81		\$766.00	99.82	
2	478.43	02/06/2014 23:50			0.88927			\$8,560.25		\$766.00	17.13	
2	478.5	02/06/2014 23:52			0.07401767			\$43,031.82		\$766.00	86.07	
2	1028.5	02/07/2014 2:52				-56.1773				\$762.00	78.78	
2	1028.14	02/07/2014 9:45				-0.36378	(\$39,387.06)			\$762.00	3.64	
2	1027.74	02/07/2014 9:45				-0.404	(\$1,819.71)			\$762.00	3.64	
2	1027.29	02/07/2014 9:45				-0.45	(\$36.10)			\$762.00	0.08	
2	1026.92	02/07/2014 9:45				-0.36378	(\$677.62)			\$762.00	1.36	
2	1026.81	02/07/2014 9:45				-0.01	(\$56.40)			\$762.00	0.12	
2	1026.86	02/07/2014 9:45				-0.05	(\$404,250.00)			\$735.00	808.5	
2	1026.41	02/07/2014 9:45				-0.45		\$248.90		\$684.21	0.5	
2	1026.23	02/07/2014 9:45				-0.18076		\$275.93		\$683.00	0.56	
								\$307.89		\$684.21	0.62	
								\$248.46		\$683.00	0.5	
								\$6.83		\$683.00	0.02	
								\$34.15		\$683.00	0.07	
								\$307.35		\$683.00	0.62	
								\$123.46		\$683.00	0.25	

SA-205

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wire(s) Out	Bitcoin Price	Fee	Notes
2	1025.73	02/07/2014 9:45				-0.5002		\$341.64		\$683.00	0.89	
2	1025.53	02/07/2014 9:45				-0.2		\$136.60		\$683.00	0.28	
2	1025.52	02/07/2014 9:45				-0.01		\$6.83		\$683.00	0.02	
2	1025.5	02/07/2014 9:45				-0.02		\$13.66		\$683.00	0.03	
2	1025.05	02/07/2014 9:45				-0.45		\$307.35		\$683.00	0.62	
2	1024.39	02/07/2014 9:45				-0.658		\$449.41		\$683.00	0.9	
2	1024.38	02/07/2014 9:45				-0.01		\$6.83		\$683.00	0.02	
2	1022.38	02/07/2014 9:45				-2		\$1,366.00		\$683.00	2.74	
2	1021.93	02/07/2014 9:45				-0.45		\$307.35		\$683.00	0.62	
2	1021.73	02/07/2014 9:57				-0.2		\$136.60		\$683.00	0.28	
2	968.89	02/07/2014 9:57				-53.3428		\$36,433.16		\$683.00	72.87	
2	967.89	02/07/2014 10:04				-0.5		\$340.00		\$680.00	0.68	
2	895.61	02/07/2014 10:04				-0.7		\$476.00		\$680.00	0.96	
2	894.91	02/07/2014 10:05				-1.27578		\$867.53		\$680.00	1.74	
2	893.64	02/07/2014 10:05				-4.0002		\$2,720.14		\$680.00	5.45	
2	889.64	02/07/2014 10:05				-20.1142		\$13,677.64		\$680.00	27.36	
2	869.52	02/07/2014 10:05				-0.103		\$70.04		\$680.00	0.15	
2	869.42	02/07/2014 10:05				-8.90868		\$6,056.59		\$680.00	12.12	
2	860.51	02/07/2014 10:05				-60.4864		\$41,130.77		\$680.00	82.27	
2	800.03	02/07/2014 10:05				-9.9		\$6,732.00		\$680.00	13.47	
2	790.13	02/07/2014 10:05				-0.10243		\$69.65		\$680.00	0.14	
2	790.02	02/07/2014 10:05				-0.22901		\$155.73		\$680.00	0.32	
2	789.79	02/07/2014 10:05				-70.4565		\$47,810.39		\$680.00	95.83	
2	719.34	02/07/2014 10:05				-4		\$2,720.00		\$680.00	5.44	
2	715.34	02/07/2014 10:05				-5		\$3,400.00		\$680.00	6.8	
2	710.34	02/07/2014 10:06				-6.13676		\$4,173.00		\$680.00	8.35	
2	704.2	02/07/2014 10:06				-15.58		\$10,601.20		\$680.00	21.21	
2	688.61	02/07/2014 10:06				-22.0818		\$15,015.64		\$680.00	30.04	
2	666.53	02/07/2014 10:15				-3.40014		\$2,312.10		\$680.00	4.63	
2	663.13	02/07/2014 10:15				-4.08086		\$2,775.05		\$680.00	5.56	
2	659.05	02/07/2014 10:15				-0.025		\$17.00		\$680.00	0.04	
2	659.02	02/07/2014 10:16				-304.514		\$207,069.85		\$680.00	414.14	
2	354.51	02/07/2014 10:16				-199		\$135,320.00		\$680.00	270.84	
2	150.51	02/07/2014 10:16				-5		\$3,400.00		\$680.00	6.8	
2	146.76	02/07/2014 10:16				-3.74571		\$2,547.08		\$680.00	5.1	
2	145.77	02/07/2014 10:16				-0.99582		\$677.16		\$680.00	1.36	
2	138.42	02/07/2014 10:16				-7.35		\$4,998.00		\$680.00	10	
2	138.39	02/07/2014 10:16				-0.025		\$17.00		\$680.00	0.04	
2	130.48	02/07/2014 10:16				-7.89947		\$5,371.64		\$680.00	10.75	
2	118.93	02/07/2014 10:16				-11.5628		\$7,862.72		\$680.00	15.73	
2	106.1	02/07/2014 10:16				-12.8301		\$8,724.43		\$680.00	17.45	
2	10	02/07/2014 10:16				-86.0951		\$65,344.70		\$680.00	130.69	
2	36.79	02/07/2014 16:36			28.78045955		(\$19,423.08)			\$725.00	38.85	
2	51.79	02/07/2014 16:36			15		(\$10,875.00)			\$725.00	21.75	
2	51.89	02/07/2014 16:36			0.09062857		(\$65.71)			\$725.00	0.14	
2	51.94	02/07/2014 16:36			0.05		(\$36.25)			\$725.00	0.08	
2	51.99	02/07/2014 16:36			0.05		(\$36.25)			\$725.00	0.08	
2	62.68	02/07/2014 16:37			10.68418605		(\$7,753.28)			\$725.00	15.51	
2	65.34	02/07/2014 16:48			2.65631348		(\$1,949.73)			\$734.00	3.9	

SA-206

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitc/Deposit	Bitc/Withdraw	Bitc/Purchase	Bitc/Sold	USD/Used to Purchase Bitc	USD/From Sales of Bitc	Wires/Out	Bitc/Price	Fee	Notes
2	65.35	02/07/2014 16:46			0.013988601		(\$10.27)			\$734.00	0.03	
2	65.35	02/07/2014 16:46			0.00398864		(\$2.94)			\$734.00	0.01	
2	65.39	02/07/2014 16:46			0.036		(\$26.42)			\$734.00	0.06	
2	944.36	02/07/2014 16:46			878.96793		(\$645.16246)			\$734.00	1290.33	
2	975.35	02/07/2014 16:46			30.99607827		(\$22.751.12)			\$734.00	45.51	
2	987.31	02/07/2014 16:46			11.96007672		(\$8.778.70)			\$734.00	17.56	
2	987.76	02/07/2014 16:46			0.446		(\$327.36)			\$734.00	0.66	
2	988.2	02/07/2014 16:46			0.444		(\$325.90)			\$734.00	0.66	
2	988.27	02/07/2014 16:47			0.06215258		(\$45.62)			\$734.00	0.1	
1	588.27	02/07/2014 17:15		-400			\$-			\$-	0	
0	689.6	02/07/2014 21:25	101.3334								0	
2	689.58	02/09/2014 20:59				-0.02168		\$15.11		\$697.00	0.04	
2	689.13	02/09/2014 20:59				-0.4457		\$310.65		\$697.00	0.63	
2	689.11	02/09/2014 20:59				-0.025		\$17.42		\$697.00	0.04	
2	689.08	02/09/2014 20:59				-0.025		\$17.42		\$697.00	0.04	
2	689.03	02/09/2014 20:59				-0.04841		\$33.74		\$697.00	0.07	
2	689.01	02/09/2014 21:00				-0.025		\$17.42		\$697.00	0.04	
2	688.96	02/09/2014 21:00				-0.0511		\$35.61		\$697.00	0.08	
2	688.23	02/09/2014 21:11				-0.72755		\$502.74		\$691.00	1.01	
2	686.23	02/09/2014 21:12				-2		\$1,382.00		\$691.00	2.77	
2	682.82	02/09/2014 21:12				-3.41169		\$2,357.48		\$691.00	4.72	
2	674.04	02/09/2014 21:12				-8.7812		\$6,067.81		\$691.00	12.14	
2	671.94	02/09/2014 21:12				-2.1		\$1,451.10		\$691.00	2.91	
2	662.44	02/09/2014 21:12				-9.5		\$6,564.50		\$691.00	13.13	
2	662.39	02/09/2014 21:12				-0.045		\$31.10		\$691.00	0.07	
2	660.42	02/09/2014 21:12				-1.8685		\$1,360.23		\$691.00	2.73	
2	656.12	02/09/2014 21:12				-4.28916		\$2,970.72		\$691.00	5.95	
2	631.12	02/09/2014 21:12				-25		\$17,275.00		\$691.00	34.55	
2	623.99	02/09/2014 21:12				-7.13153		\$4,927.89		\$691.00	9.86	
2	623.95	02/09/2014 21:12				-0.045		\$31.10		\$691.00	0.07	
2	622.95	02/09/2014 21:12				-1		\$691.00		\$691.00	1.39	
2	615.78	02/09/2014 21:12				-7.17135		\$4,955.40		\$691.00	9.92	
2	615.77	02/09/2014 21:13				-0.01027		\$7.10		\$691.00	0.02	
2	615.74	02/09/2014 21:14				-0.02375		\$16.41		\$691.00	0.04	
2	615.51	02/09/2014 21:14				-0.23		\$158.93		\$691.00	0.32	
2	609.51	02/09/2014 21:14				-6		\$4,146.00		\$691.00	8.3	
2	609.28	02/09/2014 21:14				-0.23		\$158.93		\$691.00	0.32	
2	608.83	02/09/2014 21:14				-0.45		\$310.95		\$691.00	0.63	
2	605.09	02/09/2014 21:14				-3.74185		\$2,585.62		\$691.00	5.18	
2	604.86	02/09/2014 21:15				-0.23		\$158.93		\$691.00	0.32	
2	604.41	02/09/2014 21:15				-0.448		\$309.57		\$691.00	0.62	
2	604.38	02/09/2014 21:15				-0.03129		\$21.62		\$691.00	0.05	
2	604.15	02/09/2014 21:15				-0.23		\$158.93		\$691.00	0.32	
2	603.7	02/09/2014 21:15				-0.448		\$309.57		\$691.00	0.62	
2	603.62	02/09/2014 21:15				-0.08239		\$66.97		\$691.00	0.12	
2	603.49	02/09/2014 21:15				-0.12746		\$88.07		\$691.00	0.18	
2	603.26	02/09/2014 21:15				-0.23		\$158.93		\$691.00	0.32	
2	10	02/09/2014 21:15				-593.259		\$408,942.20		\$691.00	819.89	
2	17.53	02/10/2014 9:05					(\$5,124.75)			\$681.00	10.25	
2	131.17	02/10/2014 9:14					(\$77,387.87)			\$681.00	154.78	

SA-207

Appendix B
CARL M FORCE BitStamp Account Analysis

Typel	Daily Balance:	@datetime:	Bitcoin Deposit:	Bitcoin Withdraw:	Bitcoin Purchase	Bitcoin Sold:	USD Used (to Purchase BTC):	USD from Sales of BTC:	Wires/Out	BTC Price:	Fee:	Notes:
2	143.46	02/10/2014 10:10			12.2925933		(\$8,371.26)			\$681.00	16.75	
2	263.46	02/10/2014 10:10			120		(\$81,720.00)			\$681.00	163.44	
2	263.73	02/10/2014 10:10			0.2685		(\$182.85)			\$681.00	0.37	
2	264.23	02/10/2014 10:10			0.5		(\$340.50)			\$681.00	0.69	
2	270.51	02/10/2014 10:11			6.27756795		(\$4,275.02)			\$681.00	8.56	
2	272.51	02/10/2014 10:11			2		(\$1,362.00)			\$681.00	2.73	
2	275.3	02/10/2014 10:11			2.79308915		(\$1,802.08)			\$681.00	3.81	
2	275.6	02/10/2014 10:11			0.3		(\$204.30)			\$681.00	0.41	
2	280.6	02/10/2014 10:11			5		(\$3,405.00)			\$681.00	6.81	
2	281.88	02/10/2014 10:11			1.285		(\$875.08)			\$681.00	1.76	
2	311.88	02/10/2014 10:11			30		(\$20,430.00)			\$681.00	40.86	
2	350.14	02/10/2014 10:11			38.25908897		(\$26,054.44)			\$681.00	52.11	
2	355.14	02/10/2014 10:11			5		(\$3,405.00)			\$681.00	6.81	
2	356.14	02/10/2014 10:11			1		(\$681.00)			\$681.00	1.37	
2	358.49	02/10/2014 10:11			2.35015427		(\$1,600.46)			\$681.00	3.21	
2	358.74	02/10/2014 10:11			0.25		(\$170.25)			\$681.00	0.35	
2	361.74	02/10/2014 10:11			3		(\$2,043.00)			\$681.00	4.09	
2	377.5	02/10/2014 10:12			15.75918895		(\$10,732.01)			\$681.00	21.47	
2	421.55	02/10/2014 10:12			44.0439854		(\$29,993.95)			\$681.00	59.99	
2	423.4	02/10/2014 10:12			1.849		(\$1,259.17)			\$681.00	2.52	
2	436.49	02/10/2014 10:12			13.09801194		(\$8,919.75)			\$681.00	17.84	
2	438.49	02/10/2014 10:12			2		(\$1,362.00)			\$681.00	2.73	
2	442.78	02/10/2014 10:12			4.28298988		(\$2,916.72)			\$681.00	5.84	
2	456.88	02/10/2014 10:12			14.1		(\$9,602.10)			\$681.00	19.21	
2	478.04	02/10/2014 10:12			21.15872992		(\$14,409.10)			\$681.00	28.82	
2	489.3	02/10/2014 10:12			11.2661		(\$7,672.21)			\$681.00	15.35	
2	481.9	02/10/2014 10:12			2.6		(\$1,770.60)			\$681.00	3.55	
2	494.9	02/10/2014 10:12			3		(\$2,043.00)			\$681.00	4.09	
2	504.79	02/10/2014 10:12			9.86322		(\$6,730.47)			\$681.00	13.47	
2	631.79	02/10/2014 10:12			127		(\$86,487.00)			\$681.00	172.98	
2	633.79	02/10/2014 10:12			2		(\$1,362.00)			\$681.00	2.73	
2	686.8	02/10/2014 10:12			53.01887715		(\$36,105.86)			\$681.00	72.22	
2	696.8	02/10/2014 10:12			10		(\$6,810.00)			\$681.00	13.62	
2	613.92	02/10/2014 11:56			-82.8816			\$53,873.05		\$650.00	107.75	
2	612.28	02/10/2014 12:07			-1.64714			\$1,012.99		\$615.00	2.03	
2	612.24	02/10/2014 12:07			-0.03625			\$22.29		\$615.00	0.05	
2	612.14	02/10/2014 12:07			-0.09479			\$58.29		\$615.00	0.12	
2	612.04	02/10/2014 12:07			-0.1			\$61.50		\$615.00	0.13	
2	611.39	02/10/2014 12:07			-1			\$401.95		\$615.00	0.81	
2	610.39	02/10/2014 12:07			-1			\$615.00		\$615.00	1.23	
2	602.34	02/10/2014 12:07			-0.024			\$4,950.75		\$615.00	9.81	
2	602.32	02/10/2014 12:07			-0.03625			\$14.76		\$615.00	0.03	
2	602.28	02/10/2014 12:07			-0.1			\$22.29		\$615.00	0.05	
2	602.18	02/10/2014 12:07			-0.08			\$61.50		\$615.00	0.13	
2	572.18	02/10/2014 12:07			-30			\$18,450.00		\$615.00	36.9	
2	572.1	02/10/2014 12:07			-0.08			\$49.20		\$615.00	0.1	
2	572.06	02/10/2014 12:07			-0.03625			\$22.29		\$615.00	0.05	
2	572.03	02/10/2014 12:08			-0.03625			\$22.29		\$615.00	0.05	
2	571.99	02/10/2014 12:08			-0.03625			\$22.29		\$615.00	0.05	
2	571.85	02/10/2014 12:08			-0.14148			\$87.01		\$615.00	0.18	

SA-208

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitcoin Deposit	Bitcoin Withdrawal	Bitcoin Purchase	Bitcoin Sold	USD Used for Purchase	USD from Sales	Wire Out	Bitcoin Price	Fee	Notes
2	571.35	02/10/2014 12:08				-0.5		\$307.50		\$615.00	0.62	
2	570.35	02/10/2014 12:08				-1		\$615.00		\$615.00	1.23	
2	406.34	02/10/2014 12:08				-164.007		\$100,864.14		\$615.00	201.73	
2	10	02/10/2014 12:08				-386.339		\$243,748.75		\$615.00	487.5	
0	410	02/10/2014 12:25	399.9999							\$-	0	
2	373.66	02/10/2014 14:36				-36.3424		\$23,622.57		\$650.00	47.25	
2	368.03	02/10/2014 14:36				-5.62688		\$3,657.54		\$650.00	7.32	
2	360.9	02/10/2014 14:36				-7.13		\$4,634.50		\$650.00	9.27	
2	359.9	02/10/2014 14:36				-1		\$1,950.00		\$650.00	1.3	
2	356.9	02/10/2014 14:36				-3				\$650.00	3.9	
2	288.35	02/10/2014 14:36				-68.55		\$44,557.60		\$650.00	89.12	
2	254.79	02/10/2014 14:36				-33.5694		\$21,817.52		\$650.00	43.64	
2	188.99	02/10/2014 14:36				-65.8011		\$42,770.70		\$650.00	85.55	
2	182.43	02/10/2014 14:37				-6.56		\$4,264.00		\$650.00	8.53	
2	172.43	02/10/2014 14:37				-10				\$650.00	13	
2	62.98	02/10/2014 14:37				-109.436		\$6,500.00		\$650.00	142.27	
2	60.17	02/10/2014 14:37				-2.82323		\$71,133.32		\$650.00	3.68	
2	55.16	02/10/2014 14:37				-5.01		\$3,256.50		\$650.00	6.52	
2	10	02/10/2014 14:37				-45.1548		\$29,350.69		\$650.00	58.71	
2	143.28	02/13/2014 17:58			133.2781713		(\$85,298.03)			\$640.00	170.6	
2	148.28	02/13/2014 17:58			5		(\$3,200.00)			\$640.00	6.4	
2	153.28	02/13/2014 17:58			5		(\$3,200.00)			\$640.00	6.4	
2	182.28	02/13/2014 17:58			29		(\$18,560.00)			\$640.00	37.12	
2	187.28	02/13/2014 17:58			5		(\$3,200.00)			\$640.00	6.4	
2	208.08	02/13/2014 17:58			20.8		(\$13,312.00)			\$640.00	26.63	
2	212.58	02/13/2014 17:59			4.50066		(\$2,880.42)			\$640.00	5.77	
2	222.42	02/13/2014 17:59			9.83964		(\$6,297.37)			\$640.00	12.6	
2	226.42	02/13/2014 17:59			4		(\$2,560.00)			\$640.00	5.12	
2	227.42	02/13/2014 17:59			1		(\$640.00)			\$640.00	1.28	
2	262.42	02/13/2014 17:59			35		(\$22,400.00)			\$640.00	1.28	
2	324.56	02/13/2014 17:59			62.13412394		(\$39,765.84)			\$640.00	44.8	
2	326.77	02/13/2014 17:59			2.21752813		(\$1,419.22)			\$640.00	79.54	
2	331.79	02/13/2014 17:59			5.02		(\$3,212.80)			\$640.00	2.84	
2	332.29	02/13/2014 17:59			0.5		(\$320.00)			\$640.00	0.64	
2	334.52	02/13/2014 17:59			0.23		(\$147.20)			\$640.00	2.56	
2	334.75	02/13/2014 17:59			0.23		(\$147.20)			\$640.00	0.3	
2	338.57	02/13/2014 17:59			3.82		(\$2,444.80)			\$640.00	4.89	
2	338.8	02/13/2014 17:59			0.23		(\$147.20)			\$640.00	0.3	
2	345.81	02/13/2014 17:59			7.0022923		(\$4,481.47)			\$640.00	8.97	
2	348.89	02/13/2014 18:00			3.08554		(\$1,874.75)			\$640.00	3.95	
2	354.06	02/13/2014 18:00			5.16893721		(\$3,308.40)			\$640.00	6.62	
2	362.19	02/13/2014 18:00			8.1321787		(\$5,204.59)			\$640.00	10.41	
2	363.19	02/13/2014 18:00			1		(\$640.00)			\$640.00	1.28	
2	389.73	02/13/2014 18:00			26.541051		(\$16,986.27)			\$640.00	33.98	
2	414	02/13/2014 18:00			24.26943742		(\$15,532.44)			\$640.00	31.07	
2	600.18	02/13/2014 21:21			186.1778195		(\$113,196.11)			\$608.00	226.4	
2	607.65	02/13/2014 21:21			7.46530618		(\$4,538.91)			\$608.00	9.08	
2	623.71	02/13/2014 21:22			16.06259934		(\$9,766.06)			\$608.00	19.54	
2	625.13	02/13/2014 21:22			1.42395		(\$865.76)			\$608.00	1.74	

SA-209

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires Out	BitC Price	FEES	Notes
2	625.37	02/13/2014 21:22			0.24073846		(\$146.37)			\$608.00	0.3	
2	669.37	02/13/2014 21:22			44		(\$26,752.00)			\$608.00	53.51	
2	678.56	02/13/2014 21:22			9.18479		(\$5,584.35)			\$608.00	11.17	
2	741.56	02/13/2014 21:22			63		(\$38,304.00)			\$608.00	76.61	
2	746.56	02/13/2014 21:22			5		(\$3,040.00)			\$608.00	6.28	
2	750.91	02/13/2014 21:22			4.35		(\$2,644.80)			\$608.00	5.29	
2	753.71	02/13/2014 21:22			2.8		(\$1,702.40)			\$608.00	3.41	
2	792.51	02/13/2014 21:22			38.8		(\$23,590.40)			\$608.00	47.19	
2	805.05	02/13/2014 21:22			12.54294711		(\$7,626.11)			\$608.00	15.26	
2	813.05	02/13/2014 21:22			8		(\$4,864.00)			\$608.00	9.73	
2	843.05	02/13/2014 21:22			30		(\$18,240.00)			\$608.00	36.48	
2	901.25	02/13/2014 21:22			58.20014515		(\$35,385.69)			\$608.00	70.78	
2	962.09	02/13/2014 21:22			60.83678914		(\$36,988.77)			\$608.00	73.98	
2	965.27	02/13/2014 21:22			3.17848767		(\$1,932.52)			\$608.00	3.87	
2	970.27	02/13/2014 21:22			5		(\$3,040.00)			\$608.00	6.08	
2	1026.34	02/13/2014 21:22			56.06985233		(\$34,090.47)			\$608.00	68.19	
2	1026.84	02/13/2014 21:22			0.50254181		(\$305.55)			\$608.00	0.62	
2	1027.34	02/13/2014 21:23			0.5		(\$304.00)			\$608.00	0.61	
2	1032.58	02/13/2014 21:23			5.2352532		(\$3,183.20)			\$608.00	6.37	
2	1037.22	02/13/2014 21:23			4.64490152		(\$2,824.10)			\$608.00	5.65	
2	1037.22	02/13/2014 21:23			0		\$-			\$608.00	0.01	
2	1094.18	02/13/2014 21:23			56.96323708		(\$34,633.65)			\$608.00	69.27	
2	1087.9	02/13/2014 21:23			3.72		(\$2,261.76)			\$608.00	4.53	
2	1098.4	02/13/2014 21:23			0.5		(\$304.00)			\$608.00	0.61	
2	1099.3	02/13/2014 21:23			0.9		(\$547.20)			\$608.00	1.1	
2	1099.41	02/13/2014 21:23			0.11038469		(\$67.11)			\$608.00	0.14	
2	1109.52	02/13/2014 21:23			10.10110475		(\$6,141.47)			\$608.00	12.29	
2	1110.71	02/13/2014 21:23			1.19888		(\$728.92)			\$608.00	1.46	
2	1031.47	02/14/2014 3:36				-79.2422		\$47,545.35		\$600.00	95.1	
2	988.58	02/14/2014 3:37				-42.8908		\$25,734.52		\$600.00	51.47	
2	866.98	02/14/2014 3:38				-121.6		\$72,960.00		\$600.00	145.92	
2	854.05	02/14/2014 3:38				-12.9269		\$7,756.13		\$600.00	15.52	
2	804.05	02/14/2014 3:38				-50		\$30,000.00		\$600.00	60	
2	803.95	02/14/2014 3:38				-0.1		\$60.00		\$600.00	0.12	
2	610	02/14/2014 3:38				-193.95		\$116,370.00		\$600.00	232.74	
2	650.31	02/14/2014 18:06			40.30741878		(\$27,086.59)			\$672.00	54.18	
2	677.97	02/14/2014 18:07			27.66358109		(\$18,589.83)			\$672.00	37.18	
2	711.09	02/14/2014 18:07			33.11541565		(\$22,253.56)			\$672.00	44.51	
2	711.19	02/14/2014 18:07			0.1		(\$67.20)			\$672.00	0.14	
2	711.29	02/14/2014 18:07			0.1		(\$67.20)			\$672.00	0.14	
2	728.07	02/14/2014 18:07			16.78		(\$11,276.16)			\$672.00	22.56	
2	728.17	02/14/2014 18:07			0.1		(\$67.20)			\$672.00	0.14	
2	766.86	02/14/2014 18:09			38.68469538		(\$25,996.12)			\$672.00	52	
2	766.96	02/14/2014 18:09			0.1		(\$67.20)			\$672.00	0.14	
2	781.55	02/14/2014 18:10			14.59562433		(\$9,808.26)			\$672.00	19.62	
2	787.11	02/14/2014 18:10			5.96123809		(\$3,737.15)			\$672.00	7.48	
2	792.52	02/14/2014 18:10			5.41278875		(\$3,637.39)			\$672.00	7.28	
2	794.52	02/14/2014 18:10			2		(\$1,344.00)			\$672.00	2.69	
2	794.85	02/14/2014 18:10			0.32302027		(\$217.07)			\$672.00	0.44	
2	796.67	02/14/2014 18:10			1.82669557		(\$1,227.67)			\$672.00	2.46	

SA-210

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wire In/Out	BitC Price	Fee	Notes
2	798.67	02/14/2014 18:10			2		(\$1,344.00)			\$672.00	2.69	
2	810.53	02/14/2014 18:11			11.85045677		(\$7,963.51)			\$672.00	15.93	
2	810.85	02/14/2014 18:11			0.32628567		(\$219.26)			\$672.00	0.44	
2	821.79	02/14/2014 18:14			10.93744873		(\$7,349.97)			\$672.00	14.7	
2	919.95	02/14/2014 18:16			98.16487771		(\$65,966.87)			\$672.00	131.94	
2	960.39	02/14/2014 19:13			40.43810579		(\$27,174.41)			\$672.00	54.35	
2	974.7	02/14/2014 19:25			14.30921344		(\$9,615.79)			\$672.00	19.24	
2	976.08	02/14/2014 19:25			1.37868		(\$926.47)			\$672.00	1.86	
2	976.15	02/14/2014 19:26			0.07280907		(\$48.93)			\$672.00	0.11	
2	976.23	02/14/2014 19:26			0.07692307		(\$51.69)			\$672.00	0.11	
2	1055.5	02/14/2014 19:26			79.27442184		(\$53,272.41)			\$672.00	106.55	
2	1055.28	02/16/2014 19:19				-0.22331		\$134.88		\$604.00	0.27	
2	1054.61	02/16/2014 19:19				-0.67118		\$405.39		\$604.00	0.82	
2	1053.64	02/16/2014 19:19				-0.96609		\$583.52		\$604.00	1.17	
2	1052.64	02/16/2014 19:19				-1		\$604.00		\$604.00	1.21	
2	1024.71	02/16/2014 19:20				-0.031		\$18.72		\$604.00	0.04	
2	1010.88	02/16/2014 19:21				-27.8999		\$16,851.53		\$604.00	33.71	
2	1010.83	02/16/2014 19:21				-13.776		\$8,320.68		\$604.00	16.65	
2	1010.8	02/16/2014 19:21				-0.05921		\$35.77		\$604.00	0.08	
2	1010.49	02/16/2014 19:22				-0.05236		\$31.62		\$604.00	0.07	
2	980.41	02/16/2014 19:22				-0.02578		\$15.57		\$604.00	0.04	
2	979.31	02/16/2014 19:22				-0.31023		\$187.38		\$604.00	0.38	
2	974.73	02/16/2014 19:22				-30.0809		\$18,168.88		\$604.00	36.34	
2	879.24	02/16/2014 19:22				-0.097		\$68.59		\$604.00	0.12	
2	876.47	02/16/2014 19:22				-1		\$604.00		\$604.00	1.21	
2	876.38	02/16/2014 19:22				-4.58554		\$2,769.66		\$604.00	5.54	
2	874.38	02/16/2014 19:22				-94.4868		\$604.00		\$604.00	114.15	
2	874.34	02/16/2014 19:22				-2.77355		\$1,675.22		\$604.00	3.36	
2	874.31	02/16/2014 19:22				-0.085		\$51.34		\$604.00	0.11	
2	874.21	02/16/2014 19:22				-2		\$1,208.00		\$604.00	2.42	
2	874.08	02/16/2014 19:26				-0.03767		\$22.75		\$604.00	0.05	
2	873.95	02/16/2014 19:26				-0.031		\$18.38		\$593.00	0.04	
2	873.11	02/16/2014 19:26				-0.1		\$69.45		\$594.45	0.12	
2	846.52	02/16/2014 19:26				-0.13		\$77.17		\$593.59	0.16	
2	846.42	02/16/2014 19:26				-0.13		\$77.08		\$592.92	0.16	
2	846.29	02/16/2014 19:26				-0.84317		\$500.00		\$593.00	1	
2	842.81	02/16/2014 19:26				-26.5837		\$15,817.30		\$595.00	31.64	
2	839.81	02/16/2014 19:26				-0.02		\$11.84		\$592.00	0.03	
2	835.81	02/16/2014 19:26				-0.08		\$47.36		\$592.00	0.1	
2	830.81	02/16/2014 19:26				-0.13		\$77.04		\$592.59	0.16	
2	825.81	02/16/2014 19:26				-0.98882		\$583.57		\$590.17	1.17	
2	820.81	02/16/2014 19:26				-2.5		\$1,480.25		\$592.10	2.97	
2	813.48	02/16/2014 19:26				-3		\$1,773.33		\$591.11	3.55	
2	805.11	02/16/2014 19:26				-4		\$2,364.40		\$591.10	4.73	
2						-5		\$2,955.60		\$591.12	5.92	
2						-5		\$2,965.00		\$591.00	5.91	
2						-5		\$2,860.90		\$590.18	5.91	
2						-7.3236		\$4,335.57		\$592.00	8.68	
2						-8.37663		\$4,951.71		\$591.12	9.91	

SA-211

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires Out	BitC Price	Fee	Notes
2	800.11	02/16/2014 19:26				-5		\$2,950.85		\$590.17	5.91	
2	799.98	02/16/2014 19:26				-0.12414		\$73.27		\$590.17	0.15	
2	799.9	02/16/2014 19:26				-0.08		\$47.21		\$590.17	0.1	
2	799.89	02/16/2014 19:26				-0.102		\$6.02		\$590.17	0.02	
2	798.79	02/16/2014 19:26				-0.1		\$59.02		\$590.17	0.12	
2	798.74	02/16/2014 19:26				-0.05		\$29.51		\$590.17	0.06	
2	798.74	02/16/2014 19:26				-1		\$590.17		\$590.17	1.19	
2	798.67	02/16/2014 19:26				-0.07		\$41.31		\$590.17	0.09	
2	798.57	02/16/2014 19:26				-0.1		\$59.02		\$590.17	0.12	
2	798.07	02/16/2014 19:26				-0.5		\$295.08		\$590.17	0.12	
2	793.67	02/16/2014 19:26				-4.4		\$2,596.75		\$590.17	5.2	
2	793.64	02/16/2014 19:26				-0.031		\$18.30		\$590.17	0.04	
2	793.59	02/16/2014 19:26				-0.05		\$29.51		\$590.17	0.06	
2	793.54	02/16/2014 19:26				-0.05		\$29.51		\$590.17	0.06	
2	793.49	02/16/2014 19:26				-0.04704		\$27.76		\$590.17	0.06	
2	788.49	02/16/2014 19:26				-5		\$2,950.85		\$590.17	5.91	
2	786.39	02/16/2014 19:26				-2.1		\$1,239.36		\$590.17	2.48	
2	786.29	02/16/2014 19:26				-0.1		\$59.02		\$590.17	0.12	
2	786.24	02/16/2014 19:26				-0.05		\$29.51		\$590.17	0.06	
2	786.14	02/16/2014 19:26				-0.1		\$59.02		\$590.17	0.12	
2	785.6	02/16/2014 19:26				-0.53855		\$317.84		\$590.17	0.64	
2	781.6	02/16/2014 19:26				-4		\$2,360.88		\$590.17	4.73	
2	776.8	02/16/2014 19:26				-4.8		\$2,832.82		\$590.17	5.67	
2	773.8	02/16/2014 19:26				-3		\$1,770.51		\$590.17	3.55	
2	768.8	02/16/2014 19:26				-5		\$2,950.85		\$590.17	5.91	
2	768.39	02/16/2014 19:26				-0.41085		\$242.47		\$590.17	0.49	
2	768.34	02/16/2014 19:26				-0.05		\$29.51		\$590.17	0.06	
2	767.34	02/16/2014 19:27				-1		\$590.17		\$590.17	1.19	
2	757.34	02/16/2014 19:27				-10		\$5,901.70		\$590.17	11.81	
2	697.74	02/16/2014 19:27				-59.6083		\$35,179.02		\$590.17	70.36	
2	697.68	02/16/2014 19:27				-0.05921		\$34.95		\$590.17	0.07	
2	696.63	02/16/2014 19:27				-1.04209		\$615.01		\$590.17	1.24	
2	696.53	02/16/2014 19:27				-0.1		\$59.02		\$590.17	0.12	
2	696.5	02/16/2014 19:27				-0.031		\$18.30		\$590.17	0.04	
2	696.13	02/16/2014 19:27				-0.37119		\$219.07		\$590.17	0.44	
2	695.63	02/16/2014 19:27				-0.5		\$295.08		\$590.17	0.6	
2	690.38	02/16/2014 19:27				-5.24953		\$3,098.12		\$590.17	6.2	
2	690.36	02/16/2014 19:27				-0.02		\$11.80		\$590.17	0.03	
2	689.96	02/16/2014 19:27				-0.4		\$236.07		\$590.17	0.48	
2	689.9	02/16/2014 19:27				-0.06		\$35.41		\$590.17	0.08	
2	688.6	02/16/2014 19:27				-21.3021		\$12,571.84		\$590.17	25.15	
2	658.6	02/16/2014 19:27				-10		\$5,901.70		\$590.17	11.81	
2	638.6	02/16/2014 19:27				-20		\$11,803.40		\$590.17	23.61	
2	613.31	02/16/2014 19:27				-25.2913		\$14,925.16		\$590.17	29.86	
2	613.29	02/16/2014 19:27				-0.02		\$11.80		\$590.17	0.03	
2	613.24	02/16/2014 19:27				-0.05		\$29.51		\$590.17	0.06	
2	601.93	02/16/2014 19:27				-11.3083		\$6,673.84		\$590.17	13.35	
2	541.93	02/16/2014 19:27				-60		\$35,410.20		\$590.17	70.83	
2	541.88	02/16/2014 19:27				-0.05		\$29.51		\$590.17	0.06	
2	540.34	02/16/2014 19:27				-1.5381		\$807.74		\$590.17	1.82	

SA-212

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	Bitcoin Deposit	Bitcoin Withdrawal	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wire Out	Bitcoin Price	Fee	Notes
2	535.34	02/16/2014 19:27						\$2,950.85		\$590.17	5.91	
2	515.93	02/19/2014 4:44				-5		\$12,227.95		\$630.00	24.46	
2	235.34	02/19/2014 18:59				-19.4094				\$630.00	353.55	
2	535.34	02/19/2014 22:17			300	-280.591		\$176,772.05		\$619.00	371.4	
2	535.35	02/20/2014 1:16			0.00634845		(\$185,700.00)			\$628.50	0.01	
2	763.66	02/20/2014 3:12			228.3149817		(\$3.99)			\$623.00	284.49	
2	839.35	02/20/2014 3:14			75.66501826		(\$142,240.23)			\$623.00	94.31	
2	860.14	02/20/2014 17:09			20.79112079		(\$47,151.77)			\$623.00	24.08	
2	863.24	02/20/2014 17:25			3.1000115		(\$12,038.06)			\$579.00	3.59	
2	865.64	02/20/2014 17:25			2.4		(\$1,794.91)			\$579.00	2.78	
2	865.69	02/20/2014 17:25			0.04868991		(\$1,389.60)			\$579.00	0.06	
2	867.69	02/20/2014 17:25			2		(\$28.19)			\$579.00	2.32	
2	875.18	02/20/2014 17:26			7.49604007		(\$1,158.00)			\$579.00	8.69	
2	875.23	02/20/2014 17:26			0.04653051		(\$4,340.21)			\$579.00	0.06	
2	882.15	02/20/2014 17:26			6.92		(\$26.94)			\$579.00	8.02	
2	882.4	02/20/2014 17:26			0.25257536		(\$4,006.68)			\$579.00	0.3	
2	892.4	02/20/2014 17:26			10		(\$146.24)			\$579.00	11.58	
2	892.45	02/20/2014 17:26			0.04446756		(\$5,790.00)			\$579.00	0.06	
2	964.85	02/20/2014 17:26			72.39875552		(\$25.75)			\$579.00	83.84	
2	986.86	02/20/2014 17:27			22.00819477		(\$41,918.88)			\$579.00	25.49	
2	1036.86	02/20/2014 17:27			50		(\$12,742.74)			\$579.00	57.9	
2	1036.9	02/20/2014 17:27			0.03987007		(\$28,950.00)			\$579.00	0.05	
2	1038.19	02/20/2014 17:27			1.29762344		(\$23.08)			\$579.00	1.51	
2	1041.25	02/20/2014 17:27			3.054		(\$751.32)			\$579.00	3.54	
2	1041.45	02/20/2014 17:27			0.2		(\$1,768.27)			\$579.00	0.24	
2	1041.48	02/20/2014 17:27			0.03810205		(\$115.80)			\$579.00	0.05	
2	1043.28	02/20/2014 17:28			1.8		(\$22.06)			\$579.00	2.08	
2	1043.32	02/20/2014 17:28			0.03484683		(\$1,042.20)			\$579.00	0.05	
2	1043.35	02/20/2014 17:29			0.03330803		(\$20.18)			\$579.00	0.04	
2	1049	02/20/2014 17:29			5.64363		(\$19.29)			\$579.00	6.54	
2	1049.75	02/20/2014 17:29			0.75223359		(\$3,267.66)			\$579.00	0.88	
2	995.38	02/21/2014 0:45				-54.3719	(\$435.54)	\$30,176.43		\$555.00	60.36	
2	977.69	02/21/2014 0:45				-0.19502		\$108.23		\$555.00	0.22	
2	977.64	02/21/2014 0:46				-17.4944		\$9,709.36		\$555.00	19.42	
2	971.26	02/21/2014 0:46				-0.05		\$27.75		\$555.00	0.06	
2	969.83	02/21/2014 0:46				-6.37982		\$3,540.80		\$555.00	7.09	
2	966.02	02/21/2014 0:47				-1.4273		\$792.15		\$555.00	1.59	
2	951.72	02/21/2014 0:47				-3.81017		\$2,114.65		\$555.00	4.23	
2	1062.1	02/21/2014 1:29				-14.3017		\$7,937.43		\$555.00	15.88	
2	1051.75	02/21/2014 2:03				-1.61823		\$898.12		\$555.00	1.8	
2	1020.67	02/21/2014 15:04				-0.35149	(\$55,080.00)			\$540.00	110.16	
2	1013.67	02/21/2014 15:04				-31.079		\$195.08		\$555.00	0.4	
2	987.17	02/21/2014 15:04				-6.99517		\$17,808.29		\$573.00	35.62	
2	987.14	02/21/2014 15:04				-16.5069		\$4,008.23		\$573.00	8.02	
2	995.84	02/21/2014 15:04				-0.02786		\$9,458.45		\$573.00	18.92	
2	988.39	02/21/2014 15:04				-0.841		\$15.96		\$573.00	0.04	
2	967.89	02/21/2014 15:05				-0.656		\$367.29		\$573.00	0.74	
2						-7.45168		\$375.89		\$573.00	0.76	
2						-20.5		\$4,289.81		\$573.00	8.54	
2								\$11,746.50		\$573.00	23.5	

SA-213

Appendix B
 CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wire(s) Out	BitC Price	Fee	Notes
2	966.15	02/21/2014 15:05				-1.74033		\$997.21		\$573.00	2	
2	965.56	02/21/2014 15:05				-0.59305		\$339.82		\$573.00	0.68	
2	951.75	02/21/2014 15:06				-13.809		\$7,912.54		\$573.00	15.83	
2	948.13	02/22/2014 16:26				-3.61879		\$2,124.23		\$587.00	4.25	
2	903.01	02/22/2014 16:28				-45.1219		\$26,486.58		\$587.00	52.98	
2	881.98	02/22/2014 16:28				-21.032		\$12,345.79		\$587.00	24.7	
2	879.98	02/22/2014 16:28				-2		\$1,174.00		\$587.00	2.35	
2	877.87	02/22/2014 16:29				-2.10743		\$1,237.06		\$587.00	2.48	
2	782.58	02/22/2014 16:29				-95.2876		\$55,933.80		\$587.00	111.87	
2	782.57	02/22/2014 16:29				-0.01511		\$6.87		\$587.00	0.02	
2	751.95	02/22/2014 16:29				-30.6171		\$17,972.22		\$587.00	35.95	
2	751.75	02/22/2014 16:29				-0.20009		\$117.45		\$587.00	0.24	
2	729.19	02/23/2014 16:32				-22.5638		\$14,215.17		\$630.00	28.44	
2	715.2	02/23/2014 16:32				-13.9881		\$8,812.52		\$630.00	17.63	
2	702.2	02/23/2014 16:33				-12.8		\$8,064.00		\$630.00	16.13	
2	654.7	02/23/2014 16:33				-0.2		\$126.00		\$630.00	0.26	
2	651.75	02/23/2014 16:33				-47.4945		\$29,921.52		\$630.00	59.85	
2	717.11	02/24/2014 0:08			65.36077499	-2.95362		\$1,860.78		\$630.00	3.73	
2	721.79	02/24/2014 0:08			4.67937293		(\$39,870.07)			\$610.00	79.75	
2	725.09	02/24/2014 0:09			3.29701593		(\$2,854.42)			\$610.00	5.71	
2	735.88	02/24/2014 0:09			10.79434		(\$2,011.18)			\$610.00	4.03	
2	736.88	02/24/2014 0:09			1		(\$6,584.55)			\$610.00	13.17	
2	737.88	02/24/2014 0:09			1		(\$610.00)			\$610.00	1.22	
2	739.26	02/24/2014 0:09			1.37490164		(\$610.00)			\$610.00	1.22	
2	743.49	02/24/2014 0:09			4.23082191		(\$838.69)			\$610.00	1.58	
2	744.49	02/24/2014 0:09			1		(\$2,580.80)			\$610.00	5.17	
2	745.48	02/24/2014 0:09			1		(\$610.00)			\$610.00	1.22	
2	746.49	02/24/2014 0:09			1		(\$610.00)			\$610.00	1.22	
2	747.49	02/24/2014 0:09			1		(\$610.00)			\$610.00	1.22	
2	748.18	02/24/2014 0:10			0.69478		(\$423.82)			\$610.00	0.85	
2	749.18	02/24/2014 0:10			1		(\$610.00)			\$610.00	1.22	
2	750.75	02/24/2014 0:10			1.5679926		(\$956.48)			\$610.00	1.22	
2	751.75	02/24/2014 0:10			1		(\$610.00)			\$610.00	1.22	
2	852.21	02/24/2014 2:23			100.4606941		(\$57,565.82)			\$610.00	115.94	
2	863.51	02/24/2014 2:23			11.30016176		(\$6,520.19)			\$577.00	13.05	
2	870.99	02/24/2014 2:24			7.47710656		(\$4,314.29)			\$577.00	8.63	
2	875.62	02/24/2014 2:49			4.6356691		(\$2,674.78)			\$577.00	5.35	
2	893.72	02/24/2014 2:50			18.10208678		(\$10,444.90)			\$577.00	20.89	
2	951.75	02/24/2014 2:53			58.02428172		(\$33,480.01)			\$577.00	66.97	
2	1051.75	02/24/2014 6:05			100		(\$56,300.00)			\$563.00	112.6	
2	1059.15	02/24/2014 13:36			7.4		(\$4,255.00)			\$575.00	8.51	
2	1039.67	02/25/2014 3:17				-19.4739		\$9,444.86		\$485.00	18.89	
2	1032.43	02/25/2014 3:17				-6.07987		\$2,948.30		\$485.00	5.9	
2	1027.43	02/25/2014 3:18				-1.16766		\$566.32		\$485.00	1.14	
2	1023.9	02/25/2014 3:18				-5		\$2,425.00		\$485.00	4.85	
2	1017.28	02/25/2014 3:19				-3.5234		\$1,708.85		\$485.00	3.42	
2	959.15	02/25/2014 3:20				-6.62734		\$3,214.26		\$485.00	6.43	
2	946.15	02/25/2014 4:09				-58.1287		\$28,192.41		\$485.00	56.39	
2						-12.9845		\$6,497.23		\$500.00	13	

SA-214

Appendix B
CARL M FORCE BitStamp Account Analysis

itype	Daily Balance	Datetime	BTC:Deposit	BTC:Withdraw	BTC:Purchase	BTC:Sold	USD Used to Purchase BTC	USD from Sales of BTC	Wires Out	BTC Price	FEE	Notes
2	936.33	02/25/2014 4:09				-9.821		\$4,910.50		\$500.00	9.83	
2	936.33	02/25/2014 4:09				-0.0063		\$3.15		\$500.00	0.01	
2	927.57	02/25/2014 4:09				-8.7546		\$4,377.30		\$500.00	8.76	
2	922.57	02/25/2014 4:09				-6		\$2,500.00		\$500.00	5	
2	901.67	02/25/2014 4:10				-20.9011		\$10,450.56		\$500.00	20.91	
2	893.19	02/25/2014 4:10				-8.48191		\$4,240.96		\$500.00	8.49	
2	892.94	02/25/2014 4:10				-0.25		\$125.00		\$500.00	0.25	
2	891.44	02/25/2014 4:10				-1.50306		\$751.53		\$500.00	1.51	
2	890.44	02/25/2014 4:10				-1		\$500.00		\$500.00	1	
2	880.44	02/25/2014 4:10				-10		\$5,000.00		\$500.00	10	
2	876.02	02/25/2014 4:11				-4.4128		\$2,206.40		\$500.00	4.42	
2	875.95	02/25/2014 4:11				-0.071		\$35.50		\$500.00	0.08	
2	865.95	02/25/2014 4:11				-10		\$5,000.00		\$500.00	10	
2	859.15	02/25/2014 4:11				-6.80375		\$3,401.87		\$500.00	6.81	
2	880.97	02/25/2014 4:33			21.82547817		(\$10,257.97)			\$470.00	20.52	
2	881.65	02/25/2014 4:40			0.6759183		(\$317.68)			\$470.00	0.64	
2	905.45	02/25/2014 4:53			23.79474311		(\$11,183.53)			\$470.00	22.37	
2	924.98	02/25/2014 4:53			19.53418		(\$9,181.06)			\$470.00	18.37	
2	944.72	02/25/2014 4:53			19.74069		(\$9,278.12)			\$470.00	18.56	
2	961.65	02/25/2014 4:53			16.92899042		(\$7,956.63)			\$470.00	15.92	
2	942.15	02/25/2014 15:08				-19.5003		\$10,140.16		\$520.00	20.29	
2	942.08	02/25/2014 15:08				-0.066		\$34.32		\$520.00	0.07	
2	935.94	02/25/2014 15:08				-6.13773		\$3,191.62		\$520.00	6.39	
2	913	02/25/2014 15:12				-22.9473		\$11,932.61		\$520.00	23.87	
2	911.7	02/25/2014 15:15				-1.29378		\$672.77		\$520.00	1.35	
2	911.49	02/25/2014 15:15				-0.2111		\$109.77		\$520.00	0.22	
2	898.87	02/25/2014 15:15				-12.622		\$6,563.44		\$520.00	13.13	
2	825.84	02/25/2014 15:16				-73.0316		\$37,976.42		\$520.00	75.96	
2	825.68	02/25/2014 15:16				-0.1662		\$81.22		\$520.00	0.17	
2	825.67	02/25/2014 15:17				-0.00612		\$3.18		\$520.00	0.01	
2	825.12	02/25/2014 15:17				-0.00701		\$3.65		\$520.00	0.01	
2	761.65	02/25/2014 15:44				-63.4737		\$284.52		\$520.00	0.57	
2	605.06	02/26/2014 16:04				-156.592		\$33,006.32		\$520.00	66.02	
2	604.05	02/26/2014 16:05				-1		\$90,510.04		\$578.00	181.03	
2	599.21	02/26/2014 16:05				-4.8458		\$578.00		\$578.00	1.16	
2	597.21	02/26/2014 16:05				-1		\$2,800.87		\$578.00	5.61	
2	587.14	02/26/2014 16:05				-1		\$578.00		\$578.00	1.16	
2	586.91	02/26/2014 16:05				-10.0715		\$578.00		\$578.00	1.16	
2	586.46	02/26/2014 16:05				-0.23226		\$5,821.33		\$578.00	11.65	
2	585.46	02/26/2014 16:05				-0.44292		\$134.25		\$578.00	0.27	
2	584.46	02/26/2014 16:05				-1		\$256.01		\$578.00	0.52	
2	584.16	02/26/2014 16:05				-1		\$578.00		\$578.00	1.16	
2	575.16	02/26/2014 16:05				-0.3022		\$578.00		\$578.00	0.35	
2	574.16	02/26/2014 16:05				-9.00282		\$6,203.63		\$578.00	10.41	
2	574.03	02/26/2014 16:05				-1		\$578.00		\$578.00	1.16	
2	573.53	02/26/2014 16:05				-0.125		\$72.25		\$578.00	0.15	
2	564.68	02/26/2014 16:05				-0.5		\$289.00		\$578.00	0.58	
2	563.68	02/26/2014 16:05				-8.85303		\$6,117.05		\$578.00	10.24	
2						-1		\$578.00		\$578.00	1.16	

SA-215

Appendix B
CARL M FORCE BITStamp Account Analysis

Type	Daily Balance	Datetime	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wire(s) Out	Bitcoin Price	Fee	Notes
2	563.6	02/26/2014 16:05				-0.0853		\$48.15		\$578.00	0.1	
2	561.65	02/26/2014 16:05				-1.94939		\$1,126.75		\$578.00	2.26	
2	561.75	02/28/2014 14:37			0.1		(\$56.20)			\$562.00	0.12	
2	561.65	02/28/2014 20:30			199.9		(\$112,343.80)			\$562.00	224.69	
2	508.52	03/03/2014 18:37				-200		\$118,000.00		\$590.00	236	
2	503.79	03/03/2014 18:38				-53.1318		\$36,395.30		\$685.00	72.8	
2	497.34	03/03/2014 18:38				-4.72777		\$3,238.52		\$685.00	6.48	
2	495.16	03/03/2014 18:38				-6.44594		\$4,415.47		\$685.00	8.84	
2	477.09	03/03/2014 18:38				-2.18518		\$1,496.95		\$685.00	3	
2	467.09	03/03/2014 18:38				-16.0692		\$12,377.40		\$685.00	24.76	
2	461.65	03/03/2014 18:38				-10		\$6,850.00		\$685.00	13.7	
2	462.14	03/03/2014 20:00			0.48840985	-5.44008		\$3,726.45		\$685.00	7.46	
2	462.2	03/03/2014 20:00					(\$320.40)			\$654.66	0.65	
2	470.72	03/03/2014 20:00			0.061		(\$39.96)			\$655.00	0.08	
2	495.63	03/03/2014 20:01			8.51964185		(\$5,580.37)			\$655.00	11.17	
2	496.83	03/03/2014 20:01			24.9067032		(\$16,313.89)			\$655.00	32.63	
2	497.63	03/03/2014 20:01			1		(\$655.00)			\$655.00	1.31	
2	497.68	03/03/2014 20:01			1		(\$655.00)			\$655.00	1.31	
2	497.74	03/03/2014 20:01			0.05		(\$32.75)			\$655.00	0.07	
2	507.91	03/03/2014 20:01			0.061		(\$39.96)			\$655.00	0.08	
2	507.96	03/03/2014 20:01			10.17		(\$6,661.35)			\$655.00	13.33	
2	557.46	03/03/2014 20:01			0.0516892		(\$33.86)			\$655.00	0.07	
2	557.94	03/03/2014 20:01			49.49733426		(\$32,420.75)			\$655.00	64.85	
2	558	03/03/2014 20:01			0.48		(\$314.40)			\$655.00	0.63	
2	560.01	03/03/2014 20:01			0.061		(\$39.96)			\$655.00	0.08	
2	560.51	03/03/2014 20:01			2.01096604		(\$1,317.18)			\$655.00	2.64	
2	560.56	03/03/2014 20:01			0.4995		(\$327.17)			\$655.00	0.66	
2	566.65	03/03/2014 20:05			0.05		(\$32.75)			\$655.00	0.07	
2	566.61	03/03/2014 22:00			6.0917556		(\$3,990.10)			\$655.00	7.99	
2	563.86	03/03/2014 22:00				-0.03606		\$24.19		\$671.00	0.05	
2	563.78	03/03/2014 22:00				-2.7537		\$1,847.73		\$671.00	3.7	
2	554.68	03/03/2014 22:02				-0.08		\$53.68		\$671.00	0.11	
2	580.45	03/03/2014 22:06			25.77536532	-8.10328		\$6,108.30		\$671.00	12.22	
2	583.48	03/03/2014 22:06			3.02539		(\$17,089.07)			\$663.00	34.18	
2	673.11	03/03/2014 22:21			89.6372861		(\$2,005.83)			\$663.00	4.02	
2	719.55	03/03/2014 22:42			46.43247982		(\$59,429.95)			\$663.00	118.86	
2	719.62	03/03/2014 22:42			0.07798161		(\$30,784.73)			\$663.00	61.57	
2	684.11	03/03/2014 22:59				-35.5133	(\$51.64)			\$663.00	0.11	
2	631.25	03/03/2014 23:19				-52.8697		\$23,829.45		\$671.00	47.66	
2	626.24	03/03/2014 23:20				-5.00962		\$35,466.88		\$671.00	70.94	
2	624.35	03/03/2014 23:20				-1.89017		\$3,361.46		\$671.00	6.73	
2	623.07	03/03/2014 23:20				-1.28577		\$1,268.30		\$671.00	2.54	
2	613.04	03/03/2014 23:20				-10.0306		\$862.75		\$671.00	1.73	
2	611.02	03/03/2014 23:20				-2.01293		\$6,730.55		\$671.00	13.47	
2	606.01	03/03/2014 23:20				-0.01022		\$1,350.68		\$671.00	2.71	
2	604.86	03/03/2014 23:21				-5		\$6.86		\$671.00	0.02	
2	602.86	03/03/2014 23:21				-1.1478		\$3,355.00		\$671.00	6.71	
2	600.86	03/03/2014 23:21				-2		\$770.17		\$671.00	1.55	
2								\$1,342.00		\$671.00	2.69	
2								\$1,342.00		\$671.00	2.69	

SA-216

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC Deposit	BitC Withdraw	BitC Purchase	BitC Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires Out	BitC Price	Fee	Notes
2	600.69	03/03/2014 23:21				-0.17178		\$115.26		\$671.00	0.24	
2	598.41	03/03/2014 23:21				-2.27933		\$1,529.43		\$671.00	3.06	
2	598.39	03/03/2014 23:21				-0.02867		\$17.83		\$671.00	0.04	
2	598.09	03/03/2014 23:21				-0.3		\$201.30		\$671.00	0.41	
2	596.02	03/03/2014 23:22				-2.06744		\$1,387.25		\$671.00	2.78	
2	595.29	03/03/2014 23:22				-0.72921		\$489.30		\$671.00	0.98	
2	574.51	03/03/2014 23:22				-20.7773		\$13,941.56		\$671.00	27.89	
2	559.29	03/03/2014 23:23				-15.2196		\$10,212.32		\$671.00	20.43	
2	331.6	03/03/2014 23:24				-0.93		\$624.03		\$671.00	1.25	
2	365	03/04/2014 6:54			33,404,575.79	-226.766	(\$22,147.23)	\$152,159.72		\$671.00	304.32	
2	375.85	03/04/2014 6:55			10,845,933.27		(\$7,190.85)			\$663.00	44.3	
2	386.3	03/04/2014 6:55			10.455		(\$6,931.66)			\$663.00	14.39	
2	413.75	03/04/2014 6:55			27,447.63		(\$18,197.78)			\$663.00	36.4	
2	429.98	03/04/2014 6:59			9,449,737.04		(\$6,265.18)			\$663.00	12.54	
2	566.65	03/04/2014 19:43			6,783,085		(\$4,497.19)			\$663.00	9	
2	568.58	03/04/2014 21:00			136,664,993.5		(\$90,608.89)			\$668.00	181.22	
2	569.65	03/04/2014 21:03			1,926,625.28		(\$1,286.99)			\$668.00	2.58	
2	566.53	03/06/2014 3:08			1,073,374.72		(\$717.01)			\$675.00	1.44	
2	564.32	03/06/2014 3:09				-3.11911		\$2,105.40		\$675.00	4.22	
2	562.1	03/06/2014 3:11				-2.21425		\$1,494.52		\$675.00	2.99	
2	531.51	03/06/2014 3:22				-2.21336		\$1,494.02		\$675.00	2.99	
2	472.7	03/06/2014 3:38				-30.5885		\$20,647.22		\$675.00	41.3	
2	469	03/06/2014 3:39				-8.8174		\$39,701.77		\$675.00	79.41	
2	469.36	03/06/2014 14:08			0.35883304	-3.69224		\$2,492.26		\$675.00	4.99	
2	469.72	03/06/2014 14:08			0.35987		(\$235.04)			\$655.00	0.48	
2	481.02	03/06/2014 14:08			11,300,56		(\$7,401.87)			\$655.00	14.81	
2	480.06	03/06/2014 14:08			9,034,538		(\$5,917.62)			\$655.00	11.84	
2	493.12	03/06/2014 14:08			3,064,544.5		(\$2,007.28)			\$655.00	4.02	
2	572	03/06/2014 14:21			78,881,654.46		(\$51,667.48)			\$655.00	103.34	
2	737	03/07/2014 8:43			165		(\$107,250.00)			\$650.00	214.5	
2	673.35	03/07/2014 18:45				-63.6571		\$39,487.39		\$620.00	78.94	
2	672.64	03/07/2014 18:47				-0.70736		\$438.56		\$620.00	0.88	
2	671.99	03/07/2014 18:47				-0.65101		\$403.62		\$620.00	0.81	
2	671.09	03/07/2014 18:48				-0.89587		\$555.44		\$620.00	1.12	
2	670.47	03/07/2014 18:48				-0.61787		\$383.08		\$620.00	0.77	
2	668.71	03/07/2014 18:48				-1.76484		\$1,094.20		\$620.00	2.19	
2	664.28	03/07/2014 18:48				-4.43284		\$2,748.36		\$620.00	5.5	
2	663.41	03/07/2014 18:48				-0.86988		\$539.39		\$620.00	1.08	
2	655.36	03/07/2014 18:52				-8.04551		\$4,988.22		\$620.00	9.98	
2	653.37	03/07/2014 18:52				-1.89		\$1,233.80		\$620.00	2.47	
2	653.36	03/07/2014 18:52				-0.01		\$6.20		\$620.00	0.02	
2	653.28	03/07/2014 18:52				-0.08		\$49.60		\$620.00	0.1	
2	653.25	03/07/2014 18:54				-0.03		\$18.60		\$620.00	0.04	
2	637	03/07/2014 18:57				-14.1666		\$8,783.29		\$620.00	17.57	
2	525.56	03/07/2014 20:06				-2.08104		\$1,290.24		\$635.00	2.59	
2	521.68	03/07/2014 20:06				-111.441		\$70,764.83		\$635.00	141.53	
2	516.65	03/07/2014 20:06				-3.87669		\$2,462.97		\$635.00	4.93	
2						-5.03		\$3,194.05		\$635.00	6.39	

SA-217

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitc: Deposit	Bitc: Withdrawal	Bitc: Purchase	Bitc: Spd/Id	USD Used for Purchase of Bitc	USD from Sales of Bitc	Wire: Out	Bitc: Price	Fee	Notes
2	506.05	03/07/2014 20:06				-10.8		\$6,731.00		\$635.00	13.47	
2	505.51	03/07/2014 20:06				-0.54866		\$348.40		\$635.00	0.7	
2	503.54	03/07/2014 20:08				-1.96868		\$1,250.11		\$635.00	2.51	
2	503.1	03/07/2014 20:08				-0.43843		\$278.40		\$635.00	0.56	
2	487.2	03/07/2014 20:08				-15.9		\$10,086.50		\$635.00	20.2	
2	476.96	03/07/2014 20:08				-10.237		\$6,500.50		\$635.00	13.01	
2	472.99	03/07/2014 20:08				-3.96894		\$2,520.28		\$635.00	5.05	
2	471.05	03/07/2014 20:09				-1.94123		\$1,232.68		\$635.00	2.47	
2	466.97	03/07/2014 20:09				-4.08387		\$2,593.26		\$635.00	5.19	
2	445.13	03/07/2014 20:09				-21.84		\$13,866.37		\$635.00	27.74	
2	440.02	03/07/2014 20:09				-5.10417		\$3,241.15		\$635.00	6.49	
2	437	03/07/2014 20:09				-3.0197		\$1,917.51		\$635.00	3.84	
2	505.19	03/08/2014 16:02			68.18324273		(\$41,523.59)			\$609.00	83.05	
2	506.07	03/08/2014 16:03			0.88347809		(\$598.04)			\$609.00	1.08	
2	540	03/08/2014 16:04			33.93327918		(\$20,865.37)			\$609.00	41.34	
2	410	03/11/2014 21:18				-130		\$83,200.00		\$640.00	166.4	
2	508.48	03/14/2014 19:38			98.47858485		(\$61,746.07)			\$627.00	123.5	
2	543	03/14/2014 19:43			34.52141515		(\$21,644.93)			\$627.00	43.29	
2	446.74	03/17/2014 18:45				-96.2642		\$60,453.90		\$628.00	120.81	
2	443	03/17/2014 18:46				-3.73583		\$2,346.10		\$628.00	4.7	
2	509.52	03/18/2014 4:46			66.51350228		(\$41,038.83)			\$617.00	82.08	
2	544	03/18/2014 4:46			34.48649772		(\$21,278.17)			\$617.00	42.56	
2	576	03/20/2014 2:29			31.99638736		(\$19,197.83)			\$600.00	38.4	
2	649	03/20/2014 2:31			73.00361264		(\$43,802.17)			\$600.00	87.61	
2	590.54	03/21/2014 6:30				-58.4649		\$34,065.01		\$583.00	68.18	
2	585.13	03/21/2014 6:30				-5.4076		\$3,152.63		\$583.00	6.31	
2	567.75	03/21/2014 6:31				-17.383		\$10,134.29		\$583.00	20.27	
2	567.25	03/21/2014 6:31				-0.501		\$292.08		\$583.00	0.59	
2	566.68	03/21/2014 6:31				-0.57		\$332.31		\$583.00	0.67	
2	566.18	03/21/2014 6:31				-0.501		\$292.08		\$583.00	0.59	
2	563.18	03/21/2014 6:32				-3		\$1,749.00		\$583.00	3.5	
2	559.28	03/21/2014 6:32				-3.88		\$2,267.87		\$583.00	4.54	
2	558.79	03/21/2014 6:32				-0.501		\$292.08		\$583.00	0.59	
2	557.78	03/21/2014 6:33				-0.501		\$292.08		\$583.00	0.59	
2	557.28	03/21/2014 6:33				-0.501		\$291.50		\$583.00	0.59	
2	556.92	03/21/2014 6:34				-0.36		\$292.08		\$583.00	0.42	
2	553.84	03/21/2014 6:38				-3.08318		\$209.88		\$583.00	0.42	
2	513.97	03/21/2014 6:39				-39.8731		\$1,797.49		\$583.00	3.6	
2	513.47	03/21/2014 6:39				-0.501		\$23,246.03		\$583.00	46.5	
2	507.52	03/21/2014 6:40				-5.94646		\$292.08		\$583.00	0.59	
2	507.02	03/21/2014 6:40				-0.501		\$292.08		\$583.00	0.59	
2	502.28	03/21/2014 6:40				-4.74182		\$2,764.48		\$583.00	5.53	
2	501.78	03/21/2014 6:41				-0.501		\$292.08		\$583.00	0.59	
2	500.78	03/21/2014 6:41				-1		\$583.00		\$583.00	1.17	
2	349	03/21/2014 6:41				-151.772		\$86,483.04		\$583.00	176.87	
2	345.8	03/21/2014 6:42				-3.20384		\$1,880.27		\$590.00	3.79	
2	340.9	03/21/2014 6:43				-4.80426		\$2,893.52		\$580.00	5.79	
2	339.71	03/21/2014 6:43				-1.18951		\$701.81		\$580.00	1.41	
2	339.11	03/21/2014 6:43				-0.6		\$354.00		\$580.00	0.71	

SA-218

Appendix B
 CARL M FORCE BITStamp Account Analysis

Type	Daily Balance	Datetime	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wires Out	Bitcoin Price	FEF	Notes
2	149	03/21/2014 6:44				-190.102		\$112,160.41		\$580.00	224.33	
2	386.55	03/21/2014 11:00			237.5456064		(\$135,876.09)			\$572.00	271.76	
2	439.95	03/21/2014 11:00			53.39585233		(\$30,542.43)			\$572.00	61.09	
2	441.36	03/21/2014 11:00			1.41811985		(\$811.16)			\$572.00	1.63	
2	444.92	03/21/2014 11:00			3.55337884		(\$2,032.53)			\$572.00	4.07	
2	449	03/21/2014 11:00			4.08704255		(\$2,337.79)			\$572.00	4.68	
2	451.01	03/21/2014 11:57			2.00575307		(\$1,133.25)			\$565.00	2.27	
2	500.35	03/21/2014 11:57			49.34196407		(\$27,878.21)			\$565.00	55.76	
2	467.51	03/21/2014 12:17				-32.8425		\$19,048.65		\$580.00	38.1	
2	464.15	03/21/2014 12:17				-3.35884		\$1,948.13		\$580.00	3.9	
2	422.34	03/21/2014 12:17				-41.8095		\$24,249.52		\$580.00	48.5	
2	419.15	03/21/2014 12:18				-3.19011		\$1,850.27		\$580.00	3.71	
2	403.53	03/21/2014 12:18				-15.617		\$9,057.86		\$580.00	18.12	
2	402.53	03/21/2014 12:18				-1.0075		\$584.35		\$580.00	1.17	
2	300.35	03/21/2014 12:20				-102.175		\$59,261.22		\$580.00	118.53	
2	504.35	03/21/2014 20:28			204		(\$116,280.00)			\$570.00	232.56	
2	804.35	03/22/2014 9:35			300		(\$168,000.00)			\$560.00	336	
2	790.04	03/22/2014 17:05				-14.3136		\$8,058.55		\$563.00	16.12	
2	704.35	03/22/2014 20:49				-85.6864		\$48,241.45		\$563.00	96.49	
2	573.53	03/23/2014 22:07				-130.817		\$74,565.55		\$570.00	149.14	
2	566.92	03/22/2014 22:08				-6.61633		\$3,771.31		\$570.00	7.55	
2	404.35	03/24/2014 17:54				-162.567		\$82,663.14		\$570.00	185.33	
2	428.11	03/24/2014 21:47			23.76314511		(\$13,782.62)			\$680.00	27.57	
2	428.34	03/24/2014 21:48			0.23		(\$133.40)			\$680.00	0.27	
2	428.5	03/24/2014 21:48			0.15238594		(\$88.38)			\$680.00	0.18	
2	428.62	03/24/2014 21:48			0.12598994		(\$73.08)			\$680.00	0.15	
2	428.87	03/24/2014 21:48			0.25		(\$145.00)			\$680.00	0.29	
2	429.12	03/24/2014 21:48			0.25		(\$145.00)			\$680.00	0.29	
2	429.37	03/24/2014 21:48			0.25		(\$145.00)			\$680.00	0.29	
2	429.39	03/24/2014 21:48			0.01373667		(\$7.97)			\$680.00	0.02	
2	429.64	03/24/2014 21:48			0.25		(\$145.00)			\$680.00	0.29	
2	433.9	03/24/2014 21:48			4.2605		(\$2,471.09)			\$680.00	4.95	
2	434.15	03/24/2014 21:48			0.25		(\$145.00)			\$680.00	0.29	
2	434.4	03/24/2014 21:49			0.25		(\$145.00)			\$680.00	0.29	
2	434.65	03/24/2014 21:49			0.25		(\$145.00)			\$680.00	0.29	
2	441.9	03/24/2014 21:49			7.25337424		(\$4,206.96)			\$680.00	8.42	
2	442.15	03/24/2014 21:49			0.25		(\$145.00)			\$680.00	0.29	
2	442.4	03/24/2014 21:49			0.25		(\$145.00)			\$680.00	0.29	
2	442.79	03/24/2014 21:49			0.3851923		(\$223.41)			\$680.00	0.45	
2	442.8	03/24/2014 21:49			0.01781793		(\$10.33)			\$680.00	0.03	
2	442.82	03/24/2014 21:49			0.01781793		(\$10.33)			\$680.00	0.02	
2	496.69	03/24/2014 21:50			53.87564199		(\$31,247.87)			\$680.00	62.5	
2	504.35	03/24/2014 21:50			7.96020588		(\$4,442.82)			\$680.00	8.89	
2	487.16	03/24/2014 22:37				-17.1908		\$10,142.59		\$590.00	20.29	
2	425.13	03/24/2014 22:38				-62.0316		\$36,598.68		\$590.00	73.2	
2	404.35	03/24/2014 22:39				-20.7776		\$12,258.76		\$590.00	24.52	
2	407.77	03/25/2014 15:37			3.41905509		(\$1,965.86)			\$575.00	3.94	
2	502.37	03/25/2014 15:38			94.59548607		(\$54,392.40)			\$575.00	108.79	
2	504.82	03/25/2014 15:38			2.45782832		(\$1,413.25)			\$575.00	2.83	
2	506.35	03/25/2014 15:38			1.52763052		(\$878.39)			\$575.00	1.76	

SA-219

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used for Purchase of BTC	USD from Sales of BTC	Wires Out	Bitcoin Fee	Notes
2	504.95	03/26/2014 17:24				-1.4		\$821.80		\$587.00	1.65
2	504.78	03/26/2014 17:37				-0.16991		\$99.56		\$587.00	0.2
2	504.58	03/26/2014 17:45				-0.2		\$117.40		\$587.00	0.24
2	504.46	03/26/2014 17:46				-0.11871		\$69.68		\$587.00	0.14
2	504.18	03/26/2014 17:47				-0.2862		\$166.00		\$587.00	0.34
2	502.37	03/26/2014 17:48				-1.805		\$1,059.54		\$587.00	2.12
2	502.29	03/26/2014 17:53				-0.08239		\$48.36		\$587.00	0.1
2	489.82	03/26/2014 17:59				-12.4662		\$7,317.67		\$587.00	14.64
2	489.36	03/26/2014 17:59				-0.4653		\$273.13		\$587.00	0.55
2	489.16	03/26/2014 17:59				-0.2		\$117.40		\$587.00	0.24
2	487.54	03/26/2014 17:59				-1.619		\$950.35		\$587.00	1.91
2	486.86	03/26/2014 18:00				-0.67551		\$396.52		\$587.00	0.8
2	486.53	03/26/2014 19:04				-0.33713		\$197.89		\$587.00	0.4
2	486.47	03/27/2014 14:48				-0.06		\$30.90		\$515.00	0.07
2	486.4	03/27/2014 14:49				-0.07		\$36.05		\$515.00	0.08
2	486.33	03/27/2014 14:49				-0.07		\$36.05		\$515.00	0.08
2	486.25	03/27/2014 14:49				-0.08		\$41.20		\$515.00	0.09
2	486.17	03/27/2014 14:49				-0.08		\$41.20		\$515.00	0.09
2	486.09	03/27/2014 14:49				-0.08		\$41.20		\$515.00	0.09
2	485.92	03/27/2014 14:49				-0.09		\$46.35		\$515.00	0.1
2	485.83	03/27/2014 14:49				-0.09		\$46.35		\$515.00	0.1
2	485.73	03/27/2014 14:49				-0.1		\$51.50		\$515.00	0.11
2	485.63	03/27/2014 14:49				-0.1		\$51.50		\$515.00	0.11
2	485.42	03/27/2014 14:49				-0.20878		\$107.52		\$515.00	0.22
2	484.72	03/27/2014 14:49				-0.7		\$360.50		\$515.00	0.73
2	484.65	03/27/2014 14:49				-0.07		\$36.05		\$515.00	0.08
2	484.58	03/27/2014 14:49				-0.07		\$36.05		\$515.00	0.08
2	484.49	03/27/2014 14:49				-0.09		\$46.35		\$515.00	0.1
2	484.39	03/27/2014 14:49				-0.1		\$51.50		\$515.00	0.11
2	484.28	03/27/2014 14:49				-0.1		\$51.50		\$515.00	0.11
2	483.29	03/27/2014 14:50				-1.0002		\$515.10		\$515.00	1.04
2	483.22	03/27/2014 14:50				-0.06841		\$35.23		\$515.00	0.08
2	482.24	03/27/2014 14:50				-0.9743		\$501.76		\$515.00	1.01
2	474.57	03/27/2014 14:52				-7.67574		\$3,863.01		\$515.00	7.91
2	463.8	03/27/2014 14:52				-10.7691		\$5,546.09		\$515.00	11.1
2	460.33	03/27/2014 14:52				-3.47101		\$1,787.57		\$515.00	3.58
2	451.32	03/27/2014 14:53				-9.00764		\$4,638.93		\$515.00	9.28
2	450.4	03/27/2014 14:53				-0.92208		\$474.87		\$515.00	0.95
2	450.3	03/27/2014 14:53				-0.1		\$51.50		\$515.00	0.11
2	443.05	03/27/2014 14:53				-7.24786		\$3,732.95		\$515.00	7.47
2	442.95	03/27/2014 14:53				-0.1		\$51.50		\$515.00	0.11
2	386.53	03/27/2014 14:54				-56.4249		\$28,068.81		\$515.00	58.12
2	377.74	03/27/2014 15:09				-8.79		\$4,623.54		\$526.00	9.25
2	286.53	03/27/2014 15:12				-91.21		\$47,976.46		\$526.00	95.96
2	388.53	03/27/2014 15:37	102				(\$52,632.00)			\$516.00	105.27
2	490.53	03/27/2014 23:02	102				(\$51,510.00)			\$505.00	103.02
2	490.45	03/27/2014 23:59				-0.08086		\$38.41		\$475.00	0.08
2	480.08	03/27/2014 23:59				-0.36909		\$175.32		\$475.00	0.36
2	486.93	03/27/2014 23:59				-3.14594		\$1,494.32		\$475.00	2.99

SA-220

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wires Out	Bitcoin Price	Fee	Notes
2	486.9	03/27/2014 23:59				-0.02854		\$13.56		\$475.00	0.03	
2	479.7	03/27/2014 23:59				-7.20714		\$3,423.39		\$475.00	6.85	
2	479.56	03/27/2014 23:59				-0.13191		\$62.66		\$475.00	0.13	
2	479.44	03/27/2014 23:59				-0.12598		\$59.84		\$475.00	0.12	
2	479.28	03/27/2014 23:59				-0.16022		\$76.10		\$475.00	0.15	
2	479.23	03/28/2014 0:00				-0.05		\$23.75		\$475.00	0.05	
2	469.4	03/28/2014 0:00				-9.82326		\$4,667.00		\$475.00	9.34	
2	469.22	03/28/2014 0:00				-0.1828		\$86.83		\$475.00	0.18	
2	468.97	03/28/2014 0:00				-0.2525		\$119.94		\$475.00	0.24	
2	468.67	03/28/2014 0:00				-0.3		\$142.50		\$475.00	0.29	
2	467.73	03/28/2014 0:00				-0.93912		\$446.08		\$475.00	0.9	
2	465.73	03/28/2014 0:00				-2		\$950.00		\$475.00	1.9	
2	457.23	03/28/2014 0:00				-8.49552		\$4,035.37		\$475.00	8.08	
2	456.5	03/28/2014 0:00				-0.73457		\$348.92		\$475.00	0.7	
2	455.5	03/28/2014 0:00				-1		\$475.00		\$475.00	0.95	
2	450.06	03/28/2014 0:00				-1		\$475.00		\$475.00	0.95	
2	449.06	03/28/2014 0:00				-4.44055		\$2,109.26		\$475.00	4.22	
2	393.06	03/28/2014 0:00				-1.0002		\$475.10		\$475.00	0.96	
2	380.53	03/28/2014 0:00				-56		\$26,600.00		\$475.00	53.2	
2	402.33	03/30/2014 12:46			11.80045309	-2.52979		\$1,201.65		\$475.00	2.41	
2	412.33	03/30/2014 12:46			10		(\$5,475.41)			\$464.00	10.96	
2	412.77	03/30/2014 12:46			0.4477		(\$4,640.00)			\$464.00	9.28	
2	415.27	03/30/2014 12:46			2.5		(\$207.73)			\$464.00	0.42	
2	456.18	03/30/2014 12:47			40.90881		(\$1,160.00)			\$464.00	2.32	
2	461.17	03/30/2014 12:47			4.9851		(\$18,980.30)			\$464.00	37.97	
2	492.53	03/30/2014 12:48			31.36093691		(\$2,313.09)			\$464.00	4.63	
2	545.28	03/30/2014 16:23			52.73281336		(\$14,551.47)			\$464.00	29.11	
2	549.6	03/30/2014 16:24			4.33668305		(\$23,202.35)			\$440.00	46.41	
2	574.6	03/30/2014 16:25			25		(\$1,908.10)			\$440.00	3.82	
2	598.28	03/30/2014 16:25			23.68187695		(\$11,000.00)			\$440.00	22	
2	598.82	03/30/2014 16:25			0.54		(\$10,420.03)			\$440.00	20.85	
2	602.53	03/30/2014 16:25			3.70892664		(\$237.60)			\$440.00	0.48	
2	601.66	03/30/2014 17:08				-0.87011		\$393.29		\$440.00	3.27	
2	598.17	03/30/2014 17:08				-3.49		\$1,577.48		\$452.00	0.79	
2	591.56	03/30/2014 17:08				-6.60677		\$2,986.26		\$452.00	3.16	
2	583.73	03/30/2014 17:20				-7.82765		\$3,538.10		\$452.00	5.98	
2	518.72	03/30/2014 17:22				-65.01		\$29,384.52		\$452.00	58.77	
2	510.34	03/30/2014 17:23				-8.38071		\$3,788.08		\$452.00	7.58	
2	504.99	03/30/2014 17:23				-5.34869		\$2,417.61		\$452.00	4.84	
2	504.97	03/30/2014 17:24				-0.02522		\$11.40		\$452.00	0.03	
2	492.53	03/30/2014 17:24				-12.4408		\$5,623.26		\$452.00	11.25	
2	392.53	04/01/2014 6:40				-100		\$47,000.00		\$470.00	94	
2	400.15	04/02/2014 14:55			7.62728845		(\$3,470.42)			\$455.00	6.95	
2	491.32	04/02/2014 14:55			91.16453641		(\$41,479.86)			\$455.00	82.96	
2	494.92	04/02/2014 14:55			3.6		(\$1,638.00)			\$455.00	3.28	
2	496.92	04/02/2014 14:55			2		(\$910.00)			\$455.00	1.82	
2	497.53	04/02/2014 14:55			0.60817514		(\$276.72)			\$455.00	0.56	
2	484.02	04/05/2014 23:18				-13.5062		\$6,206.11		\$459.50	12.42	
2	483.72	04/05/2014 23:18				-0.3		\$137.85		\$459.50	0.28	

SA-221

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitcoin Deposit	Bitcoin Withdrawal	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase BTC	USD from Sales of BTC	Wires Out	BTC Price	Fee	Notes
2	483.12	04/05/2014 23:19				-0.6		\$276.70		\$459.50	0.56	
2	480.62	04/05/2014 23:19				-2.5		\$1,148.75		\$459.50	2.3	
2	480.35	04/05/2014 23:19				-0.27		\$124.06		\$459.50	0.25	
2	476.94	04/05/2014 23:25				-3.41326		\$1,568.39		\$459.50	3.14	
2	422.94	04/05/2014 23:25				-54		\$24,813.00		\$459.50	48.63	
2	418.44	04/05/2014 23:25				-4.49349		\$2,064.76		\$459.50	4.13	
2	418.34	04/05/2014 23:26				-0.1		\$45.95		\$459.50	0.1	
2	418.09	04/05/2014 23:26				-0.25		\$114.88		\$459.50	0.23	
2	417.84	04/05/2014 23:26				-0.25		\$114.88		\$459.50	0.23	
2	417.59	04/05/2014 23:26				-0.25		\$114.88		\$459.50	0.23	
2	417.39	04/05/2014 23:26				-0.2		\$91.90		\$459.50	0.18	
2	369.31	04/05/2014 23:26				-48.0836		\$22,094.39		\$459.50	44.19	
2	363.96	04/05/2014 23:26				-0.25		\$114.88		\$459.50	0.23	
2	363.71	04/05/2014 23:27				-5.1		\$2,343.45		\$459.50	4.69	
2	363.61	04/05/2014 23:27				-0.25		\$114.88		\$459.50	0.23	
2	363.26	04/05/2014 23:27				-0.1		\$45.95		\$459.50	0.1	
2	363.01	04/05/2014 23:27				-0.35		\$160.82		\$459.50	0.33	
2	362.69	04/05/2014 23:27				-0.25		\$114.88		\$459.50	0.23	
2	342.89	04/05/2014 23:28				-0.32		\$147.04		\$459.50	0.3	
2	342.64	04/05/2014 23:28				-20		\$9,190.00		\$459.50	18.38	
2	342.59	04/05/2014 23:28				-0.04903		\$22.53		\$459.50	0.05	
2	310	04/05/2014 23:28				-0.05		\$22.98		\$459.50	0.05	
2	333.32	04/07/2014 15:33			23.3201113	-32.5871		\$14,973.78		\$446.00	29.95	
2	339.29	04/07/2014 16:41			5.9634107		(\$10,400.77)			\$446.00	20.81	
2	339.55	04/07/2014 16:42			0.26417274		(\$2,659.68)			\$446.00	5.32	
2	341.12	04/07/2014 16:42			1.569		(\$117.82)			\$446.00	0.24	
2	341.17	04/07/2014 16:43			0.05		(\$699.77)			\$446.00	1.4	
2	341.22	04/07/2014 16:43			0.05		(\$22.30)			\$446.00	0.05	
2	343.43	04/07/2014 16:43			2.21215		(\$22.30)			\$446.00	0.05	
2	356.45	04/07/2014 16:44			2.775		(\$986.62)			\$446.00	1.98	
2	356.49	04/07/2014 16:44			0.04		(\$4,567.17)			\$446.00	2.48	
2	356.53	04/07/2014 16:44			0.04		(\$1,237.65)			\$446.00	2.48	
2	356.58	04/07/2014 16:44			0.05		(\$17.84)			\$446.00	0.04	
2	356.63	04/07/2014 16:44			0.05		(\$17.84)			\$446.00	0.04	
2	356.68	04/07/2014 16:44			0.05		(\$17.84)			\$446.00	0.04	
2	356.68	04/07/2014 16:49			0.005		(\$22.30)			\$446.00	0.05	
2	357.79	04/07/2014 16:51			1.10615		(\$22.30)			\$446.00	0.05	
2	358.63	04/07/2014 16:53			0.841		(\$2.23)			\$446.00	0.01	
2	488.56	04/07/2014 16:56			124.9277773		(\$493.34)			\$446.00	0.99	
2	488.69	04/07/2014 16:56			5.13083658		(\$375.09)			\$446.00	0.76	
2	485.36	04/07/2014 16:56			6.67204343		(\$55,717.79)			\$446.00	111.44	
2	510	04/09/2014 12:14			14.64305666		(\$2,288.35)			\$446.00	4.58	
2	538.7	04/10/2014 3:22			29.69973285		(\$2,975.73)			\$446.00	5.96	
2	554.74	04/10/2014 3:22			15.03332		(\$6,530.80)			\$446.00	13.07	
2	569.71	04/10/2014 3:22			14.975		(\$12,741.19)			\$429.00	25.49	
2	569.8	04/10/2014 3:22			0.092		(\$6,449.29)			\$429.00	12.9	
2	577.3	04/10/2014 3:22			7.5		(\$6,424.28)			\$429.00	12.85	
2	604.34	04/10/2014 3:23			27.03374474		(\$39.47)			\$429.00	6.44	
2							(\$11,597.48)			\$429.00	23.2	

SA-222

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	Bitcoin Deposit	Bitcoin Withdraw	Bitcoin Purchase	Bitcoin Sold	USD Used to Purchase Bitcoin	USD from Sales of Bitcoin	Wire(s) Out	Bitcoin Price	Fee	Notes
2	605.15	04/10/2014 3:23			0.81		(\$347.49)			\$429.00	0.7	
2	615	04/10/2014 3:23			9.85620241		(\$4,228.31)			\$429.00	8.46	
2	515	04/10/2014 15:32				-100		\$39,200.00		\$392.00	78.4	
2	597.11	04/10/2014 22:01			67.0995788		(\$25,564.94)			\$381.00	51.13	
2	597.27	04/10/2014 22:01			0.159344		(\$60.71)			\$381.00	11.44	
2	597.75	04/10/2014 22:01			0.476		(\$181.36)			\$381.00	0.37	
2	616	04/10/2014 22:01			17.2550772		(\$6,574.18)			\$381.00	13.15	
2	618.25	04/11/2014 0:27			3.24807609		(\$1,136.83)			\$350.00	2.28	
2	619.25	04/11/2014 0:27			1		(\$350.00)			\$350.00	0.7	
2	620.87	04/11/2014 0:28			1.61801644		(\$566.31)			\$350.00	1.14	
2	623.03	04/11/2014 0:28			2.1570687		(\$754.97)			\$350.00	1.51	
2	623.5	04/11/2014 0:28			0.46957		(\$164.35)			\$350.00	0.33	
2	647.4	04/11/2014 0:30			23.90761198		(\$8,367.66)			\$350.00	16.74	
2	719.4	04/11/2014 0:30			72		(\$25,200.00)			\$350.00	50.4	
2	724.4	04/11/2014 0:30			5		(\$1,750.00)			\$350.00	3.5	
2	779.46	04/11/2014 0:30			55.06		(\$19,271.00)			\$350.00	38.55	
2	783.69	04/11/2014 0:31			4.23		(\$1,480.50)			\$350.00	2.97	
2	783.19	04/11/2014 0:31			9.5		(\$3,325.00)			\$350.00	6.65	
2	793.21	04/11/2014 0:31			0.012		(\$4.20)			\$350.00	0.01	
2	797.22	04/11/2014 0:31			4.01005		(\$1,403.52)			\$350.00	2.81	
2	820	04/11/2014 0:31			22.78760679		(\$7,975.66)			\$350.00	15.96	
2	820	04/11/2014 2:34				-89.7175		\$33,105.77		\$369.00	66.22	
2	620	04/11/2014 1:14				-110.282		\$40,694.23		\$369.00	81.39	
2	616.31	04/11/2014 12:37				-3.69116		\$1,587.20		\$430.00	3.18	
2	616.3	04/11/2014 12:37				-0.00854		\$3.67		\$430.00	0.01	
2	616.29	04/11/2014 12:37				-0.00854		\$3.67		\$430.00	0.01	
2	521.27	04/11/2014 12:37				-96.0171		\$40,857.34		\$430.00	81.72	
2	520	04/11/2014 12:37				-1,266.16		\$544.45		\$430.00	1.09	
2	488.59	04/12/2014 3:06				-31.4114		\$13,789.58		\$439.00	27.58	
2	485.48	04/12/2014 3:08				-3.11408		\$1,367.08		\$439.00	2.74	
2	482.14	04/12/2014 3:09				-3.34041		\$1,466.44		\$439.00	2.94	
2	481.96	04/12/2014 3:09				-0.1742		\$76.47		\$439.00	0.16	
2	464.55	04/12/2014 3:09				-17.4152		\$7,645.26		\$439.00	15.3	
2	459.74	04/12/2014 3:09				-4.80777		\$2,110.61		\$439.00	4.23	
2	447.58	04/12/2014 3:09				-12.16		\$5,338.26		\$439.00	10.68	
2	447.08	04/12/2014 3:10				-0.50351		\$221.04		\$439.00	0.45	
2	438.72	04/12/2014 3:10				-8.35358		\$3,687.22		\$439.00	7.34	
2	437.96	04/12/2014 3:10				-0.75966		\$333.49		\$439.00	0.67	
2	432.02	04/12/2014 3:11				-5.94		\$2,607.66		\$439.00	5.22	
2	420	04/12/2014 3:15				-12.0202		\$5,276.88		\$439.00	10.56	
2	468.19	04/13/2014 11:25				48.18117934		(\$20,236.10)		\$420.00	40.48	
2	611.23	04/13/2014 11:25				143.0405106		(\$60,077.01)		\$420.00	120.16	
2	641.23	04/13/2014 11:25				30		(\$12,600.00)		\$420.00	25.2	
2	651.5	04/13/2014 11:25				10.2736655		(\$4,314.94)		\$420.00	8.63	
2	721.5	04/13/2014 11:25				70		(\$29,400.00)		\$420.00	58.8	
2	729	04/13/2014 11:25				7.5046446		(\$3,151.95)		\$420.00	6.31	
2	641.04	04/14/2014 4:49				-87.9598		\$38,174.54		\$434.00	76.35	
2	636.04	04/14/2014 4:49				-5		\$2,170.00		\$434.00	4.34	

SA-223

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Date/Time	BitC:Deposit	BitC:Withdraw	BitC:Purchase	BitC:Sold	USD Used to Purchase BitC	USD from Sales of BitC	Wires Out	BitC:Fee	Fee	Notes
2	604.17	04/14/2014 4:49				-31.8714		\$13,832.19		\$434.00	27.67	
2	603.97	04/14/2014 4:49				-0.2		\$86.80		\$434.00	0.18	
2	602.84	04/14/2014 4:48				-1.13717		\$493.53		\$434.00	0.99	
2	588.99	04/14/2014 4:49				-13.8502		\$6,010.97		\$434.00	12.03	
2	575.73	04/14/2014 4:48				-13.2562		\$5,763.20		\$434.00	11.51	
2	570.84	04/14/2014 4:48				-4.88558		\$2,120.34		\$434.00	4.25	
2	559.78	04/14/2014 4:50				-11.0645		\$4,802.00		\$434.00	9.61	
2	559.58	04/14/2014 4:50				-0.2		\$86.80		\$434.00	0.18	
2	554.45	04/14/2014 4:50				-5.13001		\$2,226.42		\$434.00	4.46	
2	429	04/14/2014 4:50				-125.445		\$54,443.20		\$434.00	108.89	
2	328	04/15/2014 6:47				-100		\$47,500.00		\$475.00	95	
2	552	04/16/2014 17:50	222.9889				\$-			\$-	0	
2	652	04/21/2014 10:10		100			(\$49,000.00)			\$490.00	98	
1	652	04/24/2014 12:44		0							72	Palmo's BTC
2	680.3	04/25/2014 3:30			28.29535967		(\$13,694.95)			\$484.00	27.39	
2	688.87	04/25/2014 3:30			8.56889		(\$4,147.34)			\$484.00	8.3	
2	708.07	04/25/2014 3:31			18.19926		(\$9,292.44)			\$484.00	18.59	
2	715.15	04/25/2014 3:31			7.08807		(\$3,430.63)			\$484.00	6.87	
2	752	04/25/2014 3:31			36.84842033		(\$17,834.64)			\$484.00	35.67	
2	755.69	04/25/2014 3:42			3.68853733		(\$1,752.06)			\$475.00	3.51	
2	778.53	04/25/2014 3:42			22.83435055		(\$10,846.32)			\$475.00	21.7	
2	789.22	04/25/2014 3:42			10.69839175		(\$5,081.74)			\$475.00	10.17	
2	793.5	04/25/2014 3:42			4.27682414		(\$2,031.49)			\$475.00	4.07	
2	793.51	04/25/2014 3:42			0.01		(\$4.75)			\$475.00	0.01	
2	804.21	04/25/2014 3:42			10.70367265		(\$5,084.24)			\$475.00	10.17	
2	851.92	04/25/2014 3:42			47.70322358		(\$22,659.03)			\$475.00	45.32	
2	852	04/25/2014 3:42			0.085		(\$40.38)			\$475.00	0.09	
2	873.16	04/25/2014 4:20			21.15334622		(\$9,836.31)			\$465.00	19.68	
2	883.16	04/25/2014 4:20			10		(\$4,650.00)			\$465.00	9.3	
2	888.16	04/25/2014 4:20			5		(\$2,325.00)			\$465.00	4.65	
2	891.15	04/25/2014 4:20			2.991		(\$1,390.82)			\$465.00	2.79	
2	891.25	04/25/2014 4:20			0.101582		(\$47.24)			\$465.00	0.1	
2	903.25	04/25/2014 4:20			12.002		(\$5,580.93)			\$465.00	11.17	
2	907.33	04/25/2014 4:20			4.07771979		(\$1,896.14)			\$465.00	3.8	
2	907.41	04/25/2014 4:20			0.08		(\$37.20)			\$465.00	0.08	
2	909.79	04/25/2014 4:20			2.38168		(\$1,107.48)			\$465.00	2.22	
2	919.09	04/25/2014 4:20			9.30276478		(\$4,325.79)			\$465.00	8.66	
2	922.46	04/25/2014 4:20			3.36785622		(\$1,566.05)			\$465.00	3.14	
2	932.25	04/25/2014 4:20			9.79		(\$4,552.35)			\$465.00	9.11	
2	934.82	04/25/2014 4:20			2.57183		(\$1,195.90)			\$465.00	2.4	
2	935.02	04/25/2014 4:20			0.2		(\$93.00)			\$465.00	0.19	
2	935.12	04/25/2014 4:20			0.101838		(\$47.40)			\$465.00	0.1	
2	939.92	04/25/2014 4:20			4.8		(\$2,232.00)			\$465.00	4.47	
2	949.92	04/25/2014 4:20			10		(\$4,650.00)			\$465.00	9.3	
2	954	04/25/2014 4:20			4.07828299		(\$1,896.40)			\$465.00	3.8	
2	988.24	04/25/2014 11:11			34.2355074		(\$15,405.98)			\$450.00	30.82	
2	1038.24	04/25/2014 11:11			50		(\$22,500.00)			\$450.00	45	
2	1038.33	04/25/2014 11:11			0.088		(\$39.60)			\$450.00	0.08	
2	1050	04/25/2014 11:11			11.6764926		(\$5,254.42)			\$450.00	10.51	
2	1054	04/25/2014 11:11			4		(\$1,800.00)			\$450.00	3.6	

SA-224

Appendix B
CARL M FORCE BitStamp Account Analysis

Type	Daily Balance	Datetime	BTC:Deposit	BTC:Withdraw	BTC:Purchase	BTC:Sold	USD Used to Purchase BTC	USD from Sales of BTC	Wire:Out	BTC:Fee	Notes
2	1126.91	04/25/2014 11:14			72.9056128		(\$32,443.00)			\$445.00	64.89
2	1141.85	04/25/2014 11:14			14.94249634		(\$6,648.41)			\$445.00	13.3
2	1154	04/25/2014 11:14			12.15189086		(\$5,407.59)			\$445.00	10.82
2	1124.54	04/25/2014 20:12				-29.4652		\$13,612.93		\$462.00	27.23
2	962.03	04/25/2014 20:13				-162.503		\$75,076.58		\$462.00	150.16
2	954	04/25/2014 20:14				-8.03137		\$3,710.49		\$462.00	7.43
2	953.74	04/28/2014 4:33				-0.26		\$111.29		\$428.04	0.23
2	951.22	04/28/2014 4:33				-2.52147		\$1,079.19		\$428.00	2.16
2	950.95	04/28/2014 4:33				-0.275		\$117.70		\$428.00	0.24
2	944.25	04/28/2014 4:33				-6.7		\$2,867.60		\$428.00	5.74
2	944.05	04/28/2014 4:33				-0.2		\$85.60		\$428.00	0.18
2	943.75	04/28/2014 4:34				-0.3014		\$129.00		\$428.00	0.26
2	943.55	04/28/2014 4:34				-0.2		\$85.60		\$428.00	0.18
2	940.85	04/28/2014 4:35				-2.7		\$1,155.60		\$428.00	2.32
2	867.09	04/28/2014 4:35				-73.751		\$31,565.43		\$428.00	63.14
2	863.19	04/28/2014 4:35				-3.90713		\$1,672.25		\$428.00	3.35
2	833	04/28/2014 4:35				-30.1829		\$12,918.28		\$428.00	25.84
1	833	04/29/2014 13:12			0				(\$200,899.59)	\$-	180.97
1	433	04/29/2014 13:41		-400				\$-		\$-	0

Ending Balance 433 2776.380513 -1289.499 14496.66193 -10719.1 (\$9,644,732.96) \$6,484,684.87 (\$518,109.74)

SA-225

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 92 of 95

E

SA-226

TRACE OF FRENCHMAID PAYOFF



770 BTC (worth approximately \$97,000 on 9/15/2013) Per records obtained from the Silk Road marketplace and Ross Ulbricht's laptop, the 770 bitcoins transaction into bitcoins address 14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB appears to the payment to "Frenchmaid". This transaction was a withdrawal made by Ross Ulbricht from Silk Road.

The sum of these 9/15/2013, 2:10 UTC, payments to 14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB is 520 BTC. Total BTC deposited into 14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB = 770 BTC

9/17/2013 20:08
14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB sends 154 BTC to 15gCsMTDZ2zt1ydW6652jSTQXpCAHAIZL

9/17/2013 20:09
14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB sends 154.0005 BTC to 13QGtr5JCut3uwziW8ZPzRs9Sku9bBxWt3

9/17/2013 20:11
14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB sends 147 BTC to 1Mmna8iB9JyuTcMxskUyDeeisz7cP6p

9/17/2013 20:12
14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB sends 154.0005 BTC to 1N4NAD2ZnwB74gVRedWJH1NPFijby5bx9

9/17/2013 20:13
14rE7lqy4a6P27qWCCSngkUfBxtevZhPHB sends 160.999 BTC to 17Uu5TU5gCYgQqimzVoIFR6u3BDph4rVZJ

9/20/2013, 23:29
48 BTC deposited into 156RBPqUCw6dsXHCsJSksuAC6UmsRy2C
These BTC were also traced to Silk Road wallets.

9/22/2013 00:52
15gCsMTDZ2zt1ydW6652jSTQXpCAHAIZL sends 154 BTC to 17p1DgXbvDm5DQ3zu9u9vc2q9Tze9vn5ct
This address received other deposits, for a total of 388.9995 BTC

9/22/2013 00:56
13QGtr5JCut3uwziW8ZPzRs9Sku9bBxWt3 sends 154 BTC to 1JfKEvg3593ksDuEVQjS uAoLX167huP1f

9/22/2013 1:08
1Mmna8iB9JyuTcMxskUyDeeisz7cP6p sends 146.9995 BTC to 156RBPqUCw6dsXHCsJSksuAC6UmsRy2C

9/22/2013 1:17
1N4NAD2ZnwB74gVRedWJH1NPFijby5bx9 sends 154 BTC to 1L9HxpQdakkGzQT4o1mTXZ8AqUVekz9m6XS

9/22/2013 1:17
17Uu5TU5gCYgQqimzVoIFR6u3BDph4rVZJ sends 160.9985 BTC to 1Cix8u5VCZjCekzQfMi5NCq5fL6GwrN4n

9/29/2013 18:10
17p1DgXbvDm5DQ3zu9vc2q9Tze9vn5ct sends 189 BTC to 1HEUvmWkyboZ2XAVTTBYFISVQNEqM46B
This is Carl Mark Force's CampBX address

9/29/2013 23:17
17p1DgXbvDm5DQ3zu9vc2q9Tze9vn5ct sends 154 BTC to 1HDVvhcEUV3HxnRYZnmh5ZNHZwik13qL
This is Carl Mark Force's CampBX address

9/23/2013, 18:13
156RBPqUCw6dsXHCsJSksuAC6UmsRy2 sends 194.9995 BTC to 12ey8T8V9erbDJNGz6jSAJ53TXqfPc859p
This is Carl Mark Force's CampBX address

9/29/2013, 23:14
1L9HxpQdakkGzQT4o1mTXZ8AqUVekz9m6XS sends 154 BTC to 1HDVvhcEUV3HxnRYZnmh5ZNHZwik13qL
This is Carl Mark Force's CampBX address

9/29/2013, 23:13
1Cix8u5VCZjCekzQfMi5NCq5fL6GwrN4n sends 160.9985 BTC to 1HDVvhcEUV3HxnRYZnmh5ZNHZwik13qL
This is Carl Mark Force's CampBX address



All times are UTC (Coordinated Universal Time)

SA-227

Case 3:15-mj-70370-MRGD Document 1 Filed 03/25/15 Page 94 of 95


TR

SA-228

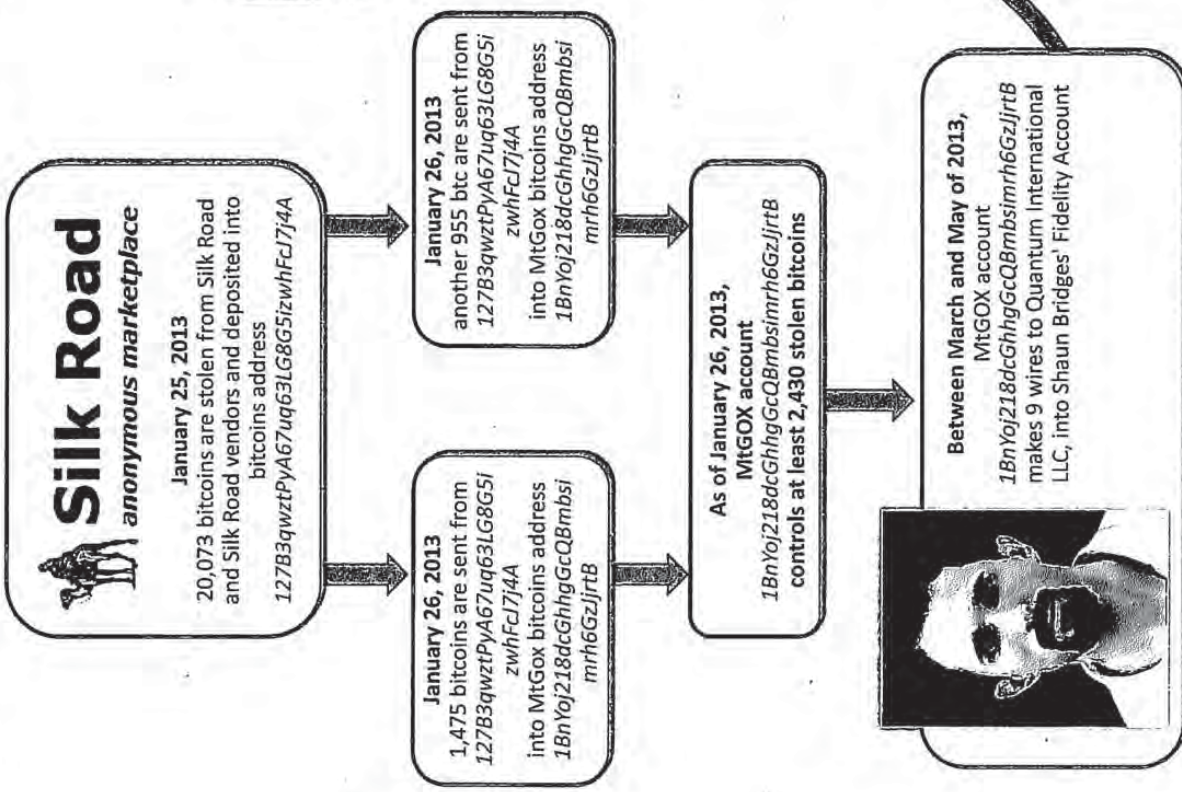
Liquidation of Silk Road Theft Proceeds

Date	Amount	Approx. BTC Price	Approx. Number of Bitcoins Sold
3/6/2013	\$ 98,511.08	\$ 42.00	2345.50
3/8/2013	\$ 98,968.00	\$ 44.00	2249.27
3/13/2013	\$ 99,968.62	\$ 46.92	2130.62
3/18/2013	\$ 99,968.74	\$ 51.00	1960.17
3/19/2013	\$ 99,968.64	\$ 59.00	1694.38
4/5/2013	\$ 99,968.08	\$ 142.00	704.00
4/16/2013	\$ 99,969.34	\$ 68.00	1470.14
4/26/2013	\$ 99,969.32	\$ 136.00	735.07
5/7/2013	\$ 25,559.37	\$ 109.00	234.49
			13289.15

*if sold on the day it was wired out



May 9, 2013
BRIDGES served as the affiant on a multi-million dollar seizure warrant for Mt. Gox and its owner's bank accounts



SA-229



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvia J. Mallo Building
One Saint Andrew's Plaza
New York, New York 10007

October 2, 2014

BY HAND

Sam Braverman, Esq.
225 Broadway, Suite 715
New York, NY 10007

Re: *United States v. Andrew Michael Jones, 13 Cr. 950 (TPG)*

Dear Mr. Braverman:

On the understandings specified below, the Office of the United States Attorney for the Southern District of New York ("this Office") will accept a guilty plea from Andrew Michael Jones to a superseding information charging him in four counts (the "Information").

Count One charges Jones with a violation of Title 21, United States Code, Section 846, in connection with his participation in a narcotics trafficking conspiracy as a site administrator on the Silk Road website from October 2012 to October 2013. This charge carries a maximum sentence of life imprisonment, a mandatory minimum sentence of ten years' imprisonment, a maximum term of lifetime supervised release, a minimum term of supervised release of five years, a maximum fine of \$10 million, and a mandatory \$100 special assessment.

Count Two charges Jones with a violation of Title 18, United States Code, Section 1030(b), in connection with his participation in a conspiracy to commit and aid and abet computer hacking as a site administrator on the Silk Road website from October 2012 to October 2013. This charge carries a maximum sentence of 5 years' imprisonment, a maximum term of 3 years' supervised release, a maximum fine, pursuant to Title 18, United States Code § 3571 of the greatest of \$250,000, twice the gross pecuniary gain derived from the offense, or twice the gross pecuniary loss to a person other than the defendant as a result of the offense, and a mandatory \$100 special assessment.

Count Three charges Jones with a violation of Title 18, United States Code, Section 1028(f), in connection with his participation in a conspiracy to traffic in fraudulent identification documents as a site administrator on the Silk Road website from October 2012 to October 2013. This charge carries a maximum sentence of 15 years' imprisonment, a maximum term of 3 years' supervised release, a maximum fine, pursuant to Title 18, United States Code § 3571 of the greatest of \$250,000, twice the gross pecuniary gain derived from the offense, or twice the gross pecuniary loss to a person other than the defendant as a result of the offense, and a mandatory \$100 special assessment.

SA-230

Count Four charges Jones with a violation of Title 18, United States Code, Section 1956(h), in connection with his participation in a money laundering conspiracy as a site administrator on the Silk Road website from October 2012 to October 2013. This charge carries a maximum sentence of 20 years' imprisonment, a maximum term of 3 years' supervised release, a maximum fine, pursuant to Title 18, United States Code, Sections 1956 and 3571, of not more than \$500,000, or twice the value of the property involved in the offense, whichever is greater, and a mandatory \$100 special assessment.

The total maximum sentence of incarceration on all counts is life imprisonment.

It is further understood that prior to the date of sentencing Jones shall file accurate amended tax returns for the years 2012 and 2013, and will pay, or will enter into an agreement to pay, past taxes due and owing by him to the Internal Revenue Service, including applicable penalties, if any, on such terms and conditions as will be agreed upon between him and the Internal Revenue Service.

The defendant furthermore admits the forfeiture allegations with respect to Counts One through Four of the Information and agrees to forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds the Jones obtained, directly or indirectly, as a result of the offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense charged in Count One, pursuant to Title 21, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offenses charged in Counts Two and Three, and, pursuant to Title 21, United States Code, Section 982(a)(1), any property, real or personal, involved in the offense charged in Count Four, or any property traceable to such property. It is further understood that any forfeiture of Jones' assets shall not be treated as satisfaction of any fine, restitution, cost of imprisonment, or any other penalty the Court may impose upon him in addition to forfeiture.

It is understood that Jones (a) shall truthfully and completely disclose all information with respect to the activities of himself and others concerning all matters about which this Office inquires of him, which information can be used for any purpose; (b) shall cooperate fully with this Office, the Federal Bureau of Investigation, Homeland Security Investigations, the Drug Enforcement Administration, the Internal Revenue Service, and any other law enforcement agency designated by this Office; (c) shall attend all meetings at which this Office requests his presence; (d) shall provide to this Office, upon request, any document, record, or other tangible evidence relating to matters about which this Office or any designated law enforcement agency inquires of him; (e) shall truthfully testify before the grand jury and at any trial and other court proceeding with respect to any matters about which this Office may request his testimony; (f) shall bring to this Office's attention all crimes which he has committed, and all administrative, civil, or criminal proceedings, investigations, or prosecutions in which he has been or is a subject, target, party, or witness; and, (g) shall commit no further crimes whatsoever. Moreover, any assistance Jones may provide to federal criminal investigators shall be pursuant to the specific instructions and control of this Office and designated investigators.

SA-231

Page 3

It is understood that this Office cannot, and does not, agree not to prosecute Jones for criminal tax violations, if any. However, if Jones fully complies with the understandings specified in this Agreement, no testimony or other information given by him (or any other information directly or indirectly derived therefrom) will be used against him in any criminal tax prosecution. Moreover, if Jones fully complies with the understandings specified in this Agreement, he will not be further prosecuted criminally by this Office for any crimes, except for criminal tax violations, related to his participation in: (a) a narcotics trafficking conspiracy as a site administrator on the Silk Road website from October 2012 to October 2013, as charged in Count One of the Information; (b) a conspiracy to commit and aid and abet computer hacking as a site administrator on the Silk Road website from October 2012 to October 2013, as charged in Count Two of the Information; (c) a conspiracy to traffic in fraudulent identification documents as a site administrator on the Silk Road website from October 2012 to October 2013, as charged in Count Three of the Information; (d) a conspiracy to commit money laundering as a site administrator on the Silk Road website from October 2012 to October 2013, as charged in Count Four of the Information; (e) the distribution of fentanyl and oxycodone as a drug dealer operating on the Silk Road website in or about 2012; (f) conspiring to commit narcotics trafficking, computer hacking, identification document fraud, and money laundering as a forum moderator on the Silk Road 2.0 discussion forum from in or about November 2013 up to and including in or about December 2013; and (g) distributing marijuana, cocaine, heroin, LSD, and other illicit drugs, from in or about 2009 up to and including in or about 2012, all to the extent that he has disclosed such participation to this Office as of the date of this Agreement. This Agreement does not provide any protection against prosecution for any crimes except as set forth above.

It is understood that all of the conduct set forth in subsections (e) through (g) of the preceding paragraph constitutes either relevant conduct, pursuant to United States Sentencing Guidelines ("U.S.S.G.") Section 1B1.3, or other conduct of the defendant, pursuant to U.S.S.G. § 1B1.4, that the Court may consider at the time of sentencing.

It is understood that this Agreement does not bind any federal, state, or local prosecuting authority other than this Office. This Office will, however, bring the cooperation of Jones to the attention of other prosecuting offices, if requested by him.

It is understood that the sentence to be imposed upon Jones is within the sole discretion of the Court. This Office cannot, and does not, make any promise or representation as to what sentence Jones will receive, and will not recommend any specific sentence to the Court. However, this Office will inform the Probation Office and the Court of (a) this Agreement; (b) the nature and extent of Jones's activities with respect to this case and all other activities of Jones which this Office deems relevant to sentencing; and (c) the nature and extent of Jones's cooperation with this Office. In so doing, this Office may use any information it deems relevant, including information provided by Jones both prior to and subsequent to the signing of this Agreement. In addition, if this Office determines that Jones has provided substantial assistance in an investigation or prosecution, and if he has fully complied with the understandings specified in this Agreement, this Office will file a motion, pursuant to Section 5K1.1 of the Sentencing Guidelines and 18 U.S.C. §3553(e), requesting the Court to sentence Jones in light of the factors set forth in Section 5K1.1(a)(1)-(5). It is understood that, even if such a motion is filed, the sentence to be imposed on Jones remains within the sole discretion of the Court. Moreover,

SA-232

Page 4

nothing in this Agreement limits this Office's right to present any facts and make any arguments relevant to sentencing to the Probation Office and the Court, or to take any position on post-sentencing motions. Jones hereby consents to such adjournments of his sentence as may be requested by this Office.

It is understood that, should this Office determine either that Jones has not provided substantial assistance in an investigation or prosecution, or that Jones has violated any provision of this Agreement, such a determination will release this Office from any obligation to file a motion pursuant to Section 5K1.1 of the Sentencing Guidelines and 18 U.S.C. §3553(e), but will not entitle Jones to withdraw his guilty plea once it has been entered.

It is understood that, should this Office determine, subsequent to the filing of a motion pursuant to Section 5K1.1 of the Sentencing Guidelines and/or 18 U.S.C. §3553(e), that Jones has violated any provision of this Agreement, this Office shall have the right to withdraw such motion.

It is understood that, should Jones commit any further crimes or should it be determined that he has given false, incomplete, or misleading testimony or information, or should he otherwise violate any provision of this Agreement, Jones shall thereafter be subject to prosecution for any federal criminal violation of which this Office has knowledge, including perjury and obstruction of justice. Any such prosecution that is not time-barred by the applicable statute of limitations on the date of the signing of this Agreement may be commenced against Jones, notwithstanding the expiration of the statute of limitations between the signing of this Agreement and the commencement of such prosecution. It is the intent of this Agreement to waive all defenses based on the statute of limitations with respect to any prosecution that is not time-barred on the date that this Agreement is signed.

It is understood that in the event that it is determined that Jones has committed any further crimes, given false, incomplete, or misleading testimony or information, or otherwise violated any provision of this Agreement, (a) all statements made by Jones to this Office or other designated law enforcement agents, and any testimony given by Jones before a grand jury or other tribunal, whether prior to or subsequent to the signing of this Agreement, and any leads from such statements or testimony shall be admissible in evidence in any criminal proceeding brought against Jones; and (b) Jones shall assert no claim under the United States Constitution, any statute, Rule 410 of the Federal Rules of Evidence, or any other federal rule that such statements or any leads therefrom should be suppressed. It is the intent of this Agreement to waive all rights in the foregoing respects.

It is further understood that this Office will not object to the defendant's continued release on the bail conditions as set forth by the Honorable Gabriel W. Gorenstein at the December 26, 2013 hearing. This Office reserves the right to move without notice to the defendant for a revocation or modification of such bail conditions should it determine that Jones has violated any provision of this Agreement or condition of his release, or should it determine that such a revocation or modification is otherwise appropriate. The defendant hereby consents to any such revocation or modification.

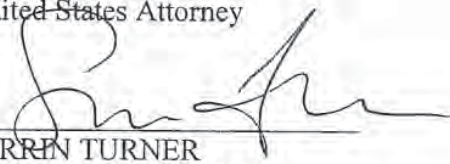
SA-233

The defendant hereby acknowledges that he has accepted this Agreement and decided to plead guilty because he is in fact guilty. By entering this plea of guilty, the defendant waives any and all right to withdraw his plea or to attack his conviction, either on direct appeal or collaterally, on the ground that the Government has failed to produce any discovery material, Jencks Act material, exculpatory material pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), other than information establishing the factual innocence of the defendant, and impeachment material pursuant to *Giglio v. United States*, 405 U.S. 150 (1972), that has not already been produced as of the date of the signing of this Agreement.

This Agreement supersedes any prior understandings, promises, or conditions between this Office and Jones. No additional understandings, promises, or conditions have been entered into other than those set forth in this Agreement, and none will be entered into unless in writing and signed by all parties.


Very truly yours,

PREET BHARARA
United States Attorney

By: 

SERRIN TURNER
TIMOTHY HOWARD
Assistant United States Attorneys
(212) 637-1946, 2308

APPROVED:

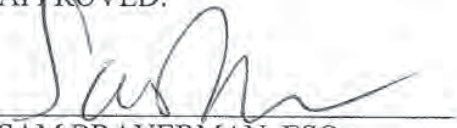

JOON H. KIM
Chief, Criminal Division

AGREED AND CONSENTED TO:


ANDREW MICHAEL JONES

10/2/14
DATE

APPROVED:


SAM BRAVERMAN, ESQ.
Attorney for Andrew Michael Jones

10/2/14
DATE