



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 21, 2014

By Hand & E-mail

Joshua L. Dratel, Esq.
2 Wall Street, 3rd Floor
New York, NY 10005

**Re: *United States v. Ross William Ulbricht, 14 Cr. 68 (KBF)*
Second Discovery Production**

Dear Mr. Dratel:

Pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure, the Government is hereby providing the following supplemental discovery materials specified below. Please note that all of these materials have been marked "Confidential" and thus cannot be shared with others outside the confines of the protective order entered in this matter.

The materials produced are as follows:

1. Three hard drives containing one set of the following materials:

Item#	Description
1	193.107.86.49: Contents of Silk Road marketplace server as imaged by the Republic of Iceland pursuant to a letter of request in July 2013.
2	207.106.6.25: Contents of Silk Road backup server, as imaged in September 2013 pursuant to a search warrant on Windstream Data Center
3	207.106.6.25 (rsync): Contents of same server associated with item #2, as remotely imaged in September 2013 pursuant to a search warrant on the server hosting provider, JTAN.com.
4	USB thumb drives: Contents of USB thumb drives belonging to the defendant, seized from his residence on October 1, 2013.

5	207.106.6.25 ("ggb"): Contents of same Silk Road backup server associated with items #2 and #3, as re-imaged pursuant to a search warrant on Windstream Data Center in October 2013.
6	207.106.6.32 ("alsa"): Contents of secondary Silk Road backup server, imaged pursuant to a search warrant on Windstream Data Center in October 2013.
7	207.106.6.11 ("beggy"): Contents of server used by the defendant as a private Tor bridge, imaged pursuant to a search warrant on Windstream Data Center in October 2013.
8	Kindle: Contents of the defendant's Kindle device, seized from his residence on October 1, 2013 pursuant to a search warrant.
9	193.107.86.34 & 193.107.86.49: Contents of (a) Silk Road marketplace server and (b) server on which Silk Road Bitcoin wallet was maintained, as re-imaged and imaged (respectively) by the Republic of Iceland pursuant to a letter of request in September 2013.
10	Laptop: Contents of the defendant's laptop, seized upon his arrest pursuant to a search warrant.
11	193.107.86.34: Contents of server on which Silk Road Bitcoin wallet was maintained, as re-imaged by the Republic of Iceland pursuant to a letter of request in October 2013.
12	193.107.86.49: Contents of Silk Road marketplace server, as re-imaged by the Republic of Iceland pursuant to a letter of request in October 2013.
13	109.163.234.40 – Contents of server used to backup Silk Road Bitcoin wallet, imaged pursuant to a search warrant in September 2013.
14	109.163.234.40 – Contents of same server associated with item #13, as re-imaged pursuant to a search warrant in October 2013.
15	65.75.246.20 – Contents of server housing private key used to control the Silk Road .onion address, as imaged by the Republic of France pursuant to a Mutual Legal Assistance Treaty request in October 2013.
16	82.221.104.28 – Contents of Silk Road discussion forum server, as imaged by the Republic of Iceland pursuant to a letter of request in November 2013

2. One DVD-ROM containing the following materials¹:

Item#	Description
1	Spreadsheets containing the defendant's posts and private messages from the Silk Road discussion forum. This data is also included in the image of the Silk Road discussion forum server included as item #16 on the hard drives referenced above, but is provided separately here as a courtesy.
2	Recorded statements of the defendant made in communications with an undercover agent working with the U.S. Attorney's Office for the District of Maryland, using the Silk Road username "nob," as well as (i) staged photographs of a murder-for-hire referenced in these communications and (ii) records of wire transfers sent by the defendant as payment for the murder-for-hire
3	Investigative reports concerning undercover purchases of drugs and other illicit goods and services from the Silk Road website, made by law enforcement agents working with the U.S. Attorney's Office for the District of Maryland
4	Recorded statements of the defendant made in communications with an undercover agent working with the U.S. Attorney's Office for the Western District of Washington, using the Silk Road usernames "nod" and "missdaisy"
5	Subpoena returns received since the Government's initial discovery production, including (a) subscriber information from 1&1 Mail & Media, Inc., concerning an e-mail account used by the defendant; and (b) records for an American Express credit card account held by the defendant
6	Records for a bank account held by the defendant at Westpac Bank, obtained pursuant to a Mutual Legal Assistance Treaty request to Australia

¹ The disc is password-protected with the password: "1nc0nc31v4bL3."

Please let me know if you have any questions concerning the above materials. Other additional materials may be produced in accordance with the Federal Rules of Criminal Procedure on a timely basis as they become available.

Sincerely,

PREET BHARARA
United States Attorney

By:


Serim Turner
Assistant United States Attorney

Enclosures