



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

October 8, 2014

By ECF

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

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

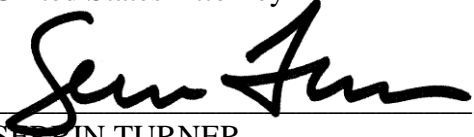
Dear Judge Forrest:

Please find attached a proposed summary of the case to be used in connection with *voir dire* at trial.

Respectfully,

PREET BHARARA
United States Attorney

By: _____


SERRIN TURNER
TIMOTHY HOWARD
Assistant United States Attorneys
Southern District of New York

cc: Joshua Dratel, Esq.

United States v. Ross Ulbricht
S1 14 Cr. 68 (KBF)

Summary of the Case for Voir Dire

The Indictment in this case contains criminal charges against one defendant: ROSS WILLIAM ULBRICHT, a/k/a “Dread Pirate Roberts,” a/k/a “DPR,” a/k/a “Silk Road.”

The Indictment charges the defendant in seven counts. All of the counts concern the defendant’s alleged operation and management of a black-market Internet website known as “Silk Road,” from 2011 to 2013. The Government alleges that the defendant deliberately designed and administered Silk Road to enable users to buy and sell illicit drugs and other illegal goods and services, including computer hacking tools and services and false identification documents, and to do so anonymously and outside the reach of law enforcement.

Counts One through Four charge the defendant with various narcotics offenses, based on the illegal drugs that were allegedly sold on Silk Road.

Count Five charges the defendant with conspiring to commit, or help others commit, computer hacking, based on the alleged sale of computer-hacking tools and services on Silk Road.

Count Six charges the defendant with conspiring to traffic in false identification documents, based on the alleged sale of fake IDs, fake passports, and other fraudulent identification documents on Silk Road.

Finally, Count Seven charges the defendant with conspiring to commit money laundering, based on the payment system used on Silk Road, which relied on Bitcoins, a form of digital currency. The Government alleges that the defendant designed that payment system to facilitate the illegal transactions conducted on Silk Road and to conceal the proceeds of those transactions from law enforcement.

The defendant denies all of the charges in the Indictment.