EXHIBIT 13

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	14 Cr. 68 (KBF)
- against -	:	
ROSS ULBRICHT,	:	DECLARATION OF DR. MONICA J. BARRATT
Defendant.	:	

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DR. MONICA J. BARRATT, pursuant to 28 U.S.C. §1746, hereby affirms under penalty of perjury:

1. I am Research Fellow at Australia's National Drug and Alcohol Research Centre, part of the University of New South Wales, Sydney. My position is funded by the Australian National Health and Medical Research Council. I attained a Bachelor of Science (Honours) in psychology and a PhD in Health Sciences at Curtin University, Perth, Australia. My research concerns the social and public health implications of internet technologies for people who use illicit and emerging psychoactive drugs, and the impacts of legislative responses to drug use and drug problems. I also hold an adjunct position at the National Drug Research Institute, Curtin University, and a position as visiting fellow at the Burnet Institute.[1]

2. During the course of 2013, I authored a research report along with co-authors Jason A. Ferris and Adam R. Winstock, entitled "Use of Silk Road, the online drug marketplace, in the United Kingdom, Australia and the United States," which was published in *Addiction* 109, at 774-783. *See* "Use of Silk Road, the online drug marketplace, in the United

[1] I am acting in a personal capacity, and the views represented in this affidavit do not necessarily represent those of my affiliated institutions.

Kingdom, Australia and the United States," attached as Exhibit 8 to the Declaration of Lindsay A. Lewis, Esq. The paper presented the results from a quantitative analysis of international survey data from a purposive sample of drug purchasers, derived from an anonymous annual online survey of drug use conducted by Global Drug Survey, and for which 22, 289 responses were received between November 15, 2012, and January 2, 2013.

3. The sample used in our paper was restricted to those who had indicated that they usually bought their own amphetamine, cannabis, cocaine, MDMA, ketamine or mephedrone, or or who reported buying "legal highs" or "research chemicals" or any drugs online during the previous 12 months, bringing the sample size down to 11, 848. The base sample was then further restricted to comprise only those 9, 470 respondents who resided in or used the currency of Australia, the United States or the United Kingdom. Commentary on our paper that was published in the same issue of *Addiction* in which our paper was published, noted that our paper presented the first large scale survey to characterize buyers on Silk Road and that prior to this, no sound, large-scale study of the buyers was available.

4. We designed questions that were informed by ongoing digital ethnographic research of Silk Road that I was conducting, and which involved participating in online discussions and monitoring the marketplace.

5. To compare differences between drug buyers who created three outcome groups based on knowledge and utilization of Silk Road: (1) those who had never heard of Silk Road; (2) those who had heard of, but never consumed drugs purchased from Silk Road, and (3) those who had consumed drugs purchased from Silk Road. Overall, half of the

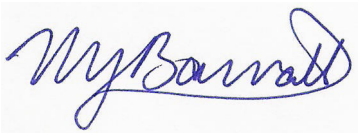
sample had heard of the online drug marketplace Silk Road, but the percentage was not the same across the three countries, with the majority in the United States having heard of Silk Road (65%) compared to approximately half of Australian respondents (53%) and 40% of U.K. respondents. Of respondents who had heard of Silk Road, approximately one-quarter of U.S. and U.K. respondents reported having consumed drugs purchased from Silk Road, while only 14% of Australian respondents reported doing so.

6. One table in our report (Table 3) presented the top 20 drugs purchased from Silk Road by country of residence. MDMA was the most commonly purchased drug. More than half of respondents in each country reported purchasing it, mainly in powdered (crystal) form. Cannabis was ranked in the top four drugs across countries and lysergic acid Diethylamide (LSD) in the top five. Cocaine was ranked sixth in Australia and 18th in the U.K., but ranked outside the top 20 in the U.S. Heroin was also outside the top 20 in all of these countries. No form of NBOMe (including 25I-NBOMe) was ranked in the top four in the U.K., the U.S. or Australia. Rather, it was ranked fifth in the U.S., 10th in Australia and 13th in the U.K.

7. Survey respondents who had purchased drugs from Silk Road were asked to pinpoint their reasons for consuming drugs purchased on Silk Road from a list of eight possible reasons. Respondents across all three countries indicated that among their top four reasons for consuming drugs purchased on Silk Road were: (1) the drugs were of better quality than the drugs they could normally access, and (2) they were more comfortable buying from sellers with high ratings. The range of drugs available and convenience were also among the top four reasons for consuming drugs purchased on Silk Road.

8. Respondents who had heard of Silk Road but had not purchased drugs from the site were asked for reasons why they had not made purchases on the site. The most common response across all countries was "I have adequate access to drugs through my own networks." The next most common response was "I fear being caught by police/customs if drugs are sent to my own address." Compared to respondents from the U.K., U.S. respondents were significantly more likely not to use Silk Road to purchase drugs as they found accessing Bitcoins too difficult, were concerned about being ripped off, thought the prices for drugs on Silk Road were too high and believed using the Silk Road to purchase drugs to be too much effort. By contrast, compared to UK respondents, Australian respondents were less likely to indicate accessing Bitcoins was too difficult, less likely to consider Silk Road prices as being too high and less likely to indicate that accessing drugs via Silk Road was too much effort.
9. In this study we found that the most commonly mentioned reasons for using Silk road to buy drugs fitted with wider e-commerce trends: access to a wider variety and better quality of product offerings, the convenience of online shopping and access to more information about the products and the vendor/ companies selling them.
10. Since the data was collected the cryptomarket landscape has changed with the arrivals of new drug marketplaces, the fall of the original Silk Road, and the rise and fall of Silk Road 2.0.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. 28 U.S.C. §1746. Executed May 14, 2015.



DR. MONICA J. BARRATT