

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

- 1: 18 U.S.C. § 1957 Money Laundering
2: 18 U.S.C. § 1512 Obstruction of Justice

- Petty
Minor
Misdemeanor
Felony

PENALTY: Maximum penalties per each count above: 20 years imprisonment; \$250,000 fine/ twice gross gain; 3 years supervised release; restitution and forfeiture; \$100 special assessment all per count

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

FILED

DEFENDANT - U.S.

JUN 16 2015

SHAUN W. BRIDGES

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DISTRICT COURT NUMBER

CR 15 0319 RS

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI S/A Scanlon, IRS S/A Gambaryan, DHS OIG S/A McHale

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-15-70370 MEJ

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

KATHRYN R. HAUN

DEFENDANT

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
1) If not detained give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)
On Pretrial release in 3-15-70370 MEJ

IS IN CUSTODY

- 4) On this charge
5) On another conviction Federal State
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount:

If Summons, complete following:

Arraignment Initial Appearance

Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Steve Levin, Esq., counsel for defendant

Date/Time: TBD in August 2015

Before Judge: Duty magistrate

Comments:

Defense and government counsel are arranging an arraignment date to coincide with guilty plea in Aug 2015

1 MELINDA HAAG (CABN 132612)
United States Attorney

FILED
JUN 16 2015
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 SHAUN W. BRIDGES,
15 a/k/a "Number13,"
16 Defendant.

CRIMINAL NO.

15 CR 15 0319

VIOLATIONS:

18 U.S.C. § 1957 – Money Laundering;
18 U.S.C. § 1512 – Obstruction of Justice;
18 U.S.C. §§ 982(a)(1); 981(a)(1)(C); and 28 U.S.C.
§ 2461(c) – Forfeiture.

RS

18 INFORMATION

19 The United States Attorney charges:

20 INTRODUCTORY ALLEGATIONS

21 At all times relevant to this Information, with all dates being approximate and all date ranges both
22 approximate and inclusive:

23 1. Defendant SHAUN W. BRIDGES ("BRIDGES") was a Special Agent with the United
24 States Secret Service ("USSS") assigned to the Baltimore Silk Road Task Force and to the Secret
25 Service's Electronic Crimes Task Force.

26 2. Silk Road was a website where illegal goods were posted for sale, including narcotics.
27 Silk Road was only accessible through The Onion Router, or "TOR" network, a network designed to

28

1 conceal the true IP addresses of computers on the network and the users' identities. The only accepted
2 form of payment on Silk Road was Bitcoin.

3 3. Bitcoin was a form of virtual currency that existed online. The value of Bitcoin
4 fluctuated widely during 2013 and 2014.

5 4. The Baltimore Silk Road Task Force was a task force formed jointly by several federal
6 law enforcement agencies, including USSS, designed to investigate and apprehend vendors, buyers,
7 administrators, and the manager of Silk Road, including the head of Silk Road, R.U., a/k/a "Dread Pirate
8 Roberts," a/k/a "DPR" (hereafter "R.U."). A Grand Jury for the District of Maryland, based in
9 Baltimore, Maryland, and in connection with the Baltimore Silk Road Task Force investigation,
10 conducted investigation into the activities of R.U., vendors, buyers, and administrators, and it
11 constituted an official proceeding.

12 5. BRIDGES was assigned to, among other responsibilities, forensic computer
13 investigations in an effort to locate, identify, and prosecute targets of the Baltimore Silk Road Task
14 Force, including R.U., and other vendors, buyers, and administrators on Silk Road.

15 6. Carl M. Force, IV, ("Force") was a Special Agent with the Drug Enforcement
16 Administration assigned to the Baltimore Silk Road Task Force. Force was assigned to act in an
17 undercover capacity in an effort to locate, identify, and prosecute targets of the Baltimore Silk Road
18 Task Force, including R.U., and other vendors, buyers, and administrators on Silk Road. Force
19 controlled "Nob," an undercover persona on Silk Road that communicated with R.U. and posed as a
20 large scale drug dealer with the ability to hire people to commit murder. A Grand Jury for the Northern
21 District of California, based in San Francisco, California, conducted investigation into the activities of
22 Force and, eventually, BRIDGES, and it, too, constituted an official proceeding.

23 7. In his role performing forensic computer analysis, BRIDGES investigated a customer
24 support representative on Silk Road, "C.G.," in connection with C.G. assisting in the delivery of
25 approximately one kilogram of cocaine to an undercover identity controlled by Force. On January 17,
26 2013, BRIDGES participated in a search and arrest of C.G. for possession with intent to distribute
27 cocaine.

28

1 8. On January 25, 2013, BRIDGES participated in an interview of C.G. During the
2 interview, C.G. described his administrator access to Silk Road as a customer support representative and
3 his ability to reset passwords and pins of account holders on Silk Road. C.G. shared his administrator
4 access and password with the interviewing agents.

5 9. On January 25, 2013, BRIDGES accessed Silk Road through a computer utilizing C.G.'s
6 administrator access. BRIDGES reset passwords and pins of various accounts on Silk Road and moved
7 bitcoin from those accounts into a "wallet" he controlled. In this manner, BRIDGES fraudulently
8 moved and stole approximately 20,000 bitcoin from Silk Road and Silk Road accounts.

9 10. On January 26, 2013, R.U. learned that C.G.'s access to Silk Road had been used to
10 fraudulently transfer bitcoin from Silk Road into a wallet. R.U. canceled C.G.'s administrator access to
11 Silk Road. On January 26, 2013, R.U. communicated with Force's undercover persona, "Nob," and
12 sought to hire "Nob" to murder C.G. in retaliation for the bitcoin thefts.

13 11. On January 26, 2013, BRIDGES moved the stolen bitcoin into an account at Mt. Gox, an
14 online digital currency exchange based in Japan.

15 12. On January 27, 2013, BRIDGES, acting as an undercover persona on Silk Road,
16 "Number13," communicated with R.U. in an effort to falsely and fraudulently prevent R.U. from
17 learning who had committed the theft from Silk Road. Using the "Number13" persona, BRIDGES
18 communicated that he had been the victim of the theft, rather than its perpetrator, and that he wanted his
19 bitcoin returned to him. At the time of these communications, R.U. was in the Northern District of
20 California and BRIDGES was in Maryland.

21 13. On February 12, 2013, BRIDGES formed "Quantum International Investments, LLC,"
22 ("Quantum"), and registered Quantum with the Maryland Secretary of State.

23 14. On February 22, 2013, BRIDGES opened a personal investment account at Fidelity under
24 the Quantum name but controlled by BRIDGES.

25 15. Between March 6, 2013, and May 7, 2013, BRIDGES liquidated the bitcoin in the Mt.
26 Gox account, proceeds of the Silk Road fraud, into U.S. Currency and transferred the U.S. Currency into
27 his Quantum Fidelity account. Subsequently, during June of 2014, BRIDGES transferred money from
28 the Quantum Fidelity account into a joint bank account in the name of BRIDGES and another person.

1 COUNT ONE: (18 U.S.C. § 1957 – Money Laundering)

2 16. The allegations in paragraphs 1 through 15 of this Information are incorporated by
3 reference as if set forth fully here.

4 17. Between March 6, 2013 and June 14, 2014, in the Northern District of California and
5 elsewhere, the defendant,

6 SHAUN W. BRIDGES, a/k/a “Number13,”

7 knowingly engaged in the following monetary transactions in the United States, knowing that the
8 transactions involved criminally derived property with a value of greater than \$10,000, and which
9 property was in fact the proceeds of specified unlawful activity, namely wire fraud, in violation of 18
10 U.S.C. § 1343:

Date	Amount	Description of Financial Transaction
3/6/13	\$98,511.08	Wire transfer from Mt. Gox to Quantum Fidelity account
3/8/13	\$98,968.00	Wire transfer from Mt. Gox to Quantum Fidelity account
3/13/13	\$99,968.62	Wire transfer from Mt. Gox to Quantum Fidelity account
3/18/13	\$99,968.74	Wire transfer from Mt. Gox to Quantum Fidelity account
3/19/13	\$99,968.64	Wire transfer from Mt. Gox to Quantum Fidelity account
4/5/13	\$99,968.08	Wire transfer from Mt. Gox to Quantum Fidelity account
4/16/13	\$99,969.34	Wire transfer from Mt. Gox to Quantum Fidelity account
4/26/13	\$99,969.32	Wire transfer from Mt. Gox to Quantum Fidelity account
5/7/13	\$25,559.37	Wire transfer from Mt. Gox to Quantum Fidelity account
6/4/14	\$225,000.00	Wire transfer from Quantum Fidelity account to PNC Bank account

23 All in violation of Title 18, United States Code, Section 1957(a).

24 COUNT TWO: (18 U.S.C. § 1512(c)(2) – Obstruction of Justice)

25 18. Paragraphs 1 through 15 of this Information are incorporated by reference as if set forth
26 fully here.

1 19. On or between January 25, 2013, and April 2, 2015, within the Northern District of
2 California and elsewhere, the defendant,

3 SHAUN W. BRIDGES, a/k/a “Number13,”

4 and others known and unknown to the Grand Jury, knowingly, intentionally, and corruptly attempted to,
5 and did, obstruct, influence, and impede the following official proceedings: (1) the Baltimore Grand
6 Jury investigation in connection with the Baltimore Silk Road Task Force, and (2) the San Francisco
7 Grand Jury investigation of BRIDGES and Force, by the following acts:

- 8 A. On January 25, 2013, BRIDGES used C.G.’s administrator access to Silk Road to steal
9 bitcoin from Silk Road, thereby limiting the use of that access to further the Baltimore Grand
10 Jury investigation of R.U. and Silk Road, creating incentive for R.U. to seek to murder C.G.,
11 and causing investigation into the thefts of bitcoin from Silk Road;
- 12 B. Between April 29, 2014, and June 27, 2014, in connection with the San Francisco Grand Jury
13 investigation, BRIDGES made and caused to be made inquiries with a database controlled by
14 the Financial Crimes Enforcement Network (“FinCEN”) in an effort to determine whether
15 Bank Secrecy Act filings existed related to his financial activities;
- 16 C. On May 28, 2014, BRIDGES made false and misleading statements to a Special Agent of the
17 Federal Bureau of Investigation, in connection with the San Francisco Grand Jury
18 investigation of Force, in an effort to prevent the investigation from focusing on BRIDGES;
- 19 D. On November 13, 2014, BRIDGES made false and misleading statements to a Special Agent
20 of the Department of Justice Office of Inspector General participating in the San Francisco
21 Grand Jury investigation of Force in an effort to prevent the investigation from focusing on
22 BRIDGES;
- 23 E. On February 1, 2015, BRIDGES solicited a witness to the FinCEN searches to make false
24 statements to Special Agents of the Department of Homeland Security Office of Inspector
25 General and the Federal Bureau of Investigation in connection with the San Francisco Grand
26 Jury investigation of Force and BRIDGES; and
- 27 F. On March 30, 2015, BRIDGES made false statements to Special Agents of the Internal
28 Revenue Service Criminal Investigation Division and Federal Bureau of Investigation

1 regarding the FinCEN searches in connection with the San Francisco Grand Jury
2 investigation of Force and BRIDGES.

3 All in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

4 **FORFEITURE ALLEGATIONS:** (18 U.S.C. § 982(a)(1) – Money Laundering Forfeiture); (18.
5 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Obstruction of Justice Forfeiture)

6 Upon conviction of the offense alleged in Count One of the Information, the defendant,

7 SHAUN W. BRIDGES, a/k/a “Number13,”

8 shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal,
9 involved in any such offense, or any property traceable to such property, including but not limited to the
10 following: a money judgment equivalent to the amount of property involved in the violation of 18 U.S.C
11 §§ 1957(a):

12 a. Any interest in, security of, claim against, or property or contractual rights of any kind in
13 the goods or tangible items that were the subject of the violation;

14 b. Any interest in, security of, claim against, or property or contractual rights of any kind in
15 tangible property that was used in the export or attempt to export that was the subject of the violation;

16 and

17 c. Any property constituting, or derived from, any proceed obtained directly or indirectly as
18 a result of the violation; and

19 d. Any property, real or personal, which constitutes or is derived from proceeds traceable to
20 the violation.

21 Upon conviction of the offense alleged in Count Two of the Information, the defendant,

22 SHAUN W. BRIDGES, a/k/a “Number13,”

23 shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c), and 28, U.S.C. § 2461(c), any
24 property, real or personal, which constitutes or is derived from proceeds traceable to the offense,
25 including but not limited to the following: a money judgment equivalent to the amount of property
26 involved in the violation of 18 U.S.C. §§ 1512(c)(2) and 2.

27 If any of the property described above, as a result of any act or omission of the defendant:

28 (a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

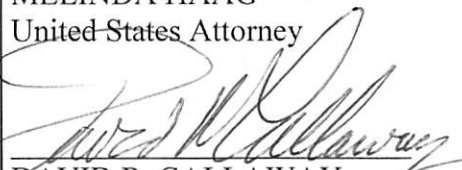
(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;


the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

MELINDA HAAG
United States Attorney


DAVID R. CALLAWAY
Chief, Criminal Division

RAYMOND HULSER
Acting Chief, Public Integrity Section

(Approved as to form:


WILLIAM FRENTZEN
KATHRYN HAUN
Assistant U.S. Attorneys

RICHARD EVANS
Trial Attorney, Public Integrity Section