

EXHIBIT 2

**GOVERNMENT EXHIBIT ADDITIONS,
MODIFICATIONS, AND DELETIONS**

12/03/14	Deadline for Government Exhibits. The government provides an initial exhibit list and a disk containing its exhibits.
12/05/14	<p>The government provides updated an exhibit list and disk with the following changes:</p> <p><u>Additional Exhibits:</u> 113((A)(D) - Demonstrative of SR Payment System Ex. 201(G) - Photo Depicting DPR Icon on Chat Ex. 294 - SSH Auth. Keys found on SR Marketplace Server 4 Exhibits in the 500 series 801 and 801(A) — Chart of Chicago UC purchases and lab test stip.</p> <p><u>Removed Exhibits:</u> 310A Email from Ulbricht to Rene Pinnell re: character references 310B Email from Priceline.com to Ulbricht re: Priceline Itinerary for Marigot, Dominica 310C Email from Ulbricht to Rene Pinnell re: waves</p>
1/02/14	The government provides new Rule 16 discovery: voicemails from Ross Ulbricht to Richard Bates (one of which later becomes GX 1005).
1/07/15	The government makes major revisions to exhibits, which are too numerous to be provided by email. The government does not provide any indication by email, phone or otherwise indicating which exhibits have been deleted, which have been modified or renumbered, and/or which descriptions were changed in the exhibit list.
1/08/15	The government provides new disk with 900 series added.
1/08/15	<p>At defense counsel's request, AUSA Serrin Turner sends an email explaining changes made to the exhibits contained in the new disks provided to counsel on 1/07/15 and 1/08/15, which are as follows:</p> <p><u>New exhibits:</u> 100A 100B 106(D) 107(D) 117A 118A-C</p>

121A
124
128B-J
129A
131
132
201B, I, & J
213
214
242
290
291
301
304
311
316
500A
501D
600
603/603A
604/604A
700-704 are new (703 is an updated version of what was formerly 700)
804

900 series is all new except for 920A-936. However, the gist of the new exhibits is the same as the exhibits formerly in the latter half of the 200 series (which have been removed and replaced with these) – i.e., screenshots and transactional data taken from the SR server.

1000 series consists of google chats formerly in 300 series, except 1000 is new

Other changes:

Metadata has been added to many of the exhibits in the 100 & 200 series
Some of the exhibits have simply been renumbered

Torchat changes:

The torchats in the new list (222-232D) largely overlap with (and replace) the torchats that were included in the prior exhibit list. However, the chats have been broken up into smaller excerpts (or related sets of excerpts), with each made into a separate exhibit. Additionally, some material has been deleted from the chats; and some exhibits contain new chat excerpts not included in our earlier set of

	<p>exhibits.</p> <p>Defense counsel also discovers that the government has removed 31 exhibits contained in their initial exhibit list, as follows:</p> <p><u>Removed Exhibits:</u></p> <ul style="list-style-type: none"> 111(D) — Example of BTC address and example of Private Key 116(D) — Bestselling jewelry 116(E) — bestselling apparel 116(F) — pill press. 116(G) — book on silencers etc. 116(H) Book excerpts on making c-4, 122 — 4 steps to get customer help 123 — A few words from DPR — now just DPR profile 125EE — SR gets a new look 125F — SR Forum Post : withdrawal problems; 125M — Stealth mode feature for vendors 125O — response to bitfool claiming DPR is doing this for the money 126B — private messages between DPR, Cirrus, SSBD re: mod powers 210 — removal of screenshot of Root directory on Ulbricbht laptop 217 —Screenshot backup coin folder 220 — Torchat buddy list 240D — 1-1-12 journal entry from Laptop 243 — Log of detected efforts of LE to investigate SR 252 — Document regarding planned SR upgrades 258 — Statement of DPR to SR community regarding DDOS attack on website 259 — Document detailing user purchase process on SR 276 A-F 277 A-D <p>Defense counsel also discovers that the government has added the following additional exhibits, not noted by the government in the summary provided:</p> <p><u>Additional Exhibits:</u></p> <ul style="list-style-type: none"> 200A — screenshot of Hash for Ross's laptop 201 series — chosen a few new 222 — Complete log file of SSH torchat 231A-C — Torchats with Smed 602 — Server photograph
1/10/15	Government adds 3 new exhibits (GXs 226F, 125G and 212A), modifies and

	makes additions to 3 others (GX 113: page added; GX 118B: metadata corrected; GX 936: messages from Silk Road forum added), and adds stickers to two existing exhibits (GXs 240C and 914)
1/12/15	<p>Emails from Serrin Turner include 5 new exhibits and 13 modified exhibits:</p> <p><u>New Exhibits:</u></p> <p>GX 111 (screenshot of crack cocaine page, which is the same as the first page of GX 103B)</p> <p>GX 133 (a screenshot of the DPR public key listed on the Silk Road website)</p> <p>3 demonstratives:</p> <p>GX 106A - who.is lookup of nfl.com</p> <p>GX 106B - who.is lookup of .onion site</p> <p>GX 107A - close up of screen from end of GX 107 video)</p> <p><u>Modified Exhibits:</u></p> <p>GX 102D: pages added</p> <p>GX 212A: pages deleted</p> <p>GX 291: redactions removed</p> <p>GX 201B, 201H, 201I: timezone of metadata changed</p> <p>GX 930 - 936: time zone changed to GMT</p>
1/14/15	<p>The government adds GXs 123, 228, 940H, and 940I, and provides digital copies to counsel at 10pm that night.</p> <p>Other exhibits were handed to counsel that morning in hard copy, with digital copies to be provided the following day by disk. We do not have a record of which exhibits were provided in hard copy only that day.</p>
1/16/15	The government provides an updated exhibit disk, containing several exhibits not included in the government's exhibit list prior to 1/14/15.
1/20/15	<p>12:10 a.m.: The government provides defense counsel with 17 new exhibits (GXs 205A, 212A, 212B, 226G, 226H, 226I, 227E, 227F, 227G, 227H, 228, 240D, 241, 280, 295, 296 and 502), and notifies counsel that it will be reformatting the metadata for all of the exhibits in the 200 series, provided on a disk reflecting changes to all of those exhibits the morning of 1/21/15, in court.</p> <p>During court, the government provides defense counsel with two new exhibits (GX 149 and GX 150), both of which were admitted in court that same day, and a modified version of GX 296. Electronic copies of these exhibits and an updated exhibit list are provided to counsel <i>post</i> court, at 6:21 p.m.</p>
1/21/15	9:38 a.m. (after the court day has commenced): Government provides defense

	<p>counsel by email with 20 new exhibits (GXs 297, 298, 318-327, 1006-1008, 806, 808, and 809A), and two modified exhibits (GXs 228 and 314). The original email was apparently sent the night before but defense counsel did not receive it, possibly due to the size of the attachments.</p> <p>9:31 p.m.: The government adds an exhibit (GX 328) and adds metadata to an additional four exhibits (GXs 501A through 501D).</p>
1/25/15	<p>The government produces to defense counsel 23 entirely new or modified exhibits (GXs 227I, 264, 312, 312C, 320, 321, 322, 324, 325, 329, 330, 331, 333A, 333B, 334, 340A, 340B, 703, 808, 936, 950, 960, and 961), including a 348KB excel spreadsheet (GX 703).</p> <p>10:17 p.m.: The government provides an additional 3MB excel spreadsheet containing a wallet analysis conducted by Former Special Agent Yum, that the government intended to produce as 3500 material and from which it was first preparing a series of summary exhibits that it intended to introduce during former SA Yum's testimony.</p>
1/26/15	<p>8:30 a.m.: The government emails defense counsel a new exhibit (GX 311) and a modified version of GX 334.</p>
1/28/15	<p>8:56 a.m.: The government sends, by email, an additional 18 new exhibits (GXs 606, 607, 608, 609, 610, 620, 620A, 620B, 620C, 630, 631, 1100, 1101, 1102, 1200, 1201, 1202 and 1203)</p> <p>9:20 a.m.: The government provides, by email, two new exhibits (GXs 1204 and 1205) and a modified version of GX 1203, first provided to defense counsel earlier that morning.</p> <p>10:59 p.m.: The government provides, by email, an additional exhibit (GX 605A) and a modified version of GX 620A, and advises counsel that it is adding GX 650 and 651, copies of which were only provided to Joshua Horowitz, Esq., by disk, that Sunday, January 25, 2015.</p>