

EXHIBIT A

1 BRIAN STRETCH (CABN 132612)
Acting United States Attorney

2 DAVID R. CALLAWAY (CABN 121782)
3 Chief, Criminal Division

4 KATHRYN HAUN (DCBN 484131)
WILLIAM FRENTZEN (LABN 24421)
5 Assistant United States Attorneys

6 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
7 Telephone: (415) 436-7200
FAX: (415) 436-7234
8 Kathryn.haun@usdoj.gov
William.frentzen@usdoj.gov

9 RAYMOND N. HULSER (MABN 551350)
10 Chief, Public Integrity Section

11 RICHARD B. EVANS (DCBN 441494)
Trial Attorney

12 1400 New York Avenue, N.W.
13 Washington, D.C. 20005
Telephone: (202) 353-7760
14 Richard.B.Evans@usdoj.gov

15 Attorneys for United States of America

16
17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 UNITED STATES OF AMERICA

21 v.

22 SHAUN W. BRIDGES
23 (A/K/A "NUMBER 13"),

24 Defendant.
25
26
27

) NO. CR 15-CR 319-001 RS

) **ORDER**
) UNITED STATES' RENEWED EMERGENCY
) MOTION FOR DEFENDANT'S IMMEDIATE
) REMAND AND ARREST

) **FILED UNDER SEAL AND EX PARTE**

FILED

JAN 27 2016

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 This Monday the defendant filed a motion to have his electronic monitoring removed which the
2 government opposed and which the Court denied. This plan would have had the defendant driving with
3 his mother-in-law, Carla Esposito, to New Hampshire to self-surrender to FCI Berlin. Today, the
4 defendant has filed a motion to self-surrender a day early and proposes that he will again be driven by
5 his mother-in-law, Carla Esposito. For the reasons that follow, the United States, through its
6 undersigned attorneys, hereby opposes the motion filed by defendant Shaun W. Bridges for self-
7 surrender and renews its prior motions for Bridges' immediate remand to the custody of the U.S.
8 Marshal's in lieu of self-surrender for the reasons that follow. To effectuate this remand to custody, the
9 government respectfully urges this Court to issue a warrant for the defendant's arrest so that federal
10 agents can tomorrow transport him to the U.S. Marshal's, who can then transport him to the facility
11 designated by BOP.

12 In support of this Motion, the government attaches as Exhibit A a search warrant for the
13 premises and persons of defendant Bridges and his now-wife, Ariana Esposito, that was just issued
14 today in the District of Maryland by U.S. Magistrate Judge Timothy Sullivan. The warrant and affidavit
15 in support thereof speak for themselves, but in sum lay out new criminal conduct the government is
16 investigating to include new thefts and money laundering that were accomplished after Bridges had
17 signed a guilty Plea Agreement with the government in this case and after he had entered his pleas
18 before this Court. As set forth in Exhibit A, one of the thefts was worth approximately \$700,000 and
19 was accomplished on or about July 28, 2015, and another theft was worth approximately \$20,000 and
20 accomplished on or about September 10, 2015. See generally Exhibit A (attached federal search warrant
21 issued January 27, 2016). The funds at issue in both thefts were digital currency and stemmed from
22 digital currency seizure warrants the U.S. government had conducted in the District of Maryland.¹
23 Defendant Bridges had unique access to both of the digital currency wallets containing the stolen funds,
24 and after he was charged in the instant case the investigative and prosecutorial team in the instant case
25 advised the U.S. Secret Service to promptly move the \$700,000 in funds to a wallet to which Bridges did
26

27
28 ¹ At least one of these warrants went through the U.S. Attorney's Office for the District of
Maryland. It is at this time unknown whether the other warrant also went through the U.S. Attorney's
Office for the District of Maryland.

1 not have access. See generally id. Unfortunately, the U.S. Secret Service did ^{not} do so and the funds
 2 were thereafter stolen, something the U.S. Secret Service only discovered once it was ordered by a court
 3 to pay a portion of the seizure back to affected claimants. See id. The government is now investigating
 4 both of these thefts as well as whether there were other thefts of digital currency aside from these.

5 The affidavit in support of the warrant also details suspicious account activity involving Bridges'
 6 and Esposito's separate PayPal accounts in or about September 2015. See id. at Paragraphs 60-61, 73.
 7 Aside from that activity, it appears that Bridges' PayPal account was used in an attempt to procure a
 8 birth certificate from Germany. See id. at Paragraph 61.

9 What is not included in the affidavit because it was just learned today² from the company,
 10 Germany-Service located in Germany, is that in or about June 2015, an "Ariana Esposito" on Lillian
 11 Lane in Maryland attempted to procure a birth certificate on or about June 6, 2015. According to
 12 information received from the company, the requested certificate was to "obtain the Birth Certificate of
 13 [my] grandmother or grandfather . . . [For which country the document is needed:] Italy." Further
 14 information from the company lists the "Shopper's Name" as "Shaun Bridges" and also provides the
 15 Lillian Lane address. The service refunded the payment on or about June 27, 2015 because it was
 16 "unable to determine the correct place of birth" the requestor had provided.

17 In addition, what was also recently learned from records received from PayPal is that on or about
 18 July 8, 2015, Bridges' PayPal account made a payment to Johnson Genealogy Services with a note in
 19 the payment section that it was for "marriage certificate: Carl Esposito."³ The government is in the
 20 process of attempting to obtain further information about this transaction from the merchant. The Court
 21 will recall the defendant's earlier attempts to change his name to Calogero Esposito and procure a new
 22 social-security number as well as his attempts to shield that information from the public record.⁴

23 _____
 24 ² Ordinarily the government would not proffer these facts in a pleading but would have them in a
 25 sworn affidavit by a law enforcement agent. However, due to the timing and the need to present the
 26 Court with the facts the government has available to it, as well as the fact that most of the agents are on
 27 the East Coast preparing to execute the search warrant or unavailable, the government has elected to
 28 proffer this information.

³ Recall that the defendant's mother-in-law's name is Carla Esposito.

⁴ It is unclear whether the defendant is/was attempting to change his name and procure additional
 identity documents in the name of another to (1) open new accounts at financial institutions in a new
 name so as to liquidate new possible criminal proceeds; or (2) to use those new identity documents to
 obtain other documents to flee; or (3) both. However, the government submits that given the facts set

1 Those records just received from PayPal have been preliminarily analyzed today by the FBI and
2 reveal that Bridges appears to have been in violation of the court-ordered conditions of his pretrial
3 release in the instant case by accessing TOR ("The Onion Router"), an anonymizing technique that
4 many users of Dark Net marketplaces use.⁵ As part of Bridges' conditions of release imposed by Judge
5 James in March 2015, Bridges was not allowed to use TOR or access any Dark Net Market. That
6 condition was later tightened even further on or about October 15, 2015, such that Bridges was not
7 permitted to use any computer device at all. Specifically, the FBI's preliminary analysis of IP logs
8 provided by PayPal that were used in connection with Bridges' PayPal account reveal that on or about
9 April 11, 2015, that account logged in and out 51 times and on 3 of those occasions the individual used
10 known TOR exit nodes. After logging in using TOR on April 11, 2015, there is a record of a cancelled
11 transaction for 12,000 euros. The individual on the other side of that transaction used an email account
12 believed to be based in Italy. In addition, Bridges' account with PayPal contained a secondary email
13 account, sbridges@yandex.com. The FBI advises that Yandex is a known Russian email service.
14 Although the government submits that it is of course possible that Bridges' account was compromised,
15 the government submits this is unlikely because after those dates, funds flowed from Bridges' PayPal
16 account to Ariana Esposito's PayPal account and there was normal account activity in the accounts.

17 The Court noted that this was a close case for remand at the time of sentencing. The government
18 disagreed that Bridges had met the statutory standard of 18 U.S.C. Section 3143 which required the
19 defendant to demonstrate by clear and convincing evidence that he did not pose a flight risk or a danger
20 to the community given his attempts to change his identity. The government submits that the new
21 information described above and the facts contained in Exhibit A makes this not a close case: it again
22 raises the specter that Bridges may have (1) access to a large amount of funds; (2) possible identity
23 documents not in his own name; and (3) a willing accomplice to help him conceal funds and/or flee.
24 Add to this that this defendant is knowledgeable about how to cover his tracks given his time as a
25 federal agent, and who has a history before this Court of attempting to change his identity. The
26 government submits that the only way to ensure that the defendant makes it to the BOP facility to serve

27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000

forth in Exhibit A this should continue to cause the Court concern.

⁵ Of course, TOR use also has other legitimate purposes.

1 his sentence is to take him into federal custody forthwith. This is especially true if a search is executed
2 at his residence tomorrow -- such that he begins to suspect that the government is investigating the new
3 thefts possibly rendering him the subject of new charges and new forfeiture -- and incentivizing him to
4 deviate from his stated plan of driving to New Hampshire. Finally, the defendant has pleaded guilty and
5 has a long term of imprisonment to serve such that the mandatory remand features of the Section 3143
6 statute apply.

7 The government moves to file this under seal and ex parte because if the Court grants the relief
8 the government is seeking, i.e. a warrant, premature disclosure of that fact to the defendant could cause
9 the defendant to flee and jeopardize the government's current investigation into the defendant's most
10 recent actions. In addition, the search warrant out of Maryland attached as Exhibit A is itself under seal
11 and is set to be executed sometime within the next 10 days, possibly as early as tomorrow. Premature
12 disclosure of that could jeopardize the items that are to be seized in the execution of those warrants.

13 A Proposed Order is attached.

14 DATED: January 27, 2016

Respectfully submitted,

15
16 BRIAN J. STRETCH
Acting United States Attorney

17
18 
KATHRYN HAUN
WILLIAM FRENTZEN
Assistant United States Attorneys


19
20 RICHARD B. EVANS
Public Integrity Section
21
22
23
24
25
26
27
28

PROPOSED ORDER

1
2 For the reasons set forth above, the Clerk's Office is directed to issue an Arrest Warrant
3 FORTHWITH for the arrest of Shaun Bridges. Upon being taken into custody by federal agents, the
4 defendant shall be remanded to the custody of the U.S. Marshal's who shall transport him to a BOP
5 facility to begin serving his sentence.

6 For good cause shown, this Order and the Government's Motion shall remain under seal until
7 further order of this Court.
8

9 1/27/16

10 
11 HON. RICHARD SEEBORG
12 U.S. District Court
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28