

SEALED

SW
SA:USAO#2013R00234

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**CURTIS CLARK GREEN,
a/k/a "Flush"
a/k/a "chronicpain"**

Defendant

:
: **CRIMINAL NO. 13-0592**
:
: **(Conspiracy to Distribute and Possess**
: **with Intent to Distribute Cocaine,**
: **21 U.S.C. § 846; Criminal Forfeiture,**
: **21 U.S.C. § 853)**
:
: **(FILED UNDER SEAL)**
: .oOo.

INFORMATION

COUNT ONE

The United States Attorney for the District of Maryland charges that:

1. The defendant, **CURTIS CLARK GREEN, a/k/a "Flush," a/k/a "chronicpain,"** trafficked controlled substances using a website called "Silk Road." Since in or about January 2011, Silk Road has served as an online, international marketplace for users to buy and sell controlled substances, false identifications, and other contraband over the Internet. The owner and operator of Silk Road, **ROSS WILLIAM ULBRICHT, a/k/a "Dread Pirate Roberts," a/k/a "DPR,"** collected a fee for each transaction on Silk Road.

2. Silk Road protected the anonymity of its users in several ways, including by using the Tor network ("Tor"). A Tor user's Internet traffic is routed through a worldwide network of volunteer computers to conceal the user's location and Internet usage. Communications via Tor are also encrypted to conceal the contents of communications to all parties except for the intended recipient.

3. As a further measure to protect the anonymity of its users, Silk Road required all

transactions to be conducted in Bitcoin. Bitcoin is a digital currency that has no association with a national government. Bitcoin was used because it is difficult to track and easy to move online.

4. Silk Road users were also required to create an account and a username. Silk Road users were instructed to use aliases as their username and never to disclose their true name.

5. The owner and operator of Silk Road, ULBRICHT, employed others to assist in the operation of Silk Road. Among these employees was **CURTIS CLARK GREEN, a/k/a "Flush," a/k/a "chronicpain,"** who was paid a salary to serve as an "administrator" for Silk Road starting in or about November 2012 (the "Employee"). **CURTIS CLARK GREEN, a/k/a "Flush," a/k/a "chronicpain,"** had responsibilities included responding to questions and complaints from buyers and sellers, resolving disputes between buyers and sellers, and investigating possible law enforcement activity on Silk Road.

The Charge

6. From in or about December 2012, through on or about January 17, 2013, in the State and District of Maryland and elsewhere, the defendant,

**CURTIS CLARK GREEN,
a/k/a "Flush,"
a/k/a "chronicpain,"**

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

21 U.S.C. § 846

FORFEITURE

1. Upon conviction of one or more of the offenses set forth in Count One of this Information, the defendant,

**CURTIS CLARK GREEN,
a/k/a "Flush"
a/k/a "chronicpain"**

shall forfeit to the United States any property used, and intended to be used, in any manner or part, to commit, and to facilitate the commission of, such violations, and shall forfeit to the United States all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of those offenses, and all property traceable to such property. This includes, but is not limited to:

- a. \$18,000 in cash seized from the person of the defendant on January 17, 2013;
- b. Mac Book Pro laptop, S/N W8934LAF7XJ;
- c. Sprint phone, model: Samsung SPH-D700 with HEX Number: A000002418AADF
- d. The contents of an online account in the name of "avidreader", held at Mt. Gox, accessible at "mtgox.com";
- e. The contents of an online account in the name of "bitcoininvestmentsllc@gmail.com", held at Dwolla, accessible at "www.dwolla.com".

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code Section 853(p) to

seek forfeiture of any other property of the defendant up to the value of the property described above.

21 U.S.C. § 853

/s/ Rod Rosenstein

Rod J. Rosenstein
United States Attorney

Date: *Oct. 28, 2013*