



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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November 20, 2013

By Hand

Hon. Kevin N. Fox
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Ross William Ulbricht,*
13 Mag. 2328**

Dear Judge Fox:

The Government respectfully submits this letter in opposition to the defendant's motion for bail. As set forth below, the defendant presents both a danger to the community and a severe flight risk. Accordingly, consistent with the recommendation of Pretrial Services, the Government seeks his detention.

BACKGROUND

A. Charges Against Ulbricht

On September 27, 2013, the Honorable Frank Maas, United States Magistrate Judge, signed a complaint charging Ross William Ulbricht, the defendant, in three counts. (*See Ex. A* (the "Complaint")). Count One of the Complaint charges Ulbricht with conspiring to commit narcotics trafficking in violation of 21 U.S.C. § 846 and 841(b)(1)(A); Count Two charges him with conspiring to commit computer hacking in violation of 18 U.S.C. § 1030(b); and Count Three charges him with conspiring to commit money laundering in violation of 18 U.S.C. § 1956(h).

The Complaint alleges that, from January 2011 to September 2013, Ulbricht owned and operated an underground website known as "Silk Road," a bustling black-market bazaar where illegal drugs of every variety were sold, along with other illegal goods and services, such as malicious computer software and fake identification documents. The site featured a polished user interface that made buying these illicit items nearly as easy as ordinary online shopping. At the same time, the site sought to operate outside the reach of law enforcement, by running on a

special part of the Internet known as the “Tor” network, designed to hide users’ true IP addresses (and thereby their identities and locations), and by requiring all purchases to be made with Bitcoins, a digital currency designed to be as anonymous as cash. During its two-and-a-half years in operation, Silk Road was used by several thousand vendors to distribute hundreds of kilograms of illegal drugs and other illicit goods and services to well over a hundred thousand users, as well as to launder hundreds of millions of dollars from these illegal transactions.

As detailed in the Complaint, Ulbricht was the leader and organizer of this vast cybercriminal enterprise. Operating under the online pseudonym “Dread Pirate Roberts” or “DPR” (hereafter, “DPR”), Ulbricht controlled and oversaw all aspects of Silk Road: he maintained the computer code and server infrastructure underlying the site; he decided what illegal goods and services could be bought and sold on the site; he managed a small staff of employees who assisted in the day-to-day operation of the site; and he alone controlled the massive profits generated as commissions from the illicit sales conducted through the site. The Complaint also describes how Ulbricht was willing to use violence to protect his online drug empire, commissioning multiple murders for hire in seeking to guard his interests in Silk Road. Ulbricht has been separately charged for one of these attempted murders for hire in an indictment issued by the United States Attorney’s Office for the District of Maryland, unsealed on October 2, 2013 (attached hereto as Ex. B).

The Complaint explains how Ulbricht was identified as the Silk Road administrator known as “DPR” based on a series of telltale digital clues. (Compl. ¶¶ 33-45.) Among other things, Ulbricht posted to a discussion forum for computer programmers using the username “frosty,” seeking advice concerning an error generated by certain computer code he was developing. A modified version of that computer code was found on the Silk Road web server, which was covertly imaged during the Government’s investigation. Moreover, a login authentication key was also found on the server, containing the string “frosty@frosty,” indicating that “frosty” was the name of the only user, as well as the name of the only computer, authorized to log in to the Silk Road server directly. (Compl. ¶ 43).

B. Arrest of Ulbricht and the Extensive Evidence Recovered from His Computer

Ulbricht was arrested by the Federal Bureau of Investigation (“FBI”) on October 1, 2013, while working on his laptop computer at a San Francisco public library. FBI agents on the scene seized the computer pursuant to a search warrant and took steps to preserve its contents. The evidence recovered from Ulbricht’s computer conclusively confirms that Ulbricht was in fact the individual who created and controlled the Silk Road website.

First, Ulbricht was logged in to the Silk Road website – as “DPR” – at the time he was arrested. The webpage open on his Tor-enabled Internet browser was part of the administrative infrastructure of Silk Road, consisting of a customer-support interface listing messages from Silk Road users that had been flagged for administrative attention. (*See* Ex. C at 1). The previous two pages he had viewed in the browser were similarly part of the Silk Road administrative interface: one page contained a customer-support control panel from which various administrative actions could be taken (*e.g.* deleting listings, demoting sellers); the other page, titled “mastermind,” provided an overview of the transactions and money moving through the

site. (See Ex. C at 2-3). Further, in a separate window, Ulbricht had a Tor-enabled chat program open, in which Ulbricht was logged in under the username “dread,” paired with an avatar matching the avatar of “DPR” on Silk Road. (See Ex. C at 4.) Finally, the name of Ulbricht’s computer appeared in the top right-hand corner of the screen as “frosty,” (see Ex. C at 5), and a check of the name of the computer revealed that it too was named “frosty” – matching, again, the login authentication key recovered from the Silk Road web server.

Forensic analysis of Ulbricht’s computer since his arrest has yielded abundant additional evidence of his operation of Silk Road. Most significantly, Ulbricht kept a journal on his computer in which he wrote about his creation and operation of Silk Road, among other things. In one entry summarizing the major events of life during the year 2010, Ulbricht explained his initial efforts to start the business, writing:

I began working on a project that had been in my mind for over a year. I was calling it Underground Brokers, but eventually settled on Silk Road. The idea was to create a website where people could buy anything anonymously, with no trail whatsoever that could lead back to them.

The journal entry goes on to describe how Ulbricht set up “a lab in a cabin . . . off the grid” where he “produced several kilos of high quality shrooms,” so that he would have something to sell on the website when it first opened. Ulbricht noted that he “struggl[ed] to figure out . . . how to set it up,” and that, by the end of the year, he “still didn’t have a site up, let alone a server.” However, he predicted that “[i]n 2011,” he would be “creating a year of prosperity and power beyond what I have ever experienced before,” adding: “Silk Road is going to become a phenomenon and at least one person will tell me about it, unknowing that I was its creator.” Other journal entries document Ulbricht’s launching of the Silk Road website in early 2011 and his further development of the site thereafter.

Additional files from Ulbricht’s computer reflect his continued control of Silk Road up to the time of his arrest. For example, the computer contains a file titled “log,” in which Ulbricht regularly recorded his activity relating to his operation of the site during the period from March 20, 2013, to September 30, 2013, the day before his arrest. One entry, for example, notes that on May 28, 2013, he “finished rewriting [*sic*] silkroad.php controller.” Another entry, covering the period from June 5, 2013 to September 11, 2013, describes efforts to “develop a monitoring system for the SR infrastructure.” Another entry, dated June 2, 2013, references a joint venture with a Silk Road user, to whom he was “loaning \$500k” in order to “start vending on SR.”

Financial files stored on Ulbricht’s computer likewise confirm his continuous control of Silk Road from beginning to end. For example, one spreadsheet, titled “sr_accounting,” lists hundreds of expenditures relating to Silk Road, from “server rent” to “pay off hacker,” spread throughout 2010 to 2013. In another spreadsheet, titled “NetWorthCalculator,” Ulbricht listed all of his assets and liabilities, the most notable of which was an entry for “sr inc,” listed as an asset worth \$104 million. Moreover, actual proceeds derived from Silk Road were found on the computer, in the form of a Bitcoin wallet containing approximately 144,000 Bitcoins, equivalent to over \$20 million based on prevailing exchange rates at the time of Ulbricht’s arrest.

C. Procedural History

Ulbricht was presented in the United States District Court for the Northern District of California on October 2, 2013, and consented to detention. A detention hearing was set for October 9, 2013; however, at the hearing, Ulbricht again consented to detention and to his transfer to the Southern District of New York.

Ulbricht arrived in the Southern District of New York on November 5, 2013 and was presented the following day. Defense counsel consented to detention at presentment but requested the instant bail hearing.

LEGAL STANDARD

Pursuant to 18 U.S.C. § 3142(e)(1), if there is no condition or combination of conditions that will reasonably assure the appearance of the defendant and the safety of any other person or the community, detention is required. Because Ulbricht is charged with a drug-trafficking offense carrying a maximum term of imprisonment of ten years or more, a rebuttable presumption applies in this case that there are no such conditions. *See* 18 U.S.C. § 3142(e)(3).

DISCUSSION

As discussed below, detention of Ulbricht is plainly warranted on grounds of both dangerousness and flight risk. As to dangerousness, Ulbricht trafficked in huge volumes of illegal narcotics in operating Silk Road, including heroin, cocaine, and other dangerous and illegal substances. Moreover, he repeatedly resorted to violence in seeking to protect his lucrative business, commissioning at least six murders for hire in connection with operating the site. As to flight risk, Ulbricht has a strong incentive to flee given the overwhelming evidence against him and the considerable penalties he faces. He also has demonstrated the willingness and ability to flee: he actively evaded law enforcement for years prior to his arrest; he lived under aliases; he made plans for eventual flight; he procured fake identification documents; he sought to obtain foreign citizenship; he has potential access to large stashes of digital currency; and he has significant familial ties abroad. Accordingly, without question, Ulbricht's application should be denied.

A. Dangerousness

Ulbricht ran a massive online drug empire for over two-and-a-half years. He established and grew a business that enabled thousands of drug dealers to distribute hundreds of kilograms of illegal drugs to well over a hundred thousand users. Not only did the site make it easy for drug dealers to conduct sales online, but it also vastly expanded their geographic reach. Just as online stores have made it easy to obtain specialty goods and services in locations where they would otherwise be scarce, Silk Road made illegal drugs available to anyone with an Internet connection and a shipping address. The site thereby greatly diminished the barriers for users seeking to obtain drugs – including younger users seeking to try drugs for the first time. Ulbricht was content to profit from this digital expansion of the drug trade, paying little heed to the

destructive consequences caused by the addictive substances sold through his business. On this basis alone, Ulbricht should be detained.

But Ulbricht also demonstrated a more sinister disregard for the lives of others in operating his online cartel. While operating Silk Road, Ulbricht commissioned no fewer than six murders for hire within a span of four months in 2013. Although it appears that none of these murders was actually carried out, Ulbricht clearly intended them to happen, and the details of the attempted murders demonstrate that Ulbricht will not hesitate to use violence in order to silence witnesses, safeguard his criminal proceeds, or otherwise protect his self-interest.

1. Murder for Hire #1

First, as alleged in the indictment filed against Ulbricht in the District of Maryland, in January 2013, Ulbricht commissioned a murder for hire from a Silk Road user claiming to be a large-scale narcotics trafficker, but who in reality was an undercover law enforcement agent (the “UC”). Specifically, on January 26, 2013, Ulbricht, through his “DPR” account on Silk Road’s private message system, told the UC that a Silk Road employee (the “Employee”) had stolen approximately \$350,000 in Bitcoins from Ulbricht, by “[taking] advantage of some of the tools I gave him to do vendor support to rip a bunch of vendors off, who I will have to compensate.” At first, Ulbricht told the UC that he wanted the Employee “beat up” and “forced to send the bitcoins he stole back.” Later, however, Ulbricht told the UC he wanted to “change the order to execute rather than torture.” Ulbricht explained that the Employee had been arrested and that he “ha[d] to assume he will sing.” Ulbricht paid \$80,000 for the job, wiring the money to a bank account designated by the UC – \$40,000 in advance, and \$40,000 after the job was purportedly done. Upon receiving staged photos from the UC of the Employee’s death, Ulbricht replied, “I’m pissed I had to kill him . . . but what’s done is done. . . . I just wish more people had some integrity.”

2. Murder for Hire #2

Next, as alleged in the Complaint, beginning on March 13, 2013, a Silk Road vendor known as “FriendlyChemist” began sending threats to Ulbricht’s “DPR” account on Silk Road’s private message system, claiming that he had a long list of actual names and addresses of Silk Road users that he intended to publish on the Internet unless Ulbricht gave him \$500,000, which “FriendlyChemist” said he needed to pay off his narcotics suppliers. Subsequently, Ulbricht communicated with another user claiming to be “FriendlyChemist’s” supplier, who went by the username “redandwhite” – a well-known nickname of the Hells Angels. Ulbricht told “redandwhite” that “FriendlyChemist” was causing him trouble and that he wanted “to put a bounty on his head.” Ulbricht gave “redandwhite” what he believed to be the true name of “FriendlyChemist,” and a location for him in White Rock, British Columbia, Canada. Ulbricht and “redandwhite” agreed upon a price of 1,670 Bitcoins – approximately \$150,000 – for the job, which Ulbricht transferred on March 31, 2013, to a particular Bitcoin address designated by “redandwhite.” This transfer appears on the public Bitcoin ledger known as the “Blockchain,” evidencing that the transfer was actually made. Over the next several days, “redandwhite” reported to Ulbricht that “FriendlyChemist” had been “taken care of” and provided what he

claimed to be a photograph of the victim after the job was done. Ulbricht thanked “redandwhite” for his “swift action.”

As noted in the Complaint, the FBI has consulted with Canadian law enforcement authorities, who have no record of any Canadian resident with the name for “FriendlyChemist” that Ulbricht passed to “redandwhite,” nor do they have a record of a homicide occurring in White Rock, British Columbia during the relevant time frame. However, the foregoing messages between Ulbricht and “redandwhite,” and Ulbricht’s \$150,000 payment to “redandwhite,” leave no doubt of his intention that the murder for hire be carried out. Moreover, evidence obtained from Ulbricht’s laptop confirm that it was in fact Ulbricht communicating as “DPR” in soliciting the murder for hire. In the “log” file on Ulbricht’s computer described above, in which Ulbricht kept a record of his actions in operating Silk Road for the period from March 20, 2013 to September 30, 2013, the following entries appear (emphasis added):

03/28/2013

being blackmailed with user info. talking with large distributor (hell's angels).

03/29/2013

commissioned hit on blackmailer with angels

04/01/2013

got word that blackmailer was excuted

04/04/2013

withdrawals all caught up

made a sign error when fixing the bond refund bug, so several vendors had very negative accounts.

switched to direct connect for bitcoin instead of over ssh portforward

received visual confirmation of blackmailers execution

3. *Murders for Hire #3 through #6*

Ulbricht commissioned at least four other murders for hire beyond the two murders for hire described in the Maryland indictment and the Complaint. Like the murder for hire described in the Complaint, these other four murders for hire were also commissioned from the Silk Road user “redandwhite.”

Specifically, around the same time that “redandwhite” told Ulbricht that “FriendlyChemist” had been “taken care of,” he also told Ulbricht that his workers had “questioned [‘FriendlyChemist’] and he spilled everything he knew.” “redandwhite” stated that “FriendlyChemist” had identified another individual located in Surrey, British Columbia, who had been working together with “FriendlyChemist” “on this scheme to blackmail you,” and who had been running scams on Silk Road “for a couple years.” “redandwhite” stated that this user went by the username “tony76” on Silk Road, and he also provided a purported true name for the individual (“Victim-3”).

On April 5, 2013, Ulbricht told “redandwhite,” “I would like to go after [Victim-3] If he is our man, then he likely has substantial assets to be recovered. Perhaps we can hold him and question him?” “redandwhite” responded that he would send people to “do some recon” and report back later. The following day, on April 6, 2013, “redandwhite” told Ulbricht that he had learned that Victim-3 was a drug dealer in the Surrey area who “works/lives with 3 other people and they all sell product together.” He asked Ulbricht, “Do you want to deal with this . . . guy, or do you want me to put the team on standby?” Ulbricht responded, “I am confident enough that it is him to move forward. Can we round up all 4 of them, separate them, and get them to out each other and give up their stolen money?” “redandwhite” wrote back that, “As for getting all 4, it would be possible but they would have to get them all at once so that one does not get away.” Ulbricht replied, “Ok, let’s just hit [Victim-3] and leave it at that. Try to recover the funds, but if not, then not.”

Two days later, on April 8, 2013, “redandwhite” offered to “hit [Victim-3] only” for “150 [thousand] just like last time.” However, “redandwhite” cautioned that, if they only took out Victim-3 and not Victim-3’s three co-residents, they would not be able to “do [the hit] at their place because there are always at least a few of them there So we wouldn’t be able to recover any of his things.” “redandwhite” stated that he would “prefer to do all 4” in order to have a “chance of recovering any potential product/money he may have,” adding: “Anything recovered would be split 50/50 with you.” “redandwhite” quoted Ulbricht a price of “500k USD” to do “all 4.” Ulbricht responded later that day: “hmm. . . ok, I’ll defer to your better judgment and hope we can recover some assets from them.” Ulbricht added that he had gone ahead and sent “\$500k in btc [Bitcoins] (3,000 @ \$166/btc)” to a Bitcoin address designated by “redandwhite” as payment. As with Ulbricht’s prior transfer to “redandwhite,” this transfer of 3,000 Bitcoins also appears on the Blockchain, confirming that it was in fact sent.

One week later, on April 15, 2013, “redandwhite” wrote to Ulbricht: “That problem was dealt with. I’ll try to catch you online [on a chat service] to give you details. Just wanted to let you know right away so you have one less thing to worry about.” Ulbricht replied: “thanks, see you on chat.”

As with the preceding murder for hire Ulbricht commissioned from “redandwhite,” the FBI has consulted with Canadian authorities, who report no homicides of any individual with Victim-3’s name or otherwise matching the circumstances reflected in these communications. However, Ulbricht clearly intended for these murders to happen, as reflected, again, not only in the foregoing messages sent from “DPR’s” account on Silk Road, and the transfer of \$500,000 to “redandwhite’s” Bitcoin address reflected in the Blockchain, but also in the following entries in the log file Ulbricht kept on his personal computer (emphasis added):

04/06/2013
made sure backup crons are working
gave angels go ahead to find tony76
cleaned up unused libraries on server
added to forbidden username list to cover I <-> I scam

04/08/2013

sent payment to angels for hit on tony76 and his 3 associates

...

very high load (300/16), took site offline and refactored main and category pages to be more efficient

* * *

In light of the foregoing, Ulbricht should be detained as a danger to the community. Given his willingness to pay approximately \$730,000 for attempts to kill six people, there is no reason to believe that he would not again resort to violence in order to protect himself, whether through intimidating witnesses, recovering proceeds of his criminal activity, or otherwise. It is evident that he cannot be trusted to comply with bail conditions designed to ensure the safety of other persons and the community. Nor has he proffered any meaningful evidence rebutting the presumption that no such conditions exist.

B. Risk of Flight

In addition to posing a clear safety risk, Ulbricht also poses a clear flight risk.

As an initial matter, Ulbricht has an enormous incentive to flee. As explained above, the proof against him is overwhelming. Through recovery of the server infrastructure underlying Silk Road, the Government has obtained extensive evidence of the breathtaking scope of the enterprise and the enormous volume of criminal transactions the business facilitated. And through recovery of Ulbricht's own personal computer, the Government has obtained damning and conclusive evidence that Ulbricht himself established Silk Road and continuously managed its operation in the role of "DPR."

Ulbricht faces very substantial jail time for his conduct. The charges he currently faces carry a mandatory minimum of ten years' imprisonment. Moreover, given the hundreds of kilograms of drugs moved through Silk Road, and various sentencing enhancements that apply to his conduct, the Government anticipates that Ulbricht will face a recommended sentence under the U.S. Sentencing Guidelines far in excess of the mandatory minimum. His incentive to flee could not be stronger.

In addition to having the incentive to flee, Ulbricht also has demonstrated that he has the willingness and ability to flee, based on a number of factors:

- *Evasion of law enforcement.* Ulbricht has spent the past two-and-a-half years continuously evading law enforcement. He used sophisticated technological methods to hide his identity and location while running his criminal enterprise, all the while knowing that law enforcement was seeking to identify and locate him. Even in his "real life," he sought to keep a low profile, renting out rooms found through Craigslist and using aliases among those living with him. As noted in the Complaint, his housemates at one location in San Francisco knew him by the fake name "Josh."

Given this history, there is every reason to believe that Ulbricht would seek to evade law enforcement again if given the chance.

- *Plans for life on the run.* Evidence from Ulbricht’s computer also reflects that he had contemplated and prepared for a life on the run. For example, one file found on the computer, labeled “emergency,” contains a list of apparent to-do items in the event that Ulbricht learned that law enforcement was closing in on him. It reads as follows:

- encrypt and backup important files on laptop to memory stick.
- destroy laptop hard drive and hide/dispose
- destroy phone and hide/dispose
- Hide memory stick
- get new laptop
- go to end of train
- find place to live on craigslist for cash
- create new identity (name, backstory)

- *Efforts to obtain foreign citizenship.* Other files from Ulbricht’s laptop show that he had researched possibilities for relocating abroad and had even taken concrete steps toward doing so. For example, the computer contained reference guides concerning the requirements for obtaining “economic citizenship” in several Caribbean countries. In particular, the computer contained an application completed by Ulbricht for citizenship in Dominica, along with reference materials explaining that Dominica’s “economic citizenship” program offers “instant” citizenship in exchange for a one-time “\$75,000 donation” to the country’s government. (*See Ex. D*). Ulbricht is also known to have traveled to Dominica in late 2012 – a fact that he notably failed to disclose to Pretrial.
- *Access to false identification documents.* Ulbricht is also intimately familiar with how to obtain fake identifications through the online underground. Silk Road itself had a “forgeries” section where fake identification documents were offered for sale, and Ulbricht availed himself of these services. As described in the Complaint, in July 2013, U.S. Customs and Border Patrol agents intercepted a package containing nine fake driver’s licenses bearing Ulbricht’s image, sent to the San Francisco residence where he was staying at the time. The identifications, which are high quality forgeries, depict Ulbricht with different names and in different guises – some with beard, some without – and include licenses from six different states and three different countries (Canada, the United Kingdom, and Australia). (*See Ex. E*).
- *Access to digital currency and offshore accounts.* Ulbricht also has the financial wherewithal to flee. As described in the Complaint, through his operation of Silk Road, he amassed over 600,000 Bitcoins in commissions from Silk Road sales, an enormous number of Bitcoins, equivalent to approximately \$420 million at current exchange rates. Although Ulbricht spent a substantial portion of his Bitcoins in operating Silk Road, and the FBI has seized approximately 144,000 of Ulbricht’s Bitcoins from his computer, there could very well be additional large stashes of

Bitcoins that Ulbricht stored elsewhere and that the FBI has yet to locate. Being digital currency, Bitcoins can be stored in any fashion that a computer file can be stored – on a thumb drive in a safe deposit box, for example, or even on the Internet, in “cloud” storage. Ulbricht could thus easily retrieve any Bitcoins he has secreted away were he to be released. Further, Ulbricht’s computer was also found to contain reference materials for setting up offshore bank accounts, indicating that Ulbricht also may have access to bank accounts held abroad.

- *Foreign ties.* Finally, Ulbricht has significant ties abroad. His parents own property and hold bank accounts in Costa Rica, and they live there for half the year. His sister resides in Australia. He also has undertaken recent foreign travel – living in Australia and traveling in Southeast Asia from November 2011 to April 2012, traveling to Costa Rica from May to June 2012, and, as noted above, traveling to Dominica in late 2012.

* * *

In short, Ulbricht has every incentive to flee and is well positioned to do so. Nor is the flight risk he poses significantly mitigated by the letters of support from friends and family included with his bail application. These supporters appear only to know one side of Ulbricht, as he has gone to great lengths to keep his criminal alter ego a secret. In spending the past two-and-a-half years evading law enforcement, he has maintained one persona in his “real life,” while maintaining a different, darker persona online. Indeed, in one of his communications with the undercover agent involved in the first murder for hire described above, Ulbricht and the agent had the following, telling exchange concerning Ulbricht’s concealment of his criminal livelihood from his then girlfriend:

UC: does she know who you are? Dread I mean

Ulbricht: no way

Ulbricht: maybe never

UC: how can you hide that from her? i have to guess that [you are] spending at least 10 to 12 hours a day on SR

Ulbricht: I've become good at hiding

Ulbricht is thus well practiced at living a double life. Indeed, even with respect to his role as “DPR” on Silk Road, Ulbricht concealed the more nefarious aspects of his criminal conduct from the users of the site. While portraying himself as a champion of “freedom” on the Silk Road website, opposed to the use of any kind of “force” against others, he was in fact a quite ruthless criminal – one who, with seeming ease and lack of conscience, nonchalantly ordered murders for hire amidst fixing server bugs and answering customer support tickets. Given his demonstrated penchant for deception, there is simply no reason to believe that any

sureties offered by the defense could exercise sufficient moral suasion on Ulbricht to prevent him from fleeing.

CONCLUSION

For the reasons set forth above, there is no condition or combination of conditions that will reasonably assure Ulbricht's future appearance and the safety of the community. Accordingly, Ulbricht's bail application should be denied.

Respectfully,

PREET BHARARA
United States Attorney

By: _____



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cc: Joshua Dratel, Esq.

Encl.