

70. Contained in the package, I located a shipping invoice from "Samples Unlimited" showing an invoice for a "Sample Order" of "Lifesaver gummies" and an additional envelope that contained a bulky item. Inside the additional envelope, I located a package of Lifesavers candy.

71. Concealed in the candy box, I located a silver, heat-sealed, Mylar anti-static type bag which contained two clear plastic baggies. One baggie contained 20 Adderall 30mg tablets. The other plastic baggie contained 10 ONAX Alprazolam 2mg tablets.

72. I accessed the Silk Road website and activated the "finalize" feature under the tab "orders." Activating this feature allowed the Bitcoins that were held in escrow to be transferred to MDPRO.

73. This package appeared on **BOLLES'** USPS shipping history.

August 20, 2013 undercover purchases of controlled substances

74. On August 20, 2013, I located an advertisement placed by MDPRO offering the sale one THC²⁷ filled e-cigarette cartridge for 0.4874 Bitcoins. MDPRO described the item as, "prefilled cartomizers with tasty, concentrated THC e liquid" At the time of the transaction, 0.4874 Bitcoins were worth approximately \$53.89. I added one lot to my undercover "Shopping Cart" by activating the "add to cart" function.

²⁷ Tetrahydrocannabinol (THC) is a Schedule I controlled substance.

75. MDPRO also advertised the sale of 2.5ml Butane Hash Oil²⁸ (BHO) for 0.9702 Bitcoins. MDPRO described the item as a, "plastic dropper bottle containing 2.5ml of THC e juice. This is a potent blend of BHO amber glass dissolved in e cig liquid [...]" I added two lots [5.0ml] to my undercover "Shopping Cart" by activating the "add to cart" function. At time of transaction, 5.0ml of BHO cost 1.9404 Bitcoins which were worth approximately \$214.51.

76. MDPRO also advertised the sale of lots of five Vyvanse²⁹ 60mg tablets for 0.8827 Bitcoins per lot. MDPRO described the item as, "5 capsules name brand Vyvanse. Extended release medication for ADHD derived from adderall!" At the time of the transaction, 0.8827 Bitcoins were worth approximately \$97.57. I added five lots (25 capsules) to my undercover "Shopping Cart" by activating the "add to cart" function. At the time of the transaction, 25 Vyvanse tablets cost 4.4131 Bitcoins which were worth approximately \$487.86.

77. MDPRO also advertised the sale of lots of five Xanax 2mg tablets. Each lot was offered in exchange for 0.1956 Bitcoins, worth approximately \$21.61 at time of transaction. I added three lots (15 tablets) to my undercover "Shopping Cart" by activating the "add to cart" function. At the time of the transaction, 15 Xanax 2mg tablets cost 0.5867 Bitcoins and were worth approximately \$64.85.

²⁸ Butane Hash Oil (BHO) contains Tetrahydrocannabinol (THC) and is a Schedule I controlled substance.

²⁹ Vyvanse is name brand Lisdexamfetamine, a Schedule II controlled substance.

78. MDPRO also advertised the sale of lots of five Adderall 30mg tablets. Each lot was offered in exchange for 0.8827 Bitcoins which, at the time of the transaction, were worth approximately \$97.58. I added one lot (5 tablets) to my undercover "Shopping Cart" by activating the "add to cart" function.

79. MDPRO charged an additional 0.0865 Bitcoins for shipping. At the time of the transaction, 0.0865 Bitcoins was worth approximately \$9.56. The total cost of these purchases was 8.3964 Bitcoins which, at the time of the transaction, was approximately \$928.25.

80. From an undercover Bitcoin wallet that I maintained, I transferred an appropriate amount of Bitcoins to the undercover Silk Road account Bitcoin wallet address. Once the Blockchain confirmed the Bitcoin transfer, I activated the checkout function on the Silk Road website, which prompted me for a shipping address and secret pin number.

81. I entered an undercover name and an undercover commercial post office box as the shipping address. I then entered the secret pin associated with the undercover Silk Road account and completed the transaction. As a result, the Bitcoins appearing in my undercover Silk Road account wallet were removed and placed into the Silk Road escrow system. The Silk Road website assigned unique identification numbers to the order.

82. On September 3, 2013, I received a USPS Priority mail package at the undercover commercial post office box that I supplied to MDPRO as the

shipping address for the August 20, 2013 order. The package was addressed to the undercover name I provided.

83. The package listed a return address of "Samples Unlimited, 26 Fox Hunt Drive, PMB 176, Bear, DE 19701" and had a USPS tracking number. The USPS tracking number showed that the package originated in Bear, Delaware on August 30, 2013.

84. Contained in the package, I located a shipping invoice from "Samples Unlimited" that showed an invoice for a "Sample Order" of "Jolly Ranchers" and an additional envelope that contained a bulky item. Inside the envelope, I located a package of Jolly Ranchers candy.

85. Concealed inside the package of Jolly Ranchers, I located two, silver-heat sealed, Mylar type anti-static bags. Contained in one of the heat-sealed bags, I located two "Stink Sack" odor concealing plastic baggies. One baggie contained an e-cigarette cartridge bearing a "V4L³⁰" logo. The e-cigarette cartridge contained the THC liquid. Upon breaking the seal of the other "Stink Sack" bag, I detected a very strong odor of marijuana. Contained in the "Stink Sack," I recovered two plastic bottles that contained Hash Oil. A DEA lab analysis confirmed that the substance was Hash Oil.

86. Contained in the additional heat-sealed bag, I located three clear plastic baggies that each contained pills or capsules. One plastic baggie contained 25 blue capsules, stamped with markings consistent with Vyvanse

³⁰ "V4L" is the business logo for Vapor 4 Life, Inc. Vapor 4 Life, Inc. is an American e-cigarette supply distributor.

60mg capsules. The second plastic baggie contained 15 Alprazolam 2mg tablets. The third plastic baggie contained five Adderall 30mg tablets.

87. I accessed the Silk Road website and activated the “finalize” feature under the tab “orders.” Activating this feature allowed the Bitcoins that were held in escrow to be transferred to MDPRO.

88. This package appears on **BOLLES'** USPS shipping account list.

Identification of Olivia **BOLLES** a/k/a MDPRO

PostNET Bear, DE Commercial Post Office

89. On July 26, 2013, I received information from the PostNET³¹ store located at 26 Fox Hunt Drive, Bear, Delaware 19701 that contains Personal Mailbox (PMB) 176, the return address for all of the packages that were received from MDPRO. The mailing address for PMB 176 is “26 Fox Hunt Drive PMB 176, Bear, DE 19701”, which matched the return address of packages received from MDPRO. The lessee of PMB 176 was listed as **Olivia BOLLES**. As proof of identify and address when renting the PMB, the lessee provided copies of her State of Delaware driver’s license and State of Delaware vehicle registration. The vehicle registration the lessee provided was for a 2012 Nissan “VRS”, VIN #3N1BC1CP2CK229634. I performed an NCIC check on that VIN and confirmed it was registered to **BOLLES**. Both the Delaware driver’s license and Delaware vehicle registration listed **BOLLES'** address as 14 Sunny Bend, Four Seasons, Newark, Delaware 19702.

³¹ PostNET is a commercial packing supply store, which commercially rents post office boxes.

90. The lessee of PMB 176 completed a contract titled "Application for Delivery of Mail through an Agent" that was required by the USPS when opening the PMB. In the section titled "Name of Firm or Corporation," the lessee wrote "Samples Unlimited." Samples Unlimited appeared on all of the return addresses and invoices supplied with drug shipments received. The lessee of PMB 176 signed the contract and the signature was consistent with the signature on **BOLLES'** Delaware driver's license. The lessee of PMB 176 provided additional signatures on other documents that were required to open and lease the mailbox, all of which were consistent with **BOLLES'** signature on her driver's license.

91. I could not locate any legitimate business operating as "Samples Unlimited" in Delaware or a surrounding state. Furthermore, I could not locate any legitimate business utilizing 26 Fox Hunt Drive, PMB 176, Bear, Delaware 19701 as its mailing address.

92. The lessee of PMB 176 provided telephone number (302) 757-6893 on her PMB application contract. I confirmed that this telephone number belonged to a Verizon Wireless account opened in **BOLLES'** name that listed an address of 14 Sunny Bend, Newark, Delaware 19702.

93. On April 11, 2013 and July 12, 2013, VISA card ****5010 was used to make payments to PostNET for the PMB rental. The VISA card utilized was issued by M & T Bank in **BOLLES'** name and drew funds directly from **BOLLES'** M & T Bank account. The charges for the PBM appeared as debits on **BOLLES'** M & T Bank account ****7301.

Returned Package in PMB 176

94. When PostNET responded to my inquiry, they provided me a photocopy of the front of the returned package which had been left inside PMB 176. The package was identical in appearance to packages I received from MDPRO and listed the same return address. The package had a USPS tracking number affixed to it.

95. The USPIS provided me with a scan of the package made when it was entered the postal system. The packaged listed the destination as an address in Sacramento, California. The package entered the postal stream on May 29, 2013. The package was returned to sender, marked undeliverable, on June 10, 2013. The package had been left, undisturbed inside PMB 176, since approximately that date. I became aware of the package on July 26, 2013. Employees of PostNET were aware that the package had been abandoned in the mailbox since it was returned to sender, on or about June 10, 2013.

96. On or about July 26, 2013, members of the DEA Wilmington Resident Office (WRO) TDS retrieved the package from PMB 176 and secured it in a DEA evidence vault. On August 2, 2013, DEA WRO agents executed a Federal search warrant on the package.

97. Inside the package, agents located a shipping invoice from "Samples Unlimited" for "Swedish Fish" and a white envelope that contained a bulky item. Contained in the white envelope was a box of Swedish Fish candy.

Concealed inside the candy box was a silver, heat-sealed, anti-static type bag that contained 15 Xanax brand Alprazolam 2mg tablets.

98. USPIS informed me the package originated in an Automatic Postal Machine (APM) in Newark, Delaware on May 29, 2013. Similar to an Automated Teller Machine (ATM), an APM takes a photograph of the person utilizing the service. USPIS provided me the still photograph that was taken by the machine when the package was mailed. The photograph was clear and of good quality. I compared the APM photograph to the photograph on **BOLLES'** Delaware driver's license and to the publically available photographs on **BOLLES'** MySpace³² and Facebook³³ accounts. The photographs all matched the picture captured on the APM that was provided by USPIS and is attached to this affidavit as Exhibit 4.

Financial Records Analysis

M & T Bank Account xxxx7301

99. On August 26, 2013, I reviewed records pertaining to **BOLLES'** checking account xxxx7301 maintained at M & T Bank. The account was opened on July 3, 2009 and **BOLLES** is the sole signatory on the account. The account was originally opened at a Wilmington Trust Bank, but was absorbed into M & T Bank at a later date. The records supplied by M & T Bank covered the period of time between August 12, 2012 and August 9, 2013.

³² [http://www.myspace.com/Olivia BOLLES](http://www.myspace.com/Olivia_BOLLES)

³³ <http://www.facebook.com/oBOLLES>

100. **BOLLES** opened the account by providing her correct name, date of birth and Social Security number. **BOLLES** listed 14 Sunny Bend, Newark, DE 19702 as her home address.

Deposit Summary

101. Between March 19, 2013 and August 8, 2013, deposits totaling \$25,547.72 were made into M & T checking account xxxx7301. Bitcoin related deposits made during this period totaled \$14,414.31. The Bitcoin related deposits were made irregularly and in amounts less than \$3,000. Based upon my knowledge of Silk Road, I know vendors generally exchange Bitcoins to a national currency by performing many smaller transactions at irregular intervals rather than in regular large transactions. Vendors who earn large quantities of Bitcoins perform transactions in this manner to avoid triggering money laundering and currency reporting requirements.

102. Between March 19, 2013 and August 8, 2013, **BOLLES** made ATM deposits totaling \$4,323.98. ATM deposits during this period included check deposits drawn from Green Dot Bank.³⁴

103. Between March 19, 2013 and August 8, 2013, **BOLLES** received legitimate payroll deposits totaling \$5,815.94 from "Health Services Payroll."

³⁴ Green Dot Bank was commonly utilized by Silk Road drug traffickers and money launderers due to the anonymous nature of its transactions. Green Dot prepaid instruments can be purchased over-the-counter at various stores without having to provide identification. Additionally, Green Dot bank instruments can contain a code, which can be given anonymously to other persons, who can utilize the code to draw currency at retail stores and banks.

104. **BOLLES** became an active vendor on the Silk Road on or about March, 2013. Between March 19, 2013 and August 8, 2013, **BOLLES** received deposits from illicit sources totaling \$18,738.29 and deposits from legitimate sources totaling \$5,815.94.

Withdrawals and Debits Summary

105. Between April 16, 2013 and July 15, 2013, **BOLLES** utilized M & T checking account xxxx7301 to send Western Union wire transfers totaling \$2,998.30 to various individuals, including \$1,235 to a suspected illicit Codeine supplier operating in Bamenda, Cameroon.³⁵ The additional funds wired were to individuals located in the United Kingdom, Ukraine, Pakistan, and Latvia.

106. On March 11, 2013, \$311.16 was debited from the M & T Bank account by Coinbase. This was the only Bitcoin purchase appearing on the account between August 12, 2012 and August 8, 2013. All additional Bitcoin related transactions were deposits, further detailing that **BOLLES** operated as a retailer who accepted Bitcoins and not as a user who utilized Bitcoins to purchase items.

107. Between April 4, 2013 and June 14, 2013, \$567.85 was debited from the account by the USPS. The largest, single debit from the USPS in the

³⁵ Between May 6, 2013 and May 7, 2013, **BOLLES** made six phone calls to a telephone number in Cameroon. I researched the phone number and found that it belonged to "Mperial Chemicals" that offered Actavis Codeine cough syrup for sale. Between August 26, 2013 and September 5, 2013, I contacted the company at the e-mail address provided, posing as a potential Codeine cough syrup customer. The person offering the codeine product for sale instructed me to provide payment through Western Union wire transfers to the same areas that **BOLLES'** wire transfers were delivered.

amount of \$103.88, occurred on June 14, 2013. The USPS account, as detailed in this affidavit, became much more active on June 16, 2013 when **BOLLES** began utilizing it for Silk Road sales of controlled substances. Payments made on the USPS account, prior to June 13, 2013, reflected payments from the M & T Bank account. Specifically, on April 12, 2013, \$88.62 was debited from the account by "POSTNETDE #101 BEAR." On July 15, 2013, an additional \$180.00 was debited by "POSTNETDE #101 BEAR." These charges were the lease payments made to PostNET for the lease of PMB 176 at the Bear, Delaware location of PostNET and the amounts matched the paper receipts generated by PostNET.

108. Between March 18, 2013 and August 8, 2013, debits totaling \$1,218.24 were posted to the account in 11 separate transactions from Smoking Supply shops, who stock e-cigarette products including e-cigarette liquid and cartridges. Included in these charges were debits from "VAPOR 4 LIFE." As detailed in this affidavit, I purchased a Vapor 4 Life brand e-cigarette cartridge containing THC oil from MDPRO.

109. Between May 13, 2013 and May 22, 2013, three debits, totaling \$603.67 were made by Green Dot Bank.

110. Payments from the account after June 13, 2013 detail PayPal payments.

Coinbase

111. The website www.coinbase.com (Coinbase) provides Bitcoin/U.S. dollar exchange services. Coinbase allows users to transfer funds directly to traditional bank accounts using wire transfers. Coinbase also provides a user with a Bitcoin wallet address and allows Bitcoin transfers between wallets.

112. According to records obtained during the investigation, **BOLLES** began utilizing Coinbase on or about March 12, 2013. **BOLLES** utilized the e-mail address oBOLLES@tormail.org³⁶ when she activated her account.

113. On March 12, 2013, **BOLLES** utilized her Coinbase account to purchase seven Bitcoins for \$311.16; this transaction also appeared on bank records supplied by M & T Bank. Between March 12, 2013 and August 20, 2013, this was the only Bitcoin purchase made by **BOLLES**. All additional transactions through Coinbase were exchanging Bitcoins into U.S. dollar. This activity is consistent with an individual operating as a vendor and accepting Bitcoins as payment.

114. In an effort to trace **BOLLES'** Bitcoin activity, I utilized <http://blockchain.info> to view **BOLLES'** transactions related to her Coinbase Bitcoin wallet that contained seven Bitcoins. On March 13, 2013, the seven Bitcoins entered into a series of transactions where they passed through numerous Bitcoin wallet identifiers with varying numbers of other Bitcoins. This

³⁶ TORMAIL is an anonymous web based e-mail provider and is located on the TOR network. TORMAIL specifically states that they do not respond to any legal process. TORMAIL does not require any identifying information to sign up for an account.

activity made it impossible to track the seven Bitcoins through commerce and was consistent with the use of a Bitcoin tumbler designed to disguise the source and destination of Bitcoins. This activity was also consistent with the tumbler utilized by Silk Road.

115. Between April 4, 2013 and August 20, 2013, **BOLLES** utilized her Coinbase account to exchange 265.5 Bitcoins for \$29,582.72 in 26 separate transactions. The funds were all wire transferred into **BOLLES'** M & T Bank account xxxx7301.

116. There were no rent or utilities payments that appeared on **BOLLES'** Coinbase account.

Green Dot Bank

117. On May 11, 2013, **BOLLES** signed up for Green Dot Bank (GDB) services. **BOLLES** provided her name, date of birth, and Social Security number to open the account. **BOLLES** provided olivia BOLLES@yahoo.com as her e-mail address and 14 Sunny Bend, Newark, Delaware 19702 as her address.

118. **BOLLES** utilized at least six GDB services, including: (1) "Online Card Sales Everyday VISA"; (2) "7-Eleven Online Shopping VISA"; (3) "CVS Everyday Mastercard" (two separate cards); (4) "Walgreens Everyday VISA"; (5) "WalMart Everyday non-instant" card; and (6) "Everyday VISA TP."

119. Between June 2, 2013 and June 7, 2013, **BOLLES** completed at least eight suspicious GDB "MoneyPak"³⁷ PIN Purchase Reloads.³⁸ Specifically, these reloads occurred on:

- June 2, 2013 - \$500.00 PIN Purchase Reload - City of Industry, California
- June 5, 2013 - \$300.00 PIN Purchase Reload – Pinellas Park, Florida
- June 5, 2013 - \$160.00 PIN Purchase Reload – Belmont, North Carolina
- June 6, 2013 - \$100.00 PIN Purchase Reload – Brownstown, Michigan
- June 6, 2013 - \$100.00 PIN Purchase Reload – Greenfield, Indiana
- June 6, 2013 - \$380.00 PIN Purchase Reload – Portland East, Oregon
- June 7, 2013 - \$100.00 PIN Purchase Reload – Newport News, Virginia
- June 7, 2013 - \$10.00 New Card Purchase – Newark, Delaware

120. Based upon my knowledge of Bitcoins and Silk Road, I know that multiple bank deposits, performed on the same day or in quick succession, but in different geographical locations are consistent with the operation of a "funnel" account for illicit purposes. GDB products are favored for this purpose due to

³⁷ MoneyPak is a stored-value card ("cash top up card") provided by GDB. A MoneyPak is typically purchased at a retail store then used to fund prepaid debit cards with relative anonymity.

³⁸ A PIN Purchase reload is when a person purchases a MoneyPak card from a retailer, and then provides the PIN number supplied with the card to apply funds to a prepaid debit card. This is a preferred method of payment for illegal money launderers and persons wishing to transfer currency without triggering legal and reporting requirements.

their availability outside traditional financial institutions³⁹ and the anonymity afforded by being pre-paid.

121. On June 7, 2013, GDB deactivated **BOLLES'** accounts.

PayPal⁴⁰ account xxxxx43137

122. **BOLLES** controlled at least six PayPal accounts. The accounts were created between June 22, 2000 and May 19, 2013. Three of the accounts were created on or after December 28, 2012. All six of the accounts listed an address of 14 Sunny Bend, Newark, Delaware 19702, **BOLLES'** home address. **BOLLES** utilized e-mail addresses o**BOLLES**@tormail.org and Olivia **BOLLES**@yahoo.com as registration e-mail addresses for PayPal.

123. Between June 10, 2013 and August 9, 2013, **BOLLES** received 38 GDB MoneyPak deposits totaling \$9,064.90 into her PayPal accounts. During that same period of time, an additional \$379.45 was deposited from sources other than GDB MoneyPaks.

124. Between June 16, 2013 and August 9, 2013, **BOLLES** utilized PayPal 38 times to send a total of \$2,486.80 to the USPS. The dates of these transactions were consistent with the dates **BOLLES** operated the USPS account.

125. **BOLLES** utilized the accounts to send payments for all laboratory and postage supplies she purchased on eBay. Notable purchases linked to the

³⁹ GDP products are available at retail stores. No identification is requested when purchasing a GDP pre-paid product.

⁴⁰ PayPal is a global e-commerce business allowing payments and money transfers to be made through the internet. PayPal is a subsidiary of eBay, Inc.

PayPal accounts include: (1) 3M Dri-Shield Moisture Barrier Bags (utilized to conceal drug odors from law enforcement canines); (2) 3ml "LDPE" Squeezable Plastic Dropper Bottles (which in this investigation were utilized to package and send Butane Hash Oil); and 32400+ml (32.4+ liters) of Butane Gas (which based on my experience are utilized in the production of Butane Hash Oil).

126. Approximately 96% of all deposits into PayPal account xxxxx3137 were GDB MoneyPak reload transactions, none of which were completed by GDB accounts in **BOLLES'** name. Based on my training, experience, and this investigation, I believe this activity is consistent with **BOLLES'** activity on the Silk Road marketplace.

14 Sunny Bend, Newark, Delaware 19701

127. During the entirety of this investigation, **BOLLES** lived at 14 Sunny Bend, Newark, Delaware 19702. Surveillance of the residence has showed **BOLLES'** vehicle, the same vehicle for which the registration was provided as proof of address at PostNET, to be regularly present at the residence.

128. Based upon my training, experience, and this investigation, I know it is common for drug traffickers and distributors to:

- keep large amounts of U.S. currency in order to maintain and finance their on-going narcotics business;
- keep books, records, receipts, notes, ledgers, airline tickets;
- maintain bank records, money orders, and other papers relating to the manufacture, importation, transportation, and distribution of illegal controlled substances. These individuals commonly front (provide illegal controlled substances on consignment) illegal controlled substances to their clients and thus keep some type of

records concerning monies owed. The aforementioned books, records, receipts, notes, ledgers, airline tickets, bank records, money orders, etc., are maintained where the narcotics trafficker has ready access to them such as his/her person, his/her residences and offices, in his/her motor vehicles or place of operation, or in storage facilities;

- secrete contraband, precursor chemicals and glassware, proceeds of drug sales, and records of drug transactions in secure locations within their residences, businesses, properties, automobiles, and within rented storage units for ready access and to conceal same from law enforcement authorities;
- conceal in residences, businesses, properties, automobiles, and within rented storage units, caches of drugs, currency, financial instruments, precious metals, jewelry, and other items of value and/or proceeds of drug transactions, and evidence of financial transactions relating to obtaining, transferring, secreting, or spending of large sums of money made from engaging in narcotics trafficking activities;
- amass proceeds from the sale of drugs to attempt to legitimize these profits through foreign and domestic banks and their attendant services, securities, cashier's checks, money drafts, letters of credit, brokerage houses, real estate, shell corporations, and business fronts;
- keep books, papers, and electronic devices that reflect names, addresses and/or telephone numbers of their clients and associates in the trafficking organization;
- photograph themselves, their associates, their property, and their operations and the controlled substances, and that these traffickers usually keep these photographs in their possession;
- keep paraphernalia for manufacturing, importing, packaging, weighing, and distributing narcotics that include but are not limited to, glassware, precursor chemicals, scales, plastic bags, and other packaging materials; and
- utilize telephones, cellular telephones, digital pagers, utilities, automobiles, motel rooms, apartments, houses, and storage units which have been obtained by third parties (straw purchasers) or

obtained in false names to hinder law enforcement investigations and to avoid seizure laws.

Items delivered to 14 Sunny Bend, Newark, DE 19702

129. **BOLLES** controlled an eBay user account with a username of "o**BOLLES**." As part of this investigation, I obtained records from eBay, Inc. that detailed the items purchased on eBay by **BOLLES** during the same time period that she was operating her MDPRO Silk Road vendor account.

130. A review of those records detailed that **BOLLES** purchased several items from eBay that were consistent with items for sale on the MDPRO Silk Road vendor page or were utilized in the packaging or production of items purchased from the MDPRO Silk Road vendor page. Specifically, between April 22, 2013 and July 19, 2013, **BOLLES** purchased various chemicals on eBay including:

- sodium hydroxide;⁴¹
- 32.4+ liters of butane;⁴²
- sassafras oil;⁴³
- sodium iodide;⁴⁴
- sodium hydroxide;⁴⁵
- 4 liters of formaldehyde;⁴⁶ and

⁴¹ Sodium hydroxide is commonly utilized in the manufacturing of "Red" Hash Oil, which is a THC concentrate.

⁴² Butane is commonly utilized in the manufacturing of "Butane" Hash Oil, which is a THC concentrate.

⁴³ Sassafras oil is a list I chemical, which is a precursor chemical in the manufacturing of MDMA, a Schedule I controlled substance.

⁴⁴ Sodium iodide is commonly utilized to enhance lighting in hydroponic indoor Cannabis grows.

⁴⁵ Sodium hydroxide is commonly utilized in hydroponic indoor cannabis grows to alter pH balance.

- 2 liters of chloroform.⁴⁷

131. During the same time period, between April 22, 2013 and July 19, 2013, **BOLLES** purchased various items of laboratory equipment, including:

- boiling flask and filtration paper;⁴⁸
- gas chromatograph;⁴⁹
- vacuum Desiccator;⁵⁰ and
- miscellaneous laboratory items, including flasks, stir rods, robber plugs, funnels and beakers.

132. Based upon my training, experience, and this investigation, I know that chemicals and laboratory items purchased by **BOLLES** are also commonly utilized in the hydroponic indoor cultivation of cannabis and in the extraction of various THC concentrates, including Hash Oil, from cultivated cannabis plants. The THC concentrates produced by that process would be consistent with those purchased during this investigation and consistent with the THC items **BOLLES** offered for sale on Silk Road.

133. **BOLLES** also utilized eBay to purchase packing and packaging supplies. Specifically, **BOLLES'** eBay records detail that she purchased:

⁴⁶ Formaldehyde is commonly mixed with THC products to increase their potency and volume. The street terminology for this is "wet" and also commonly includes Phencyclidine (ie. P.C.P., a Schedule II controlled substance).

⁴⁷ Chloroform is commonly utilized in the production of THC concentrates, such as hash oil.

⁴⁸ Boiling flasks and filtration paper are commonly utilized in the production of "butane" Hash Oil, a THC concentrate.

⁴⁹ Gas chromatography is utilized to test the purity and composition of substances.

⁵⁰ Vacuum desiccators are utilized to package sensitive items in a dry, dust and oxygen free manner. They are commonly utilized to assist in packaging controlled substances in a manner that evades odor detection by law enforcement.

- 3M brand "Dri-Shield" moisture barrier bags (these are the same moisture bags that contained controlled substances purchased from **BOLLES**);
- 1000 white, self-adhesive shipping labels;
- 200 3ml LDPE squeezable plastic dropper bottles (these are the same bottles that contained BHO purchased from **BOLLES**);
- Impulse bag sealer and additional supplies for bag sealer (likely utilized to heat seal the moisture barrier bags);
- 6 rolls Scotch shipping tape;
- 500 white "peel & seal" envelopes (these are the same envelopes that contained and concealed controlled substances purchased from **BOLLES**);
- 100 Poly Mailers Plastic Envelopes (these are the same envelopes utilized in an undercover purchase from **BOLLES** that contained controlled substance).

134. **BOLLES** listed the address 14 Sunny Bend, Newark, Delaware 19702 as both her residence and shipping address on her eBay account. According to records obtained from eBay, all of the aforementioned the items purchased by **BOLLES** on eBay were shipped to 14 Sunny Bend, Newark, Delaware 19702.

135. Laboratory items, such as the items purchased by **BOLLES**, are generally used multiple times and are not of a consumable nature.

IP Addresses Utilized by BOLLES

136. During this investigation, I obtained lists of various IP addresses from which **BOLLES** accessed online services. **BOLLES** maintained a Verizon Wireless Online ("Verizon") account that included Internet services. **BOLLES** also received telephone services through Verizon. From examining records obtained during the investigation, I determined that **BOLLES** accessed various online services while utilizing IP addresses assigned to her by Verizon, including Yahoo! e-mail, PayPal, M & T Bank, GDB, and eBay. The billing address for **BOLLES'** Verizon account was listed as her residence, 14 Sunny Bend, Newark, Delaware 19702. I also utilized a commercial, IP address geo-locating service that showed the IP addresses utilized to access **BOLLES'** online services that belonged to Verizon were issued to a user in Newark, Delaware.

137. **BOLLES'** eBay purchases were made while connected to the Internet on the following IP addresses:

- 173.75.251.195 and 173.75.117.57 are IP addresses assigned to Verizon FiOS Internet access. Verizon was **BOLLES'** Internet provider. These IP addresses were geo-located to Newark, Delaware.
- 167.112.135.3 is an IP address assigned to **BOLLES'** employer, Christiana Care Health Center. The sodium iodide and sodium hydroxide purchased by **BOLLES** were purchased while connected to this IP address. However, according to eBay, those items were shipped to 14 Sunny Bend, Newark, Delaware 19702.
- 69.255.194.135 is an IP address assigned to Comcast Internet access. This IP address was geo-located to Baltimore, Maryland. The sassafras oil cited above was purchased from this IP address. However, according to eBay, this item was shipped to 14 Sunny Bend, Newark, Delaware 19702.

138. **BOLLES** utilized computer devices located at 14 Sunny Bend, Newark, Delaware 19702 to access and conduct her illicit business. As detailed in this affidavit, **BOLLES** utilized a computer device located at that address for all facets of her drug trafficking business, including the purchase of precursor chemicals, packing supplies, drug concealment supplies, payment of postage, access and transfer of illicit funds.

139. **BOLLES** also accessed various online services while utilizing the TOR network to anonymize her online activity. When TOR is utilized to access a non-TOR services (the "clear web"), the TOR exit node IP address utilized by the user will show as the point of origin for the data. When a user accesses the clear web while utilizing TOR, their actual IP address is hidden. Instead, the website logs the IP address of the TOR exit node. TOR exit nodes are published on the Internet and are readily identifiable. The investigation determined that **BOLLES** accessed the clear web from the following TOR exit nodes:

- 204.11.50.131 (tor-exit.boingboing.net);
- 37.130.227.133 (torland1-this.is.a.tor.exit.server.torland.is);
- 93.182.129.86 (exit2.ipredator.se);
- 93.184.66.138 (exit6.ipredator.se); and
- 93.184.66.138 (93.184.66.138.vnet.sk).

140. Included in **BOLLES'** Verizon account is wireless Internet access. This product provides Internet access through a wireless air card, which is typically installed into a non-telephonic computer device.

141. Based upon the above information, **BOLLES** utilized Verizon Internet service from a computer device located at 14 Sunny Bend, Newark,

Delaware 19702, and has accessed TOR services, including the Silk Road, from that computer device.

142. **BOLLES'** Verizon account also includes smartphone/PDA internet access from a telephonic device on the account. The telephonic device on the account has a cellular telephone number of (302) 757-6893. This device is a Motorola Droid type cellular phone.

October 16, 2013 Trash Pull from 14 Sunny Bend, Newark, Delaware

143. On October 16, 2013, Agents from the DEA WRO performed a trash pull at 14 Sunny Bend, Newark, Delaware. The trash was placed in a garbage receptacle outside of the residence, in a position from which it would be removed by the garbage collection service.

144. Inside a black plastic trash bag, agents recovered:

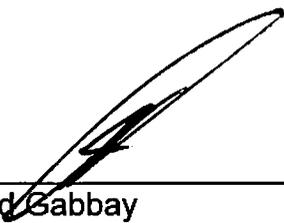
- Documents bearing the name "Olivia **BOLLES MD**";
- USPS Priority mail box addressed to **BOLLES** that contained a packing slip describing the shipped product as "Cera E-Liquid Cartridge Metal Finish";
- two empty boxes of Codeine Phosphate 60mg, 28 tablets per box, bearing a label for Olivia **BOLLES**;
- a Hefty brand plastic bag containing eight empty blister packs of Codeine Phosphate 60mg, 14 tablets per package, and a large number of empty Phenergan 25mg packages;
- an M & T Bank deposit envelope;
- **BOLLES'** work schedule, depicted on a calendar;
- IV Catheter Supplies, including a rudder tourniquet; and

- empty lactated Ringer's solution bags.

Conclusion

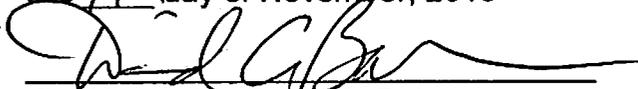
145. Based on the information set forth herein, I submit that there is probable cause to believe that **Olivia Louise BOLLES a/k/a "MDPRO"** has violated 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) (distribution of a controlled substance).

This concludes my affidavit.



Jared Gabbay
DEA Task Force Agent

Sworn to and subscribed before me
this 19th day of November, 2013



The Honorable David A. Baker
UNITES STATES MAGISTRATE JUDGE

Exhibit 1

The screenshot shows a web browser window displaying a marketplace listing. The browser's address bar shows the URL: `silkroadvb5piz3r.onion/silkroad/items/40ace70528`. The page header includes the Silk Road logo (a camel) and the text "Silk Road anonymous market". Navigation links for "messages 0", "orders 0", and "account B0.00" are visible. A search bar is present with a "Go" button. The user is identified as "the Dread Pirate Roberts" with a "Hi" greeting and a "logout" link. A shopping cart icon shows "0" items.

The main listing is for "Oxycontin 80mg (OC) x2 tablets". It features a photograph of two blue, round tablets. The price is listed as "B0.90" with an "add to cart" button. The seller is "mdpro(100)", shipping from the "United States of America" to "Worldwide". The category is "Prescription". There are buttons for "bookmark this item" and "report this item".

Under "postage options", it says "Two or more listings ANC" with a question mark icon.

The "Description" section contains the text: "Two tablets 80mg oxycontin. These are imprinted with 80 on one side and OC on the other side. Marquis reagent result = light purple."

Exhibit 2

```

P/5HtBxnbDpUvkSTXKR22oZrQdryfFYy49CgE4a/LAb41Sf3Un6V7HgA3zI4R2Qv
496iPQOA076DNe18/YurGPeQuZF+kt7FQARAQABIQEIBBgBAGAPBQJRtBmQAhsM
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ZLc4n13KUzoaRs0ldp0yS9myMwa6MkuFin1SmGJYqQ50Ei2GMEg=
=HioN
-----END PGP PUBLIC KEY BLOCK-----
    
```

| category | title | price | ship to | ship from | |
|---------------|---------------------------------------|---------|-----------|--------------------------|-------------|
| Weight Loss | Phentermine 37.5mg x5 tablets | B0.1716 | Worldwide | United States of America | add to cart |
| Services | Shipping fee payment | B0.0000 | Worldwide | United States of America | add to cart |
| Weight Loss | Phentermine 50mg x5 tablets | B0.2287 | Worldwide | United States of America | add to cart |
| Pain Relief | Roxicodone 30mg x3 | B0.7958 | Worldwide | United States of America | add to cart |
| Adderall | Adderall IR 30mg x5 (qualitest brand) | B1.0310 | Worldwide | United States of America | add to cart |
| Vallium | Vallium (generic) 15mg x 5 | B0.1145 | Worldwide | United States of America | add to cart |
| Antibacterial | Silvadene burn cream - 20 gram tube | B0.2267 | Worldwide | United States of America | add to cart |
| Supplements | Force Factor Nitric Oxide Supplement | B0.2857 | Worldwide | United States of America | add to cart |
| Services | Physician consultation | B0.2857 | Worldwide | United States of America | add to cart |
| Nootropics | Noopept 40mg capsules x10 | B0.2857 | Worldwide | United States of America | add to cart |
| Alprazolam | Xanax bars (generic) - 2mg tablets x5 | B0.2287 | Worldwide | United States of America | add to cart |
| Concentrates | 2.5ml THC e juice made from BHO | B1.1332 | Worldwide | United States of America | add to cart |
| Concentrates | BHO e cig cartomizer | B0.5697 | Worldwide | United States of America | add to cart |

ikroadvb5pic3r.onion...

Exhibit 3

The screenshot shows a web browser window with the address bar displaying 'silkroadvb5piz3r.onion: silkroad/user/bd113ba604'. The page header includes the Silk Road logo (a camel) and the text 'Silk Road anonymous market'. Navigation links for 'messages 0', 'orders 0', and 'account B0.00' are present. A search bar is located on the right side of the header. The user profile for 'mdpro' is displayed, including a 'send a message' button and a statistics box stating: 'has been a vendor for 2 months', 'was last seen: today', 'ranked in the top 16% of sellers with 99.7% positive feedback from more than 300 transactions', and 'has 137 fans - become a fan'. A 'report this vendor' button is also visible. A welcome message follows: 'Welcome! I am here to provide you with a great experience. I pledge to provide excellent service, prompt communication and processing, fast shipping, and amazing stealth for every member on the road with whom I have the pleasure to do business. I specialize in pharmaceuticals and THC concentrates. Thank you for viewing my page! I hope to make your acquaintance soon)'. Below this is a list of 'Limited stock of new products to come shortly':
Pharmaceuticals (in stock as of 6/12/13):
- Xanax 2mg bars (brand name)
- Valium 15mg
- Phentermine 37.5mg
- Adderall IR 30mg
- Oxycodone 80mg
- Roxicodone 30mg
- Noopept: a nootropic that improves cognitive function, 1000 times more potent than piracetam
THC e cig cartomizers
- Food grade vegetable glycerin based
- Fully vacuum purged amber glass RHO serves as the active content.

On the right side, under 'Featured listings:', there are three product images with their respective descriptions and prices:
1. An image of two white tablets, described as 'Phentermine 37.5mg x5 tablets' for 'B0.15'.
2. An image of a small dark bottle, described as '2.5ml THC e juice made from BHO' for 'B1.01'.
3. An image of a small white packet labeled 'NOOPEPT'.

Exhibit 4

