

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v.- :

STIPULATION

ROSS ULBRICHT, :

S1 14 Cr. 68 (KBF)

a/k/a "Dread Pirate Roberts," :

a/k/a "DPR," :

a/k/a "Silk Road," :

Defendant. :

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IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by Preet Bharara, United States Attorney for the Southern District of New York, Serrin Turner and Timothy Howard, Assistant United States Attorneys, of counsel, and Ross Ulbricht, by and through his counsel, Joshua Dratel, Esq., as follows:


1. Canadian law enforcement authorities have no record of any Canadian residents named "Blake Krokoff" or "Andrew Lawsry," or any name associated with "Friendly Chemist."

2. Canadian law enforcement authorities do not have any record of any homicide occurring in the area of White Rock, British Columbia on or about March 31, 2013, or any record of any homicides occurring in the area of Surrey, British Columbia on or about April 15, 2013, or any other evidence that anyone was physically harmed as a result of the plans discussed by "Dread Pirate Roberts" and "redandwhite."

IT IS FURTHER STIPULATED AND AGREED that the above-referenced exhibits and this Stipulation (Government Exhibit 805) are admissible as Government exhibits at trial, except that the defendant reserves the right to object to these exhibits under Federal Rule of Evidence 403 or 404(b).

Dated: New York, New York
January 13, 2015

PREET BHARARA
United States Attorney
Southern District of New York

By: 
SERRIN TURNER
TIMOTHY T. HOWARD
Assistant United States Attorneys


JOSHUA L. DRATEL
Counsel for the Defendant