

**FILED**

MAR 31 2015

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

1 MELINDA HAAG (CABN 132612)  
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 Acting 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 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION  
19

20 UNITED STATES OF AMERICA, )  
21 v. )  
22 CARL M. FORCE IV and )  
SHAUN W. BRIDGES, )  
23 Defendants. )  
24 )  
25 )

**UNSEALING APPLICATION AND  
[PROPOSED] UNSEALING ORDER**  
3-15-70370

26 The United States hereby applies for an order directing that the previously sealed  
27 paragraph of the affidavit in the above-titled matter, together with the application and this  
28 SEALING APPLICATION AND SEALING ORDER

1 court's sealing order sealing that paragraph, be hereby unsealed. The prosecutors in the  
2 Southern District of New York moved to unseal, and Judge Katherine B. Forrest has now  
3 unsealed, the previously sealed materials in *United States v. Ulbricht* relating to the  
4 investigation in the above-captioned case. Accordingly, I hereby request the sealed paragraph  
5 that was part of Special Agent Gambaryan's affidavit be unsealed.  
6

7 WHEREFORE, I respectfully request that the Court issue an order granting this  
8 application.

9  
10 DATED: March 30, 2015

Respectfully submitted,

11 MELINDA HAAG  
12 United States Attorney

13   
14 KATHRYN HAUN  
Assistant United States Attorney

15 **ORDER**

16  
17 For good cause shown, IT IS HEREBY ORDERED THAT:

18 The previously sealed paragraph of the affidavit in the above-titled matter, together with  
19 the application, and this Court's sealing order, are hereby ordered UNSEALED and may now be  
20 publicly filed. The Clerk of Court is hereby directed to public file those documents.  
21

22 IT IS SO ORDERED.

23  
24 DATED: March 31, 2015

25   
26 HONORABLE MARIA ELENA JAMES  
27 UNITED STATES MAGISTRATE JUDGE  
28

1                                   **PARAGRAPH PROVIDED TO COURT UNDER SEAL**

2           I am aware that the federal prosecutors who are prosecuting this case made substantive  
3 disclosures to the prosecutors in both the Southern District of New York and the District of Maryland  
4 very early on in the government's investigation against FORCE. Those disclosures continued  
5 throughout this investigation.

6           In advance of trial in United States v. Ulbricht, the Southern District of New York prosecutors  
7 took the information concerning the FORCE investigation and disclosed it in a detailed letter filing to  
8 the federal judge presiding over that trial, Judge Katherine B. Forrest. Those prosecutors requested  
9 permission to provide that disclosure to Ulbricht and his defense team under seal and pursuant to a  
10 Protective Order. Judge Forrest ordered that disclosure made to Ulbricht and his defense team, and the  
11 disclosure was made in December 2014. Because of the sensitive nature of the investigation, the fact  
12 that investigation was still ongoing (and subject to the strictures of Fed. R. Crim. P. 6(e)), and the fact  
13 that FORCE had not worked on the New York Silk Road investigation, Judge Forrest ordered that the  
14 fact of the FORCE investigation information remain under seal until further order of the Court.

15           My understanding from the prosecutors in this Northern District of California case against  
16 FORCE and BRIDGES is that, as soon as FORCE and BRIDGES are apprehended and/or surrender and  
17 the Complaint is therefore unsealed, the prosecutors in the Southern District of New York will make an  
18 application to Judge Forrest to unseal the previously-sealed disclosures that were made to Ulbricht and  
19 his defense team.

20           However, because those matters are sealed and the instant Complaint will become automatically  
21 unsealed upon the apprehension and/or surrender of FORCE and BRIDGES, I seek a separate Protective  
22 Order with respect to this Paragraph that is intended for Page 11 of the Affidavit. I request that this  
23 Paragraph remain sealed until further order of this Court. The government will submit an unsealing  
24 request for this Paragraph immediately upon learning that Judge Forrest has unsealed the underlying  
25 documents and materials in the Ulbricht matter. A Proposed Order is attached.

1 MELINDA HAAG (CABN 132612)  
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  
8 FAX: (415) 436-7234  
Kathryn.haun@usdoj.gov  
William.frentzen@usdoj.gov

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

11 RICHARD B. EVANS (DCBN 441494)  
12 Trial Attorney

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

15 Attorneys for United States of America

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

19 SEaled  
BY COURT ORDER

MEJ

20 UNITED STATES OF AMERICA,

21 v.

22 CARL M. FORCE IV and  
SHAUN W. BRIDGES,

23 Defendants.  
24

3-15-70370

) SEALING APPLICATION AND [PROPOSED]  
) SEALING ORDER

) FILED UNDER SEAL

25  
26  
27 The United States hereby applies for an order directing that the sealed paragraph of the  
28 affidavit in the above-titled matter, together with the application and this court's sealing order,

1 be kept under seal until further order of the Court. The United States requests that the above-  
2 described materials be sealed to preserve the confidentiality of the matters under seal in *United*  
3 *States v. Ulbricht*.

4  
5  
6 WHEREFORE, I respectfully request that the Court issue an order granting this  
7 application.

8 DATED: March 25, 2015

Respectfully submitted,

MELINDA HAAG  
United States Attorney

10  
11   
12 \_\_\_\_\_  
13 WILLIAM FRENTZEN  
14 Assistant United States Attorney

15 **ORDER**

16 For good cause shown, IT IS HEREBY ORDERED THAT:

17 The sealed paragraph of the affidavit in the above-titled matter, together with the  
18 application, and this Court's sealing order, be kept under seal until further order of the Court.  
19

20 IT IS SO ORDERED.

21  
22 DATED: March 25, 2015

23   
24 \_\_\_\_\_  
25 HONORABLE MARIA ELENA JAMES  
26 UNITED STATES MAGISTRATE JUDGE  
27  
28