

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 1957 - Money Laundering

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: Not more than 10 years imprisonment;
Not more than \$250,000 fine;
Not more than 3 years Supervised Release; and
\$100 Special Assessment

Name of District Court, and of Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

AUG 14 2017

DEFENDANT - U.S.

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT

SHAUN W. BRIDGES NORTHERN DISTRICT OF CALIFORNIA

DISTRICT COURT NUMBER

CR17 0448

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FEDERAL BUREAU OF INVESTIGATION

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form BRIAN J. STRETCH

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) WILLIAM FRENTZEN

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: _____

Date/Time: _____ Before Judge: _____

Comments: _____

FILED

AUG 14 2017

**SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

1 **BRIAN J. STRETCH (CABN 163973)**
United States Attorney

2 **ANNALOU TIROL**
3 **Acting Chief, Public Integrity Section**

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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

SI

CR17 0448

13 **UNITED STATES OF AMERICA,**

) **CRIMINAL NO.**

14 **v.**

) **INFORMATION**

15
16 **SHAUN W. BRIDGES,**

) **VIOLATIONS –**
) **18 U.S.C. § 1957 – Money Laundering;**
) **§ 982(a)(1) – Forfeiture.**

17 **Defendant.**

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19
20
21 **INFORMATION**

22 **The United States Attorney charges:**

23 **INTRODUCTORY ALLEGATIONS**

24 **At all times relevant to this Information:**

25 **1. Defendant SHAUN W. BRIDGES (hereafter “BRIDGES”) was a Special Agent with the**
26 **United States Secret Service (hereafter “USSS”) assigned to the Baltimore Silk Road Task Force.**
27
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1 2. Silk Road was a website where illegal goods were posted for sale, including narcotics.
2 Silk Road was only accessible through The Onion Router, or "TOR," network, a network designed to
3 conceal the true IP addresses of computers on the network and the users' identities. The only accepted
4 form of payment on Silk Road was Bitcoin.

5 3. Bitcoin was a form of digital currency that existed online. The value of Bitcoin
6 fluctuated widely from 2013 up to the present.

7 4. The Baltimore Silk Road Task Force was a task force formed jointly by several different
8 federal law enforcement agencies, including USSS, designed to investigate and apprehend vendors,
9 buyers, administrators, and the manager of Silk Road, including the head of Silk Road, R.U., a/k/a
10 "Dread Pirate Roberts," a/k/a "DPR" (hereafter "R.U.").

11 5. BRIDGES was assigned to, among other responsibilities, forensic computer
12 investigations in an effort to locate, identify, and prosecute targets of the Baltimore Silk Road Task
13 Force, including R.U., and other vendors, buyers, and administrators on Silk Road. Among BRIDGES'
14 responsibilities as a Special Agent with USSS, he served as an affiant on warrants to seize assets,
15 including digital currency.

16 6. Carl M. Force, IV, (hereafter "Force") was a Special Agent with the Drug Enforcement
17 Administration. Force was assigned to the Baltimore Silk Road Task Force. Force was assigned to act
18 in an undercover capacity in an effort to locate, identify, and prosecute targets of the Baltimore Silk
19 Road Task Force, including R.U., and other vendors, buyers, and administrators on Silk Road.

20 7. On or about January 25, 2013, BRIDGES accessed Silk Road through a computer
21 utilizing access obtained from an administrator on Silk Road. BRIDGES reset passwords and pins of
22 various accounts on Silk Road and moved bitcoin from those accounts into a wallet that BRIDGES
23 controlled. In this manner, BRIDGES fraudulently moved and stole approximately 20,000 bitcoin from
24 Silk Road and Silk Road accounts. On or about January 26, 2013, BRIDGES moved those stolen
25 bitcoin into an account at Mt. Gox, an online digital currency exchange based in Japan. On or about
26 February 22, 2013, BRIDGES opened a personal investment account at Fidelity. On or between March
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1 6, 2013, and May 7, 2013, BRIDGES laundered bitcoin in the Mt. Gox account, proceeds of the Silk
2 Road fraud, into U.S. Currency and transferred the U.S. Currency into his Fidelity account.

3 8. In November of 2014, as part of his duties as a Special Agent with USSS, BRIDGES
4 worked with the United States Attorney's Office in Baltimore, Maryland, to obtain a seizure warrant for
5 bitcoin held by a digital currency exchange called Bitstamp. The seizure warrant authorized seizure of,
6 among other things, approximately 1606.6488 bitcoin in various accounts at Bitstamp. The stated basis
7 of the seizure warrant was that the account owners had not provided basic account holder information
8 such as name, address, and phone number. BRIDGES swore to the accuracy of the warrant as the
9 affiant. The warrant was executed on or about November 18, 2014.

10 9. In order to execute the warrant, in compliance with the warrant, and at BRIDGES'
11 direction, Bitstamp sent the seized funds to an online digital wallet created by BRIDGES. Only
12 BRIDGES had the private key to access the funds in the digital wallet.

13 10. Among the accounts seized from Bitstamp, was an account owned and controlled by
14 Force, that held bitcoin obtained from Force's illegal activities while investigating Silk Road.

15 11. On or about March 18, 2015, USSS placed BRIDGES on administrative leave. On or
16 about March 18, 2015, BRIDGES resigned from USSS. When BRIDGES left USSS, he retained the
17 private key to access the funds that he had seized from Bitstamp. On or about March 25, 2015,
18 BRIDGES was charged with criminal activity in the Northern District of California for his thefts from
19 Silk Road. On or about June 15, 2015, BRIDGES signed an agreement with the United States
20 Attorney's Office, Northern District of California, to plead guilty to money laundering and obstruction
21 of justice stemming from the thefts from Silk Road.

22 12. On or about July 28, 2015, while on release from the pending case in the Northern
23 District of California, BRIDGES caused transfer of the approximately 1606.6488 seized Bitstamp funds
24 in the online wallet that belonged to the United States government into a separate online account at
25 BTC-E controlled by BRIDGES. BTC-E is an online digital currency exchange.

13. Between July 28, 2015 and before going into custody, BRIDGES laundered the funds stolen from the United States government by moving the funds out of the BTC-E account and into other various online wallets and accounts.

COUNT ONE: (18 U.S.C. § 1957 – Money Laundering)

THE MONEY LAUNDERING CHARGE

14. The allegations set forth in paragraphs 1 through 13 are hereby incorporated herein by reference as if set forth fully herein.

15. On or between July 28, 2015 and on or about November 15, 2015, in the Northern District of California and elsewhere, the defendant,

SHAUN W. BRIDGES,

did knowingly engage and attempt to engage in the following monetary transactions by through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, withdrawal, transfer, and exchange of monetary instruments, such property having been derived from a specified unlawful activity, that is, theft of government property, in violation of Title 18, United States Code, Section 641:

Date	Amount	Description of Monetary Transaction
8/3/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "rbfe"
8/4/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "rbfe"
8/5/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "rbfe"
8/6/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "rbfe"
8/8/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "rbfe"
8/10/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "rbfe"
8/11/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "rbfe"
8/12/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "sxzT"
9/15/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "dWe9"

1	9/16/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "dWe9"
2	9/17/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "Dexi"
3	9/18/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "WeMd"
4	9/19/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "GAUo"
5	9/20/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "GAUo"
6	9/21/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "NNbC"
7	9/23/15	100 BTC	Withdrawal from BTC-E account to online digital wallet "H2o7"
8	9/24/15	6.6497 BTC	Withdrawal from BTC-E account to online digital wallet "4acr"
9	11/16/15	605 BTC	Deposit from multiple accounts into account "suK7" at exchange Bitfinex
10	Unknown	1037 BTC	Deposit into hardware wallet

11 All done in violation of Title 18, United States Code, Section 1957.

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13
14 **FORFEITURE ALLEGATIONS:** (18 U.S.C. § 982(a)(1) – Money Laundering Forfeiture)

15 Upon conviction of the offense alleged in Count One of the Information, the defendant,

16 **SHAUN W. BRIDGES,**

17 shall forfeit to the United States, pursuant to 18 U.S.C § 982(a)(1), any property, real or personal,
18 involved in any such offense, or any property traceable to such property, including but not limited to the
19 following: a money judgment equivalent to the amount of property involved in the violation of 18 U.S.C
20 § 1957:

21 a. Any interest in, security of, claim against, or property or contractual rights of any kind in
22 the goods or tangible items that were the subject of the violation;

23 b. Any interest in, security of, claim against, or property or contractual rights of any kind in
24 tangible property that was used in the export or attempt to export that was the subject of the violation;
25 and

26 c. Any property constituting, or derived from, any proceed obtained directly or indirectly as
27 a result of the violation; and

1 d. Any property, real or personal, which constitutes or is derived from proceeds traceable to
2 the violation.

3 If any of the property described above, as a result of any act or omission of the defendant:

4 (a) cannot be located upon the exercise of due diligence;

5 (b) has been transferred or sold to, or deposited with, a third party;

6 (c) has been placed beyond the jurisdiction of the court;

7 (d) has been substantially diminished in value; or

8 (e) has been commingled with other property which cannot be divided without difficulty;

9 the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. §
10 853(p), incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

11 BRIAN J. STRETCH
12 United States Attorney

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14 BARBARA J. VALLIERE
15 Chief, Criminal Division

16 ANNALOU TIROL
17 Acting Chief, Public Integrity Section

18 (Approved as to form:



AUSA WILLIAM FRENTZEN
AUSA DAVID COUNTRYMAN
TRIAL ATTORNEY RICHARD EVANS