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

19 3-15-70370

MEJ

20 UNITED STATES OF AMERICA,

21 v.

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

23 Defendants.  
24

) SEALING APPLICATION AND [PROPOSED]  
) SEALING ORDER  
)  
)  
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[REDACTED]

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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,

SEALING APPLICATION AND SEALING ORDER

3-MJJ

FILED

MAR 25 2015

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

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,

9 MELINDA HAAG  
10 United States Attorney

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

**PARAGRAPH PROVIDED TO COURT UNDER SEAL**

1  
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.

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