

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

OLIVIA LOUISE BOLLES)
a/k/a "MDPRO")

Case No.

6:13-mj-1614

Defendant(s)

I certify the foregoing to be a true and correct copy of the original.
EMILY L. DEBACH, Clerk
United States District Court
Middle District of Florida
By: *Emily L. Debach*
Deputy Clerk

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/13/2013 to 08/20/2013 in the county of Seminole in the Middle District of Florida, the defendant(s) violated:

Code Section

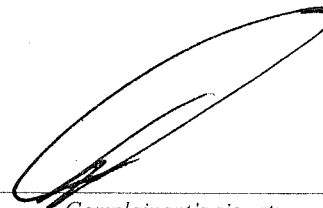
Offense Description

21 U.S.C. § 841(a)(1) and (b)(1)(C)

Distribution of a mixture and substance containing a detectable amount of a controlled substance.

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Jarad Gabbay, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/19/2013



Judge's signature

City and state: Orlando, FL

David A. Baker, Magistrate Judge

Printed name and title

AFFIDAVIT

I, Jared F. Gabbay, being duly sworn, do state as follows:

Introduction

1. I am a Task Force Agent (TFA) with the Drug Enforcement Administration (DEA) Miami Field Division where I am currently assigned to the DEA Orlando District Office Tactical Diversion Squad (TDS). The TDS is composed of DEA Special Agents (SA), DEA Diversion Investigators (DI), and deputized TFAs charged with investigating drug trafficking and money laundering offenses specifically related to the diversion of pharmaceutical controlled substances. I have been employed as a TFA with DEA since March 2013. As a TFA, my duties include the investigation of violations of federal controlled substances laws and other criminal violations related to the illegal distribution of controlled substances, including violations of federal money laundering laws.

2. I have been employed as a full time law enforcement officer for approximately 10 years. Since 2005, I have been employed by the Orange County Sheriff's Office (OCSO). Prior to joining OCSO, I was employed by the City of Key West Police Department.

3. I have received training and information regarding the structure and investigation of narcotic crimes and organized criminal organizations from schools, other narcotic investigators, supervisors, and prosecutors, and have

conducted extensive investigations of organized criminal racketeering offenses and narcotic crimes, including the use of visual surveillance, electronic surveillance, informant interviews, interrogation, and undercover operations. In connection with drug trafficking investigations, I have participated in and/or executed numerous search warrants, including residences of drug traffickers/manufacturers and their co-conspirators. I have previously been assigned to the Metropolitan Bureau of Investigation (MBI) Vice/Organized Crime squad, the OCSO Street Crimes Unit, and the OCSO Undercover Narcotics Unit. I have additional advanced training and experience in Computer Networking and Unix Systems Administration.

4. The information in this affidavit is based on my personal knowledge of, and participation in, this investigation, information from other criminal investigators and law enforcement officers, information from confidential sources, financial institutions, other business entities, as well as other documents and records obtained by law enforcement during the course of this investigation. The information set forth herein is provided for the limited purpose of establishing probable cause. Because this affidavit is submitted for the limited purpose of establishing such probable cause, it does not include all of the details of this investigation of which I am aware.

Purpose of this Affidavit

5. This affidavit is submitted in support of a criminal complaint and arrest warrant for **Olivia Louise BOLLES a/k/a "MDPRO"** for violations of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) (distribution of a controlled substance).

Structure of this Affidavit

6. This affidavit is divided into separate sections to present the information herein to the Court. First, I provide "Summary of the Investigation" which gives an overview of the investigation and evidence which is subject of this affidavit. Second, I provide a "Subject of this Investigation" section. Third, I provide a "Background on Silk Road" in which I explain the Silk Road drug marketplace and related technical aspects of the investigation. Fourth, I detail the "Probable Cause" that supports the offenses detailed in this affidavit. Within the "Probable Cause" section of the affidavit, I detail a "Background of Silk Road Vendor "MDPRO," describe a "Feedback Based Sales Analysis of MDPRO," and outline an "Analysis of Postal Information of Packages Sent by MDPRO." Furthermore, I detail "Undercover Purchases of Controlled Substances from MDPRO" and I describe how I identified **BOLLES** as MDPRO. Next, I detail a "Financial Records Analysis." In the fifth section of the affidavit, titled "14 Sunny Bend, Newark, Delaware 19701," I detail evidence relating to **BOLLES'** residence. In the sixth section, I describe "IP Addresses Utilized by **BOLLES.**"

Summary of the Investigation

7. The investigation determined that **BOLLES**, a licensed medical doctor, illegally sold controlled substances on the Silk Road drug marketplace website using the alias "MDPRO."

8. As part of the investigation, on the Silk Road website, I made several undercover purchases of controlled substances from "MDPRO." From reviewing bank and business records, the investigation confirmed that **BOLLES** utilized the Silk Road alias "MDPRO." The investigation established that **BOLLES** was the person who shipped the controlled substances that were purchased from MDPRO. The investigation determined that **BOLLES** utilized her personal bank accounts to purchase items which were later utilized to further her illegal drug dealing business, including packaging materials and laboratory materials.

9. On the Silk Road website, **BOLLES** offered to sell controlled substances which, once purchased, were delivered to customers using the United States Postal Service (USPS). The investigation identified more than 600 sales of controlled substances that were mailed by **BOLLES** to individuals in more than 17 different countries.

Subject of the Investigation

10. **Olivia Louise BOLLES a/k/a "MDPRO"** attended the University of Missouri-Columbia School of Medicine where she obtained her medical doctorate. Prior to attending medical school, **BOLLES** held a State of Missouri

pharmacy technician license. **BOLLES** is currently a licensed medical doctor in the State of Delaware with license number C1-0010699. **BOLLES** is currently listed on the Christiana Care Health System website¹ as a fourth year resident/chief resident of obstetrics and gynecology.

11. **BOLLES** does not presently hold a controlled substance dispensing license, nor does she have a DEA Registration Number. **BOLLES** has a controlled substance license application pending in the State of Delaware.

12. While practicing as a licensed doctor, **BOLLES** operated a vendor account on the Silk Road drug marketplace using the alias MDPRO.

13. **BOLLES'** home address is 14 Sunny Bend, Newark, Delaware, 19702.

Background of Silk Road

14. In the course of this investigation, I gained extensive familiarity and knowledge about the Silk Road website. The Silk Road website provided a sales platform that allowed vendors and buyers who were users of the website to conduct transactions online. The basic user interface resembled those of well-known online marketplaces. However, unlike mainstream e-commerce websites, Silk Road was only accessible on the TOR network. Based on my training, experience, and this investigation, I know that TOR is a special network of computers on the Internet, distributed around the world. The TOR network is designed to conceal the true Internet Protocol (IP) addresses of the computers

¹ <http://www.christianacare.org/residentlist>

on the network, and, as a result, the identities of the network's users.² Although TOR has legitimate uses, it is also known to be used by criminals seeking to anonymize their illegal online activities. Every communication sent through TOR is routed through numerous relays within the TOR network and is wrapped in numerous layers of encryption, such that it is practically impossible to trace the communication back to its true originating IP address. The encryption is designed to prevent even the TOR relay servers from knowing the true origin and destination of a communication. TOR likewise enables websites to operate on the network in a way that conceals the true IP addresses of the computer servers hosting the website. Such "hidden services" operating on the TOR network have complex web addresses, generated by a computer algorithm, ending in ".onion." For example, the address for the Silk Road website was <https://silkroadvb5piz3r.onion>.³

15. Websites with ".onion" addresses are only accessible using the TOR browser software or by utilizing one of several TOR proxy websites, such as <https://onion.to>. TOR proxy websites allow a user to access TOR services, but do not provide the user the same level of anonymity. The TOR browser software is easily downloaded, at no cost, on the internet.

² Every computer device connected to the Internet has an Internet Protocol or "IP" address assigned to it. The IP address is utilized to route traffic to and from the device. A device's IP address can be used to determine its physical location, internet provider and, thereby, its user.

³ The Silk Road website was seized on October 2, 2013 by the Federal Bureau of Investigation pursuant to a seizure warrant issued in the United States District Court for the Southern District of New York.

16. In order to access the Silk Road website, a user needed to only download the TOR browser software onto his/her computer and then type the Silk Road's ".onion" address in to the TOR browser address bar. The Silk Road's ".onion" address could be found by utilizing any Internet search engine and was listed in numerous places on the regular Internet.

17. Upon being directed to the Silk Road website, a user was presented with a black screen containing a prompt for a username and password, as well as a link that said, "Click here to join." No further explanation about the site was given. Based on my training, experience, and this investigation, such cryptic login screens are often used by criminal websites in order to restrict access to users who already know about the illegal activity on the site, typically through word of mouth, in Internet forums, and on Internet Relay Chat networks, and deliberately seek to enter.

18. Upon clicking the link on the Silk Road login screen to join the website, the user was prompted to create a username, password, and identify the country where he/she was located. No other information was requested and the country-location information was not required, nor was it subject to verification. After entering a username and password, the user was then directed to Silk Road's homepage. At the top left corner of the homepage there was a logo for the website labeled "Silk Road anonymous market." On the left side of the screen there was a list titled "Shop by Category" which contained links to various categories of items for sale on the website. In the center of the screen,

there was a collection of photographs that reflected a sample of the current listings on the site. At the top of the screen, there was a link labeled “messages” through which the user could click on to access Silk Road’s “private message” system. This system allowed users to send messages to one another through the site, similar to e-mails. At the bottom right of the screen, there was a link labeled “community forums” which led to an online forum where Silk Road users could post messages to “discussion threads” concerning various topics related to the website. This link was identified as the “Silk Road forum.” Also at the bottom right of screen, there was a link labeled “wiki,” which led to a collection of “frequently asked questions” and other forms of guidance for site users. This link was identified as the “Silk Road wiki.” The bottom right of the screen also contained a third link labeled “customer service” which led to a customer support page where users could “open a support ticket” and contact an “administrator” who, the webpage said, “will take care of you personally.”

19. Clicking on any of the links to items for sale on the Silk Road website brought up a webpage that contained the details of the listing, including a description of the item, the prices of the item, the user name of the vendor selling it, and “reviews” of the vendor’s “product” posted by previous customers. An example of a listing is attached to this affidavit as Exhibit 1. To buy an item listed for sale, the user could simply click the link on the listing labeled “add to cart.” In order to confirm an order, the user was prompted to provide a shipping address.

Once the order was placed, it was processed through the Silk Road's Bitcoin based payment system.

Illegal Goods and Services Sold on the Silk Road Website

20. The illegal nature of the items sold on the Silk Road was readily apparent to any user browsing through its inventory. The vast majority of the goods for sale consisted of illegal drugs and other controlled substances of nearly every variety, which were openly advertised on the website and prominently visible on the website's home page.

21. As of September 23, 2013, there were nearly 13,000 listings for controlled substances on the website listed under the categories "Cannabis," "Dissociatives," "Ecstasy," "Intoxicants," "Opioids," "Precursors," "Prescription," "Psychedelics," and "Stimulants," among others. Clicking on the link for a particular listing brought up a picture and description of the drugs being offered for sale. For example, listings stated "2.5ml THC e juice made from BHO" or "80mg Oxycodone (OP80) - \$50 each" or "QUALITY #4 HEROIN ALL ROCK."

22. The controlled substances sold on the Silk Road website tended to be sold in individual-use quantities, although some vendors would sell in bulk. The offerings for sale on the website, at any single time, amounted to multi-kilogram quantities of heroin, cocaine, methamphetamine, methylene, MDMA, Oxycodone, Hydrocodone and various other controlled substances.

23. In addition to illegal narcotics, other illicit goods and services were openly sold on Silk Road. For example, as of September 23, 2013, there were

159 listings on the site under the category "Services" and most concerned computer-hacking services. For example, one listing was by a vendor that offered to hack into Facebook, Twitter, and other social networking accounts of the customer's choosing so that "You can Read, Write, Upload, Delete, View All Personal Info." Another listing offered tutorials on "22 different methods" for hacking Automatic Teller Machines (ATM). There were 801 listings under the category "Digital goods," including offerings for pirated media content, hacked accounts at various online services such as Amazon and Netflix, and listings for malicious software. There were 169 listings under the category "Forgeries," placed by vendors offering to produce fake drivers licenses, passports, Social Security cards, utility bills, credit card statements, car insurance records, and other forms of identity documents. There were 280 listings under the category "Money," placed by vendors offering to launder currency and exchange Bitcoins for various national currencies. Included in this category were listings for "Cash in the Mail" in exchange for Bitcoins and tutorials on offshore banking and avoiding money laundering laws.

24. Not only were the goods and services offered on the Silk Road overwhelmingly illegal on their face, but the illicit nature of the commerce conducted through the website was candidly recognized in the Silk Road wiki and the Silk Road forum. For example, the Silk Road wiki contained a "Seller's Guide" and "Buyer's Guide" that contained extensive guidance for users on how to conduct transactions on the website without being caught by law enforcement.

The “Seller’s Guide” instructed vendors to “vacuum seal” packages that contained controlled substances narcotics, in order to avoid detection by “canine or electronic sniffers.” Meanwhile, the “Buyers Guide” instructed buyers to “[u]se a different address” from the user’s own address to receive a shipment of any item ordered through the site, “such as a friend’s house or P.O. box” from which the user could then “transport [the item] discreetly to its final destination.”

25. Likewise, the Silk Road forum contained extensive guidance, posted by users of the site themselves, on how to evade law enforcement. For example, in a section of the forum labeled “Security – Tor, Bitcoin, cryptography, anonymity, security, etc.,” there were numerous postings by users that offered advice to other users on how they should configure their computers to avoid leaving any trace on their systems of their activity on Silk Road.

Silk Road’s Bitcoin Based Payment System

26. The only form of payment accepted on the Silk Road was Bitcoins. Bitcoins are an anonymous, decentralized form of electronic “currency,” existing entirely on the Internet and not in any physical form. The currency is not issued by any government, bank, or company. Rather, a Bitcoin is generated and controlled automatically through computer software operating on a “peer-to-peer” network. Bitcoin transactions are processed collectively by the computers composing the network.

27. To acquire Bitcoins in the first instance, a user typically must purchase them from a Bitcoin “exchanger.” In return for a commission, Bitcoin

exchangers accept payments in some conventional form of currency (cash, wire transfer, etc.) and exchange the money for a corresponding number of Bitcoins. Exchangers also accept payments of Bitcoin and exchange the Bitcoins back to conventional currency, again, charging a commission for the service. Bitcoin exchangers are generally not registered with state or federal regulation bodies such as the Financial Crimes Enforcement Network (FinCEN) and many operate as unlicensed money transmitting services. The value of a Bitcoin is based on a fluctuating exchange rate.

28. Once a user acquires Bitcoins from an exchanger, the Bitcoins are kept in a “wallet” associated with a Bitcoin “address” as designated by a complex string of letters and numbers. The “address” is analogous to the account number for a bank account, while the “wallet” is analogous to a bank safe where the money in the account is physically stored. Once a Bitcoin user funds his or her wallet, the user can then use Bitcoins in the wallet to conduct financial transactions by transferring Bitcoins from their Bitcoin address to the Bitcoin address of another user, over the Internet.

29. All Bitcoin transactions are recorded on a public ledger known as the “Blockchain,” stored on the peer-to-peer network on which the Bitcoin system operates. The Blockchain serves to prevent a user from spending the same Bitcoins more than once. However, the Blockchain only reflects the movement of funds between anonymous Bitcoin addresses and, therefore, cannot by itself be used to determine the identities of the persons involved in the transactions. Only

if one knows the identities associated with each Bitcoin involved in a set of transactions is it possible to meaningfully trace funds through the system.

30. Bitcoins are not illegal in and of themselves and may have legitimate uses. However, Bitcoins are known to be used by criminals for money laundering purposes, given the ease with which they can be used to move money anonymously.

31. Silk Road's payment system consisted of a Bitcoin "bank" internal to the website where every user had to have an account in order to conduct transactions. Specifically, every user on Silk Road had a Silk Road Bitcoin address or had multiple addresses associated with the user's Silk Road account. These addresses were stored on wallets maintained on servers controlled by Silk Road. A user could request a new wallet address at any time.

32. In order to make a purchase on the Silk Road, the user had to first obtain Bitcoins and send them to a Bitcoin address associated with the user's Silk Road account. After funding a user account, the user could then make purchases from Silk Road vendors. When the user purchased an item on Silk Road, the Bitcoins needed for the purchase were held in escrow pending completion of the transaction. The escrow was in a wallet maintained by Silk Road.

33. Once the transaction was complete, the user's Bitcoins were transferred to the Silk Road Bitcoin address of the vendor involved in the transaction. The vendor could then withdraw Bitcoins from the vendor's Silk

Road Bitcoin address by sending them to a different Bitcoin address, outside Silk Road, such as the address of a Bitcoin exchanger who could exchange Bitcoins for a common currency.

34. The Silk Road charged a commission for every transaction conducted by its users. The commission rate varied, generally between 8 and 15 percent, depending on the size of the sale. Typically, the larger the sale, the lower the commission charged by Silk Road.

35. The Silk Road used a “tumbler” to process Bitcoin transactions in a manner designed to frustrate the tracking of individual transactions through the Blockchain. According to the Silk Road wiki, the Silk Road’s tumbler “sent all payments through a complex, semi-random series of dummy transactions ... making it nearly impossible to link your payment with any coins leaving the site.” In other words, if a buyer made a payment on Silk Road, the tumbler obscured any link between the buyer’s Bitcoin address, the vendor’s Bitcoin address, and where the Bitcoins ended up. This made it fruitless to use the Blockchain to follow the money trail involved in the transaction, even if the buyer’s and vendor’s Bitcoin addresses were both known. The tumbler placed the Bitcoins utilized in a given transaction into several different unknown Bitcoin wallets, which contained many more Bitcoins. Those Bitcoins were then sent to several other Bitcoin addresses in varying amounts. This took place until the original transaction’s Bitcoins arrived in their final destination. Based on my training, experience, and

this investigation, I know that the only function served by such “tumblers” was to assist with the laundering of criminal proceeds.

Probable Cause

Background of Silk Road Vendor “MDPRO”

36. Based upon my knowledge of the Silk Road website and through this investigation, I became familiar with a drug vendor who operated on the Silk Road under the username “MDPRO.” MDPRO opened a vendor account on Silk Road in or about March 2013. Silk Road vendors were provided with a personal webpage on which to advertise their products for sale and to display any messages they wished to display. Feedback from previous buyers left for the vendor was also displayed on the vendor’s page. A screenshot of MDPRO’s offerings, as of July 26, 2013, is attached to this affidavit as Exhibit 2.

37. MDPRO offered various pharmaceutical controlled substances for sale including, Oxycodone⁴, Mixed Amphetamine Salts (Adderall)⁵, and Alprazolam⁶. Additionally, MDPRO offered to sell items of “Butane Hash Oil” (BHO) which is a concentrated Tetrahydrocannabinol⁷ (THC). Based upon my training, experience, and this investigation, I know that the BHO production process involves a very high risk of injury or death due to the flammability of the fuel utilized to produce the BHO.

⁴ Oxycodone is a Schedule II controlled substance.

⁵ Mixed Amphetamine Salts (Adderall) are a Schedule II controlled substance.

⁶ Alprazolam is a Schedule IV controlled substance.

⁷ Tetrahydrocannabinol is a Schedule I controlled substance.

38. MDPRO also offered a “Physician Consultation” service for sale on its Silk Road vendor page. The listing stated that a purchaser would obtain “email access to a U.S. licensed physician for general medical questions, symptom management, and assistance with how to get what you want or need when being seen in a doctor’s office...He will not prescribe medications, but will advise you on how to obtain them.”

39. MDPRO made several postings on the Silk Road Forum. Based on my training, experience, and this investigation, I believe these postings showed that MDPRO had advanced training in medicine and pharmacy. Specifically, on June 2, 2013, MDPRO posted information on the Silk Road forum information about “Heroin Arterial Injection” wherein MDPRO provided advice on giving heroin injections. Also, on June 2, 2013, MDPRO posted on the Silk Road forum in a conversation regarding Actavis Syrup.⁸ MDPRO stated that she was going to manufacture a homemade version of pharmaceutical Actavis Syrup for distribution on Silk Road. MDPRO stated the concentrations of medications would be the same as the commercial product. MDPRO claimed to have precise equipment and a background in pharmacy, including compounding.⁹

Feedback Based Sales Analysis of MDPRO

40. On or about July 29, 2013, I performed an analysis of the feedback posted on MDPRO’s Silk Road vendor page. The feedback was left by

⁸ Actavis Syrup is a cough syrup containing codeine, a Schedule II controlled substance.

⁹ Pharmaceutical compounding is the precise mixing of medications to create a specific medication upon the order of a physician.

previous customers of MDPRO and listed each product the feedback was in response to and the approximate age of the feedback. A user was not compelled to leave feedback for a transaction, nor could a user leave multiple items of feedback for a single order. Consequently, the analysis represented the minimum number of transactions in which MDPRO undertook as a vendor on Silk Road and was not representative of all transactions where MDPRO was the selling party.

41. In my analysis of MDPRO's feedback, I located 610 drug transactions between MDPRO and Silk Road users. The users were not identified in the feedback. The transactions included MDPRO's sale of:¹⁰

- Diazepam¹¹ 15mg: 675 tablets
- E-Cigarette Cartridges containing THC⁵: 49 lots¹²
- Flunitrazepam¹³ 2mg: 38 tablets
- Phentermine¹⁴ 37.5mg: 335 tablets
- Phentermine 50mg: 90 tablets
- Alprazolam⁴ 2mg: 540 tablets
- Alprazolam⁴ 1mg: 40 tablets
- Adderall³ 30mg: 245 tablets
- Adderall³ 5mg: 30 tablets
- Oxycodone² 40mg: 12 tablets
- Oxycodone² 30mg: 12 tablets
- Lisdexamfetamine¹⁵ 60mg: 65 tablets
- Codeine¹⁶ Syrup 4oz: 17 lots (68 fluid ounces)

¹⁰ The list does not account for any transactions occurring on or after July 29, 2013.

¹¹ Diazepam is a Schedule IV controlled substance.

¹² A "lot" on the Silk Road Website is terminology for a single advertisement that offers a specific quantity of an item, or a grouping of items.

¹³ Flunitrazepam (Rohypnol) is a Schedule IV controlled substance.

¹⁴ Phentermine is a Schedule IV controlled substance

¹⁵ Lisdexamfetamine (Vyance) is a Schedule II controlled substance.

¹⁶ Codeine is a Schedule II controlled substance.

- Codeine Syrup (unknown size): 10 lots
- Hydrocodone/Acetaminophen¹⁷ 10/325mg: 25 tablets
- Hydrocodone/Acetaminophen¹² 5/325mg: 20 tablets
- Testosterone Gel¹⁸ (unknown size): 3 lots (unknown quantity per lot)

42. Silk Road vendors were able to place “Custom Listings” for sale on their vendor page for users that requested a specific product or specific amounts. Feedback may appear for these products, however, the actual item sold was not displayed.

Analysis of Postal Information of Packages Sent by MDPRO

43. I obtained records from the United States Postal Inspection Service (USPIS) regarding a USPS account utilized by MDPRO. As further detailed in this affidavit, I subsequently identified MDPRO’s USPS account as being opened and operated by **Olivia BOLLES**.

44. Between June 17, 2013 and August 7, 2013, **BOLLES’** USPS account was used to send 368 unique packages to 332 unique locations in 17 countries. Of those, 42 packages were destined for locations outside of the United States. Included in the list of outbound packages were two undercover purchases I made from MDPRO using Silk Road. Also included on the USPS list was a package which was destined for a person in Australia. The package was seized by Australian Customs on July 1, 2013 and, after it was searched, was

¹⁷ Hydrocodone is a Schedule III controlled substance, when in combination with Acetaminophen.

¹⁸ Testosterone gel is a Schedule III controlled substance.

found to contain 250 Alprazolam 2mg tablets concealed in "Johnson & Johnson" brand first aid kits.

45. All of the packages detailed by the USPS listed a return address of "Samples Unlimited, 26 Fox Hunt Lane PMB 176, Bear, DE 19701." This address is a commercial Post Office Box that was rented by **BOLLES**. **BOLLES** utilized her personal e-mail address, Olivia **BOLLES**@yahoo.com, to open the USPS account. With the exception of two packages, all of the postage was paid with **BOLLES'** personal VISA card or **BOLLES'** personal PayPal account.

46. Additional records supplied by the USPS for packages sent between August 22, 2013 and September 10, 2013 showed that **BOLLES'** account was used to send an additional 42 unique packages to destinations in six countries. Three packages were sent listing the return addresses of 14 Sunny Bend, Newark, Delaware 19702. The remaining 39 packages were sent with a return address of "Samples Unlimited, 26 Fox Hunt Lane PMB 176, Bear, DE 19701." As subsequently detailed in this affidavit, this address matches the return address of all drug packages received in subsequent undercover purchases from MDPRO.

Undercover Purchases of Controlled Substances from MDPRO

47. Between June 12, 2013 and September 3, 2013, using an undercover Silk Road user account that I created and controlled, I made four separate undercover purchases of controlled substances from MDPRO.

48. I placed the orders by utilizing the TOR browser to access The Silk Road website. Once on the Silk Road website, I activated links which lead me to MDPRO's vendor profile page. MDPRO's vendor page displayed various controlled substances for sale. The vendor page also displayed information that had been posted by MDPRO that would assist potential customers in placing a successful order with MDPRO for controlled substances. A screen capture of MDPRO's vendor profile page, captured on June 12, 2013, is attached to this affidavit as Exhibit 3.

49. All of the undercover purchases made from MDPRO were made utilizing Bitcoins that I previously acquired from a Bitcoin exchanger.

50. After placing an order with MDPRO, all of the packages I received were printed with a return address of "Samples Unlimited, 26 Fox Hunt Dr PMB 176, Bear, DE 19701" and contained a printed USPS tracking number.

June 12, 2013 undercover purchase of Oxycontin

51. On June 12, 2013, I located an advertisement placed by MDPRO for "Two tablets 80mg Oxycontin."¹⁹ MDPRO offered each lot of two Oxycontin 80mg tablets in exchange for 0.90 Bitcoins per lot. At the time of the transaction, 0.90 Bitcoins was worth approximately \$100.89. I added the two lots (a total of four 80 mg Oxycontin tablets) to my undercover "Shopping Cart" by activating the "Add to Cart" function. MDPRO charged an additional 0.09 Bitcoins for shipping. The total cost for four Oxycontin 80mg tablets, including shipping, was 1.88

¹⁹ Oxycontin is a brand name for Oxycodone.

Bitcoins. At the time of the transaction, the total cost was approximately \$211.35.

52. 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.

53. I entered an undercover name and an undercover commercial post office box as the shipping address.²⁰ 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.

54. On June 17, 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 Oxycontin tablets. The package was addressed to the undercover name I supplied MDPRO. The package was printed with 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 the package originated in Newark, Delaware on June 13, 2013.

²⁰ The undercover commercial post office box referred to in this affidavit was located in Seminole County, Florida.

55. Contained in the package, I located a shipping invoice from "Samples Unlimited" showing an invoice for a "Sample Order" of "Sour Patch watermelon candy" and an additional envelope containing a bulky item. Inside the envelope, I located a sealed box of Sour Patch watermelon candy. Concealed inside the Sour Patch watermelon candy box was a silver, heat-sealed, Mylar anti-static type bag which contained a plastic baggie. The plastic baggie contained four Oxycontin 80mg tablets.

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

June 19, 2013 undercover purchase of Valium

57. On June 19, 2013, I located an advertisement placed by MDPRO for "Valium²¹ (Generic) 15mgx5." MDPRO was selling lots of five Diazepam 15mg tablets in exchange for 0.10 Bitcoins per lot. I added two lots (a total of 10 tablets) to my undercover "Shopping Cart" by activating the "Add to Cart" function. MDPRO charged an additional 0.09 Bitcoins for shipping. The total cost of 10 Diazepam 15mg tablets, including shipping, was 0.29 Bitcoins. At the time of the transaction, 0.29 Bitcoins was worth approximately \$31.02.

58. 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

²¹ Valium is name branding for Diazepam, which is a Schedule IV controlled substance.

the checkout function on the Silk Road website which prompted me for a shipping address and secret pin number.

59. 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.

60. On June 24, 2013, I received a USPS Priority mail package at the shipping address that I supplied to MDPRO for the Diazepam tablets. The package was addressed to the undercover name I supplied. The package was printed with 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 June 21, 2013.

61. Contained in the package, I located a shipping invoice from "Samples Unlimited" showing an invoice for a "Sample Order" of "Airheads" candy and an additional envelope that contained a bulky item. Inside the additional envelope, I located a sealed box of Airheads candy. Concealed inside the Airheads candy box, I located a silver, heat-sealed, Mylar anti-static type bag which contained a plastic baggie. The plastic baggie contained ten Diazepam 15mg tablets.

62. 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.

63. This package appeared on **BOLLES’** USPS shipment history.

August 2, 2013 undercover purchase of Alprazolam and Adderall

64. On August 2, 2013, I located advertisements placed by MDPRO offering Alprazolam²² 2mg and Adderall²³ 20mg tablets for sale. MDPRO was selling lots of five Adderall 30mg tablets in exchange for 0.95 Bitcoins per lot. MDPRO advertised the Adderall as being manufactured by Qualitest Pharmaceuticals.²⁴ I added four lots (20 tablets) to my undercover “Shopping Cart” by activating the “add to cart” function. The cost for 20 Adderall 30mg tablets was 3.8068 Bitcoins, which, at the time of transaction, was approximately \$399.59.

65. MDPRO was also selling lots of five Xanax²⁵ 2mg tablets in exchange for 0.211 Bitcoins per lot. MDPRO listed the Xanax as “ONAX” brand.²⁶ I added two lots (10 tablets) to my undercover “Shopping Cart” by

²² Alprazolam is a Schedule IV controlled substance.

²³ Adderall is brand name Mixed Amphetamine Salts, a Schedule II controlled substance.

²⁴ Qualitest Pharmaceuticals is an American pharmaceutical company that produces generic drugs.

²⁵ Xanax is a brand name for Alprazolam, a Schedule IV controlled substance.

²⁶ ONAX Alprazolam is manufactured by Safe-Pharma, a pharmaceutical company operating in India.

activating the "add to cart" function. The cost of 10 Xanax 2mg tablets was 0.422 Bitcoins, which, at the time of transaction, was approximately \$43.24.

66. 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.

67. 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.

68. On August 9, 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 Adderall and Xanax order. The package was addressed to the undercover name I supplied.

69. 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 7, 2013.

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/o**BOLLES**](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 “**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:

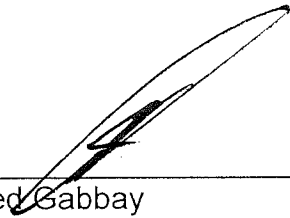
- Documents bearing the name "Olivia **BOLLES MD**";
- USPS Priority mail box addressed to **BOLLES** that contained a packing slip describing the shipped product as "Cera E-Liquid Cartridge Metal Finish";
- two empty boxes of Codeine Phosphate 60mg, 28 tablets per box, bearing a label for Olivia **BOLLES**;
- 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

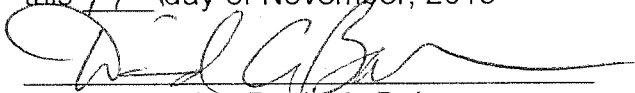
145. Based on the information set forth herein, I submit that there is probable cause to believe that **Olivia Louise BOLLES a/k/a "MDPRO"** has violated 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) (distribution of a controlled substance).

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

Browser address bar: silkroadvb5piz3ronion/s/ilecad/rem/4Caca7052D

Navigation: Startpage

Account: messages 0 | orders 0 | account B0.00

Search: Go

Logout: Hi, [logout](#)

Shop by Category



Oxycontin 80mg (OC) x2 tablets

B0.90 [add to cart](#)

seller: mdpro(100)
ships from: United States of America
ships to: Worldwide
category: Prescription
[bookmark this item](#)

postage options:
[Two or more listings AND](#) (?)

[report this item](#)

Description

Two tablets 80mg oxycontin. These are imprinted with 80 on one side and OC on the other. Marquis reagent result = light purple.

Exhibit 2

```

silkroadvb5pi3r.onion: /silkroad/user/bd113ba6c429
P5HIBXnBdPuvkSTXKR22ozrQdrvfiYy49CqE4aLAb41Sf3JnsV7HgASz4R2Qv
495IPQAA076DNeT8YurGPeQuZf+kil7FQARAQASIQEiB6gBAgAP6CJRlbnQAhsM
BQkZuluwAaoJEJkq5eJZjuXRccIALI1uIPEN5Q2mpNX+kBICEEDnLJIQUUwQYm
wTGDv1sAhY+cmqLVM8ppujyzLWixsnevUG6v+RN09nL+naLlIAU9mC95Auw91
Puno5N5GBMWWkBsL9KvupkGeC7480aooUCQ80Elyr6+1oeyU8jYz2dfjokS
Gcv4/mMERnDAexwSLW9Nw2XVAI//G5WPPYxPakJokkGjsnm78EA92gJ4NVpbUy
R8y3GncWok7UmoNW3D3CyeeEh23i6F2sA1Tt17E7CIDw+SaFVMGAB+ehSPdkQs5
ZLc4n13KUzooRsUldpOyS9nymWz6MkuFIn1SmGJYqQ50Ei2GMeg=
-----BEGIN PGP PUBLIC KEY BLOCK-----


```

category	title	price	ship to	ship from	
Weight Loss	Phentermine 37.5mg x5 tablets	\$0.1716	Worldwide	United States of America	add to cart
Services	Shipping fee payment	\$0.0000	Worldwide	United States of America	add to cart
Weight Loss	Phentermine 50mg x5 tablets	\$0.2287	Worldwide	United States of America	add to cart
Pain Relief	Roxicodone 30mg x3	\$0.7958	Worldwide	United States of America	add to cart
Adderall	Adderall IR 30mg x5 (quailtest brand)	\$1.0310	Worldwide	United States of America	add to cart
Vaillum	Vaillum (generic) 15mg x 5	\$0.1145	Worldwide	United States of America	add to cart
Antibacterial	Silvadene bum cream - 20 gram tube	\$0.2267	Worldwide	United States of America	add to cart
Supplements	Force Factor Nitric Oxide Supplement	\$0.2857	Worldwide	United States of America	add to cart
Services	Physician consultation	\$0.2857	Worldwide	United States of America	add to cart
Nootropics	Noocept 40mg capsules x10	\$0.2857	Worldwide	United States of America	add to cart
Alprazolam	Xanax bars (generic) - 2mg tablets x5	\$0.2267	Worldwide	United States of America	add to cart
Concentrates	2.5ml THC e Juice made from BHO	\$1.1332	Worldwide	United States of America	add to cart
Concentrates	BHO e cig cartomizer	\$0.5697	Worldwide	United States of America	add to cart


silkroadvb5pi3r.onion


Exhibit 3

silkr0ad/vb5piz2r.onion silkr0ad/user/ba113ka0d4 [Storage](#) [Home](#)

 **Silk Road**
anonymous market

messages 0 | orders 0 | account 60.00

the Dread Pirate Roberts 

Search Hi. 

Shop by Category

mdpro

send a message

has been a vendor for **2 months**
was last seen: **today**
ranked in the **top 15%** of sellers with **99.7%** positive feedback from **more than 300** transactions
has **137** fans - [become a fan](#)

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.)

Limited stock of new products to come shortly.

Pharmaceuticals (in stock as of 6/12/13):

- Xenax 2mg bars (brand name)
- Valium 15mg
- Phentermine 37.5mg
- Adderall IR 30mg
- Oxycontin 80mg
- Roxicodone 30mg
- Noopept: a nootropic that improves cognitive function, 1000 times more potent than piracetam.

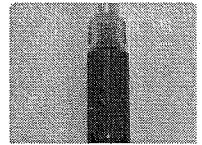
THC e cig cartomizers.

- Food grade vegetable glycerin based.
- Fully vacuum pumped amber glass BHO serves as the active content.

Featured listings:



Phentermine 37.5mg x5
tablets
B0.15



2.5ml THC e juice made
from BHO
B1.01



Exhibit 4

