

15-1815-CR

IN THE
United States Court of Appeals
FOR THE SECOND CIRCUIT

—▶◀—
UNITED STATES OF AMERICA,

Appellee,

v.

ROSS WILLIAM ULBRICHT, AKA DREAD PIRATE ROBERTS, AKA SILK ROAD,
AKA SEALED DEFENDANT 1, AKA DPR,

Defendant-Appellant.

—
*On Appeal from the United States District Court
for the Southern District of New York (New York City)*

BRIEF FOR DEFENDANT-APPELLANT

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POINT I

 THE COURT ABUSED ITS DISCRETION AND DENIED
 ULBRICHT HIS FIFTH AND SIXTH AMENDMENT RIGHTS TO
 DUE PROCESS, THE RIGHT TO PRESENT A DEFENSE, AND A
 FAIR TRIAL BY (A) PRECLUDING THE DEFENSE FROM USING
 AT TRIAL THE EVIDENCE RELATING TO DEA SPECIAL
 AGENT CARL FORCE’S CORRUPTION; (B) REFUSING TO
 ORDER THE GOVERNMENT TO PROVIDE ADDITIONAL
 DISCOVERY AND BRADY MATERIAL REGARDING
 CORRUPTION; AND (C) DENYING ULBRICHT’S MOTION FOR
 A NEW TRIAL BASED ON ADDITIONAL POST-TRIAL
 DISCLOSURES REGARDING FORCE AND ANOTHER CORRUPT
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