



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

Affidavit

I, Adv. Shiri Rom, from the Israeli Cybercrime Department in the State Attorney's Office (License number 30912), after being warned that I have to tell the truth, and that if I will not do so I will be punished according to the Israeli Penal Code (1977), am stating as follows:

- a. Since 2001 I served as an attorney in the Tel-Aviv District Attorney's Office, as I am serving in the Cybercrime Department in the Israeli State Attorney's Office for the past year. As part of my position, I am advising to a criminal investigation against Mr. Amos Dov Silver, an Israeli and a U.S. citizen (Israeli I.D. no. 36559680, U.S. Passport no. 443902062) (hereinafter: "**Silver**"). The investigation deals with the criminal offences stated in the extradition request.
- b. This affidavit's aim is to support the extradition request of Silver, so that he may be indicted in Israel for the offences stated in the extradition request.
- c. This affidavit will elaborate on the main evidences that have been collected against Silver, based on which we ask his extradition.

Commented [AE1] עדיף לבדוק מול המחלקה הבינ"ל אם יש נוסח קבוע של החלק הזה באנגלית, כרגע זה תרגום חופשי שלי

Introduction and the Course of the Investigation

"Telegrass" (or: "**The service**") is a service operated on Telegram's platform, and has been active since early 2017. The service is used by its users in order to preform drug trafficking – Cannabis, Marijuana and psychodynamic drugs. The drug trade is performed through a direct connection between the costumer and the dealer in a Secret Chat on the application (app). The drugs are than delivered by a courier, who receives cash money only and returns with the money to the dealer. The users of Telegrass, including the managers, use nicknames ("display names") in order to disguise their true identity.



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

Telegrass enables drug trafficking by providing drug-dealers the platform to advertise through groups and "channels" based on subject and distribution area. A drug-dealer who wants to use Telegrass' services receives one free channel on the app on which he can publish, and for every additional channel he is required to pay an amount of 420 NIS (roughly 116 USD) per month. This payment is transferred in cash to the managers of the service, using couriers. Telegrass includes: Telegram groups dedicated to drug-trafficking based on the type of drug and on distribution areas; reviews on the dealers and on the quality of the drugs provided by them; written guides on how to grow and manufacture drugs; conversations between the managers of the service etc.. The service, operated on Telegram's platform (as stated above) has been developed by Israeli citizens, most of the users are Israeli residents, and the drug trafficking takes place mostly in Israel. The National Cyber Unit in the Israeli Police and the Central Investigation Unit in the Northern District in the Israeli Police have conducted, since February 2018, a covert investigation against the developers of the service and its high-ranking managers, and the evidence gathered so far indicates that this operation is a Criminal Organization (hereinafter: "Telegrass Organization") **בצל שרת ניהול ופעילים**.

Alongside the covert investigation, one of the managers in the Telegrass Organization has been recruited as a **criminal Informant** (hereinafter: "the CI"). The CI has been recruited in late 2017 as part of a covert investigation managed by the Central Investigation Unit in the Northern District in the Israeli Police. That past investigation was focused on the detection and arrest of drug dealers that used Telegrass' platform, while the current investigation focuses on the managers' level.

The CI's is one of the high ranking managers in the Telegrass organization. The agreements between the CI and the Israeli police were signed, with the approval of the State Attorney's Office, on April 10th 2018 and October 16th 2018.

During the course of the CI's operation, he gave more than 80 elaborated statements in which he described the organization's activity, scope and nature, the characteristics of the organization and the identity of its managers. During his operation, CI initiated a few meetings between himself and high-ranking managers in the organization, which enabled the certain identification of the managers by the Police. These meetings were documented by the CI, who acted according to his operators' guidance. Using the CI's

Commented [AE2]: לא הבנתי למה התכוונתם כאן

Commented [SR3]: אין לי מושג. אולי הוסיפו את זה בבינלאומית?

Commented [YH(4)]: לציון גם "סוכן" לדעתי כי מספיק.



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

user account on Telegrass, the correspondence on the different groups on the service, mainly in closed managing groups, were documented.

Based on the investigative material gathered so far during the covert investigation, it appears that Telegrass Organization is an organization with hierarchical structure, division of functions and other characteristics of a criminal organization (based on the Israeli legal status). Based on the investigative material gathered so far, Silver is the founder of the organization and is leading the organization, and thus he is a suspect of offences based on Articles 2(a) and 2(a)(1), together with Article 2(c) of the Israeli Fight against Criminal Organizations Act (2003). One of Silver's known associates is Bar-el Levi (hereinafter: "**Levi**"), a 28 years-old Israeli national. Levi functions as VP of operations in Telegrass and is currently the highest ranking manager who resides in Israel.

Due to the fact that the organization's sole purpose is the enable drug-trafficking (Cannabis and Marijuana alongside MDMA, LSD etc.) Silver is also a suspect in committing drug trafficking offences, according to Articles 13, 14 and 19A of the Israeli Illegal Drugs Ordinance (1973), alongside Article 3 of the Israeli Fight against Criminal Organizations Act (2003). The Telegrass Organization and Silver himself encouraged the use of drugs by minors, and indeed, as part of the Telegrass Organization's activity evidence shows that drugs have been sold to minors. Thus, Silver is also a suspect for committing offences of soliciting the use of drugs by a minor, based on Articles 21(a)(1) of the Israeli Illegal Drugs Ordinance (1973), alongside Article 3 of the Israeli Fight against Criminal Organizations Act (2003). Additionally, Silver is a suspect for committing offences of Obstruction of Justice, based on Article 244 to the Israeli Penal Code (1977). This is due to the fact that Silver chose, as part of his activity, to use the Telegram app in order to disguise the identity of the managers and dealers in the Telegrass Organization, and in order to prevent the possibility of their correspondence being exposed. The managers, including Silver, operated while using nicknames and different usernames. The managers also developed a software, that enables each one of the managers to delete all the organization's data. Silver's actions also constitute an offence of money laundering as part of a criminal organization, based on Article 3(a) of the Israeli Prohibition of Money Laundering Act (2000), alongside Article 3 of the Fight against Criminal Organizations Act (2003). Additionally, Silver's acts constitute



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

fraudulent offences as part of a criminal organization, based on Article 220(5) of the Israeli Income Tax Ordinance (1961), alongside Article 3 to the Fight against Criminal Organizations Act (2003).

The investigative material indicates that Silver, a U.S. residence, managed (and as of today- still manages) a criminal organization, that most of its activity is in Israel and most of its income comes from illegal activities performed in Israel. Silver lived off the Organization's income and yet did not report any income to the tax authorities in Israel (attached is a Civil Servant Certificate from the Israeli Tax Authority, indicating that Silver did not pay taxes between the years 2013-2018). Evidence gathered indicates that the organization receives money from drug dealers using the Telegrass' advertising service. The money is transferred using couriers to one of the organization's managers, a suspect named Ran Buginim (hereinafter: **"Buginim"**), who then divides and transfers that money, in cash, to the managers via couriers. Additionally, the managers can choose whether to receive their monthly salary in cash, or to receive their salary using Bitcoin and/or drugs. Part of the money stated above was transferred to Silver, while he was residing in the U.S, **using Bitcoin to the best of my knowledge.**

Evidence that support Silver's alleged Guilt

A General Analysis of Telegrass Service from the Costumer's Point of View

During the course of the investigation Chief Sargent Itzhak Bromi, one of the computer exports investigators, wrote an analysis report regarding the different usage options of the service. During the investigation, Chief Sargent Bromi used Telegrass as a costumer. The report contains screenshots from within the different groups in the Telegrass service that are open to costumers, alongside explanations about each group. It should be noted that the statements given by the CI reinforce the information in the abovementioned report regarding the nature of the Telegrass service as a service enabling the acquisition of illegal drugs using a simple process, and encourages drug-trafficking.

Publications regarding Telegrass and Silver



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

As detailed below, Silver is unequivocally recognized as the founder of the Telegrass organization, and he also openly presents himself as the founder of Telegrass on his personal Facebook account – Amos Dov Silver. Silver also gave a few interviews regarding the organization, where he is shown with his face uncovered. Detailed below are a few examples to illustrate, from dozens of Facebook Posts and newspaper articles gathered during the investigation:

1. **Videos from the Facebook Page "Telegrass"** – these videos have been viewed and documented in a report by Superintendent Eyal Sharon from March 19th 2018. In some of the videos, Silver invited the viewers to different gatherings sponsored by Telegrass. In one of the videos from August 2017, Silver called the audience to join Telegrass and "the revolution" (according to his own words), and stated that as of that point in time 70,000 users and over 1,500 dealers are registered in Telegrass,.
2. In another video, Silver gave an interview to an Israeli Television show named "Orly and Guy". On the show Silver explained that Telegrass is a system of multiple groups and channels on Telegram, on which Cannabis can be traded in a secure manner. Silver added that 80,000 users are registered on Telegrass. **Silver also confirmed, to the show's hosts' question, that there are many consumers under the age of 18 that use Telegrass to purchase Cannabis, and that he personally is aiding minors to locate dealers that will sell them drugs, and supports the sale of drugs to minors under 18. Silver added that there is a separate group on Telegrass where psychodynamic drugs are sold, and that minors under the age of 18 may enter that group, but the acquisition of those drugs will be more complex for them.**
3. A video from the Israeli television show called "HaTzinzor" ("The Pipeline"), named **"Treasure Hunt – the Cannabis version"**. In this video, Silver explained to the show's host about the event "Treasure Hunt" – a game in which the representatives from Telegrass will hide Marijuana in different locations in Israel, and the public is welcome to search for the drugs. In the same video, Silver stated that there are 180,000 users on Telegrass and 1,500 dealers. When the show's host asked Silver if he is the "Don" running Telegrass, Silver replied: *"Alone I cannot run anything, so I formed around me a very strong, determined and talented group of managers".*



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

4. In a newspaper interview dated September 18th 2017, that was published on an Israeli news website named "The Marker", Silver was portrayed as the founder of Telegrass, and was cited regarding his vision of Telegrass: *"Any 13 years old girl may sell drugs"*. The reporter stated that Silver was interviewed using Skype and that when asked if he is the head of a criminal organization he replied: *"Yes, yes. I suppose I am... If the State defined this as a crime than I am the head of the organization, I don't mind if I am defined as a head of a criminal organization or as Mother Teresa"*. Silver also stated: *"I am in favor of minors smoking weed the same way I did... I always explain that I am unequivocally in favor of dealers selling drugs to minors"*. In this article Silver explained that he is refraining from returning to Israel because he fears being arrested, and **acknowledges that his livelihood is based on Telegrass' income**. Additionally, Silver acknowledged in this article that **Telegrass organization developed into psychodynamic drugs' trafficking** and added that he has no intention to stop the Telegrass organization, and his goal is to expand the service to more countries as well as to drug trafficking using Bitcoin.
5. Documentation from Silver's personal Facebook Page, dated December 7th 2018, was documented in a report written by Chief Sargent Shushan Benjamin. On that day Silver posted a newspaper article named "Telegrass' year: 282 million NIS income from Cannabis". Silver was asked on one of the comments written on his post if he became a millionaire, and replied *"Not yet. For this time being I earn in a month what a big dealer is earning in a day or two. I withdraw enough money to cover my living expenses and no more"*.
6. Other publications on Silver's personal Facebook Page have been documented in a report written by Chief Sargent Yaniv Hason, dated September 2nd 2018. For example, on May 16th 2018 Silver wrote a post on his Facebook account saying that on average every day 16 new dealers are added to the service. Silver referred to a publication made by the Israeli Police dated the previous day regarding the arrest of a Telegrass dealer, and stated: *"Good pace, in a few thousand months they will completely get a hold on the whole deal"*. In another publication, dated May 22nd 2018, Silver wrote: *"Most of you guys don't have any idea how much effort is being put in operating this enormous system. I will remind you that we started with 30 dealers and two managers and today we have thousands of*

Commented [YH(5)]: בטוח שכדאי לציין זאת? זה מראה שהוא לא באמת מתעשר...

Commented [SR6]: מצד שני זה מוכיח שהוא חי מזה ולא מדווח הכנסות ©



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

dealers tens of thousands of regular users and over 100 devoted managers”.

Following that, Silver wrote that the managers, including himself, make do with just a fraction of the money that is running through the Telegrass system. Silver explained that he is not forcing anyone to use the service, but claimed that Telegrass organization is trying to improve the drug market. In a post, dated May 30th 2018, Silver informed the psychedelic drugs' users about a new secured and advanced technological update, and added a link to this new update.

7. A publication on Telegrass' Facebook Page, dated August 25th 2017 and documented in a report written by Chief Sargent Yaniv Hason dated September 9th 2018, contained a video. On this video Silver is documented talking on a raffle that took place on Telegrass, congratulated the winner, and thanked the people that joined Telegrass' Facebook account. Silver called out more people to join him and the 70,000 users and 1,500 dealers registered on the service.
8. An additional post from Silver's personal Facebook account was documented in a report written by Chief Sargent Shushan Benjamin dated October 23rd 2018. In this post, dated February 8th 2017, Silver encourages the people to cultivate drugs, in an attempt to lower demand and thereby motivate dealers to lower their prices.
9. In another post on Silver's Facebook account, dated May 16th 2017, Silver announced Telegrass will not be adding new dealers to the system due to overload, but promised that in the following days they will reinforce their team and will go back to adding new dealers.
10. In an additional post on Silver's Facebook account, dated May 19th 2017, Silver wrote that when "they" opened Telegrass they had no idea how fast the service will grow, and **stated that the number of dealers on Telegrass indicates the volume of trade, without the State being able to stop it. He also wrote that his most conservative estimate regarding the volume of drug trade via Telegrass is 15 KG a day.**
11. In a recorded interview dated August 9th 2017 in an Israeli radio station named 103FM, **Silver stated that he encourages drug trafficking to minors.**
12. Another publication on Silver's personal Facebook Page, dated May 5th 2017, revealed once again that Silver supports drug trafficking to minors.



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

The CI's Statements

1. So far, the CI gave 86 statements to the police, as part of the current investigation.
2. In his statements the CI stated that Silver, whom he knows personally, is the head of the organization and as he refers- "The CEO". Detailed below information delivered in the CI's statements regarding Silver:
 - a. The CI's statement dated January 7th 2018 – the CI stated Silver's name ("Amos Silver") as the founder and the main controller of the Telegrass organization. According to the CI, Silver is active and shows presence on the different Telegram channels and groups every day, and is actively involved on the service. According to the CI, Silver preaches and encourages drug trafficking to minors under the age of 18. The CI stated that many of the dealers using the service see Silver as "The green Messiah" ("Green" is an Israeli known nickname for Cannabis). The CI stated that Silber is leading the organization and that he is the CEO. The CI also stated that he met Silver 15 years ago, before the Telegrass organization was founded. After the CI joined Telegrass, he and Silver reconnected and their relationship also included conversations regarding personal matters. According to the CI, Silver lives in the USA (it will be noted that based on examination of the Israeli border registration, Silver left Israel on October 1st 2015 and didn't returned since).
 - b. The CI's statement dated June 25th 2018 – the CI stated once again that Silver is the head of the organization, and added that his Telegram's username is "@amossilver" (Telegram ID 216318973). According to the CI, Silver is a member of the high-ranking management group on Telegrass, in which the high-ranking managers discourse among themselves.
 - c. The CI's statement dated July 26th 2018 – the CI explained that Telegrass organization employs couriers, and their role is to collect money from drug dealers using Telegrass' advertising channels, and afterwards divide it among the managers. The money is given out in cash or transferred in Bitcoins. It should be noted that during the investigation, money was transfers, via couriers, to the CI based on his activity on Telegrass. All transforms were documented. Bitcoin transfers to the CI were also



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

documented on December 9th 2018 and January 13th 2019, after the CI addressed the matter to the organization's treasurer. The documentation of the Bitcoin transfers was sent to the CI by the organization's treasurer via Blockchain link.

- d. The CI's statement dated September 26th 2018 – the CI stated that Silver was, at the current time, in Germany. The CI concluded that after seeing a photo Silver published on his Facebook account in which he is seen in front of the Reichstag. It should be noted that based on documentation dated September 16th 2018 by Chief Sargent Rachel Afriat, on September 4th 2018 Silver published on his personal Facebook account a post stating "Good morning Berlin". Based on the same report, on September 6th 2018 Silver posted in the same account a photo of the Reichstag building in which he wrote "Sitting on the grass in front of the Reichstag... trying to find solutions to different problems...". It should be noted that based on an Israeli MLAT to Germany, the German authorities sent us a report and photos in which Silver is spotted alongside Levy and another man, highly likely to be Yossi Meshi – the organization's treasurer.
- e. The CI's statement dated October 25th 2018 – the CI stated that Silver is a member in a group that enables drug trafficking outside of Israel named "Operating abroad", along with 11 other Telegram managers. According to the CI, the members of the group are active drug dealers from different countries.
- f. The CI's statement dated December 20th 2018 – the CI stated that Silver has full control on the managers' and the dealers' accounts on Telegram. According to the CI, in the beginning of the Telegram activity, Silver was looking for a place to live in the USA. The CI volunteered to help, and through a friend he approached a businessman residing in the USA and who owns a legal Cannabis farm in Oregon, and a residential building in Poughkeepsie. The CI talked with the businessman and asked to see if Silver may live in the residential building free of charge. The businessman agreed. Two weeks later Silver arrived to Poughkeepsie where, according to the CI's information, he resides until today,.



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

- g. The CI's statement dated December 26th 2018 – the CI stated that Silver is the highest ranking manager on Telegrass, and that lately he started delegating authorities, although he remains the "Final ruler" (in his words). According to the CI, Silver is defined as an "Admin" in the "High-ranking management" group on Telegrass. The CI also stated that Silver hates it when people are out against selling drugs to minors under 18. The CI added that there is a user named "Telegrass management", that created all the groups on Telegrass, and that Silver is using that user, by which he can delete all of Telegrass' data. Additionally, the CI referred to the financial gains of the Telegrass organization. According to him, every dealer that joins the organization receives one free of charge channel to publish on, and for every other channel he needs to pay 420 NIS each month (roughly 116 USD). These payments constitutes the organization's profit.
- h. The CI's statement dated December 31st 2018 – the CI stated that Silver has a spouse named Gali Amar (hereinafter: "**Amar**"), living with him in the USA. The CI is in touch with Amar, and was told by her that she receives money through Silver for her activity in the organization. The CI added in this statement that Silver has the final word in Telegrass and that a few of the high-ranking managers in the organization report directly to Silver. Additionally, the CI stated that he himself receives a monthly salary of 7,000 NIS (roughly 2,000 USD), and that Silver receives the payments using PayPal, but he does not know exactly how this is done.
- i. The CI's statement dated January 8th 2019 – the CI stated that Silver is using another display name on the service named (in Hebrew) "unavailable and not answering". The CI stated that dealers in the organization know that if they want to appeal against decisions made in the organization, they have to address Silver. The CI also stated that Silver is the one giving orders to all the rest of the managers in the organization, and that Silver has control over the servers of Telegrass and has the highest authorizations in the service.

Evidence regarding Silver's Status in the Telegrass Organization, from other involved persons



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

1. Yaffit Doar (hereinafter: **"Doar"**) is an Israeli citizen that was arrested as part of the investigation in Lod station of the Israeli Police. Doar was arrested after purchasing drugs from a drug dealer that was also arrested in the same investigation. In her investigation, for committing an offence of holding drugs not for self-use (based on Article 7(c) to the Illegal Drugs Ordinance (1973), she stated that she was one of the managers of the Telegrass organization in its early stages and that she left the organization after a while. Doar stated that Silver is the founder of the organization. Doar also stated that Silver encouraged the sale of drugs to minors, and that this was one of the reasons why she left the organization. According to Doar, Silver silences everyone who opposes the sale of drugs to minors in the organization.
2. As part of a wiretap that was conducted to Doar (wiretap warrant no. 247627-2018) conversations between her and another ex-manager in the Telegrass organization, named Avishai Rosenblum (nicknamed **"Han Solo"**), were intercepted. During a conversation on May 9th 2018, the two were intercepted talking about Silver, and Rosenblum was heard stating, regarding Silver's activity on Telegrass, that he is like **"a leader of a cult"**. In another conversation on May 3rd 2018 Rosenblum said to Doar that Silver thinks he is the Messiah of drugs in Israel.
3. On December 7th 2018 a meeting between the CI and a high-ranking manager in the organization, named Ran Buganim (nicknamed **"Brain"**) was recorded. Buganim is responsible for the couriers array on Telegrass organization, and of receiving the money and dividing it between the managers. In the said meeting, Buganim said to the CI that Silver and two other high-ranking managers in the organization are addressing him for a few days in a row, saying that he is not working.
4. As part of a wiretap that was conducted to another high-ranking manager in the organization, named Bar-El Levi (wiretap warrant no. 248672-2018), a conversation between him and another high-ranking manager named Yohai Michelle was intercepted. In that conversation, the two were heard talking about their roles in the organization, stating that Silver is the CEO.



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

5. As part of the abovementioned wiretap, in a conversation from January 23rd 2019 between Bar-El Levy and Yohai Michelle, Bar-El stated that his monthly salary was raised to 35,000 NIS (roughly 9,500 USD).

Correspondence from different channels and groups on the Telegrass service, as documented from the CI's user

During the investigation, correspondence from the Telegrass service has been documented, as received from the CI's user in different groups and channels of the organization on Telegram. Personal correspondence between the CI and officials in the organization were also documented. These correspondences indicate Silver's vast influence and activity in the organization:

1. As mentioned above, Silver is often using a Telegram profile with his own picture under the name "unavailable and will not answer". Sometimes he is using the profile under the display name of "does not read secret". It is possible to know that Silver is using these profiles as both have his picture on, the ID number of the profiles, and the CI's statements that states the connection between the profiles and Silver. The content of the messages published by the two profiles indicates that Silver is using these profiles. In a Chat between Silver and the CI, Silver is sending him a message under the display name of "does not read secret": "I am removing all of the admins authorizations from the managers in order to redistribute using Korlima *[a Bot used by Telegrass]*. I will give you Admin and everyone else that needs...". It will be noted that in the group "High Management", in the member's list, the user "does not read secret" does not appear with Silver's picture. The picture also appears alongside the display name of "unavailable and will not answer". In the correspondence of the group "The Managers Community", appears a correspondence of one of the managers that wrote "Telegram overtook WhatsApp". Silver replied under one of the abovementioned display names "I don't really care about anonymity, Telegram overtake WhatsApp due to its features and sophistication as opposed to WhatsApp's basicity". In another correspondence someone wrote that is it important to encourage professional growers to which Silver replied "ideas are



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

always welcome". Additionally, a user named Kasper wrote to Silver in that group "A big Chapeau on the Uman business! You are welcome to publish on my wall as well, it is a Big Like to all the ones taking the trouble the take care to every man everywhere with this precious flower".

2. Staff Sergeant Major Shushan Benjamin entered the Telegrass service and examined how many groups in the service have Silver as a member. The report found that the username "amossilver" can be found in 11 groups around Israel.
3. A Chat conversation in a group dedicated to managers correspondence – the managers talked among themselves regarding a reporter that wrote a newspaper article on Telegrass and insisted to interview them in a conversation rather than correspondence. In response Silver wrote: "why make it difficult for him after he helped me and us, please help him however he asks, even conversation if needed... he addressed me because I said that we will help and then Telegrass is giving him a hard time without any good reason.... There has been improper and very disrespectful conduct by the Telegrass spokesmen, I'm glad its behind us and that there is willingness to help him".
4. In a different group, named "Managers' Operations Room", used for managerial discourse in the organization, Silver was documented blocking a user that was "coursing managers".
5. In another documentation of the correspondence in the said group, Silver asked the group's members (under the display name of "unavailable and will not answer") not to send news reports in this group without any professional interest, and that for that there is the group "Managers Group". In another group with high-ranking officials, named "High-Ranking management", Silver wrote that the usual money courier is unavailable to distributions and other couriers and used, this is why: "from a security stand point, one timer users are better". In another correspondence Silver wrote regarding "the fake password that make it log out", probably meaning a fake code that enables the deletion of all the information from the mobile phone when entering the code.

Evidence for drug trafficking and the sale of drugs to minors as part of the organization, from different investigation cases around Israel



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

1. As part of the investigation, dozens of investigation cases were collected from all around Israel, where illegal drugs were purchased using Telegrass: both drugs like Cannabis and Marijuana and both psychodynamic drugs (such as MDMA). In these cases it was established, whether using a police agent who bought drugs using the service and whether by suspects who were investigated, that the drug trafficking was conducted as part of the Telegrass organization. It will also be noted that as part of these investigation cases, actual drugs that were sold were caught by police agents.
2. In some of these cases, drug dealers and their customers were investigated, and testified that that drug trafficking was conducted using Telegrass's service.
3. It will be noted that as part of the case investigated in Lod station (mentioned above), a minor named Meshi Kaduri (today above 18) was investigated, and she stated in her investigation that since the age of 16.5 she regularly purchased drugs using Telegrass.
4. In a case investigated in Kiryat-Shmona police station, a 17 years old minor, named Alon Tamir, was investigated and stated that he purchased drugs using Telegrass.

Evidence for Money Laundering, from Wiretaps preformed as part of the investigation

As part of the investigation, a wiretap was conducted, based on a judicial warrant, to a few telephone lines of suspects in the case, among them Ran Buganim, who deals with the financial affairs in the organization. From these wiretaps the following was found:

1. Buganim is heard stating that he has 600,000 NIS cash (roughly 166,000 USD) that he cannot put anywhere.
2. Buganim is heard speaking with another suspect named Ofer Rahima, regarding a shipment of money to Telegrass's managers and collection of money. Additionally, Buganim is heard saying to his spouse, Nofar Ana Frankle, also involved in a few offences, that Ofer left 160,000 NIS (roughly 44,500 USD) under the table and that it should be put in a drawer, and Nofar is heard saying that there is no more room in the drawer.

Commented [AE7] במקרים קודמים שבהם הזכרנו האזנות סתר כתבנו את מספר הצו – נשלים בהמשך אם יש צורך



**The Ministry of Justice
The State Attorney's Office
The Cybercrime Department**

3. Buganim is heard speaking on several occasions with another suspect named Erez Shmueli regarding Bitcoin and the need to switch wallet, because too much has been transferred from it already. Buganim also stated that he transferred 80,000 USD to each wallet (probably referring to Bitcoin wallets).
4. A conversation has been intercepted in which Bar-El Levi is updating Buganim on the fact that he spoke with "Amoa" on Buganim's role, and that Amos is pleased with Buganim's performance on a daily basis, but Buganim has to be more available.

Summary

1. Based on my professional experience, the evidence detailed above are sufficient in order to indict Silver based on the offences elaborated in the extradition request.
2. Everything stated in this affidavit is true to the best of my knowledge and understanding, and based on the investigative material that was viewed by me.

Shiri Rom, Adv.

**The Cybercrime Department
The Israeli State Attorney's Office**

Confirmation

I, Adv. Dr. Haim Wismonskey, head of the Israeli Cybercrime Department in the State Attorney's Office (License number [REDACTED]), confirms that on Adv. Shiri Rom (License number 30912), whom I am familiar with, appeared in front of me, and after I warned her that she has to tell the truth otherwise she may face punishment

Commented [AE8]: עדיף לבדוק מול המחלקה הבינ"ל אם יש נוסח קבוע של החלק הזה באנגלית, כרגע זה תרגום חופשי שלי

Commented [SR9]: עדיף לבדוק מול המחלקה הבינ"ל אם יש נוסח קבוע של החלק הזה באנגלית



The Ministry of Justice
The State Attorney's Office
The Cybercrime Department

according to the Israeli Penal Code (1977), Adv. Rom confirmed that above affidavit and signed in my presence.

Signature

Date