

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

15-CR-227-CJS

RICHARD PETIX,

Defendant.

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**GOVERNMENT'S WITNESS LIST**

THE UNITED STATES OF AMERICA, by and through its attorney, James P. Kennedy, Jr., Acting United States Attorney for the Western District of New York, Wei Xiang, Assistant United States Attorney, of counsel, hereby files its witness list and requests leave to amend if more information is obtained prior to and during trial.

DATED: Buffalo, New York, April 17, 2017.

JAMES P. KENNEDY, JR.  
Acting United States Attorney

By: s/WEI XIANG  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
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1. **Ivette Rivera-Hernandez**  
**United States Probation Officer**  
**Rochester, New York**

Officer Rivera-Hernandez supervised Petix and participated in the events of December 3, 2015, that resulted in Petix's arrest.

2. **Thomas Langelotti**  
**Supervising United States Probation Officer**  
**Rochester, New York**

Officer Langelotti participated in the events of December 3, 2015, that resulted in Petix's arrest.

3. **Roosevelt Smith, Jr.**  
**United States Probation Officer**  
**Rochester, New York**

Officer Smith participated in the events of December 3, 2015, that resulted in Petix's arrest.

4. **Brittany Benight**  
**Rochester, New York**

Petix drove Benight to Buffalo on the night of December 3, 2015. She was interviewed by U.S. Probation Officers about Petix, his cell phone, and his laptop computer. She told the officers, inter alia, that the phone and computer were Petix's, not hers.

5. **Ryan Glor**  
**Special Agent, Homeland Security Investigations**  
**Buffalo, New York**

Special Agent Glor was the computer forensic agent who took photographs of data displayed on Petix's laptop computer following Petix's arrest and who extracted the data from Petix's cell phone. To the extent that testifying to such cell phone data extraction will necessitate some expert opinion, the government will seek to qualify SA Glor in the field of digital forensic examination and analysis.

**6. Adam Ouzer**  
**Special Agent, Homeland Security Investigations**  
**Buffalo, New York**

Special Agent Ouzer exchanged text messages with Petix and participated in the events of December 3, 2015, that resulted in Petix's arrest.

**7. Brad Brechler**  
**Special Agent, Homeland Security Investigations**  
**Syracuse, New York**

Special Agent Brechler was the case agent who participated in the events of December 3, 2015, that resulted in Petix's arrest. He also gathered and/or reviewed historical evidence, including but not limited to records for four bank accounts used by Petix, telephone toll records for Petix, email records for Petix, data extracted from Petix's cell phone, data viewed on Petix's laptop computer, and LocalBitcoins.com ads posted by Petix.

**8. Christopher Nasca**  
**Special Agent, Homeland Security Investigations**  
**Buffalo, New York**

Special Agent Nasca observed the photo array confirmations of Petix by Brooks, Bass, and Acheson.

**9. Barbara Duffy**  
**Special Agent, Financial Crimes Enforcement Network**  
**Vienna, Virginia**

As a FinCEN records custodian, Special Agent Duffy searched FinCEN records and found that no money transmitting business registration form had been filed by Petix during the period applicable to the Superseding Indictment. She will also testify to the form and accompanying instructions, which is FinCEN Form 107 (entitled "Registration of Money Services Business").

**10. Douglas Brooks**  
**c/o Personius Melber LLP**  
**Buffalo, New York**

Petix transferred approximately \$55,000 in bitcoins for Brooks in 14 transactions between August 22, 2014, and October 15, 2015. Brooks is the subject of a criminal complaint in 15-mj-1117-JJM for operating an unlicensed money transmitting business and money laundering.

**11. Thomas Bass**  
**c/o Dominic Saraceno, Esq.**  
**Buffalo, New York**

Bass spent over \$100,000 in bitcoins to buy marijuana on dark net markets between about July 2014 and August 2015. Bass mostly dealt with Brooks, but met and transacted with Petix twice in August 2015. Bass pled guilty in 15-cr-212-RJA to possession with intent to distribute and distribution of marijuana and money laundering.

**12. Christopher Acheson**  
**c/o Barclay Damon LLP**  
**Rochester, New York**

Petix transferred approximately \$25,000 in bitcoins for Acheson in 15 transactions between July 18, 2014, and November 3, 2015.