

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KEITH GIDELSON	:	VIOLATIONS:
KIRSTEN GIDELSON		
ROBERT JAMES WALTERS	:	21 U.S.C. § 846 (conspiracy to distribute
JAY GIULIANO		and possess with intent to distribute
MICHAEL SUPILOWSKI	:	anabolic steroids and human growth
MICHAEL BARCLAY		hormone - 1 count)
KEITH EBNER	:	21 U.S.C. § 841(a)(1), (b)(1)(E)
JEFFREY FILOON		(possession with intent to distribute
CHRISTIAN KOWALKO	:	anabolic steroids - 16 counts)
JOEL LEVIN		
LUKE LORS	:	Notice of forfeiture
JOSEPH MCINTYRE		
GEORGE SAMBUCA	:	
WILLIAM SCHIAVO		
VAIDOTAS VERIKAS,		
a/k/a "Lucas"		

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about September 2009, to in or about April 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KEITH GIDELSON,
KIRSTEN GIDELSON,
ROBERT JAMES WALTERS,
JAY GIULIANO,
MICHAEL SUPILOWSKI,
MICHAEL BARCLAY,
KEITH EBNER,
JEFFREY FILOON,**

**CHRISTIAN KOWALKO,
JOEL LEVIN,
LUKE LORS,
JOSEPH MCINTYRE,
GEORGE SAMBUCA,
WILLIAM SCHIAVO, and
VAIDOTAS VERIKAS, a/k/a “Lucas,”**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute anabolic steroids, a Schedule III controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E), and human growth hormone, in violation of Title 21, United States Code, Section 333(e)(1).

MANNER AND MEANS

It was part of the conspiracy that:

Keith Gidelson’s Steroid Distribution Network

2. Defendant KEITH GIDELSON, a detective with the Philadelphia Police Department, operated an anabolic steroid and human growth hormone (“HGH”) distribution network, in the Philadelphia, Pennsylvania metropolitan area.

3. Defendant KEITH GIDELSON obtained monthly shipments of anabolic steroids and HGH from foreign suppliers known as “Karl,” and “Roger,” in Europe and China, respectively. Karl shipped these steroids to California where defendant ROBERT JAMES WALTERS, re-packaged the steroids and shipped them directly to defendant GIDELSON’s house. Roger shipped orders of steroids to GIDELSON’s rented mailbox at a UPS store.

4. At times defendant KEITH GIDELSON and defendant MICHAEL SUPILOWSKI partnered to buy large shipments of steroids from GIDELSON’s suppliers.

5. Defendant KEITH GIDELSON, and his wife, defendant KIRSTEN GIDELSON, stored and packaged steroids and HGH at their home in Philadelphia.

6. Defendants KEITH GIDELSON and KIRSTEN GIDELSON met with drug customers, including defendants MICHAEL BARCLAY, KEITH EBNER, JEFFREY FILOON, CHRISTIAN KOWALKO, JOEL LEVIN, LUKE LORS, JOSEPH MCINTYRE, GEORGE SAMBUCA, WILLIAM SCHIAVO, and VAIDOTAS VERIKAS, at their home and at Philadelphia-area fitness clubs, to distribute anabolic steroids and HGH in various quantities.

7. Defendant KEITH GIDELSON coordinated his purchases of steroids from foreign suppliers with defendants MICHAEL BARCLAY, KEITH EBNER, JEFFREY FILOON, CHRISTIAN KOWALKO, JOEL LEVIN, LUKE LORS, JOSEPH MCINTYRE, GEORGE SAMBUCA, WILLIAM SCHIAVO, and VAIDOTAS VERIKAS, who were then selling steroids to their own customers.

8. Defendant KEITH GIDELSON also distributed steroids to customers throughout the United States that he met through online weightlifting chat rooms on websites including: STEROIDS.COM; INJECT.COM; ISTEROIDS.COM; and BODYBUILDING.COM.

9. Defendant KEITH GIDELSON paid defendant JAY GIULIANO, who worked at a vitamin store, \$500 for steroid or HGH customers GIULIANO referred to GIDELSON.

10. Defendants KEITH GIDELSON, KIRSTEN GIDELSON, ROBERT JAMES WALTERS, and JAY GIULIANO routinely used cellular telephones to discuss the distribution of anabolic steroids and HGH and arrange meeting locations to distribute anabolic steroids and HGH to customers, known and unknown to the grand jury.

11. Defendant KEITH GIDELSON used the electronic mail service yahoo.com, and the encrypted email services hushmail.com, and safemail.com, to place orders and communicate with his foreign suppliers.

12. Defendant KEITH GIDELSON used the money-transmitting services Western Union and Money Gram to send money to his foreign suppliers.

13. The defendants and their customers, known and unknown to the grand jury, consistently used coded language when speaking over the telephone, in order to thwart detection of their unlawful activities by law enforcement.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants KEITH GIDELSON, KIRSTEN GIDELSON, ROBERT JAMES WALTERS, JAY GIULIANO, MICHAEL SUPILOWSKI, MICHAEL BARCLAY, KEITH EBNER, JEFFREY FILOON, CHRISTIAN KOWALKO, JOEL LEVIN, LUKE LORS, JOSEPH MCINTYRE, GEORGE SAMBUCA, WILLIAM SCHIAVO, and VAIDOTAS VERIKAS, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

On or about October 15, 2010:

1. Person #1, known to the grand jury, called defendant KEITH GIDELSON on his cellular telephone to arrange a purchase of Testodex Enanthate 250, commonly known as “test,” and Nandrodex 300, commonly known as “deca.”

2. Subsequently, Person #1, went to defendant KEITH GIDELSON’s home, where defendant GIDELSON sold him two bottles of Testodex Enanthate 250, one bottle of

Nandrodex 300, and gave Person #1 forty one white pills, that GIDELSON said were anti-estrogen pills, and fifteen syringes.

On or about October 29, 2010:

3. Person #1 sent a text message to defendant KEITH GIDELSON on his cellular telephone to arrange a purchase of anabolic steroids. Defendant GIDELSON responded via text message that he could meet Person #1 at GIDELSON's home.

4. At approximately 4:31 p.m., Person #1 went inside defendant KEITH GIDELSON's home where defendant GIDELSON sold him two bottles of Testodex Enanthate 250 and two bottles of Trenadex Acetate 100.

On or about November 22, 2010:

5. Person #1 sent a text message to defendant KEITH GIDELSON on his cellular telephone to arrange a purchase of anabolic steroids. Defendant GIDELSON responded via text message that he could meet Person #1 at GIDELSON's home.

6. At approximately 4:01 p.m., Person #1 went inside defendant KEITH GIDELSON's home where defendant GIDELSON sold him two bottles of Testodex Enanthate 250 and two bottles of Trenadex Enanthate 200.

On or about December 15, 2010:

7. Person #1 sent defendant KEITH GIDELSON a text message, to arrange another purchase of steroids from defendant GIDELSON. GIDELSON responded via text message that he could meet Person #1 at GIDELSON's home.

8. At approximately 4:20 p.m., Person #1 went inside defendant KEITH GIDELSON's home where defendant GIDELSON sold him three bottles of Nandrodex 300 and three bottles of Testodex Cypionate 250.

On or about January 27, 2011:

9. At approximately 5:46 p.m., defendant CHRISTIAN KOWALKO called defendant KEITH GIDELSON on the telephone to arrange a steroid purchase. During this call, defendant KOWALKO told defendant GIDELSON, "It's not for me. It's for my buddy. He's been begging me for it." GIDELSON then asked KOWALKO "T?" and KOWALKO answered, "T. Test."

10. At approximately 6:46 p.m., defendant CHRISTIAN KOWALKO called defendant KEITH GIDELSON and said that he needed to buy HGH.

11. At approximately 7:05 p.m., defendant CHRISTIAN KOWALKO arrived at defendant KEITH GIDELSON's home where defendant GIDELSON sold him anabolic steroids and HGH.

On or about February 3, 2011:

12. At approximately 10:43 p.m., defendant WILLIAM SCHIAVO called defendant KEITH GIDELSON on the telephone to arrange a steroid purchase. During the conversation, defendant SCHIAVO said, "I was gonna stop by. Someone hit me up this morning so," and defendant GIDELSON responded, "Oh, ok. I got my stuff in today."

13. At approximately 12:32 a.m., defendant WILLIAM SCHIAVO arrived at defendant KEITH GIDELSON's home where defendant GIDELSON sold him anabolic steroids.

On or about February 7, 2011:

14. At approximately 7:48 p.m., defendant JOSEPH McINTYRE sent a text message to defendant KEITH GIDELSON that read: "I need 3 test .. 1 CYP .. 1 SUST AND 1 DECA when I come over and I wanna stay on test I'm off."

15. At approximately 7:53 p.m., defendant JOSEPH McINTYRE sent a text message to defendant KEITH GIDELSON that read: "Please don't forget my two bottles I only have 1 deca left and had my buddie wait for 1 week for the sust."

16. At approximately 10:00 p.m., defendant KEITH GIDELSON sent a text message to defendant JOSEPH McINTYRE that read: "I got ya ready also."

On or about February 11, 2011:

17. At approximately 1:18 p.m., defendant GEORGE SAMBUCA sent a text message to defendant KEITH GIDELSON that read: "Hey bud whats a good time to come up? I'm totally out, and gotta meet my lil bro 4 cash cuz he wants sum stuff also."

18. At approximately 3:40 p.m., defendant GEORGE SAMBUCA sent a text message to defendant KEITH GIDELSON that read: "Just met up with my bro 4 cash im like 5 mins away at my parents house, r u home?"

19. At approximately 3:45 p.m., defendant KEITH GIDELSON sent a text message to defendant GEORGE SAMBUCA that read: "I'mmmmm up. Yoo."

On or about February 12, 2011:

20. At approximately 4:11 p.m., defendant GEORGE SAMBUCA arrived at defendant KEITH GIDELSON's home and purchase anabolic steroids.

On or about February 13, 2011:

21. At approximately 6:46 p.m., defendant KEITH GIDELSON called defendant JOEL LEVIN on the telephone to discuss the sale of anabolic steroids. During the conversation defendant LEVIN told defendant GIDELSON he needed to acquire steroids to sell to his customers.

On or about February 15, 2011:

22. At approximately 11:20 a.m., defendant JOEL LEVIN arrived at defendant KEITH GIDELSON's home and purchased anabolic steroids.

23. At approximately 12:12 p.m., defendant JEFFREY FILOON called defendant KEITH GIDELSON on the telephone and told him that he needed to pick up steroids for his customers.

On or about March 1, 2011:

24. At approximately 9:35 p.m., defendant KEITH GIDELSON sent a text message to defendant GEORGE SAMBUCA that read: "Sorry bro I was so sick last few days, let me know. I got the IGF also."

25. At approximately 9:40 p.m., defendant GEORGE SAMBUCA responded via two text messages that read in full: "No problem at all bud I hope ur feeling better, im doin slin and hgh with every meal now I wana crush this show so bad its all I think about, can I grab them igf and a couple kits on Thursday? That's my nxt therapy day."

26. At approximately 9:42 p.m., defendant KEITH GIDELSON sent defendant GEORGE SAMBUCA a text that read: "Yes sir. I just need the cash same day."

27. At approximately 9:48 p.m., defendant GEORGE SAMBUCA sent defendant KEITH GIDELSON a text that read: "Oh yea no doubt, I got sum xtra cash and got a

income tax anticipation check so I just want to grab it while I have the cash so I dnt run short on.”

28. At approximately 9:50 p.m., defendant KEITH GIDELSON sent defendant GEORGE SAMBUCA a text message that read: “Got ya bubbie, thanks. The igf bottles are big, looks so different. About 5 times the size of the others.”

On or about March 4, 2011:

29. At approximately 1:09 p.m., defendant LUKE LORS called defendant KEITH GIDELSON on the telephone to purchase anabolic steroids for his customers.

30. At approximately 7:02 p.m., defendant LUKE LORS arrived at defendant KEITH GIDELSON’s home and purchased anabolic steroids.

On or about March 9, 2011:

31. At approximately 6:28 p.m., defendant KEITH GIDELSON sent a text message to defendant JOSEPH McINTYRE that read: “All is in and your things have been replaced 100 percent.”

32. At approximately 6:58 p.m., defendant KEITH GIDELSON sent a text message to defendant MICHAEL BARCLAY that read: “All new books r in brother.”

33. At approximately 7:26 p.m, defendant MICHAEL BARCLAY sent a text message to defendant KEITH GIDELSON that read: “Is it a good time?” Approximately one minute later, defendant GIDELSON responded: “Sure.”

34. At approximately 7:43 p.m., defendant MICHAEL BARCLAY arrived at defendant KEITH GIDELSON’s home and purchased anabolic steroids.

35. At approximately 8:34 p.m., defendant JOSEPH McINTYRE sent a text message to defendant KEITH GIDELSON that read: “On my way.”

36. At approximately 8:45 p.m., defendant JOSEPH McINTYRE arrived at defendant KEITH GIDELSON’s home and purchased anabolic steroids.

On or about March 10, 2011:

37. At approximately 10:09 a.m., defendant KEITH GIDELSON spoke to defendant MICHAEL SUPILOWSKI on the telephone and told him, “make sure you got your money together. I just got my order in yesterday of about 300 bottles and I got like 20 left.” Later in the conversation, defendant GIDELSON asked defendant SUPILOWSKI, “where you gonna be around, \$1,500?” SUPILOWSKI responded, “at a minimum, yeah, lets call it \$1,500.”

On or about March 11, 2011:

38. At approximately 6:40 p.m., defendant JOSEPH McINTYRE called defendant KEITH GIDELSON on the telephone. During this call, defendant McINTYRE said, “I need to get a deca and cyp tonight . . . it’s for the guy who always get me work at the Roxy. I wanted to hook him up. I wanted to try and get it for him.” Defendant GIDELSON asked McINTYRE what time he wanted to pick up the steroids.

39. At approximately 8:11 p.m., defendant JOSEPH McINTYRE arrived at defendant KEITH GIDELSON’s home and purchased anabolic steroids.

On or about March 13, 2011:

40. At approximately 11:21 a.m., defendant KEITH GIDELSON called defendant VAIDOTAS VERIKAS on the telephone to discuss the sale of anabolic steroids.

41. At approximately 2:14 p.m., defendant VAIDOTAS VERIKAS arrived at defendant KEITH GIDELSON's home and purchased anabolic steroids.

On or about March 17, 2011:

42. At approximately 6:53 p.m., defendant KIRSTEN GIDELSON sent a text message to defendant JOSEPH McINTYRE that read: "Hey. Keith is at his moms. Til Sunday but if u need anything I can help u....kir."

43. At approximately 6:59 p.m., defendant KIRSTEN GIDELSON sent a text message to defendant VAIDOTAS VERIKAS that read: "Hi..this is keiths wife. He is at his moms until Sunday but I can give it to you tomorrow."

44. At approximately 7:01 p.m., defendant VAIDOTAS VERIKAS sent a text message to defendant KIRSTEN GIDELSON that read: "hi keiths wife. Can I come tomorrow 1 o'clock."

45. At approximately 7:51 p.m., defendant KIRSTEN GIDELSON spoke to defendant JOEL LEVIN on the telephone and told defendant LEVIN what types of anabolic steroids were currently available for purchase.

On or about March 18, 2011:

46. At approximately 12:17 p.m., defendant KEITH GIDELSON called defendant WILLIAM SCHIAVO on the telephone. During this conversation, defendant SCHIAVO said, "I got a pretty tall freakin order," and defendant GIDELSON responded, "Yeah, I want to get you first because I have tons of people comin and callin and I got an order goin' out today. So I want to get you in before everyone because I don't want to run out of anything." SCHIAVO then told GIDELSON he wanted, "One test cyp . . . five tren E's, two clen, pills."

GIDELSON asked, “anymore bottles or no?” SCHIAVO answered, “one deca, three sus, and that’s it out of the bottles. I need a kit to.”

47. At approximately 1:02 p.m., defendant JOEL LEVIN called defendant KEITH GIDELSON on the telephone. Defendant LEVIN told defendant GIDELSON that he needed to meet GIDELSON to acquire steroids to sell to a friend.

48. At approximately 1:03 p.m., defendant WILLIAM SCHIAVO arrived at defendant KEITH GIDELSON’s home and purchased a large amount of anabolic steroids.

49. At approximately 3:09 p.m., defendant JOEL LEVIN arrived at defendant KEITH GIDELSON’s home and purchased anabolic steroids.

50. At approximately 5:44 p.m., defendant CHRISTIAN KOWALKO called defendant KEITH GIDELSON on the telephone to arrange a steroid purchase. During this call, KOWALKO said, “alright, just gave her the price for everything like you know. Basically, test, the IGF, clen.”

51. At approximately 6:58 p.m., defendant CHRISTIAN KOWALKO arrived at defendant KEITH GIDELSON’s home and purchased anabolic steroids.

On or about March 28, 2011:

52. At approximately 6:06 p.m., defendant JAY GIULIANO called defendant KEITH GIDELSON and told him about a new customer named “Tony,” defendant GIULIANO was referring to him. During this call GIULIANO said that he expected a Christmas gift card for all the money GIULIANO’s “Russian” referral spent buying steroids from defendant GIDELSON.

53. At approximately 6:15 p.m., defendant KEITH GIDELSON spoke to “Tony” on the telephone and discussed the sale of anabolic steroids.

54. At approximately 6:26 p.m., defendant KEITH GIDELSON called defendant JAY GIULIANO on the telephone and told him that he would stop by the vitamin store to pay defendant GIULIANO a \$500 referral fee.

On or about March 29, 2011:

55. At approximately 3:15 p.m., defendant KEITH EBNER called defendant KEITH GIDELSON to arrange a purchase of steroids for himself and his customers.

56. At approximately 5:09 p.m., defendant KEITH EBNER arrived at defendant KEITH GIDELSON’s home and purchased anabolic steroids.

On or about April 1, 2011:

57. Defendant KEITH GIDELSON placed a large order of anabolic steroids with his foreign supplier.

58. Defendant ROBERT JAMES WALTERS sent defendant KEITH GIDELSON a package through the United States Postal Service containing one hundred and sixty seven bottles of various types of steroids and two thousand six hundred steroid tabs.

On or about April 7, 2011:

59. At approximately 2:38 p.m., defendant KEITH GIDELSON called the United States Postal Service multiple times to inquire about the location of a package of anabolic steroids he was expecting. During this call, defendant GIDELSON identified himself as a Philadelphia Police Detective and said his wife was expecting something she bought through eBay.

60. At approximately 6:51 p.m., defendant ROBERT JAMES WALTERS called defendant KEITH GIDELSON about the missing package of steroids. During this call, defendants GIDELSON and WALTERS discussed how GIDELSON should deal with the missing package.

On or about April 18, 2011:

61. Defendant ROBERT JAMES WALTERS sent defendant KEITH GIDELSON a new shipment of steroids through the United States mail to replace the missing shipment of steroids defendant WALTERS sent to defendant GIDELSON on or about April 1, 2011.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 1 and 2 of Count One of this indictment are incorporated here.

2. On or about October 15, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KEITH GIDELSON

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 3 and 4 of Count One of this indictment are incorporated here.

2. On or about October 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KEITH GIDELSON

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12, and Overt Acts 5 and 6 of Count One of this indictment are incorporated here.

2. On or about November 22, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KEITH GIDELSON

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 7 and 8 of Count One of this indictment are incorporated here.

2. On or about December 15, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KEITH GIDELSON

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 9 through 11 of Count One of this indictment are incorporated here.

2. On or about January 27, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and CHRISTIAN KOWALKO**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 12 and 13 of Count One of this indictment are incorporated here.

2. On or about February 3, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and WILLIAM SCHIAVO**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 14 through 16 of Count One of this indictment are incorporated here.

2. On or about February 7, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and JOSEPH McINTYRE**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 17 through 20 of Count One of this indictment are incorporated here.

2. On or about February 11, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and GEORGE SAMBUCA**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 21 and 22 of Count One of this indictment are incorporated here.

2. On or about February 13, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and JOEL LEVIN**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 29 and 30 of Count One of this indictment are incorporated here.

2. On or about March 4, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and LUKE LORS**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 33 and 34 of Count One of this indictment are incorporated here.

2. On or about March 9, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and MICHAEL BARCLAY**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 38 and 39 of Count One of this indictment are incorporated here.

2. On or about March 11, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and JOSEPH McINTYRE**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 40 and 41 of Count One of this indictment are incorporated here.

2. On or about March 13, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and VAIDOTAS VERIKAS, a/k/a “Lucas,”**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 46 and 48 of Count One of this indictment are incorporated here.

2. On or about March 18, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and WILLIAM SCHIAVO**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 47 and 49 of Count One of this indictment are incorporated here.

2. On or about March 18, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and JOEL LEVIN**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 13, and Overt Acts 55 and 56 of Count One of this indictment are incorporated here.

2. On or about March 29, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEITH GIDELSON,
and KEITH EBNER**

knowingly and intentionally possessed with intent to distribute anabolic steroids, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(E).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendants

**KEITH GIDELSON,
KIRSTEN GIDELSON,
ROBERT JAMES WALTERS,
JAY GIULIANO,
MIKE SUPILOWSKI,
MICHAEL BARCLAY,
KEITH EBNER,
JEFFREY FILOON,
CHRISTIAN KOWALKO,
JOEL LEVIN,
LUKE LORS,
JOSEPH MCINTYRE,
GEORGE SAMBUCA,
WILLIAM SCHIAVO,
VAIDOTAS VERIKAS,
a/k/a "Lucas"**

shall forfeit to the United States of America:

(a) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United

States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney