

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

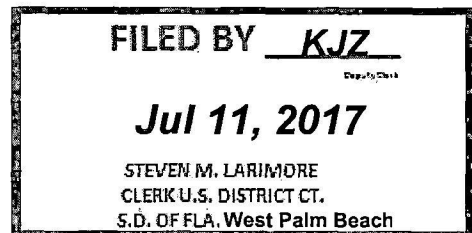
CASE NO. 17-80131-CR-Bloom/Valle
21 U.S.C. § 846
21 U.S.C. § 841

UNITED STATES OF AMERICA

v.

CHRISTOPHER SHAUN COUSINEAU,
KARL EDWARD VAETH,
SALVATORE IEMOLO,
GERALD ANTHONY MONTESORRENTINO,
NICHOLAS CIRNIGLIARO,
CHRISTOPHER LEE RODGERS,
ALAN LEE ROSS,
SHANE SHAHRAM ESLAHI, and
EDWARD JACK O'DONNELL, JR.,

Defendants.



INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Possess with Intent to Distribute Anabolic Steroids)

From on or about February 20, 2014, through on or about July 15, 2015, in Palm Beach and Broward Counties, in the Southern District of Florida, the defendants,

CHRISTOPHER SHAUN COUSINEAU,
KARL EDWARD VAETH,
SALVATORE IEMOLO,
GERALD ANTHONY MONTESORRENTINO,
NICHOLAS CIRNIGLIARO,
CHRISTOPHER LEE RODGERS,
ALAN LEE ROSS,
SHANE SHAHRAM ESLAHI, and

EDWARD JACK O'DONNELL, JR.,

did knowingly and willfully combine, conspire, confederate, and agree with each other and persons known and unknown to the Grand Jury, to possess with intent to distribute, and distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

With respect to the defendants, **CHRISTOPHER SHAUN COUSINEAU, KARL EDWARD VAETH, SALVATORE IEMOLO, GERALD ANTHONY MONTESORRENTINO, SHANE SHAHRAM ESLAHI, NICHOLAS CIRNIGLIARO, CHRISTOPHER LEE RODGERS, ALAN LEE ROSS, SHANE SHAHRAM ESLAHI and EDWARD JACK O'DONNELL, JR.,** the controlled substance involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(E)(i).

COUNT 2

(Distribution of Anabolic Steroids)

On or about February 20, 2014, in Palm Beach County, in the Southern District of Florida, the defendant,

CHRISTOPHER SHAUN COUSINEAU,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that

this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 3

(Distribution of Anabolic Steroids)

On or about November 21, 2014, in Palm Beach County, in the Southern District of Florida, the defendant,

CHRISTOPHER SHAUN COUSINEAU,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 4

(Distribution of Anabolic Steroids)

On or about December 17, 2014, in Palm Beach County, in the Southern District of Florida, the defendant,

CHRISTOPHER SHAUN COUSINEAU,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 5

(Possession with Intent to Distribute Anabolic Steroids)

On or about March 5, 2015, in Palm Beach County, in the Southern District of Florida, the defendants,

**CHRISTOPHER SHAUN COUSINEAU and
ALAN LEE ROSS,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 6

(Possession with Intent to Distribute Anabolic Steroids)

On or about March 10, 2015, in Palm Beach County, in the Southern District of Florida, the defendants,

**CHRISTOPHER SHAUN COUSINEAU and
NICHOLAS CIRNIGLIARO,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic

steroids, a Schedule III controlled substance.

COUNT 7

(Possession with Intent to Distribute Anabolic Steroids)

On or about March 11, 2015, in Palm Beach and Broward Counties, in the Southern District of Florida, the defendants,

**CHRISTOPHER SHAUN COUSINEAU and
CHRISTOPHER LEE RODGERS,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 8

(Possession with Intent to Distribute Anabolic Steroids)

On or about March 30, 2015, in Palm Beach County, in the Southern District of Florida, the defendants,

**CHRISTOPHER SHAUN COUSINEAU and
SHANE SHAHRAM ESLAHI,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 9

(Possession with Intent to Distribute Anabolic Steroids)

On or about March 31, 2015, in Palm Beach County, in the Southern District of Florida,
the defendants,

**CHRISTOPHER SHAUN COUSINEAU and
EDWARD JACK O'DONNELL, JR.,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 10

(Possession with Intent to Distribute Anabolic Steroids)

On or about June 20, 2015, in Palm Beach County, in the Southern District of Florida, the
defendants,

**KARL EDWARD VAETH and
GERALD ANTHONY MONTESORRENTINO,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic

steroids, a Schedule III controlled substance.

COUNT 11

(Possession with Intent to Distribute Anabolic Steroids)

On or about July 1, 2015, in Palm Beach County, in the Southern District of Florida, the defendants,

**CHRISTOPHER SHAUN COUSINEAU,
KARL EDWARD VAETH and
SALVATORE IEMOLO,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 12

(Possession with Intent to Distribute Anabolic Steroids)

On or about July 6, 2015, in Palm Beach County, in the Southern District of Florida, the defendants,

**CHRISTOPHER SHAUN COUSINEAU and
KARL EDWARD VAETH,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

COUNT 13

(Distribution of Anabolic Steroids)

On or about March 30, 2016, in Palm Beach County, in the Southern District of Florida, the defendant,

GERALD ANTHONY MONTESORRENTINO,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(E)(i), it is further alleged that this violation involved a mixture and substance containing a detectable amount of anabolic steroids, a Schedule III controlled substance.

CRIMINAL FORFEITURE

Upon conviction of any of the violations alleged in Counts 1 through 13 of this indictment, the defendants, **CHRISTOPHER SHAUN COUSINEAU, KARL EDWARD VAETH, SALVATORE IEMOLO, GERALD ANTHONY MONTESORRENTINO, NICHOLAS CIRNIGLIARO, CHRISTOPHER LEE RODGERS, ALAN LEE ROSS, SHANE SHAHRAM ESLAHI and EDWARD JACK O'DONNELL, JR.**, shall forfeit to the United States any and all property constituting or derived from any proceeds which the defendants **CHRISTOPHER SHAUN COUSINEAU, KARL EDWARD VAETH, SALVATORE IEMOLO, GERALD ANTHONY MONTESORRENTINO, NICHOLAS CIRNIGLIARO,**

CHRISTOPHER LEE RODGERS, ALAN LEE ROSS, SHANE SHAHRAM ESLAHI and EDWARD JACK O'DONNELL, JR., obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit or facilitate the commission of such violation.

Pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON



BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY

ADAM C. McMICHAEL
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO.

17-80131-CR-BLOOM/VALE

vs.

CERTIFICATE OF TRIAL ATTORNEY*

CHRISTOPHER SHAUN COUSINEAU, ET AL.,

Defendant.

/ Superseding Case Information:

Court Division: (Select One)

____ Miami ____ Key West
 ____ FTL X WPB ____

New Defendant(s) _____
 Number of New Defendants _____
 Total number of counts _____
 FTP _____

Yes _____ No _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) NO
 List language and/or dialect _____
4. This case will take 3-5 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)

(Check only one)

I 0 to 5 days X
 II 6 to 10 days _____
 III 11 to 20 days _____
 IV 21 to 60 days _____
 V 61 days and over _____

Petty _____
 Minor _____
 Misdem. _____
 Felony X

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes:

Judge: _____

Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) No

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) NO

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes X No
8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? _____ Yes X No

ADAM McMICHAEL
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 0772321

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM /VALE

Defendant's Name: CHRISTOPHER SHAUN COUSINEAU,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
2 - 12	Distribution and possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALE

Defendant's Name: KARL EDWARD VAETH,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
10 - 12	Possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALLE

Defendant's Name: SALVATORE IEMOLO,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
11	Possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALLE

Defendant's Name: GERALD ANTHONY MONTESORRENTINO,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
10, 13	Distribution and possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALLE

Defendant's Name: NICHOLAS CIRNIGLIARO,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
6	Possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALLE

Defendant's Name: CHRISTOPHER LEE RODGERS,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
7	Possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALLE

Defendant's Name: ALAN LEE ROSS,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
5	Possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALLE

Defendant's Name: SHANE SHAHRAM ESLAHI,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
8	Possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

CASE NO. 17-80131-CR-BLOOM/VALLE

Defendant's Name: EDWARD JACK O'DONNELL, JR.,

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to distribute controlled substances, anabolic steroids	21:846 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA
9	Possession with intent to distribute controlled substances, anabolic steroids	21:841 and 841(b)(1)(E)(i)	10 years imprisonment \$500,000 fine SR: at least 2 years to life \$100 SA