
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

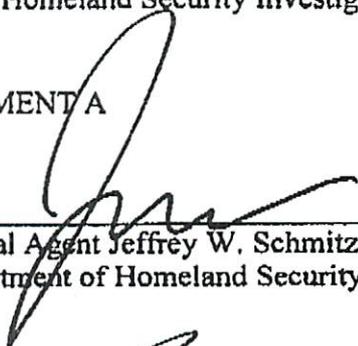
UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Honorable Mark Falk
	:	
KYLE JOBES,	:	Mag. No. 13-3552 (MF)
BENJAMIN CATURANO, and	:	
CONOR HEALION	:	

I, Jeffrey W. Schmitz, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. From at least as early as on or about March 6, 2013 through on or about March 15, 2013, in Middlesex County, in the District of New Jersey, and elsewhere, defendants KYLE JOBES, BENJAMIN CATURANO, and CONOR HEALION did:

knowingly and intentionally conspire and agree with each other to distribute and possess with intent to distribute Methylenedioxypropyvalerone, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C), in violation of Title 21, United States Code, Section 846.

I further state that I am a Special Agent with Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT A



 Special Agent Jeffrey W. Schmitz
 Department of Homeland Security

Sworn to before me and subscribed in my presence,
March 18, 2013 Newark, New Jersey

HONORABLE MARK FALK
UNITED STATES MAGISTRATE JUDGE



 Signature of Judicial Officer

ATTACHMENT A

I, Jeffrey W. Schmitz, am a Special Agent with Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

BACKGROUND

1. "Bath salts" is the commonly used name for a variety of synthetic stimulants that have effects on the human body similar to amphetamines and cocaine. In 2011, the Drug Enforcement Administration scheduled the three most prevalent types of bath salts (Methylenedioxypryovalerone ("MDPV"), Mephedrone, and Methylone) as Schedule I controlled substances, which means they are among the most dangerous and addictive illegal drugs with no currently accepted use for treatment in the United States. Bath salts are typically sold in small crystal or powder form and they generally have an off-white or slightly yellow coloring and often resemble legal bathing products, such as Epsom salts.
2. Between March 13, 2013 and March 15, 2013, law enforcement dismantled a major bath salts distribution ring centered in New Jersey and New York. As described in more detail below, law enforcement arrested four individuals who were responsible for importing kilogram quantities of bath salts from China and distributing them throughout the New Jersey and New York area. As part of its investigation, law enforcement also seized approximately two kilograms of MDPV, over \$90,000 in cash, and two Mercedes Benz.

THE INVESTIGATION

3. On or about March 6, 2013, a package containing approximately two kilograms of MDPV was sent via International Express Mail from a location in Nanjing, China to an address in Old Bridge, New Jersey (the "Package"). Pursuant to a lawful border search, law enforcement examined the Package on or about March 13, 2013 and discovered the MDPV that was packed inside a plastic bag. Law enforcement seized the MDPV, confirmed via a field test that it was MDPV, and replaced it with sham drugs that resembled bath salts. Over the course of the next two days, law enforcement followed the Package as it was transferred between multiple co-conspirators who had been working together to import and distribute MDPV. As described below, defendants Kyle Jobes ("Jobes"), Benjamin Caturano ("Caturano"), Conor Healion ("Healion"), and Charles Knierim ("Knierim") were parties to the conspiracy.
4. On March 14, 2013, law enforcement first delivered the Package to the residence in Old Bridge, New Jersey that it was addressed to. Shortly after it was delivered, Knierim, who has been charged in a separate Criminal Complaint, see United States v. Knierim, Mag. No. 13-4030 (MAH), came to the residence, took possession of the Package, and drove

- away. Knierim later delivered the package to defendant Jobes at a nearby fast-food restaurant.
5. The following day, defendant Jobes delivered the Package to defendant Caturano at Caturano's residence which is near Rutgers University in New Brunswick, New Jersey. Defendant Caturano paid defendant Jobes approximately \$9,900 when he picked up the Package.
 6. After accepting the package, defendant Caturano had telephone calls with defendant Healion which were lawfully recorded by law enforcement. During those calls, defendant Caturano offered to sell defendant Healion two kilograms of MDPV for \$14,000. Defendant Healion agreed to purchase the MDPV for \$14,000 but indicated that he only had \$10,000 available and would owe Caturano \$4,000. During the evening of March 15, 2013, Healion drove from New York to New Brunswick, New Jersey to purchase the MDPV from Caturano. Defendant Healion drove a 2011 Mercedes Benz C300 to make the purchase and had \$10,000 cash with him when he arrived in New Brunswick.
 7. All four individuals were arrested by law enforcement for their involvement in the conspiracy to distribute and possess with intent to distribute the Package.
 8. Following their arrests, defendants Jobes, Caturano and Knierim all admitted that they knew the Package contained illegal bath salts. All three also admitted to having distributed multiple additional packages containing kilogram amounts of bath salts in the previous year.

THE SEIZURES

9. During the course of the investigation, law enforcement seized approximately \$91,470 in drug proceeds. This amount was made up of:
 - a. Approximately \$68,000 in cash that defendant Jobes had stored in a safe at a third party's residence and which defendant Jobes admitted was drug proceeds.
 - b. Approximately \$10,000 which defendant Healion brought with him when he drove from New York to New Jersey to purchase MDPV from defendant Caturano.
 - c. Approximately \$9,900 which defendant Caturano paid defendant Jobes for the Package.
 - d. Approximately \$3,570 that was seized from defendants Caturano and Jobes at the time of their arrests.
10. Law enforcement also seized the 2011 Mercedes Benz C300 that defendant Healion drove when he came to New Jersey to purchase the MDPV and a 2003 Mercedes Benz SL500 that Caturano owned and admitted was purchased with proceeds of selling bath salts.