

---

---

**United States District Court  
District of New Jersey**

---

---

UNITED STATES OF AMERICA : Hon. Madeline Cox Arleo  
:   
v. :   
: Magistrate No. 13-8180  
RICHARD GRAY : CRIMINAL COMPLAINT

I, Anthony Cangelosi, 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 April 23, 2013 through on or about April 25, 2013, in the District of New Jersey and elsewhere, defendant RICHARD GRAY did:

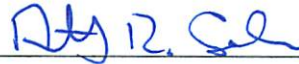
Knowingly and intentionally conspired and agreed with others to distribute quantities of anabolic steroids, a Schedule III controlled substance, contrary to Title 21, United States Code, Section 841(a)(1) and (b)(1)(E)

In violation of Title 21, United States Code, Section 846.

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

SEE ATTACHMENT A

continued on the attached page and made a part hereof.



\_\_\_\_\_  
Anthony Cangelosi, Special Agent  
Department of Homeland Security,  
Homeland Security Investigations

Sworn to before me and subscribed in my presence,  
May 17, 2013, at Newark, New Jersey



\_\_\_\_\_  
HONORABLE MADELINE COX ARLEO  
UNITED STATES MAGISTRATE JUDGE

## ATTACHMENT A

I, Anthony Cangelosi, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”). I have knowledge of the facts set forth below from my involvement in the investigation, and a review of reports and discussions with other law enforcement personnel. Because this Complaint is being submitted for the limited purpose of establishing probable cause, it does not include every fact that I have learned during the course of the investigation. Where the content of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where dates and times are reported herein, they are approximate.

1. On or about April 23, 2013, Customs and Border Protection (“CBP”) conducted a routine border inspection of a package (“Package #1”) that was shipped from China to a package consignment store (“Store #1”) in Edison, New Jersey. Package #1’s mail declaration stated that it contained hardware products and was addressed care of Store #1 to a business, “Custom Parts.” When CBP opened the package for inspection, it contained approximately 110 ampules that were individually labeled as different types of anabolic steroids, including “Mastabol, Dromastanolone Enanthate,” “Testosterone,” “Boldenone Undecylenate,” “Nandrolone Decanoate,” and “Testosterone Enanthate.”

2. On or about April 25, 2013, law enforcement visited Store #1 to inquire about the person(s) who were supposed to pick up Package #1. Store #1 employees told law enforcement that defendant RICHARD GRAY (“GRAY”) was the ultimate recipient of Package #1. The employees also informed law enforcement that Store #1 had another package (“Package #2”) awaiting pick-up by GRAY. Package #2 was nearly identical to the one seized by CBP, in that it was sent from the same shipper and was addressed to the same business, “Custom Parts.” When GRAY arrived at Store #1 to pick up Package #2 later that same day, law enforcement placed him under arrest.

3. On or about April 25, 2013, following his arrest, GRAY made statements to local law enforcement acknowledging in sum and substance that he was engaged in a conspiracy to distribute anabolic steroids throughout the United States.

4. Law enforcement seized Package #2 and submitted the contents to the CBP laboratory for testing. On or about May 16, 2013, law enforcement learned that the samples tested positive for anabolic steroids.

5. Following his arrest, GRAY also consented to permit law enforcement to search his home in Port Reading, New Jersey. Inside GRAY’s storage room in the basement of his residence, they found a substantial amount of anabolic steroids, which were in both liquid and pill form. Some of the steroids were meticulously labeled and organized in boxes and individual trays,

which were then placed on metal shelves, while others were stored in large, gallon-sized plastic bags and placed individual storage carts. During the search, law enforcement took photographs of GRAY's basement, attached hereto as Attachments A – C, which illustrate how GRAY had stored and labeled the anabolic steroids in his possession.

6. Law enforcement was able to identify the following as anabolic steroids, which were stored in glass vials and bottles in GRAY's basement:

<b>Drug Name</b>	<b>Quantity</b>
Testabol Enanthate	148
Mastaol	60
Decabol	200
Stanoil	153
Sustanon QV	30
Masteron QV	100
Deca QV	250
Boldabol	219
Trenabol	178
Bold QV	106
Primobol	38
Cloprostenol Sodium	175
Testodex Cypionate	10
Testodexenanthate	4
Testodex Propionate	1
Nipertropin	19
Ketotifen	20
Stanazoil QV100	138
Trembolona QV100	55
Trenabol Depot	144
Primobolon QV100	200
Enantat QV250	76
Propionat QV200	76
Andropen 275	222
Testabol	148
Propioline 100	1
Anavar 10	1

7. Law enforcement also recovered approximately 86,900 assorted anabolic steroids in pill form in GRAY's basement, many of which were stored in clear gallon-sized plastic bags. In particular, law enforcement found the following anabolic steroids: T-Bol/T-3, Stablon, DNP, Nolvadex, Mast, Lasix, Winny, Halo, Proviron, Arimidex, Anavar, Anadrol, Clen, Anavar 50, and D-Bol.

8. Inside GRAY's home, law enforcement also found significant evidence that GRAY was distributing the large amounts of steroids in his possession. Of note, law enforcement found assorted shipping labels, packaging materials, shrink wrap, and a large amount of Western Union receipts evidencing wire transfers from various individuals located throughout the United States.

# **ATTACHMENT A**



# **ATTACHMENT B**

Andro  
Andro  
CYP  
BD DECA  
BD EQ  
Mast  
Mast  
BD PRIMO  
TEST CYP  
Mast  
Mast

TEST E  
T 400  
T 400  
SUS  
T 400  
Test E BD  
Test E BD  
Tren A  
Tren ACE  
Tren A  
Tren E  
Tren A  
BD Tren

WINN  
HCG  
HCG  
HCG  
HCG  
HCG  
HCG  
stanz  
stanz

DNP  
HALO  
LASTY



# **ATTACHMENT C**



Test A

Test B

TEST ENNA

MINI

TEST ENNA

Stan 2

Stan 2

MINI

MINI

KOMBIO

MINI

HCG

Keta

