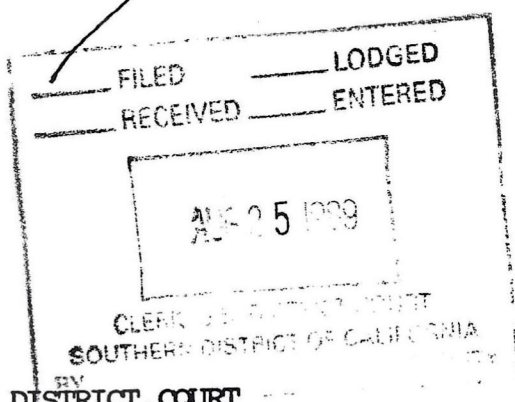


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

November 1988 Grand Jury

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
WILLIAM E. CAMERA, JR. (1),)
)
aka "B.C.")
)
JAMES V. SORANNO (2),)
)
aka "Big James")
)
Defendants.)

Criminal Case No. 890854K

I N D I C T M E N T

Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 21, U.S.C.,
Secs. 331(i)(3) And 333(b) -
Counterfeit Steroids; Title 21,
U.S.C., Secs. 331(k), 333(b),
And 353(b)(1) - Selling Steroids
Without A Prescription; Title 21,
U.S.C. 333(e) - Distributing
Anabolic Steroids; Title 18,
U.S.C., Sec. 2 - Aiding And
Abetting

The grand jury charges:

Count 1

INTRODUCTORY ALLEGATIONS

1. The United States Food and Drug Administration (hereinafter referred to as "FDA") is the federal agency charged with the responsibility of protecting the health and safety of the American public by ensuring that prescription drugs are safe and effective before they are manufactured and dispensed to the people of this country.

1 2. The FDA is charged with the responsibility of protecting the
2 American public and ensuring, among other things, that drugs are: (1) safe
3 and effective for their intended use before they are approved for sale;
4 (2) administered only by licensed physicians because of their potential
5 toxicity and harmful side effects; (3) manufactured and stored under
6 conditions that ensure their safety and effectiveness; and (4) distributed
7 only through approved distributors and licensed pharmacists or physicians.

8 3. Accordingly, the Congress of the United States has passed laws
9 which allow the FDA to ensure that prescription drugs, including anabolic
10 steroids, androgenic hormones, and human growth hormone are properly
11 manufactured to ensure their composition, sterility and potency. Further,
12 these drugs must be marked with identifying codes to allow for the tracing
13 of each drug and labeled to ensure their proper use and dispensation by a
14 physician licensed by law to administer such drugs.

15 4. Anabolic steroids and androgenic hormones (hereinafter referred
16 to generically as "steroids") are chemical derivatives of testosterone, the
17 "male sex hormone." Developed in the 1930s, their primary medical use is to
18 help the body build tissue and prevent the breakdown of tissue that occurs
19 in debilitating disease. However, not until the early 1960s were a broad
20 array of different anabolic steroids introduced into this country for a wide
21 variety of ill-defined and general uses.

22 5. Today, however, there are only a few approved steroids on the
23 market. For example, nandrolone phenpropionate is available for the
24 treatment of certain types of breast cancer; nandrolone decanoate for anemia
25 caused by renal failure; and oxymetholone for aplastic anemia. The FDA has
26 limited the use of steroids to these types of serious illnesses due to the
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1 documented adverse side-effects, which include: cancer of the liver,
2 jaundice, testicular atrophy, increased risk of coronary heart disease,
3 stroke, sterility, birth defects, prostate cancer, increased masculinity in
4 women and aggressive behavior in men.

5 6. While the FDA has been narrowing the approved types of steroids
6 that may be legally marketed, an estimated 200 to 400 million dollar black
7 market has arisen in its place. This black market arose because the use of
8 steroids to enhance athletic performance and appearance has reached epidemic
9 proportions among this nation's amateur and professional athletes. This
10 epidemic, in turn, has resulted in black marketeers finding it increasingly
11 difficult to obtain legally manufactured steroids. In the face of this
12 increased demand, individuals illegally supplying these drugs have had to
13 create new sources to satisfy their customers.

14 7. The FDA has recently become aware that "counterfeit" steroids
15 are flooding the black market in response to the growing demand. These
16 steroids are counterfeit in that they falsely represent, without
17 authorization, they are the products of legitimate drug manufacturers.
18 Because they are counterfeit drugs that are smuggled into the United States,
19 they are not able to be regulated by any government agency and are not
20 manufactured according to FDA rules and regulations. As such, they pose a
21 serious potential health risk to the American public.

22 8. During the last two years, the following types of counterfeit
23 steroids have been found in the United States: (1) anabolic steroids that
24 when properly manufactured are approved by the FDA for use by persons with
25 a valid prescription, to wit: nandrolone decanoate injection (trade name
26 Deca-durabolin), Oxandrolone (trade name Anavar), Oxymetholone (trade name
27 Anadrol), and stanozolol (trade names Stroma and Winstrol); (2) those
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1 anabolic steroids from foreign manufacturers that are not approved by the FDA
2 for sale and use in the United States, to wit: acetate de metenolone (trade
3 name Primobolan), Oxandrolone (trade name Nelevar), acetate de trenbolone
4 (trade name Finaject), trenbolone (trade name Parabolon), methandrostenolone
5 (trade name Dianabol), dihydromesterone, and Oxandrolone (trade name
6 Oxandrolone SPA); (3) those androgenic hormones that when properly
7 manufactured are approved by the FDA for use under a prescription, to wit:
8 testosterone cypionate injection, and testosterone enanthate injection; (4)
9 those steroids that when properly manufactured are approved by the FDA for
10 prescription use in animals, but never humans, to wit: boldenone
11 undecylenate (trade name Equipoise injectable), Stanazolol (trade name
12 Winsrol-V); (5) those steroid-type drugs that are not approved by the FDA for
13 any use, to wit: androgenicum prolongatum (trade name Sustanon 250); and
14 (6) other prescription drugs that when properly manufactured are approved by
15 the FDA for use by persons with a valid prescription, to wit: tamoxifen
16 citrate (trade name Nolvadex) and Liothyronine Sodium (trade name Cytomel).
17 Neither defendant WILLIAM E. CAMBRA, JR., nor defendant JAMES V. SORANNO,
18 have applied for nor obtained approval from the FDA or any other legal
19 authority to manufacture, distribute or dispense any of the above-listed
20 steroids in the United States.

21 9. Even those steroids that the FDA has approved for prescription by
22 a physician for certain limited medical uses, have not been approved for use
23 by the American public for purposes of athletic enhancement or appearance.
24 Further, in all cases that involve counterfeits, such steroids may not be
25 legally manufactured, imported or otherwise brought into the United States.
26 Therefore, they must be either manufactured in domestic "clandestine labs"
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1 or smuggled into this country, if they are to be distributed on the steroid
2 black market.

3 10. Synthesized human growth hormone is utilized to treat thousands
4 of children in the United States who suffer from a pronounced growth
5 deficiency (this treatment is available only to children as bone growth
6 centers close after puberty and the hormone can no longer stimulate growth).
7 The children are unable to achieve normal growth because the pituitary glands
8 located at the base of their brains do not naturally secrete enough growth
9 hormone. Substitute growth hormone was originally obtained in a very
10 expensive and complex procedure from the pituitary glands of human cadavers.
11 However, in early 1985, the FDA discovered that some of the pooled batches
12 of the cadaver-derived growth hormone appeared to have been infected with
13 Creutzfeldt-Jakob disease, an extremely rare and invariably fatal virus that
14 is known to be harbored in the brain tissues of patients with the disease.
15 Following this discovery, the National Institute of Health and the only two
16 commercial manufacturers ceased distribution of natural growth hormone.

17 11. In October 1985, the FDA approved an application by Genentech,
18 San Francisco, California, to market genetically synthesized human growth
19 hormone under the trade name "Protropin". Genentech genetically synthesized
20 the hormone by combining growth hormone genes selected from human cells with
21 the DNA of a laboratory strain of the bacteria E. Coli. The human genes
22 were then inserted into the DNA of the bacteria in such a way that the
23 bacterium treated it as its own; producing large amounts of the desired
24 hormone. Since Protropin is synthesized in bacteria, contamination with
25 viruses indigenous to man is not believed possible. In 1987, the FDA also
26 approved an application by Eli Lilly Co., Indianapolis, Indiana, to market
27 genetically synthesized growth hormone under the trade name "Humatrope".
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1 12. Due to its potential for abuse and known adverse side effects, the
2 FDA approved the marketing of the genetically engineered human growth hormone
3 only for the long-term treatment of children who have growth failure due to
4 an inadequate secretion of normal endogenous growth hormone. Unfortunately,
5 athletes have become attracted to human growth hormone as it is believed to
6 produce effects similar to that of anabolic steroids without some of the
7 disadvantages of detection through drug tests. While it is possible to test
8 for increased levels of growth hormone, it appears to be more difficult to
9 detect than many steroids. As a result, a black market has also arisen in
10 Genetech and Lilly growth hormone.

11 THE CONSPIRACY

12 13. Beginning sometime before January 1987, and continuing up to and
13 including May 1989, within the Southern District of California, and
14 elsewhere, defendants WILLIAM E. CAMBRA, JR., and JAMES V. SORANNO did
15 knowingly and willfully combine, conspire and agree with various
16 coconspirators to commit offenses against the United States, in particular,
17 the FDA by:

18 a. Holding for sale and selling, with the intent to defraud and
19 mislead, counterfeit drugs, namely: steroids, whose container and labeling,
20 without authorization, bear the trade name and mark of drug manufacturers and
21 distributors other than those who in fact manufactured and distributed the
22 drugs and thereby falsely representing such drugs to be manufactured and
23 distributed by the named drug manufacturers and distributors; in violation
24 of Title 21, United States Code, Sections 331(i)(3) and 333(b);

25 b. distribute and sell, with the intent to defraud and mislead,
26 human growth hormone, without a prescription authorized by a licensed
27 physician and without adequate directions for its use, while holding such
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1 hormone for sale after its shipment in interstate commerce; in violation of
2 Title 21, United States Code, Sections 331(k), 352(f), 333(a)(2), and
3 353(b)(1);

4 c. Receiving, holding, distributing and selling, in interstate
5 commerce with the intent to defraud and mislead, drugs, namely: steroids
6 and human growth hormone which are prescription human and animal drugs,
7 without a prescription authorized by a licensed physician or veterinarian,
8 in violation of Title 21, United States Code, Sections 331(a), 333(b) and
9 353(b); and

10 d. Distributing and selling anabolic steroids for use in humans
11 other than for treatment of disease pursuant to the order of a physician; in
12 violation of Title 21, United States Code, Section 333(e)(1).

13 THE METHODS OF THE CONSPIRACY

14 14. As a part of the conspiracy, defendant WILLIAM E. CAMBRA, JR.,
15 employed various coconspirators to assist him in his illegal steroid
16 distribution organization.

17 15. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
18 JR., would provide free anabolic steroids to his coconspirators to assist in
19 the packaging and distribution of the steroids and human growth hormone.

20 16. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
21 JR., would employ coconspirators to store the steroids and human growth
22 hormone, as well as to deliver the drugs in rental trucks.

23 17. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
24 JR., accepted hundreds of thousands of dollars in illegal steroid orders.

25 18. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
26 JR., attempted to frustrate detection by law enforcement by utilizing pay
27 phones to conceal his illegal activities.

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1 19. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
2 JR., utilized connections with state law enforcement personnel in an attempt
3 to verify the bona fides of his customers.

4 20. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
5 JR., extended credit to his customers in order to facilitate the illegal sale
6 of steroids and human growth hormone.

7 21. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
8 JR., utilized the United States Postal Service, Federal Express, rental car
9 companies and various airlines to deliver his illegal shipments.

10 22. As a further part of the conspiracy, defendant WILLIAM E. CAMBRA,
11 JR., attempted to hinder law enforcement by warning his associates not to
12 cooperate with the authorities.

13 OVERT ACTS

14 In furtherance of the conspiracy and to effect the objects thereof, the
15 following overt acts, among others, were committed within the Southern
16 District of California, and elsewhere:

- 17 1. In or about December 1986, in Carmichael, California, WILLIAM E.
18 CAMBRA, JR., convinced Patrick Crocker to assist in the illegal
19 shipment of anabolic steroids to various parts of the country.
- 20 2. In the early part of 1987, in Carmichael, California, WILLIAM E.
21 CAMBRA, JR., gave Patrick Crocker approximately \$7,000 and various
22 anabolic steroids as part of his payment for assisting in the
23 illegal distribution operation.
- 24 3. In the early part of 1987, WILLIAM E. CAMBRA, JR., had numerous
25 truck loads of steroids delivered to his health club, the Body &
26 Power Health Club, 6451 Fair Oaks, Carmichael, California.

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4. In the early part of 1987, WILLIAM E. CAMBRA, JR., stored large quantities of anabolic steroids in lockers located in the staff bathrooms at his health club and at Patrick Crocker's residence, 6832 Blue Duck Way, Sacramento, California.
5. On or about February 15, 1987, in Carmichael, California, WILLIAM E. CAMBRA, JR., sold anabolic steroids to John Fernandez.
6. On or about February 20, March 2 and 29, and April 7, 1987, in Carmichael, California, WILLIAM E. CAMBRA, JR., caused 28, 93, 50 and 75 pounds of anabolic steroids, respectively, to be delivered to United and Northwest Airlines for shipment to George Sorenson, 17536 Zodiac Street, Forest Lake, Minnesota.
7. On or about March 2, 1987, in Carmichael, California, WILLIAM E. CAMBRA, JR., caused 93 pounds of anabolic steroids to be delivered to United Airlines for shipment to Amagin Ltd., 513 Wilshire Boulevard, Suite 284 Santa Monica, California.
8. In or about early September 1988, in Carmichael, California, WILLIAM E. CAMBRA, JR., discussed with Jim Insko the delivery of a large quantity of steroids and human growth hormone on credit.
9. In or about mid-September 1988, in Los Angeles, California, Jim Insko arranged to sell over one hundred thousand dollars worth of CAMBRA's steroids and human growth hormone to Michael Stewart.
10. On or about September 19, 1989, in Los Angeles, California, WILLIAM E. CAMBRA, JR., discussed with Jim Insko the delivery of over one hundred thousand dollars of steroids and human growth hormone to southern California.
11. On or about September 20, 1989, in Los Angeles, California, Jim Insko directed Mike Stewart to call phone number (213) 578-6270,

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in order to receive instructions on how to pick up the shipment of steroids and human growth hormone.

12. On or about September 21, 1988, in Carmichael, California, WILLIAM E. CAMBRA, JR., directed Lori Zeller to rent a truck to deliver the steroids and human growth hormone ordered by Jim Insko and destined for Mike Stewart in southern California.
13. On or about September 21, 1988, in Sacramento, California, Lori Zeller rented a white Ford van, license number 3H5599, from Western Car Rental, Inc.
14. On or about September 22, 1988, in Carmichael, California, WILLIAM E. CAMBRA, JR., directed JAMES V. SORANNO to drive the white Ford van to a warehouse so it could be loaded with the steroids and human growth hormone.
15. On or about September 22, 1988, in Santa Monica, California, JAMES V. SORANNO met Jim Insko while driving the white Ford van loaded with the drugs.
16. On or about September 22, 1988, in Los Angeles, California, JAMES V. SORANNO advised WILLIAM E. CAMBRA, JR., that the delivery was running late due to road construction.
17. On or about September 23, 1988, in El Centro, California, JAMES V. SORANNO and Jim Insko drove the steroids and human growth hormone to the parking lot of the Best Western El Dorado Motel, 1464 Adams Avenue, El Centro, California.
18. In or about September 23, 1988, in El Centro, California, JAMES V. SORANNO rented a room at the Best Western El Dorado Motel.

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- 19. In or about September 23, 1988, JAMES V. SORRANO performed counter-surveillance in the parking lot of the Best Western Motel in an effort to detect possible law enforcement activity.
- 20. In or about September 23, 1988, in Carmichael, California, WILLIAM E. CAMBRA, JR., received a telephone call from Jim Insko placed from the Best Western El Dorado Motel in El Centro.
- 21. In or about September 23, 1988, in Carmichael, California, WILLIAM E. CAMBRA, JR., placed telephone calls to Imperial County Corrections, United States Customs and United States Immigration in an attempt to learn what had happened to JAMES V. SORRANO.
- 22. On or about February 16, 1989, in Carmichael, California, WILLIAM E. CAMBRA, JR., offered to sell anabolic steroids to an undercover agent with the California Bureau of Narcotics Enforcement.
- 23. On or about February 27, 1989, in Carmichael, California, WILLIAM E. CAMBRA, JR., warned Jim Insko not to ever start working for law enforcement.
- 24. On or about February 27, 1989, in Carmichael, California, WILLIAM E. CAMBRA, JR., informed the state undercover operative that Jim Insko had just called regarding an \$80,000 debt, but that he would not discuss business over the phone because he suspected that he was working with the police.
- 25. On or about March 7, 22, and April 6, 1989, in Carmichael, California, WILLIAM E. CAMBRA, JR., sold small quantities of Stanazolol to the state undercover operative.

- 1 26. On or about March 7, 1989, in Carmichael, California, WILLIAM E.
2 CAMBERA, JR., informed the state undercover operative that the
3 Stanazolol was the equivalent to carrying cocaine or heroin.
4 27. On or about May 1, 1989, in Carmichael, California, WILLIAM E.
5 CAMBERA, JR., agreed to send approximately \$1,000 worth of steroids
6 to the undercover agent in the San Diego area after receiving
7 payment.
8 28. On or about May 9, 1989, in Carmichael, California, WILLIAM E.
9 CAMBERA, JR., negotiated a \$1,000 Check sent by the undercover
10 agent for the San Diego shipment.
11 29. On or about May 18, 1989, in Carmichael, California, WILLIAM E.
12 CAMBERA, JR., explained to the undercover agent that he had not
13 yet sent the \$1,000 worth of anabolic steroids as he had
14 suspicions that a police informant was working out in his gym.
15 30. On or about May 18, 1989, in Carmichael, California, WILLIAM E.
16 CAMBERA, JR., warned the state undercover agent that San Diego was
17 the "capital" of steroid law enforcement.
18 31. On or about May 26, 1989, WILLIAM E. CAMBERA, JR., sent a package
19 containing 2,205 tablets of Stanazolol to Rancho Bernardo,
20 California.

21 All in violation of Title 18, United States Code, Section 371.

22 Counts 2 through 10

23 1. Paragraphs 1 through 12 and 14 through 22 of Count 1 are hereby
24 realleged and incorporated by reference as if set forth in full herein.

25 2. On or about September 23, 1988, within the Southern District of
26 California and elsewhere, defendants WILLIAM E. CAMBERA, JR., and JAMES V.
27 SORANNO, with intent to defraud and mislead, did hold, cause to be held for
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1 sale, and sell the below-listed "counterfeit" drugs (Column A), in that the
2 containers and labeling, without authorization, bear the trademark, trade name
3 and other identifying marks of drug manufacturers and distributors other
4 than those who in fact manufactured and distributed them, thereby falsely
5 purporting and representing such drugs to be the product of and be
6 distributed by the named drug manufacturers and distributors (Column B):

	(A)	(B)
<u>COUNT</u>	<u>DRUG</u>	<u>MANUFACTURER/DISTRIBUTOR</u>
2	Parabolan	Laboratories Negma, France
3	Dianabol	Ciba-Geigy, Germany
4	Deca Durabolin	Organon Laboratories, New Zealand
5	Andriol - 50	Syntex, Ireland
6	Nelevar	Searle, England
7	Delatest Cypionate	McGuff, Australia
8	Winstrol - V	Winthrop-Sterling, U.S.A.
9	Finaject	Hoechst UK, Ltd., England
10	Equipoise	Squibb, Canada

18 All in violation of Title 21, United States Code, Sections 331(i)(3) and
19 333(b), and Title 18, United States Code, Section 2.

20 Count 11

21 1. Paragraphs 1 through 12 and 14 through 22 of Count 1 are hereby
22 realleged and incorporated by reference as if set forth in full herein.

23 2. On or about September 23, 1989, in the Southern District of
24 California, defendants WILLIAM E. CAMBRA, JR. and JAMES V. SORANNO, with
25 intent to defraud and mislead, did possess with the intent to distribute
26 and did distribute and dispense quantities of Humatrope, human growth
27 hormone, a prescription drug, within the meaning of Title 21, United States
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1 Code, Section 353(b)(1)(B) and (C), which had been shipped in interstate
2 commerce and which, upon being dispensed by the defendants, became
3 "misbranded" within the meaning of Title 21, United States Code,
4 Section 353(b)(1), in that the drug was dispensed without obtaining the
5 authorization of a prescription from a licensed practitioner, and within the
6 meaning of Title 21, United States Code, Section 352(f)(1) in that the drug
7 failed to bear adequate directions for its use; in violation of Title 21,
8 United States Code, Sections 331(k) and 333(b), and Title 18, United States
9 Code, Section 2.

10 Count 12

11 1. Paragraphs 1 through 12 and 14 through 22 of Count 1 are hereby
12 realleged and incorporated by reference as if set forth in full herein.

13 2. On or about May 26, 1989, within the Southern District of
14 California, defendant WILLIAM E. CAMERA, JR., did knowingly distribute
15 approximately 2205 tablets of the anabolic steroid Stanazolol, for use in
16 humans other than for treatment of disease pursuant to the order of a
17 physician; in violation of Title 21, United States Code, Section 333(e)(1)
18 and Title 18, United States Code, Section 2.

19 DATED: Aug. 25, 1989.

A TRUE BILL

20
21 _____
Foreperson

22 WILLIAM BRANIFF
23 United States Attorney

24 By: _____
25 PHILLIP L. B. HALPERN
Assistant U.S. Attorney
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