

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FILED

MAY 31 11 00 AM '84
CLERK OF COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY *[Signature]*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
May 1984 Grand Jury

UNITED STATES OF AMERICA,)	Criminal Case No. '84 1071E
)	
Plaintiff,)	<u>I N D I C T M E N T</u>
)	
v.)	Title 18, U.S.C., Secs. 371
)	and 545 - Conspiracy to Import
)	Merchandise; Title 18, U.S.C.,
RICHARD ANTHONY FITTON,)	Sec. 545 - Importing Mer-
VICTORIA LEA STEENROD,)	chandise; Title 21, U.S.C.,
)	Secs. 952, 960, and 963 -
Defendants.)	Importation of Controlled
)	Substances; Title 18, U.S.C.,
)	Sec. 1001 - False Statements
)	to a Federal Officer

The grand jury charges:

COUNT ONE

Beginning at a date unknown to the grand jury and continuing up to and including November 12, 1984, in the Southern District of California, and elsewhere, defendants RICHARD ANTHONY FITTON and VICTORIA LEA STEENROD did knowingly and

PLH:ch:San Diego County
11/29/84

-10-

1 willfully combine, conspire and agree with each other, and with
2 divers other persons unknown to the grand jury, to violate
3 Title 18, United States Code, Section 545.

4 As part of said conspiracy, defendants RICHARD ANTHONY
5 FITTON and VICTORIA LEA STEENROD agreed to fraudulently and
6 knowingly import and bring into the United States from Mexico,
7 certain merchandise, to wit: prescription legend drugs and other
8 pharmaceuticals, contrary to law in that said merchandise would
9 not be presented for inspection, entered, and declared as re-
10 quired by Title 19, United States Code, Sections 1459, 1461,
11 1484 and 1485; all in violation of Title 18, United States Code,
12 Section 371.

13 OVERT ACTS

14 In pursuance of said conspiracy and to further the objects
15 thereof, the following overt acts, among others, were committed
16 in the Southern District of California, and elsewhere:

- 17 1. On or about November 12, 1984, defendant RICHARD
18 ANTHONY FITTON flew from Alabama to San Diego, Cali-
19 fornia to meet defendant VICTORIA LEA STEENROD.
- 20 2. On or about November 12, 1984, defendants RICHARD
21 ANTHONY FITTON and VICTORIA LEA STEENROD rented a 1983
22 Ford Escort from Getaway Rent-A-Car in San Diego,
23 California, and drove it to Mexico through the Port of
24 Entry at San Ysidro, California.
- 25 3. On or about November 12, 1984, defendant RICHARD
26 ANTHONY FITTON purchased various prescription legend
27 drugs in Tijuana, Mexico.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. On or about November 12, 1984, defendants RICHARD ANTHONY FITTON and VICTORIA LEA STEENROD concealed various prescription legend drugs throughout the rented Ford Escort.
5. On or about November 12, 1984, defendant RICHARD ANTHONY FITTON attempted to enter the United States through the Port of Entry at Tecate, California in the rented 1983 Ford Escort which contained prescription legend drugs.
6. On or about November 12, 1984, defendant VICTORIA LEA STEENROD attempted to enter the United States through the Port of Entry at Tecate, California, as a passenger in the 1983 Ford Escort.
7. On or about November 12, 1984, defendants RICHARD ANTHONY FITTON and VICTORIA LEA STEENROD stated to a United States Officer at the Port of Entry that they had not purchased or acquired anything, including medicine, while visiting Tijuana, Mexico.

COUNT TWO

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendants RICHARD ANTHONY FITTON and VICTORIA LEA
4 STEENROD did knowingly and fraudulently import and bring into
5 the United States certain merchandise, to wit: approximately
6 6,000 grams of Dianabol, contrary to the law, in that said
7 merchandise had not been presented for inspection and declared
8 as provided by Title 19, United States Code, Sections 1459,
9 1461, 1484, and 1485, and which merchandise is subject to for-
10 feiture; in violation of Title 18, United States Code, Section
11 545.

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT THREE

1
2 On or about November 12, 1984, in the Soutehrn District of
3 California, defendants RICHARD ANTHONY FITTON and VICTORIA LEA
4 STEENROD did knowingly and fraudulently import and bring into
5 the United States certain merchandise, to wit: approximately
6 60 grams of Sostenon in preloaded syringes, contrary to the law,
7 in that said merchandise had not been presented for inspection
8 and declared as provided by Title 19, United States Code, Sec-
9 tions 1459, 1461, 1484, and 1485, and which merchandise is
10 subject to forfeiture; in violation of Title 18, United States
11 Code, Section 545.

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT FOUR

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendants RICHARD ANTHONY FITTON and VICTORIA LEA
4 STEENROD did knowingly and fraudulently import and bring into
5 the United States certain merchandise, to wit: approximately 50
6 bottles of Neurofor, contrary to the law, in that said merchan-
7 dise had not been presented for inspection and declared as
8 provided by Title 19, United States Code, Sections 1459, 1461,
9 1484, and 1485, and which merchandise is subject to forfeiture;
10 in violation of Title 18, United States Code, Section 545.
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT FIVE

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendants RICHARD ANTHONY FITTON and VICTORIA LEA
4 STEENROD did knowingly and fraudulently import and bring into
5 the United States certain merchandise, to wit: approximately
6 120 grams of Sten, contrary to the law, in that said merchandise
7 had not been presented for inspection and declared as provided
8 by Title 19, United States Code, Sections 1459, 1461, 1484, and
9 1485, and which merchandise is subject to forfeiture; in vio-
10 lation of Title 18, United States Code, Section 545.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT SIX

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendants RICHARD ANTHONY FITTON and VICTORIA LEA
4 STEENROD did knowingly and fraudulently import and bring into
5 the United States certain merchandise, to wit: approximately
6 1600 tablets of Proviron, contrary to the law, in that said
7 merchandise had not been presented for inspection and declared
8 as provided by Title 19, United States Code, Sections 1459,
9 1461, 1484, and 1485, and which merchandise is subject to for-
10 feiture; in violation of Title 18, United States Code, Section
11 545.

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT SEVEN

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendant VICTORIA LEA STEENROD did knowingly and
4 fraudulently import and bring into the United States certain
5 merchandise, to wit: approximately 150 tablets of Omifin,
6 contrary to the law, in that said merchandise had not been
7 presented for inspection and declared as provided by Title 19,
8 United States Code, Sections 1459, 1461, 1484, and 1485, and
9 which merchandise is subject to forfeiture; in violation of
10 Title 18, United States Code, Section 545.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT EIGHT

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendant VICTORIA LEA STEENROD did knowingly and
4 fraudulently import and bring into the United States certain
5 merchandise, to wit: approximately 90 tablets of Naxen, con-
6 trary to the law, in that said merchandise had not been pre-
7 sented for inspection and declared as provided by Title 19,
8 United States Code, Sections 1459, 1461, 1484, and 1485, and
9 which merchandise is subject to forfeiture; in violation of
10 Title 18, United States Code, Section 545.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT NINE

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendant VICTORIA LEA STEENROD did knowingly and
4 fraudulently import and bring into the United States certain
5 merchandise, to wit: approximately 71 tablets of Bumex, con-
6 trary to the law, in that said merchandise had not been pre-
7 sented for inspection and declared as provided by Title 19,
8 United States Code, Sections 1459, 1461, 1484, and 1485, and
9 which merchandise is subject to forfeiture; in violation of
10 Title 18, United States Code, Section 545.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT TEN

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendant VICTORIA LEA STEENROD did knowingly and
4 intentionally import, and attempt to import, approximately 149
5 tablets of Tonapan, a Schedule III Controlled Substance, into
6 the United States from a place outside thereof; in violation of
7 Title 21, United States Code, Sections 952, 960 and 963.

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT ELEVEN

1
2 On or about November 12, 1984, in the Southern District of
3 California, defendant VICTORIA LEA STEENROD did knowingly and
4 intentionally import, and attempt to import, approximately 51½
5 tablets of Halcion, a Schedule IV Controlled Substance, into the
6 United States from a place outside thereof; in violation of
7 Title 21, United States Code, Sections 952, 960 and 963.

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT TWELVE

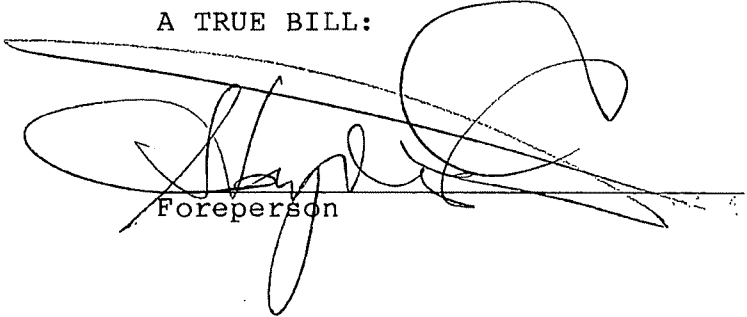
1
2 On or about November 12, 1984, in the Southern District of
3 California, defendant RICHARD ANTHONY FITTON did make false,
4 fictitious and fraudulent statements and representations to
5 material facts in a matter within the jurisdiction of the United
6 States Customs Service, an agency or department of the United
7 States, in that he did represent and state to Supervisory
8 Inspector Charles Mazon of the United States Customs Service
9 that they had not purchased or acquired anything, including
10 medicine, while in Mexico, whereas in truth and fact, as they
11 then well knew, that statement was false, fictitious and
12 fraudulent when made; in violation of Title 18, United States
13 Code, Section 1001.

COUNT THIRTEEN

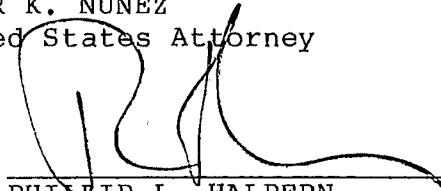
1
2 On or about November 12, 1984, in the Southern District of
3 California, defendant VICTORIA LEA STEENROD did make false,
4 fictitious and fraudulent statements and representations to
5 material facts in a matter within the jurisdiction of the United
6 States Customs Service, an agency or department of the United
7 States, in that she did represent and state to Supervisory
8 Inspector Charles Mazon of the United States Customs Service
9 that they had not purchased or acquired anything, including
10 medicine, while in Mexico, whereas in truth and fact, as they
11 then well knew, that statement was false, fictitious and
12 fraudulent when made; in violation of Title 18, United States
13 Code, Section 1001.

14 Dated: November 30, 1984

15 A TRUE BILL:

16 
17
18 Foreperson

19 PETER K. NUNEZ
20 United States Attorney

21 
22 BY: _____
23 PHILLIP L. HALPERN
24 Assistant U. S. Attorney
25
26
27
28