

# UNITED STATES DISTRICT COURT

District of RHODE ISLAND

UNITED STATES OF AMERICA

## WARRANT FOR ARREST

V.

THOMAS CHRISTOPHER THOMSEN

Case Number: 1:07MJ94A

To: The United States Marshal  
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest

Thomas Christopher Thomsen  
Name

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

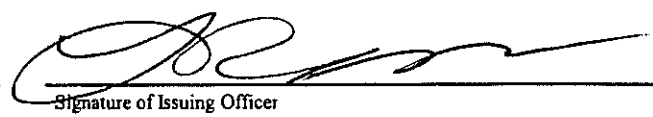
- Indictment  
  Information  
  Complaint  
  Order of court  
  Probation Violation Petition  
  Supervised Release Violation Petition  
  Violation Notice

charging him or her with (brief description of offense)

sale of drug paraphernalia and money laundering

in violation of Title 21 United States Code, Section(s) 863, and 18 USC Section 1956

LINCOLN D. ALMOND  
Name of Issuing Officer

  
Signature of Issuing Officer

U.S. MAGISTRATE JUDGE  
Title of Issuing Officer

9/20/07 Providence RI  
Date and Location

### RETURN

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

UNITED STATES DISTRICT COURT

DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA  
V.

THOMAS CHRISTOPHER THOMSEN  
5008 West Lancaster Street  
Tampa, FL

CRIMINAL COMPLAINT

Case Number: 1:07MJ94A

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 10/06 through 08/07 in Providence County, in the District of Rhode Island and elsewhere defendant(s) did,

(Track Statutory Language of Offense)  
sale of drug paraphernalia and money laundering

in violation of Title 21 United States Code, Section(s) 863 and 18 USC § 1956

I further state that I am a(n) Postal Inspector and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part of this complaint:  Yes  No

*Almino Correia*  
Signature of Complainant

Almino Correia  
Printed Name of Complainant

Sworn to before me and signed in my presence,

9/20/07  
Date

at Providence RI  
City State

Lincoln D. Almond US Magistrate Judge  
Name of Judge Title of Judge

*Lincoln D. Almond*  
Signature of Judge



## AFFIDAVIT

I, Almino Correia, being duly deposed and sworn, say:

1. I am a Postal Inspector with the United States Postal Inspection Service and have been so employed since February of 1991. I have received training and attended seminars on the various means and methods by which illegal drug traffickers obtain, posses, transport, divert, and distribute controlled substances (such as anabolic steroids), non-controlled prescription drugs (such as human Growth Hormone (HGH)), and drug paraphernalia. As part of my training, I am aware of a variety of different methods drug traffickers and associates of drug traffickers use to conceal or dispose of their drug proceeds, often in violation of federal money laundering statutes.

2. This affidavit is submitted in support of:

A. a criminal complaint and arrest warrant for Thomas Christopher Thomsen (DOB: November 18, 1970) for the sale of drug paraphernalia in violation of 21 U.S.C. § 863 and evidence of the laundering of monetary instruments in violation of 18 U.S.C. §1956.

3. The United States Government, including the Food and Drug Administration-Office of Criminal Investigations (FDA-OCI), Drug Enforcement Administration (DEA), Internal Revenue Service-Criminal Investigation Division (IRS-CID), United States Postal Inspection Service (USPIS), and Immigration and Customs Enforcement (ICE) are conducting a criminal investigation in connection with a scheme or schemes to buy/sell drug paraphernalia via the internet. This paraphernalia, which includes syringes, oil-filled ampoules, and other related items, is utilized in the conversion of anabolic steroids (a Schedule III Controlled Substance) into other forms, including, oil

based injectable liquids for use in humans. As set forth more fully below, this investigation has produced evidence that Thomas Thomsen, using the website [Universalkits.com](http://Universalkits.com), sells and uses the mails to transport drug paraphernalia in violation of 21 U.S.C. § 863(a)(1) and (2).

4. In May of 2005, agents initiated an investigation into an anabolic steroid/hGH trafficker, who is now acting as the Confidential Source (CS). Several search and seizure warrants related to the CS were executed in September of 2006 in Rhode Island, whereby agents seized quantities of anabolic steroids, human growth hormone (hGH), and large amounts of currency from the CS. The CS admitted to trafficking anabolic steroids, hGH, and other prescription drugs using the internet as his/her (CS)'s primary means of communication. The CS has no known prior arrests or convictions for any crime. The CS has been made aware of potential criminal charges against the CS involving this investigation. No promises have been made to the CS other than agents will inform the appropriate prosecutor of his/her (CS) assistance in this investigation. Some assets and currency previously seized by the Government from the CS have been and may be returned in the future to the CS. The CS has provided reliable information in the past resulting in the identification of suspects, the arrest of numerous individuals, and the seizure of a clandestine anabolic steroid laboratory.

5. On October 31, 2006, the CS was directed by agents to log onto [www.universalkits.com](http://www.universalkits.com) and to place an order for items that can be used to convert anabolic steroid powders to oil based injectables for use in humans. An electronic mail (e-mail) conversation occurred between the CS and a representative of

www.universalkits.com (using the e-mail address of customerservice@universalkits.com). CS wrote in his e-mail that he wanted to purchase "a kit to convert fina pellets for my personal use." The CS also inquired as to what type of "kit" he would need to convert "three cartridges of Tran pellets." The CS indicated he wanted non-peanut based oil and syringes.

6 Based upon my training, experience, and conversations with other agents, I know that the term "Tran" as used by the CS, is a slang term of the anabolic steroid Trenbolone, a Schedule III controlled substance. Based on conversations with other agents, I further believe that the term "fina pellets" refers to the veterinary cattle implant Finaplix which contains Trenbolone Acetate. I know based upon my conversations with other agents, including FDA-OCI agents and certified agents of the DEA's clandestine laboratory enforcement team, that certain individuals will sell or distribute a combination of items termed "kits." These items, if used in correct sequence, are designed to separate the binder in Finaplix from the active steroid Trenbolone. The Trenblone can then be converted clandestinely into a form that is more optimal for injection by people.

7. A representative from Universalkits customer service responded to the CS's e- mail with the following message:

"You would need to purchase the 6g F-Type kit which will give you A Total yield of 60ml @ 100mg/ml and just request an oil other than peanut in the comment section at the time of your order, suggest Grapeseed and you will be fine. In Good Health, The Universal Kits Team  
www.universalkits.com, www.gencorefitness.com,  
customerservice@universalkits.com."

8. Based upon a review of this e-mail communication, conversations with the CS, as well as agents of the FDA-OCI and DEA, I believe that the individual utilizing the e-mail account customerservice@universalkits.com is knowingly suggesting the CS purchase paraphernalia that can be used to covert the anabolic steroids Trenbolone to a form that is readily ingestible by humans. I further note that in the above conversation that the individual using the e-mail address customerservice@universalkits.com is showing knowledge that the CS will administer the anabolic steroid Trenbolone into the CS's person. By way of example, customerservice@universalkits.com replies to the CS's question concerning peanut allergies by stating, "just request an oil other than peanut in the comment section at the time of your order, suggest Grapeseed and you will be fine."<sup>4</sup>

9. The CS complied with instructions from agents to order an "F Type kit" (6g kit, hypodermic needles and syringes, and alcohol prep pads) from the website. The CS further complied with instructions from agents to direct that the order be shipped to an undercover Post Office Box located in Rhode Island that is controlled by the United States Postal Inspection Service.

10. On November 2, 2006, agents mailed a Postal Money Order #10466397055 in the amount of \$80.55 to Universalkits.com, 301 W. Platt Street #426, Tampa, Florida 33606 as payment for the drug paraphernalia. On November 13, 2006, agents retrieved a parcel addressed to the undercover Post Office Box in Rhode Island listing the return address as www.universalkits.com 301 W. Platt Street #426, Tampa, Florida 33606. The parcel contained unlabeled, liquid-filled ampoules, hypodermic needles, syringes, and alcohol prep pads.

11. According to the website WHOIS.NET, the website Universalkits.com is registered through TUCOWS.COM. Based upon my training and experience, and conversations with other agents, WHOIS.NET is an internet research tool that identifies domain registrants. According to the website TUCOWS.COM, the website Universalkits.com is registered by Gencore Incorporated in Florida. Florida Secretary of State documents indicate that Gencore Inc. was incorporated on November 25, 2003. Thomas C. Thomsen of 709 W. Peninsular St., Tampa, Florida 33606 is listed as the Registered Agent and President of Gencore, Inc..

12. According to a Tampa Police Department report filed on September 25, 2004, Thomas Thomsen reported a burglary to his personal residence in Tampa, Florida. In the report, Thomsen stated that his laptop and a substantial amount of health related products were stolen. Thomsen documented that he operates an internet business that sells "health related products that relate to bodybuilding" and that the name of his website is "universalkits.com." Thomsen stated that he has full and complete ownership of the business. Thomsen reported the loss of his laptop, several thousand of dollars in merchandise, shipping equipment, and folders of documents containing his articles of incorporation.

13. In December 2006, a copy of Postal Money Order #10466397055 was returned to the United States Postal Inspection Service. Postal Order #10466397055 was deposited into SunTrust Bank account # 000025229625, at SunTrust Bank, 601 West Platt Street, Tampa, Florida. The signature card on bank account # 000025229625 is registered to GENCORE INC dba UNIVERSALKITS and lists Thomas Thomsen as President. Thomas Thomsen has sole signatory authority on the account.

14. Analysis of SunTrust Bank Account #000025229625 held in the name of GENCORE INC. dba UNIVERSALKITS revealed that between January 1, 2006 and October 31, 2006 over \$250,000.00 in U.S. currency was deposited into the bank account.

15. From on or about February 13, 2007 to on or about February 15, 2007 the CS was directed to log onto [www.universalkits.com](http://www.universalkits.com) to inquire about the purchase of drug paraphernalia for the conversion of anabolic steroid powders into oil based injectables for human use. An e-mail conversation occurred between the CS and a representative of [universalkits.com](http://universalkits.com) (using the e-mail address, [customerservice@universalkits.com](mailto:customerservice@universalkits.com)). As a result the CS sent an em-mail in which he stated that he <sup>is</sup> ~~was~~ trying to convert "Test Prop powder" (referring to the anabolic steroid Testosterone Propionate, a Schedule III controlled substance). The CS stated that the conversion process was painful and he inquired about various oils he should use for the conversion.

16. A representative of [customerservice@universalkits.com](mailto:customerservice@universalkits.com) responded to the CS that "The pain is in the dissolving solution and not so much the oil, although Grape Seed is from a fruit so there it may burn more than oil from a bean or nut extract. We suggest using peanut and we always use as little dissolving solution as possible." In a further e-mail, a representative of [Customerserivce@universalkits.com](mailto:Customerserivce@universalkits.com) wrote, "We also have COTTON SEED, GRAPE SEED and SESAME SEED, just let us know what you want in the kit when placing your order. In Good Health, The Universal Kits Team [www.universalkits.com](http://www.universalkits.com) [www.gencorefitness.com](http://www.gencorefitness.com), [customerserivce@universalkits.com](mailto:customerserivce@universalkits.com) [www.myspace.com/universalkits](http://www.myspace.com/universalkits)"

17. Based upon my training and experience, conversations with other agents and a review of the e-mail communication in paragraph 17, I believe the individual using the e-mail address Customerservice@universalkits.com is acknowledging that the CS is attempting to convert Testosterone Propionate powder into an oil based injectable. Based on my training and experience with these types of investigations, as well as conversations with these other agents, testosterone propionate can be illicitly ordered in bulk form from foreign and domestic sources and then can be converted into a oil based injectable form, using a minimal amount of paraphernalia such as oil-based solvents and syringes. I believe that the individual using the e-mail address Customerservice@universalkits.com is acknowledging that the CS is planning to convert anabolic steroids from a bulk powder into an oil based injectable liquid for use in humans. I also believe that Customerservice@universalkits.com has knowledge that the CS intends to personally inject himself when stating, "The pain is in the dissolving solution and not so much the oil, although Grape Seed is from a fruit so there it may burn more than oil from a bean or nut extract."

18. The CS complied with instructions from agents to place an order over the web-site for a 20ml powder kit. The CS further complied with instructions to direct the order to an undercover Post Office Box in Rhode Island that is controlled by the USPIS.

19. On February 15, 2007, agents mailed Postal Money Order # 10714199984 in the amount of \$68.30 to Universalkits.com, 301 W. Platt Street #426, Tampa, Florida 33606 as payment for the drug paraphernalia. On March 6, 2007, agents retrieved a parcel addressed to the undercover Post Office Box in Rhode Island, listing the return address as www.universalkits.com. The parcel contained one vial containing a clear

liquid, two vials containing a yellow liquid, two empty gauge needles, one 25mm. filter, four alcohol prep pads, and two latex gloves.

20. A copy of Postal Money Order #10714199984 was returned to the United States Postal Inspection Service and indicated it had been negotiated at SunTrust Bank. Bank records obtained from SunTrust Bank revealed that Postal Order #10714199984 was deposited into bank account #000025229625 on February 26, 2007.

21. Bank records obtained from Sun Trust Bank disclosed that on May 4, 2007 a deposit of \$1,444.25 was credited to the account, bringing the balance to \$0.00 and that account #0025229625 was officially closed. Sun Trust Bank records also disclosed that account #1000055171465 was opened on February 16, 2007. The signature card for account #1000055171465 is in the name of GENCORE INC. dba UNIVERSALKITS, with Thomas Thomsen, President, as the official signatory.

22. In July of 2007 the CS was again directed by agents to log onto [www.universalkits.com](http://www.universalkits.com) and to place an order for paraphernalia used to convert anabolic steroid powders into oil based injectables. An e-mail conversation occurred between the CS and a representative of universalkits.com (using the e-mail address, [customerservice@universalkits.com](mailto:customerservice@universalkits.com)). The conversation included the following:

CS: "Hey got a few questions on your liquid clen product listed on your site. I want to purchase a bottle just to lose some fat and try to lean out for the summer. The bottle on the picture says 100mcg/ml. How many CC's does the bottle dropper hold and how many mcg's you'd

suggest I should take per day? m trying to drop around 15-20 pounds and my diet is in check. . . .”

Customerservice@universalkits.com: “Sorry we are just buried right now with e-mails and having a hard time getting back with everyone quickly. The dropper is a half cc, other than that we can't discuss usage as it is a research chemical and not sold for human consumption. Go to the discussion forums and do a quick search there you will find all the information you need.”

23. Based upon my training, experience, and conversation with other agents, I believe that customerservice@universalkits.com is advising the CS to log onto specific websites for advice on the use of Clenbuteral in humans. I believe that customerservice@universalkits.com is purposely avoiding the discussion of Clenbuterol in an attempt not to incriminate itself, but is in fact acknowledging that the CS plans to personally utilize the drug. Customerservice@universalkits.com does this by suggesting how the CS may obtain this information. I know based upon my experience with this investigation that several users and/or traffickers of illegally obtained performance enhancing drugs (such as clenbuterol) typically obtain information regarding these substances through websites commonly referred by law enforcement as “steroid discussion boards.” Traffickers and users of illegal performance enhancing drugs frequently depend upon these web-sites for information on personal drug use and/or obtaining drugs while avoiding law enforcement scrutiny. I know that Clenbuterol has no FDA approved use for humans in the United States, but is typically used illicitly by body builders in an effort to lose body fat.

24. The CS complied with instructions from agents to place an order on

universalkits.com for a 30ml vial of Clenbuterol and an "F-type" conversion kit. The CS further complied with instructions to direct the order to an undercover Post Office Box in Rhode Island controlled by the USPIS.

25. On July 27, 2007, agents mailed Postal Money Order # 11461055466 in the amount of \$95.54 to Universalkits.com, 301 W. Platt Street #426, Tampa, Florida 33606 as payment for the suspected drug paraphernalia.

26. On August 10, 2007, agents retrieved a parcel addressed to the undercover Post Office Box in Rhode Island, listing the return address as www.universalkits.com. The parcel contained unlabeled, liquid-filled ampoules, hypodermic needles, filters, syringes, and alcohol prep pads.

27. A copy of Postal Money Order #11461055466 was returned to the United States Postal Inspection Service. Postal Order # 11461055466 had been negotiated on August 6, 2007 at Bank of America in account #004434263095. On August 15, 2007, I was advised by a representative of Bank of America that account #004434263095 is held in the name of Gencore and the sole signatory on the account is Thomas Thomsen with address of 301 West Platt Street, Suite 426, Tampa Florida. I was further informed that the account had been opened on March 22, 2007.

28. Analysis of SunTrust Bank #000025229625 revealed that over \$9,500 was paid to the United States Postal Service during 2006. As set forth above, the paraphernalia received from universalkits.com was mailed to a Post Office Box controlled by the USPIS. The shipments bore delivery confirmation "Click-N-Ship" labels with the return address of universalkits, 301 West Platt St., Tampa, Florida. "Click-N-Ship" is a service provided by the Postal Service which allows its customers to

create mailing labels and affix postage from their personal computers. The postage and other services such as delivery confirmation are deducted from the postal customer's credit card or prearranged account. Based upon my training and experience, as well as my discussions with Postal authorities, I believe it is likely that the payments of \$9,500 are for postage and ~~Click-N-Ship~~ <sup>CC</sup> services.

29. Analysis of SunTrust Bank #000025229625 also revealed frequent payments to Androusa, Inc.. An internet search revealed that Androusa, Inc. is a source for hypodermic needles and syringes. On October 30, 2006, for instance, account statements for SunTrust Bank #000025229625 shows an electronic debit from that account to Androusa's account in the amount of \$26.11. Similar payments were observed to other potential suppliers to universalkits.com. Thus, for instance, account statements for SunTrust Bank #000025229625 revealed frequent payments to the business Capsule Connection. By way of example, bank statements show an electronic debit from the Sun Trust Bank account to Capsule Connection on September 13, 2006 for \$31.70. I believe, based on my training and experience that Thomsen is utilizing criminally derived proceeds that were deposited into SunTrust Bank #000025229625 to promote his business by paying suppliers of syringes, empty capsules, and other types of paraphernalia.

30. On August 20, 2007, In the Middle District of Florida, United States Magistrate Judge Mark Pizzo issued a search warrant for 5008 West Lancaster Street, Tampa Florida, the residence of Thomas Thomsen. As the search warrant was executed, Thomsen agreed to be interviewed by law enforcement agents. I have been advised by FDA/OCI Task Force Agent Timothy Heston that Thomsen admitted that he

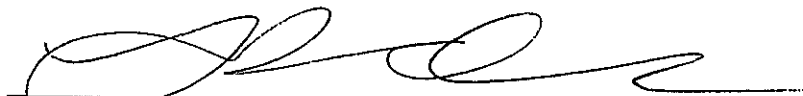
was the sole owner and operator of the website universalkits.com and the company Gencore Inc. Additionally, Thomsen admitted that he advertised his business on as many as twenty websites, including steroidology.com and anabolicminds.com. Thomsen also bought advertising space in the magazine Planet Muscle. Thomsen acknowledged control over the Sun Trust Bank accounts listed above. Thomsen stated that his business had sales of approximately \$250,000.00 for the last calendar year. Thomsen also admitted that he had not paid any form of taxes relative to those sales.

31. For the reasons set forth above, there is probable cause to find that Thomas Thomsen sold and used the mail to transport drug paraphernalia, in violation of 21 U.S.C. § 863(a)(1)&(2), and laundered the proceeds of this illegal activity, in violation of 18 U.S.C. §1956(a)(1)(A)(i).



Almino Correia  
Postal Inspector

Sworn to and subscribed to in my presence on  
This 20 day of September, 2007



LINCOLN D. ALMOND  
UNITED STATES MAGISTRATE JUDGE