

*United States District Court
District of New Jersey*

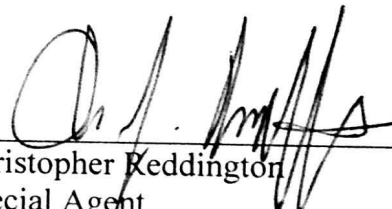
UNITED STATES OF AMERICA : CRIMINAL COMPLAINT
v. : Magistrate No. 13-7346 (CLW)
JORDAN S. GONZALEZ, :
a/k/a "j0r62n"
a/k/a "jordanusmagnus1"

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A.

I further state that I am a Special Agent of the Drug Enforcement Administration, and that this complaint is based on the following facts:


SEE ATTACHMENT B.



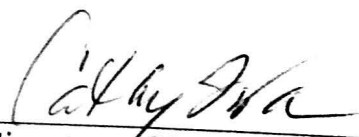
Christopher Reddington
Special Agent
Drug Enforcement Administration

Sworn to and subscribed
in my presence

November 13, 2013
Date


Newark, New Jersey
City and State

Hon. Cathy L. Waldor, U.S.M.J.
Name/Title of Judicial Officer



Signature of Judicial Officer

ATTACHMENT A

COUNT 1

Between in or about November 2012, through on or about November 13, 2013, in the District of New Jersey, and elsewhere, defendant

JORDAN S. GONZALEZ,
a/k/a “j0r62n”
“jordanusmagnus1”

knowingly and intentionally attempted to manufacture 3,4 methylenedioxyamphetamine (MDA), a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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

COUNT 2

Between in or about November 2012, through on or about November 13, 2013, in the District of New Jersey, and elsewhere, defendant

JORDAN S. GONZALEZ,
a/k/a “j0r62n”
“jordanusmagnus1”

knowingly and intentionally did possess a three-neck round-bottom flask, encapsulating machine, and gelatin capsule, and chemicals and materials which may be used to manufacture a controlled substance or listed chemical, knowing, intending, and having reasonable cause to believe, that they will be used to manufacture a controlled substance or listed chemical in violation of subchapter I and subchapter II of chapter 13 of Title 21 of the United States Code.

In violation of Title 21, United States Code, Section 843(a)(6).

ATTACHMENT B

I, Christopher Reddington, am a Special Agent of the Drug Enforcement Administration (DEA). My assignments with the DEA involve the investigation of clandestine laboratories, which are locations where chemical reactions are carried out in secret to manufacture illicit substances. I have personally participated in this investigation and am aware of the facts contained in this complaint based on my own investigation, as well as my review of documents and records and information provided to me by other law enforcement officers and technical experts. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint and arrest warrant, I have not necessarily included each and every fact known by the government 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.

The Defendant

1. Defendant JORDAN S. GONZALEZ is a 33-year-old pharmacist. From as early as 2010 until recently, GONZALEZ resided at an address in Jersey City, New Jersey (the “NJ Residence”), according to records maintained by the New Jersey Department of Motor Vehicles and credit reports. Recently, GONZALEZ has resided at an address in Manhattan in New York City (the “NY Residence”), according to records maintained by the New Jersey Department of Labor and credit reports.

“Company A”

2. Company A, whose true name is not identified in this complaint, provides a variety of online services related to buying and selling goods to the general public via its online auction website. In general, Company A subscribers who wish to sell an item (*i.e.*, Company A sellers) will post the item for sale by entering a basic description that is used for the listing title and then any additional details including photographs and more detailed descriptions of the item that Company A includes in the body of the listing. Company A subscribers who want to purchase goods (*i.e.*, Company A buyers) generally use the search function of the Company A website to locate items of interest. Company A buyers will bid on goods based on a set of rules that dictate how goods are sold to the highest bidder. Company A allows subscribers to obtain a username (*a/k/a*, a user ID) or store name that they will use to identify themselves for the purposes of buying and selling goods online.

3. Subscribers obtain an account by registering with Company A. During the registration process, Company A asks subscribers to provide basic subscriber information such as a name, telephone number, and e-mail address. Company A also records information such as the user’s history of account access, the type of goods the user purchased, the type of goods the user has offered for sale, the prices the user has paid for goods, the prices for which the user has sold goods, and “feedback” comments from other users who have interacted with the subscriber indicating the other user’s evaluation of the subscriber’s quality of service.

The Jordan Gonzalez Account

4. In response to a federal grand jury subpoena, Company A has produced transaction and subscriber records for an account that is registered under the name “Jordan Gonzalez” (the “Jordan Gonzalez Account”). According to Company A’s records, the account was registered on March 22, 2009, with user name “jordanusmagnus1” and the address of the NJ Residence. On January 21, 2013, the user changed the user name to “j0r62n.” On October 20, 2013, the user provided the NY Residence as a shipment address. However, the billing address for the account remains the NJ Residence.

MDA

5. 3,4 methylenedioxyamphetamine (MDA), is a hallucinogen and a Schedule I controlled substance under federal law. Safrole is a precursor chemical (*i.e.*, starting material) from which MDA can be synthesized and is regulated as a list I chemical under federal law.¹ *See* 21 U.S.C. § 802(34)(Q). Safrole is most commonly distilled from sassafras oil. Safrole, in turn, can be manufactured into MDA through chemical reactions commonly conducted with certain reagents (*i.e.*, chemicals that are necessary to facilitate a chemical reaction) and specialized lab equipment, including three-neck round-bottom flasks.² Reagents that can be used to synthesize MDA, include methylamine hydrochloride and mercurous chloride.

6. After synthesis of MDA is complete, the final step is to divide it into dosage units, such as gelatin capsules that can be filled through the use of an encapsulating machine.

7. Three-neck round-bottom flasks, gelatin capsules, and encapsulating machines are specifically listed, among other items, in 21 U.S.C. § 843(a)(6), which prohibits the possession of equipment, chemicals, products, or materials which may be used to manufacture a controlled substance or listed chemical, knowing, intending, or having reasonable cause to believe, that they will be used to manufacture a controlled substance or listed chemicals in violation of subchapter I or II of the Controlled Substances Act, 21 U.S.C. § 801, *et seq.*

¹ The term “list I chemical” means “a chemical specified by regulation of the Attorney General as a chemical that is used in manufacturing a controlled substance in violation of this subchapter and is important to the manufacture of the controlled substances[.]” 21 U.S.C. § 802(34).

² A three-neck round bottom flask is a vessel in which chemical reactions are performed and is particularly well-suited to the manufacture of synthetic drugs, such as MDA.

Purchases of Items Associated with the Manufacture of MDA

8. According to Company A’s records, the following purchases were made using the Jordan Gonzalez Account of items associated with the manufacture of MDA:

Item as Listed in Company A’s Records	Quantity Purchased	Date of Purchase	Shipment Address
“Sassafras Oil Essential Trading Post Oils 8 fl. oz (240 ML)”	3	Dec. 22, 2012	NJ Residence
“Sassafras Oil Essential Trading Post Oils 8 fl. oz (240 ML)”	4	June 18, 2012	NJ Residence
“Mercurous chloride, 99.999%, for analysis, ACS/ultrapure, 25g (50% OFF)”	1	Jan. 1, 2013	No Record Available
“Methylamine hydrochloride, 99%, reagent, 100g”	1	Jan 5, 2013	No Record Available
“Chemglasss CG-1524-19 5000ml 5L heavy glass 3-neck round bottom flask 24/40”	1	Feb. 1, 2013	NJ Residence
“1000 EMPTY GELATIN CAPSULES ~ SIZE 1 ~ Colored White/Dark Green (Kosher) gel cap”	1	Mar. 19, 2013	NJ Residence
“Cap M Quick Capsule Filling Machine (Manual Filler): Size #1, 0, 00 or All Three”	1	Mar. 19, 2013	NJ Residence

9. The foregoing purchases, particularly given their type, timing, quantities, and combination, establish probable cause to conclude that GONZALEZ has attempted to manufacture MDA in a clandestine laboratory in violation of federal law.

Search Warrant

10. On November 8, 2013, Hon. Cathy L. Waldor, United States Magistrate, United States District Court for the District of New Jersey, issued a search warrant for information maintained by Provider A, a company that provides web-based e-mail and whose true name is not identified in this complaint, Internet search, and a variety of other computer services, for information associated with GONZALEZ’s e-mail account. Provider A’s records reflect that GONZALEZ has conducted research on the Internet related to the synthesis of MDA and viewed documents describing the same.

Conclusion

11. Your affiant respectfully submits that the foregoing purchases, particularly given their type, timing, quantities, and combination, establish probable cause to conclude that GONZALEZ: (1) knowingly and intentionally attempted to manufacture a quantity of MDA; and (2) knowingly and intentionally possessed a three-neck round-bottom flask, encapsulating machine, and gelatin capsule, and chemicals and materials which may be used to manufacture a controlled substance or listed chemical, knowing, intending, and having reasonable cause to believe, that they will be used to manufacture a controlled substance or listed chemical in violation of federal law.