

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

2016 SEP 22 PM 3:15

CLERK, US DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DISTRICT

UNITED STATES OF AMERICA

v.

GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard, and  
ELIJAH ADAMS,

CASE NO.	3:16-cr-142-J39 PDB
Ct. 1:	21 U.S.C. §§ 963 and 960(b)(5)
Ct. 2:	21 U.S.C. §§ 846 and 841(b)(1)(E)
Ct. 3:	18 U.S.C. § 371
Ct. 4:	21 U.S.C. §§ 952 and 960(b)(5) and 18 U.S.C. § 2
Ct. 5:	21 U.S.C. § 333(e)(1) and 18 U.S.C. § 2
Ct. 6:	18 U.S.C. §1956(h)
Cts. 7-10:	18 U.S.C. §§1956(a)(2)(A) and 2
Forfeiture:	21 U.S.C. § 853 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) 18 U.S.C. § 982(a)(1)

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**  
**(Conspiracy to Import Controlled Substances)**

From in or about December 2013, and continuing through on or about the date of this Indictment, in the Middle District of Florida, and the People's Republic of China, and elsewhere,

**GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,  
and  
ELIJAH ADAMS,**

the defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree with persons both known and unknown to the Grand Jury, to commit the following offense against the United States: to knowingly and intentionally import from the People's Republic of China, a mixture and substance containing a detectable amount of a controlled substance, that is, anabolic steroids, Schedule III controlled substances, in violation of Title 21, United States Code, Section 952(a).

All in violation of Title 21, United States Code, Sections 963 and 960(b)(5).

**COUNT TWO**

**(Conspiracy to Manufacture, Distribute and Possess with Intent to Distribute Controlled Substances)**

From in or about December 2013, and continuing through on or about the date of this Indictment, in the Middle District of Florida, and the People's Republic of China, and elsewhere,

**GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,  
and  
ELIJAH ADAMS,**

the defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree with persons both known and unknown to the Grand Jury, to commit the following offense against the United States: to manufacture, distribute, and possess with intent to distribute a mixture and substance containing a detectable amount

of a controlled substance, that is, anabolic steroids, Schedule III controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(E).

**COUNT THREE**  
**(Conspiracy to Possess with Intent to Distribute  
and Distribute Human Growth Hormone)**

From in or about December 2013, and continuing through on or about the date of this Indictment, in the Middle District of Florida, and the People's Republic of China, and elsewhere,

**GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,  
and  
ELIJAH ADAMS,**

the defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree with persons both known and unknown to the Grand Jury, to commit the following offense against the United States: to knowingly possess with intent to distribute and distribute Human Growth Hormone, as defined in Title 21, United States Code, Section 333(e)(4), for a use in humans other than the treatment of a disease or other recognized medical condition, where such use had been authorized by the Secretary of Health and Human Services under Title 21, United States Code, Section 355, and was pursuant to the order of a physician, in violation of Title 21, United States Code, Section 333(e)(1).

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

**OVERT ACTS**

In furtherance of the conspiracy, the defendants and at least one of their co-conspirators committed and caused to be committed in the Middle District of Florida, at least one of the following overt acts, among others:

1. On or about December 19, 2013, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to defendant **ASHLEY HINSON** in the Middle District of Florida.

2. On or about January 4, 2014, defendant **ASHLEY HINSON** sent \$2,890.00 to the supplier via Western Union, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

3. On or about April 16, 2014, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to himself in the Middle District of Florida.

4. On or about April 21, 2014, defendant **ASHLEY HINSON** sent \$2,185.00 to the supplier via Western Union, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

5. On or about May 26, 2015, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to himself in the Middle District of Florida.

6. On or about June 3, 2015, defendant **ELIJAH ADAMS** sent \$750.00 to the supplier via Western Union, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

7. On or about July 2, 2015, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to **ELIJAH ADAMS** in the Middle District of Florida.

8. On or about July 2, 2015, defendant **ELIJAH ADAMS** sent \$950.00 to the supplier via Western Union, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

9. On or about November 28, 2015, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to himself in the Middle District of Florida.

10. On or about December 9, 2015, defendant **HEATHER MARIE WAGNER, f/k/a Heather Marie Rickard**, sent two payments to the supplier, each in the amount of \$980.00, via Western Union, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

11. On or about January 15, 2016, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to co-conspirator A.B., known to the Grand Jury, in the Middle District of Florida.

12. On or about January 15, 2016, co-conspirator A.B. sent \$875.00 to the supplier via Western Union, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

13. On or about January 28, 2016, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to defendant **ASHLEY HINSON**, in the Middle District of Florida.

14. On or about January 28, 2016, defendant **HEATHER MARIE WAGNER, f/k/a Heather Marie Rickard**, sent \$980.00 to the supplier via Western Union, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

15. On or about February 19, 2016, the supplier in the People's Republic of China confirmed that the Human Growth Hormone ordered by defendant **GREGORY ALLEN BAKER** had shipped.

16. On or about February 22, 2016, Human Growth Hormone ordered by defendant **GREGORY ALLEN BAKER** on January 28, 2016, arrived in the Middle District of Florida.

17. On or about February 24, 2016, defendant **ASHLEY HINSON** accepted delivery of the Human Growth Hormone in the Middle District of Florida.

18. On or about April 6, 2016, defendant **GREGORY ALLEN BAKER** ordered Human Growth Hormone from a supplier in the People's Republic of China to be shipped to **WILLIAM PETER WAGNER** in the Middle District of Florida.

19. On or about April 7, 2016, defendant **WILLIAM PETER WAGNER** sent \$2,350.00 to the supplier by wire transfer from his Navy Federal Credit Union account, to pay for the Human Growth Hormone and other substances ordered by defendant **GREGORY ALLEN BAKER**.

20. On or about April 25, 2016, in the Middle District of Florida, defendant **WILLIAM PETER WAGNER** took possession of packages containing more than two kilograms of Human Growth Hormone that arrived from the People's Republic of China

addressed to defendant **GREGORY ALLEN BAKER** at defendant **WILLIAM PETER WAGNER's** residence.

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

**COUNT FOUR**  
**(Importation of a Controlled Substance)**

On or about February 22, 2016, in the Middle District of Florida, and the People's Republic of China, and elsewhere,

**GREGORY ALLEN BAKER,**  
**ASHLEY HINSON,**  
**and**  
**HEATHER MARIE WAGNER,**  
**f/k/a Heather Marie Rickard,**

did knowingly and intentionally import, and aid and abet the importation, from the People's Republic of China, a mixture and substance containing a detectable amount of a controlled substance, that is, anabolic steroids, Schedule III controlled substances.

In violation of Title 21, United States Code, Sections 952(a) and 960(b)(5) and Title 18 United States Code, Section 2.

**COUNT FIVE**  
**(Possession with Intent to Distribute Human Growth Hormone)**

On or about April 25, 2016, in the Middle District of Florida,

**GREGORY ALLEN BAKER,**  
**and**  
**WILLIAM PETER WAGNER,**

defendants herein, did knowingly and intentionally possess with intent to distribute and aid and abet the possession with intent to distribute Human Growth Hormone, as

defined in Title 21, United States Code, Section 333(e)(4), for a use in humans other than the treatment of a disease or other recognized, medical condition, where such use had been authorized by the Secretary of Health and Human Services, under Title 21, United States Code, Section 355, and was pursuant to the order of a physician.

In violation of Title 21, United States Code, Section 333(e)(1) and Title 18 United States Code, Section 2.

**COUNT SIX**  
**(Conspiracy to Commit Money Laundering)**

From in or about December 2013, and continuing through on or about the date of this Indictment, in the Middle District of Florida, and the People's Republic of China, and elsewhere,

**GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,  
and  
ELIJAH ADAMS,**

the defendants herein, did knowingly combine, conspire, confederate, and agree with persons both known and unknown to the Grand Jury, to commit the following offense against the United States: to transport, transmit and transfer, and attempt to transport, transmit and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, alleged in Counts One and Two and Count Four of this Indictment, in violation of Title 18, United States Code, Section 1956(a)(2)(A).



Manner and Means

21. The allegations contained in Counts One, Two and Four of this Indictment are hereby realleged and incorporated by reference herein.

22. The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, among others, the following:

(a) It was part of the conspiracy that defendant **GREGORY ALLEN BAKER**, and others did agree with each other to purchase raw anabolic steroids from China and manufacture, distribute and possess with intent to distribute Schedule III controlled substances, including Testosterone, Mesteron, Anavar, Trenbolone, Halotestin, Sustanon, Deca and Equipoise.

(b) It was further part of the conspiracy that conspirators, including defendants **GREGORY ALLEN BAKER, WILLIAM PETER WAGNER, ASHLEY HINSON, HEATHER MARIE WAGNER, f/k/a Heather Marie Rickard, and ELIJAH ADAMS**, and others agreed to send payments to the People's Republic of China for raw steroids using Western Union from various locations, including Publix supermarkets.

(c) It was further part of the conspiracy that conspirators would receive compensation for sending payments to the People's Republic of China in the form of U.S. currency and raw steroids.

(d) It was further part of the conspiracy that the conspirators would perform acts and make statements to hide and conceal and cause to be hidden and concealed the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of Title 18, United States Code, Section 1956(h).

**COUNT SEVEN**  
**(International Transportation of Monetary Instruments)**

On or about January 4, 2014, in the Middle District of Florida, and elsewhere,

**GREGORY ALLEN BAKER,**  
**and**  
**ASHLEY HINSON,**

defendants herein, did transport, transmit, transfer and attempt to transport transmit, transfer, funds, that is \$2,890, from a place in the United States, that is the Middle District of Florida, to a place outside the United States, that is the People's Republic of China, with the intent to promote the carrying on of specified unlawful activities, alleged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

**COUNT EIGHT**  
**(International Transportation of Monetary Instruments)**

On or about June 3, 2015, in the Middle District of Florida, and elsewhere,

**GREGORY ALLEN BAKER,**  
**and**  
**ELIJAH ADAMS,**

defendants herein, did transport, transmit, transfer and attempt to transport, transmit, transfer, funds, that is \$750, from a place in the United States, that is the Middle District of Florida, to a place outside the United States, that is the People's Republic of China, with the intent to promote the carrying on of specified unlawful activities, alleged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

**COUNT NINE**  
**(International Transportation of Monetary Instruments)**

On or about January 28, 2016, in the Middle District of Florida, and elsewhere,

**GREGORY ALLEN BAKER,**  
**and**  
**HEATHER MARIE WAGNER,**  
**f/k/a Heather Marie Rickard,**

defendants herein, did transport, transmit, transfer and attempt to transport, transmit, transfer, funds, that is \$980, from a place in the United States, that is the Middle District of Florida, to a place outside the United States, that is the People's Republic of China, with the intent to promote the carrying on of specified unlawful activities, alleged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

**COUNT TEN**  
**(International Transportation of Monetary Instruments)**

On or about March 4, 2016, in the Middle District of Florida, and elsewhere,

**GREGORY ALLEN BAKER,**  
**and**  
**WILLIAM PETER WAGNER,**

defendants herein, did transport, transmit, transfer and attempt to transport, transmit, transfer, funds, that is \$2,710, from a place in the United States, that is the Middle District of Florida, to a place outside the United States, that is the People's Republic of China, with the intent to promote the carrying on of specified unlawful activities, alleged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

**FORFEITURE**

1. The allegations contained in Counts One through Ten of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 21, United States Code, Sections 853, Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of a violation of 21 U.S.C. § 963, 846, and/or 841 charged in Counts One and Two, the defendants,

**GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,  
and  
ELIJAH ADAMS,**

shall forfeit, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

3. Upon conviction of a conspiracy to violate section 333(e)(1), in violation of Title 18, United States Code, Section 371 as charged in Count Three, the defendants,

**GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,  
and  
ELIJAH ADAMS,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

4. Upon conviction of a violation of 21 U.S.C. § 952 charged in Count Four, the defendants,

**GREGORY ALLEN BAKER,  
ASHLEY HINSON,  
and  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,**

shall forfeit, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

5. Upon conviction of a violation of 21 U.S.C. § 333(e)(1) charged in Count Five, the defendants,

**GREGORY ALLEN BAKER,  
and  
WILLIAM PETER WAGNER,**

shall forfeit, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

6. Upon conviction of a violation of Title 18, United States Code, Section 1956 charged in Counts Six through Ten, the defendants,

**GREGORY ALLEN BAKER,  
WILLIAM PETER WAGNER,  
ASHLEY HINSON,  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard,  
and  
ELIJAH ADAMS,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense and any property traceable to such property.

7. The property to be forfeited includes, but is not limited to, the following:
  - a. 2008 Cadillac Escalade Luxury, VIN 1GYEC63828R222834;
  - b. 2015 Land Rover Range Rover Sport SC, vIN ALWR2VF5FA612103;
  - c. 2011 Yamaha Drive Electric Golf Cart, VIN JW9-006251;
  - d. (5) Assorted Jewelry described as:
    - 1 14kt White Gold 1.6 ct Diamond Earring Pair;
    - 1Breitling Oceane Custom Diamond Ladies Watch;
    - 1Breitling A13370 custom diamond Gent's Watch;
    - 1 Breitling A13370 Custom Diamond Gent's Watch; and
    - 1 Breitling Bentley Diamond Gent's Watch;
  - e. 2013 Kia Soul Sport, VIN KNDJT2A67D7582119;
  - f. Navy Federal Credit Union, Cashier's Check #0438426221 in the amount of \$50,000.00;
  - g. Navy Federal Credit Union, Cashier's Check #0438426196 in the amount of \$74,418.98;
  - h. 2007 Yamaha YZF-R1 Motorcycle, VIN JYARN20E37A006097;
  - i. Ladies 18k Diamond Ring.

and

8. If any of the property described above, as a result of any act or omission of the defendants:

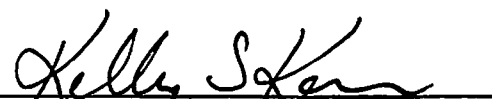
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty,

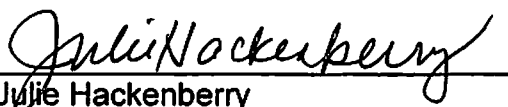
the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853, Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), and as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL,

  
Foreperson

A. LEE BENTLEY, III  
United States Attorney

By:   
Kelly S. Karase  
Assistant United States Attorney

By:   
Julie Hackenberry  
Assistant United States Attorney  
Chief, Jacksonville Division

**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Jacksonville Division

THE UNITED STATES OF AMERICA

vs.

GREGORY ALLEN BAKER  
WILLIAM PETER WAGNER  
ASHLEY HINSON  
HEATHER MARIE WAGNER,  
f/k/a Heather Marie Rickard  
ELIJAH ADAMS

**INDICTMENT**

Violations:	Ct. 1:	21 U.S.C. §§ 963 and 960(b)(5)
	Ct. 2:	21 U.S.C. §§ 846 and 841(b)(1)(E)
	Ct. 3:	18 U.S.C. § 371
	Ct. 4:	21 U.S.C. §§ 952 and 960(b)(5) and 18 U.S.C. § 2
	Ct. 5:	21 U.S.C. § 333(e)(1) and 18 U.S.C. § 2
	Ct. 6:	18 U.S.C. §1956(h)
	Cts. 7-10:	18 U.S.C. §§1956(a)(2)(A) and 2

A true bill,

  
\_\_\_\_\_  
Foreperson

Filed in open court this 22<sup>nd</sup> day

of September, 2016  
  
\_\_\_\_\_  
Deputy Clerk

Bail \$ \_\_\_\_\_