

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 - - -  
4 BEFORE THE FEDERAL GRAND JURY  
5 - - -

ORIGINAL

6  
7 Stenographic transcript  
8 proceeding of had and evidence presented  
9 before the Federal Grand Jury of the United  
10 States District Court for the Eastern District  
11 of Pennsylvania located at 900 Market Street,  
12 6th Floor, Suite 2, in Philadelphia,  
13 Pennsylvania, on Wednesday, January 19, 2005,  
14 commencing at 10:56 a.m., before Jill T.  
15 Watson, Court Reporter and Notary Public.

16 - - -  
17 TESTIMONY OF: SPECIAL AGENT ERIC RUSS  
18 - - -

19 APPEARANCES:

20 JAMES PAVLOCK,, ESQUIRE  
21 Assistant U.S. Attorney  
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1                   SPECIAL AGENT ERIC RUSS, after  
2 having been first duly sworn, was examined and  
3 testified as follows. . . .

4                   - - -  
5                   EXAMINATION  
6                   - - -

7 BY MR. PAVLOCK:

8 Q           Good morning, Agent Russ.

9 A           Good morning.

10 Q           Agent, I described to the ladies and  
11 gentlemen of the grand jury a moment ago that  
12 I'd like to take you through and in just brief  
13 cursory fashion the organization and the  
14 individuals involved, the Bansal organization  
15 itself, who you've identified as the suppliers  
16 of the organization and the various website  
17 operators and individual customers who are  
18 purchasing controlled and noncontrolled  
19 pharmaceuticals from the Bansal organization.

20 A           Okay.

21 Q           So let's turn to the first page of  
22 Exhibit 2 that I've marked, the grand jury  
23 exhibit.

24                   For the Bansal organization  
25 itself there are listed about ten people right

1 here. Would you describe briefly who these  
2 individuals are and based upon what evidence  
3 have you been able to determine even in  
4 general terms or nondefinitive terms, what  
5 their roles are in the organization?

6 A Okay. Well, instead of starting with  
7 the top on Akhil I'll start with Brij Bansal  
8 the second one. He is the father of the Akhil  
9 Bansal, he resides in India. We believe owns  
10 a hospital, possibly two hospitals in India.  
11 He is the individual that obtains all the  
12 prescription medication. Any drugs that are  
13 needed for the organization he's the one that  
14 obtains them in India and then has them  
15 shipped to the United States to be distributed  
16 from the United States as well as coordinates  
17 shipments for drugs to Europe and all over the  
18 world.

19 Go up to the top, Akhil  
20 Bansal. That's Brij Bansal's son. Basically  
21 he's head of we would classify him as the head  
22 of the U.S. based operations. He oversees all  
23 the shipments that are distributed from the  
24 United States to the various customers. He  
25 also maintains contact every now and then to

1 some of the larger customers as well as holds  
2 the majority of the U.S. based bank accounts  
3 to where money is being transferred in to.

4 Q And where does he reside?

5 A He is in Philadelphia.

6 Q Okay. And by the way, Agent, for the  
7 most part, your conclusions are based upon the  
8 search warrant evidence that was obtained from  
9 MSN HotMail; is that correct?

10 A Yes.

11 Q And another server called CI Host in  
12 Texas?

13 A Yes.

14 Q That was prior to a couple search  
15 warrants?

16 A Yes.

17 Q They basically communicate in large part  
18 via E-mail both between themselves and the  
19 individuals in the organization as well as  
20 their customers. Is that fair to say?

21 A Yes, from what we've seen so far. The  
22 E-mail is the primary means of communication.

23 Q There had been some surveillance; is  
24 that correct?

25 A Yes, there has.

1 Q I think you described or one of the  
2 agents may have described some of the  
3 surveillance up in New York as well?

4 A I believe she did, yes.

5 Q Let's go through some of these other  
6 individuals in the distribution organization  
7 itself.

8 A Okay. The third name Julie Agarwal we  
9 believe that is Brij Bansal's daughter,  
10 Akhil's sister. We believe she's based in  
11 India. She facilitates a lot of the orders to  
12 the European based customers to have them  
13 mailed out and distributed.

14 We've also seen her sort of  
15 help out and guide Akhil as to where to  
16 transfer money to from the banks in the United  
17 States to different overseas banks or  
18 different corporations and companies within  
19 the United States as well as around the world.

20 Q Is she sometimes in communication with  
21 the various customers both the website  
22 operators and the individual customers as to  
23 getting a customer relationship going and  
24 ultimately where to wire transfer payment?

25 A Yes. She does handle that and a lot

1 again is for the European based operators I  
2 guess you can say.

3 Q Okay. David and Elizabeth Armstrong?

4 A David and Elizabeth Armstrong are both  
5 up in New York and they run, if you want to  
6 call it, the stash or packaging house for the  
7 Bansal organization. The Armstrongs handle  
8 any orders that come in from the various  
9 customers and websites come in to, they get  
10 forwarded to the Armstrongs and the Armstrongs  
11 then oversee an organization of about eight I  
12 believe employees if you want to call them  
13 that, package the drugs, label them and then  
14 have them shipped out via UPS, Airborne  
15 Express and the postal service to customers  
16 all over the world.

17 Q How about Sanjeev Srivastav?

18 A Sanjeev Srivastav again he is similar to  
19 the Armstrongs. We also believe that he may  
20 be a little more involved than the Armstrongs  
21 in the whole organization. But we're just  
22 looking into that. But we've also seen orders  
23 be shipped to him to be filled instructing him  
24 to mail certain orders to certain customers.

25 Q Where do you believe he's located?

1 A We believe he's possibly in Ohio.

2 Q And does he deal any type of particular  
3 drugs primarily based upon the E-mail  
4 evidence?

5 A Initially we saw him handling the  
6 majority of the Ketamine, ephedrine and  
7 steroids. But lately we've seen that he's  
8 also beginning to handle some of the pills as  
9 well.

10 Q And the Ketamine and the steroids those  
11 are scheduled controlled substances?

12 A Ketamine is a schedule three substance  
13 and ephedrine is a list one chemical.

14 Q Foram Mankodi?

15 A We don't have much on Foram Mankodi. We  
16 know she resides with Akhil Bansal and we  
17 believe it's the girlfriend of Akhil Bansal,  
18 what her role in the actual organization is  
19 and her knowledge of the organization has yet  
20 to be determined.

21 Q And Atul Patil?

22 A Atul Patil also resides with Akhil  
23 Bansal, he's friends with Akhil Bansal. He  
24 also maintains bank accounts for the Bansal  
25 organization where money is wire transferred

1 to so we believe he's helping facilitate the  
2 laundering and the transfer of the money.

3 In addition, we've --  
4 surveillance has seen him travel to New York  
5 with Akhil up to the stash house.

6 Q Was there communication in one of the  
7 E-mails or a couple of E-mails that he might  
8 have signed for some cash that was sent as  
9 payment through the UPS or one of the courier  
10 services, Fed Ex?

11 A Yes, I believe so. One of the customers  
12 actually mails instead of wire transferring  
13 money, mails bulk cash through the mail. And  
14 he was the -- he signed for one of the  
15 packages that we believe contained the money.

16 Q Money delivered here to Philadelphia?

17 A Yes.

18 Q How about the rest of the individuals on  
19 that list?

20 A Yatindra Agarwal again we are unsure if  
21 it's a direct family relative we believe based  
22 in India helps facilitate the Bansal  
23 organization sends out, we believe, SPAM to  
24 the various customers basically saying we can  
25 supply you with whatever you need.

1                   Richard Dabney, he was the one  
2 that started this whole case. He was based  
3 out of Chester, Pennsylvania and he was the  
4 individual who was shipping packages for the  
5 Bansal organization through Akhil and Atul,  
6 shipping stuff out for them to various  
7 customers throughout the United States.

8 Q           His current as far as being in the  
9 organization is --

10 A           We believe that he's no longer  
11 associated with these individuals since the  
12 119 packages were seized from him and then we  
13 met with him with regards to this seizure and  
14 the fact that law enforcement took it and he  
15 was owed money by Akhil and Atul for services  
16 that he provided and money was never paid to  
17 him so we believe he's no long in contact.

18 Q           He was in the shipping and distribution  
19 aspect of the organization probably that is  
20 focused on primarily in New York and to some  
21 degree Sanjeev Srivastav?

22 A           Yes, that's what we believe right now.

23 Q           Himanshu Klushrestha?

24 A           Again we believe he is in India and he  
25 also facilitates -- help facilitate the

1 payments owed from the Bansals to these  
2 particular companies for drugs that were  
3 provided.

4 Q Some of the E-mails include like a list  
5 of the drugs themselves, like some invoices  
6 from the company to the Bansal organization  
7 and payments requested?

8 A Yes.

9 Q That kind of thing?

10 A Yes.

11 Q Both of these companies are in India?

12 A We believe that both companies are  
13 operating out of India, yes.

14 Q Let's turn then to the website operators  
15 and other customers.

16 I believe that there has been  
17 some description already of the Shack  
18 Corporation or RXmart.com.

19 Would you just briefly go  
20 through those individuals?

21 A Yes. Again Shack Corp. RXmart.com as  
22 it's also referred to is one of the websites  
23 that Shack Corp. runs in addition to about 15  
24 to 16 other ones. But that's the Australian  
25 based organization that's customers to the

1 Bansals.

2 Andrew Shackleton is basically  
3 the CEO or head of the organization. His  
4 brother Simon Shackleton sort of helps out  
5 with the day to day operations of the  
6 organization.

7 Cameron Germein appears to be  
8 sort of the systems guy if you want to say.  
9 He handles most of the computer stuff as well  
10 as he's sort of an officer manager to oversee  
11 the employees in Australia. In addition he's  
12 the primary individual that maintains E-mail  
13 contact with Brij Bansal to the orders that  
14 Shack Corp. wants to be filled.

15 Andrei Nikulinsky at one time  
16 he was in Germany. We believe he's back in  
17 Australia now but he appears to handle the  
18 majority of the requests for pharmaceuticals  
19 that are going to be supplied by the Hungarian  
20 based suppliers which are listed below  
21 Alexander Schreiner and Asztalos Sandor.

22 Q So essentially this is one group that  
23 operates a number of websites that has a large  
24 amount of business with the Bansals, that's  
25 their supplier. But they also have other

1 suppliers such as the Hungarian groups?

2 A Yes.

3 Q International Pharmacy and various names  
4 listed GoPharmacy.com, Interphar.com,  
5 Man-Health.com?

6 A Yes. In addition to the sites listed  
7 above they have multiple pharmaceutical sites  
8 or sites that sell pharmaceuticals without  
9 prescription. We believe this is a Costa  
10 Rican based operation and the majority of the  
11 E-mails seem to point that Klaus Rieder who  
12 also refers to himself in E-mails as Jon and  
13 Corinna Mehrer are sort of the president and  
14 vice president of this organization. They  
15 have multiple employees that also help out to  
16 facilitate orders. Which once they receive  
17 the orders, they pass them on to the Bansal  
18 organization to be filled.

19 Q They appear to be, based on the E-mails,  
20 one of the more significant purchasers of  
21 drugs from the Bansal organization from what  
22 you can tell?

23 A Yes. Just based on E-mails and the  
24 invoices that are received and the bills that  
25 the Bansals are passing to them, they appear

1 to be one of the larger customers of the  
2 Bansal organization.

3 Q Another large customer is Performance  
4 Marking Limited operating HerbalAmerica.com,  
5 AmericanPharma -- excuse me, I skipped over  
6 Kim.

7 What's her relationship if you  
8 know of International Pharmacy?

9 A Kim we've seen her communicate from the  
10 Kim at MDZN.com. Again, it's preliminary but  
11 we believe that she's somehow associated with  
12 the International Pharmacy and GoPharmacy.  
13 She ships orders directly or E-mails orders  
14 directly to the Bansals as well.

15 Q Let's turn to Performance Marketing  
16 then?

17 A Performance Marketing we believe the  
18 majority of these individuals, Duane Gartman  
19 and Kevin Atkinson, Jodie last name unknown  
20 and Coleen Gartman. We believe this is a  
21 Canadian based organization. It runs multiple  
22 websites again that sell pharmaceuticals  
23 without prescription.

24 Once the orders are placed to  
25 them, they forward those orders to the Bansal



1 offers to host other people's pharmaceutical  
2 sites. In other words, you can become an  
3 affiliate of their site. They'll set up the  
4 site for you, they'll put everything up for  
5 you and, you know, you kind of get a  
6 percentage of whatever they sell. In addition  
7 to doing that, he also has his own sites to  
8 where he again he takes orders from customers  
9 throughout Canada and the United States and  
10 then ships those orders to the Bansals to be  
11 filled.

12 Q And now in addition to the operators of  
13 various websites, have you been able to  
14 identify the number of individual purchasers  
15 that somehow contact the Bansal organization?  
16 Could you describe how they basically come and  
17 contact the Bansal organization?

18 A Yes. What we have found so far, it  
19 appears the majority of these individuals, how  
20 they got in contact with the Bansal  
21 organization is through various message boards  
22 on the internet. There's several message  
23 boards you can go to and just inquire about  
24 certain things.

25 The majority of the people go

1 to these Indian based company message boards  
2 where there's advertised pharmaceuticals,  
3 fashions, all kinds of stuff from India. And  
4 we believe that they post something on that  
5 board and you get a reply saying, hey, I can  
6 supply you with that or I can get you this.  
7 You know.

8                   They sort of just post a  
9 message for anybody to read and then let  
10 someone respond to them. And we believe  
11 that's how these individuals got in contact  
12 with actually Brij Bansal, they communicated  
13 with him.

14 Q       These message boards you basically sign  
15 on to your computer and you go to this website  
16 that posts the message board, you grab the  
17 message and include your E-mail address, as to  
18 how you can be contacted and then the Bansal  
19 organization appears to have initiated some  
20 sort of contact or is it Brij Bansal actually  
21 posting the message and people are responding  
22 to him or both?

23 A       Both, a little bit of both. Brij Bansal  
24 does post on several of these sites  
25 advertising that he is an importer exporter of

1 generic pharmaceuticals from India.

2 Q And on those occasions Brij Bansal has  
3 posted, has he used the Dr. Brij Bansal at  
4 HotMail.com? That E-mail address?

5 A Yes, that's the E-mail address he uses.

6 Q So we begin to see then as far as the  
7 search warrant evidence, you'll begin to see  
8 E-mails from these various individual  
9 customers to Dr. Brij Bansal at his HotMail  
10 address inquiring about drugs?

11 A Yes.

12 Q Would you describe a couple of them -- I  
13 assume this is not an exhaustive list of the  
14 individual purchasers?

15 A No, it is not. These are some of the  
16 purchasers that we directly saw from the  
17 beginning order -- the majority of the  
18 individual customers will order bulk  
19 quantities of Ketamine, ephedrine or steroids  
20 we believe either for their personal use or  
21 for their own little distribution  
22 organizations that they distribute locally or  
23 on the street, not necessarily via the  
24 internet.

25 Q Just for the grand jury's benefit, what

1 again is Ketamine? What does it do to you  
2 and --

3 A Ketamine is a schedule three drug and  
4 it's basically it will numb you, people snort  
5 it. You get a numbing sensation also at  
6 times it does cause hallucinations.

7 Q And when you say bulk, what kind of  
8 quantities are you talking about?

9 A Usually they get kilogram quantities of  
10 Ketamine.

11 Q And have you been able to ascertain  
12 approximately what the price that Brij Bansal  
13 is charging for bulk Ketamine?

14 A Usually we've seen anywhere between nine  
15 and \$10,000 a kilo, up to \$14,000 a kilo.

16 Q Would you describe some of these  
17 individuals and what they've been doing and  
18 have they been repeat purchasers?

19 A From what we've seen, yes.

20 Q Millerlight?

21 A This Millerlight, the reason he's  
22 referred to as Millerlight here is because his  
23 E-mail address is Millerlight at -- I'm not  
24 sure what server he uses but it's Millerlight  
25 at something dot com. We believe it's

1 possibly W. Reed or William Reed located down  
2 in Virginia.

3 He orders steroids for himself  
4 that he has shipped directly to Virginia. In  
5 addition to the steroids he orders kilogram  
6 quantities of Ketamine. But when he has the  
7 Ketamine shipped, he has it shipped to New  
8 York to he refers to his cousin and that's  
9 this Len Santalucia.

10 Q In New York City?

11 A New York City, yes.

12 Q Was there a series of E-mails from and  
13 to Millerlight and Brij Bansal with respect to  
14 pricing and problems that the Bansal  
15 organization was having that was resulting in  
16 a higher price for the Ketamine kilograms?

17 A Yes, there was.

18 Q Would you describe that just a little  
19 bit to the grand jurors?

20 A Millerlight was doing looking to get  
21 kilogram quantities of Ketamine fairly quickly  
22 and he wanted it at the normal price of around  
23 nine or \$10,000.

24 Brij Bansal kept -- they were  
25 E-mailing back and forth. Basically Brij

1 the websites if you went on it looks like a  
2 professional website where you would go and  
3 order anything. They'll have a list of  
4 medications or various drugs they may classify  
5 by pain killers, sleep aids, diet aids, things  
6 like that. And you would go to this site, you  
7 would pick what particular drug you wanted,  
8 what quantity you wanted and just about every  
9 single website there is no requirement to fill  
10 out some sort of form of describing your  
11 symptoms or no place to fax a prescription.

12 So you just go in and say if  
13 you take Valium for example say I want, you  
14 know, a hundred Valiums, hundred dosage units  
15 of Valium, you would put in your credit card  
16 number, your name, where you wanted the Valium  
17 mailed to and basically just, you know, an  
18 order.

19 And then a few days later a  
20 box with the Valium would show up at your  
21 house. But usually when it shows up it's just  
22 in blister packs, there's no instruction in  
23 there, you know, there is no doctor's note of  
24 telling you how to take it or anything like  
25 that. It's just the Valium in a box.

1 BY MR. PAVLOCK:

2 Q And, Agent Russ, is it fair to say that  
3 there are both controlled substances, those  
4 substances such as Valium and Xanax that are  
5 listed in the various schedules two through  
6 five of the Controlled Substances Act, those  
7 are being offered for sale on these various  
8 websites as well as other drugs that are not  
9 controlled but nonetheless like the other  
10 controlled substances require prescriptions  
11 nonetheless? Something like Viagra. Is that  
12 fair to say?

13 A Yes.

14 Q Is the majority of the drugs being  
15 offered by most of these websites the  
16 controlled substances?

17 A I wouldn't say that, no. I would say  
18 they offer everything from Viagra and generic  
19 Viagra it's a huge item that people order over  
20 the internet.

21 GRAND JUROR: I was just  
22 wondering, how can they be so brazen about  
23 this? I mean, there's no doctor involved and  
24 yet they have a lot of different websites.  
25 Isn't the law clear? Is there some sort of

1 ambiguity?

2 MR. PAVLOCK: I would say that  
3 the agent is probably not in a position to be  
4 describing what the clarity of the state of  
5 the law is. I can state that United States  
6 drug laws require prescriptions and the  
7 Controlled Substance Act does require  
8 prescriptions and doctors cannot prescribe  
9 unless they are registered.

10 BY MR. PAVLOCK:

11 Q As I understand, Agent Russ, you have  
12 made an investigation and nobody that you've  
13 identified in the Bansal organization is a  
14 registered doctor under the Controlled  
15 Substance Act; is that correct?

16 A Right. They have no DEA registration  
17 number which is required to actually fill out  
18 prescriptions and dispense pharmaceutical  
19 drugs.

20 Q Nor do any of the organizations have any  
21 kind of corporate name licensed to import  
22 those pharmaceuticals; is that correct?

23 A That's correct.

24 GRAND JUROR: Are the other  
25 people involved a licensed doctor in another

1 nation or under whatever licensing  
2 organization they have? Like is he a doctor  
3 in India but not listed by the AMA here?

4 THE WITNESS: We believe that  
5 Brij Bansal is a doctor in India, what  
6 licensing they have over there I'm not aware  
7 of.

8 MR. PAVLOCK: Any other  
9 questions?

10 GRAND JUROR: The companies in  
11 India, we assume or you assumed that they are  
12 producing all the drugs or may they also be  
13 buying some of the drugs elsewhere and selling  
14 them too?

15 THE WITNESS: We believe the  
16 majority of them are producing themselves.  
17 There are some that we believe that they  
18 acquire from either chemical companies or  
19 other companies that they don't manufacture  
20 themselves but they obtain for the Bansal  
21 organization.

22 GRAND JUROR: What kind of  
23 communication have you had or has U.S. had  
24 with India about these individuals and the  
25 companies? Is there an investigation going on

1 in India on these individuals or do you have  
2 any contact between you and India?

3 THE WITNESS: Without going  
4 into too much detail, yes, there is. There's  
5 an ongoing investigation in India in to these  
6 individuals.

7 GRAND JUROR: And I think I  
8 should have asked, this operation's going one  
9 hundred percent, right? This minute, right  
10 now? Everything is functioning with the  
11 websites and the Bansal organization? They  
12 are just operating normally and don't know  
13 that they are under investigation?

14 THE WITNESS: Yes.

15 MR. PAVLOCK: Any other  
16 questions for the witness today?

17 GRAND JUROR: Just to  
18 reiterate you've had communications with  
19 everyone listed on here specifically and the  
20 Bansals; is that correct?

21 THE WITNESS: To the Bansal --

22 GRAND JUROR: Because if  
23 somebody just works for them, you have a  
24 direct link between them and the Bansal  
25 organization?

1 THE WITNESS: Yes, have only  
2 looked at the Bansals E-mail addresses, we've  
3 looked at no other individual addresses to  
4 this point. And that's where all these  
5 individuals were identified through.

6 BY MR. PAVLOCA:

7 Q And I want to point out, this is a  
8 tentative evaluation based upon our review or  
9 the agent's review of the E-mails and to some  
10 extent we have individuals on here that we  
11 have not presented specific information with  
12 respect to their roles in the organization.  
13 We have identified them through the E-mails;  
14 is that correct?

15 A Yes.

16 Q So this is very tentative and subject to  
17 change and we just wanted to present to the  
18 grand jurors today just a general overview so  
19 when you hear these names in the future you  
20 have some sort of reference point like, well,  
21 you know, is this individual associated with a  
22 website or is this an individual buyer or a  
23 member of the Bansal organization; is that  
24 correct, Agent?

25 A Yes. Also I have a real quick

1 correction. I said that we just looked at the  
2 Bansal E-mail, in addition to the Bansal  
3 organization, Shack Corp., the Australian  
4 based organization, we've actually looked into  
5 them as well and some of their E-mails.

6 GRAND JUROR: Is there any  
7 posting on the websites that this is legal or  
8 no prescription necessary? Like, I don't  
9 know, I used to get SPAM, I'm pretty sure, I  
10 mean, and I just ignored it because I don't  
11 have a prescription. What do they -- how do  
12 they get people to actually, I don't know, go  
13 for it?

14 THE WITNESS: Some of the web  
15 sites do say basically no prescription  
16 required.

17 There are some of the websites  
18 if you go on them actually looks fairly --  
19 it's put together pretty well for a website.  
20 It will tell you that, you know, that is  
21 legal, that you're allowed to do this, that,  
22 you know, the new laws will allow us to ship  
23 you drugs but it's all a farce.

24 Pharmaceuticals cannot be  
25 imported from outside the United States. All

1 pharmaceuticals have to be manufactured within  
2 the United States if they're going to be  
3 distributed in the United States.

4 BY MR. PAVLOCK:

5 Q Agent Russ, on one or two occasions have  
6 there been websites that have advertised that  
7 doctors were available to give medical advice  
8 and there have been attempts by law  
9 enforcement agents to communicate in an  
10 attempt to ask for medical advice and  
11 nothing's been forthcoming by way of a  
12 response?

13 A I don't believe we've ever reached out  
14 to ask for medical advice. I know there's  
15 some saying that there are doctors available  
16 if you have question. Or that some of the  
17 sites not necessarily the ones we've seen but  
18 other pharmaceutical sites you can go on and  
19 again fill out sort of just your symptoms and  
20 say that you want, if you want to talk to a  
21 doctor we can arrange that to happen. To my  
22 knowledge I don't believe we've done that yet.

23 MR. PAVLOCK: Any other  
24 further questions?

25 GRAND JUROR: For further

1 testimony, can we have forms like this to  
2 refer to? I mean, you know, just is this a  
3 one time hand out?

4 MR. PAVLOCK: I think for  
5 today it's a one time hand out because we're  
6 still sort of in an initial evaluation. And  
7 this may be subject to change and I will  
8 certainly recommend that when we are talking  
9 with individuals that as I found when I'm  
10 doing analysis the names and especially  
11 foreign names are some times difficult to  
12 associate. So that we will present this on a  
13 continuing basis for reference. I would say  
14 that this particular exhibit is probably  
15 subject to some change and refining. Thank  
16 you.

17

18 (Whereupon the testimony of  
19 SPECIAL AGENT ERIC RUSS concluded at 11:31  
20 a.m.)

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C E R T I F I C A T E

- - -

COMMONWEALTH OF PENNSYLVANIA :  
: SS  
COUNTY OF PHILADELPHIA :

I, Jill T. Watson, Court Reporter and Notary Public in and for the County of Philadelphia, Commonwealth of Pennsylvania, do hereby certify that the foregoing testimony of SPECIAL AGENT ERIC RUSS was taken before me at 900 Market Street, 6th Floor, Suite 2, before the Federal Grand Jury in Philadelphia, Pennsylvania on Wednesday, January 19, 2005; that the foregoing testimony was taken by me in shorthand by myself and reduced to typing under my direction and control, that the foregoing pages contain a true and correct transcription of all of the testimony of said witness.

*Jill T. Watson*  
.....  
JILL T. WATSON  
Notary Public  
My commission expires  
February 10, 2008.