

Approved: SARAH R. KRISOFF
Sarah R. Krissoff
Assistant United States Attorney

Before: HONORABLE GEORGE A. YANTHIS
United States Magistrate Judge
Southern District of New York

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: COMPLAINT
UNITED STATES OF AMERICA :
: Violations of
- v. - : 18 U.S.C. § 111(a)(1) and
: 21 U.S.C. §§ 812, 841(a)(1) &
: 841(b)(1)(D)
: SCOTT SIEGEL, : COUNTY OF OFFENSE:
: WESTCHESTER
Defendant. :
: :
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SOUTHERN DISTRICT OF NEW YORK, ss.:

GLEN SPINNER, being duly sworn, deposes and says that he is a detective with the New Rochelle Police Department currently assigned to the Drug Enforcement Administration's Westchester County Drug Enforcement Task Force ("Task Force"):

COUNT ONE

On or about February 19, 2009, in the Southern District of New York, SCOTT SIEGEL, the defendant, unlawfully, intentionally and knowingly distributed and possessed with intent to distribute a schedule III controlled substance, to wit, anabolic steroids.

(Title 21, United States Code, Sections 812, 841(a)(1), & 841(b)(1)(D).)

COUNT TWO

On or about February 18, 2009, in the Southern District of New York, SCOTT SIEGEL, the defendant, forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a person designated in 18 U.S.C. Section 1114, to wit, officers and employees of an agency of the United States Government, while engaged in and on account of the performance of official duties.

(Title 18, United States Code, Section 111(a)(1).)

The bases for my knowledge and for the foregoing charge, are, in part, as follows:

1. I am a detective with the New Rochelle Police Department currently assigned to the Task Force, and I have been involved in the investigation of the above-described offenses. I have been employed with the New Rochelle Police Department for 10 years, and I have been assigned to the Task Force for approximately 1.5 years. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, including my review of pertinent documents, and from my conversations with fellow law enforcement officers. Because this affidavit is submitted for the limited purpose of demonstrating probable cause, I have not included details of every aspect of the investigation. Where I relate statements, conversations, and actions of others, those statements, conversations, and actions are related in substance and in part, except where otherwise indicated.

2. As part of an investigation into the trafficking of illegal anabolic steroids by SCOTT SIEGEL, the defendant, on or about February 18, 2009, other law enforcement officers with the Task Force and I were conducting surveillance in the vicinity of the Lake Isle gated community in Eastchester, New York. I saw SIEGEL, the defendant, park outside of a townhouse located inside of Lake Isle (the "Lake Isle Townhouse") that is SIEGEL's parents' home.

3. Another officer with the Task Force then saw SCOTT SIEGEL, the defendant, get out of his car holding a square brown box. I then saw SIEGEL approach the surveillance vehicle in which I was sitting with three other officers. SIEGEL, the defendant, looked in all four windows and the front windshield of the car, which were all tinted, and stated, "Nice fucking car." I saw SIEGEL walk back to his own car while still holding the box, and drive away. Shortly thereafter, I saw SIEGEL drive out of the Lake Isle community. A short while later, I saw SIEGEL return, in his car, to the Lake Isle community and pull in front of the Lake Isle Townhouse. At that time, I pulled behind SCOTT SIEGEL, the defendant, and activated the lights and sirens on my police vehicle. Several other cars containing officers also pulled up behind SIEGEL's car.

4. Then, I saw SCOTT SIEGEL, the defendant, speed away in his car. In an apparent attempt to escape the police vehicles, SIEGEL drove his car through a wooden fence enclosing

the Lake Isle gated community. A pursuit ensued. According to other officers involved in the pursuit, including officers with the Task Force, Eastchester Police Department, and Tuckahoe Police Department, as well as information I learned from my own observations and the radio calls I heard during the pursuit, the following occurred:

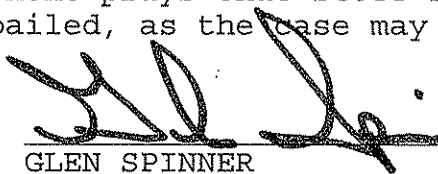
- a. SCOTT SIEGEL, the defendant, hit, apparently intentionally, approximately 3 marked Eastchester Police Department cars, as well as approximately 2 DEA cars, with his own car during the pursuit. This included an instance where SIEGEL, with his car, hit a DEA car that was blocking SIEGEL's exit from a parking lot. A DEA Special Agent and a Sergeant assigned to the Task Force were in the DEA car at the time SIEGEL hit it.
- b. At another point during the pursuit, SIEGEL's car was cornered by police vehicles, including marked cars, on a residential road near Route 22 in Eastchester. SIEGEL, in an apparent effort to escape, hit his car into several of the police vehicles. At least two officers with the Task Force then proceeded on foot. One of the officers tried to open the driver's side door of SIEGEL's car, but SIEGEL operated his car in an erratic manner and the officer fell to the ground. Very shortly thereafter, SIEGEL drove his car directly at another Task Force officer, in an apparent attempt to run him over.
- c. Thereafter, SIEGEL got out of his car and got into another car. A few minutes later, SIEGEL was apprehended by officers with the Eastchester Police Department while running down a street in Eastchester.

5. After SIEGEL's arrest, other law enforcement officers went to the Lake Isle Townhouse and spoke with SIEGEL's parents. SIEGEL's parents indicated that SIEGEL had a key to their townhouse and would come and go as he pleased.

6. Early in the morning of February 19, 2009, a United States Magistrate Judge sitting in the Southern District of New York authorized the issuance of search warrants for the Lake Isle Townhouse as well as SIEGEL's residence. According to a DEA Agent who participated in the search, during the execution of the search warrant at the Lake Isle Townhouse law enforcement

officers recovered, among other items: (1) approximately 1,500 bottles, which appear, based on the labeling and packaging for the bottles, to be predominately anabolic steroids; and (2) approximately \$30,000 to \$70,000 in cash. I participated in the execution of the search warrant at SIEGEL's residence, and other law enforcement officers and I recovered, among other items: (1) approximately \$70,000 in cash; and (2) packaging materials which are consistent with packaging materials for steroids.

WHEREFORE, the deponent prays that SCOTT SIEGEL, the defendant, be imprisoned or bailed, as the case may be.



GLEN SPINNER
Detective
Drug Enforcement Administration

Sworn to before me this
19th day of February, 2009

UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK