



**Food and Drug Administration
OFFICE OF CRIMINAL INVESTIGATIONS
REPORT OF INVESTIGATION**

REPORTING OFFICE: San Francisco Resident Office

DOCUMENT NUMBER: 196691

CASE NUMBER: 2010-SFC-735-0280

RELATED CASE NUMBER: (b) (7)(E)

TYPE OF CASE: 735.100, DIETARY SUPPLEMENTS - CDER

CASE TITLE: PRIMORDIAL PERFORMANCE

CASE AGENT: (b) (7)(F)

INVESTIGATION MADE AT: Oakland, CA

INVESTIGATION MADE BY: SA (b) (7)(F)

REPORTING PERIOD: **FROM:** 05/24/2011 **TO:** 08/19/2011

STATUS OF CASE: Continued

SYNOPSIS: Received undercover purchase and forwarded to FCC for analysis; received results of analysis from FCC; consulted with CFSAN; correspondence with CSO; made undercover phone call; conducted surveillance of business premises.

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REPORT SUBMITTED BY: (b) (7)(F) _____, Special Agent, **DATE:** 08/19/2011

REPORT APPROVED BY: _____ **DATE:** 08/22/2011
Thomas W. Emerick, Special Agent in Charge,

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1. INTRODUCTION:

This case originated after the February 8, 2010, receipt of information from the United States Anti-Doping Agency (USADA) about an email solicitation from PRIMORDIAL PERFORMANCE on the sale of a new product called Superdrone. The email indicates that PRIMORDIAL PERFORMANCE's Superdrone is a "Superdrol-clone" and contains the designer anabolic steroid methyldrostanolone. Superdrol (aka methyldrostanolone, aka methasteron) is a designer anabolic steroid (b) (7)(E)

(b) (7)(E)

Reference is made to the Report of Investigation for the period February 23, 2011 through May 23, 2011.

2. DETAILS OF INVESTIGATION:

On June 1, 2011 SA (b) (7)(F) received the undercover purchase of AndroMass (b) (7)(E)

On the same date, SA (b) (7)(F) inventoried the parcel and its material contents on CIE 172223 and the product on CIE 172224. On June 9, 2011 the AndroMass was forwarded to the FCC for analysis.

On June 2, 2011 SA (b) (7)(F) received an FCC Case Sample/Summary Report for the products AndroLean and AndroHard (previously inventoried on CIE 153015). In summary the report states that AndroHard contained the steroid, androsterone enanthate, which is consistent with the structure designated on the product label as Super-R-DHEA; however the nomenclature listed on the product label for Super-R-DHEA was incorrect. The report also states that AndroLean contained a compound consistent with the nomenclature and structure designated on the product label as Super-7-DHEA. Additionally the analysis showed AndroLean contained a derivative of DHEA, which is not listed on the product label. On July 5, 2011 SA (b) (7)(F) spoke to Mary B. Jones, Chemist, FCC, who conducted the analysis of AndroHard and AndroLean. Ms. Jones stated the compounds found in both AndroHard and AndroLean were derivatives of DHEA. Ms. Jones also stated the labeling for these products was incorrect.

(b) (7)(E), (b) (7)(F), (b) (5)

(b) (7)(E), (b) (7)(F), (b) (5)

On July 5, 2011 SA (b) (7)(F) sent an (b) (7)(E) email (b) (7)(E), (b) (7)(C), (b) (6)

(b) (7)(E), (b) (7)(F), (b) (5) Product Specialist/Marketing Manager, PRIMORDIAL PERFORMANCE, at (b) (6), (b) (7)(C) requesting a consultation with POTRATZ or (b) (6), (b) (7)(C) for the previously purchased AndroMass. On July 6, 2011 SA (b) (7)(F) received a response from (b) (6), (b) (7)(C) arranging a consultation with POTRATZ on July 6, 2011.

On July 6, 2011 SA (b) (7)(F) , acting in an undercover capacity, received a consensually monitored phone call from POTRATZ. POTRATZ asked for SA (b) (7)(F) height, weight, exercise habits, diet and goals. During the call POTRATZ stated PRIMORDIAL PERFORMANCE previously distributed Superdrol and Tren in liquid, tablets and topical form. POTRATZ stated he did not believe police and fire departments tested for the type of supplements contained in AndroMass. POTRATZ stated the ingredients in the AndroMass were a "different kind of DHEA." POTRATZ stated the DHEA in AndroMass has been "tweaked so that it is "more anabolic for muscle building." POTRATZ stated the results he is seeing from the use of AndroMass is equivalent to using 128mg per day of injectible steroids. POTRATZ suggested SA (b) (7)(F) "stack" the AndroMass with another product such as (b) (4) , a progestational steroid, to put on weight. POTRATZ stated he could purchase (b) (4) through (b) (4) or through the website (b) (4) POTRATZ stated he was "a couple months away" from producing a similar product at PRIMORDIAL PERFORMANCE. POTRATZ stated (b) (4) was an obscure compound that "they aren't testing for." POTRATZ stated he recorded the phone call and would provide a copy of the recording. The ES digital recording of the consensually monitored telephone call was inventoried on CIE 153133 and stored in the SFRO evidence room.

On July 6, 2011 SA (b) (7)(F) spoke to Craig Hopkins, CSO, San Francisco District Office who stated he intercepted three parcels on or about April 22, 2011 at the Honolulu International Airport. He stated the parcels were shipped from (b) (6), (b) (7)(C) . Mr. Hopkins stated he conducted an inspection of the parcels and their contents and found the PRIMORDIAL PERFORMANCE product AndroHard (Androterone) Liquid. Mr. Hopkins inspected the labels and believed the product was a drug.

On July 28, 2011 SA (b) (7)(F) received an email from Robert Moore, Special Assistant, Division of Dietary Supplement Programs, CFSAN regarding his review of the products AndroHard and AndroLean. In summary Mr. Moore stated the steroids found in the products appear to be eligible dietary ingredients. On the same date SA (b) (7)(F) discussed Mr. Moore's response with OCC attorney James Smith.

On August 17, 2011 SA (b) (7)(F) conducted surveillance at 13331 NE Whitaker Way, Portland, OR, the business premises of Primordial Performance. During the daylight hours SA (b) (7)(F) observed POTRATZ' vehicle parked at the front of the business. SA (b) (7)(F) also observed a white piece of paper with black typed writing "Primordial Performance 13331 NE Whittaker Way" affixed to the glass entry door of the business. SA (b) (7)(F) also observed a roll top door in the rear of the location. The door was partially rolled up and the bottom was covered with plywood. A blue cooler sat outside the door. SA (b) (7)(F) observed an unknown white male exit the rear door of the business and walk towards the front.

3. JUDICIAL ACTION:

None this reporting period

4. DISPOSITION OF EVIDENCE, CONTRABAND, AND PERSONAL PROPERTY:

One bottle of AndroMass, received on June 1, 2011 from an undercover purchase, was inventoried on CIE 172224. The item listed on CIE 172224 was forwarded to the FCC for analysis on June 9, 2011.

Packaging material and a parcel received on June 1, 2011 from an undercover purchase were inventoried on CIE 172223 and stored in the SFRO evidence room.

The ES digital recording of the consensually monitored telephone call received on July 7, 2011 between SA (b) (7)(F) and ERIC POTRATZ of PRIMORDIAL PERFORMANCE was inventoried on CIE 153133 and stored in the SFRO evidence room.

5. STATUS OF INVESTIGATION:

Continued

6. SUSPECTS/DEFENDANTS/OTHER:

PRIMORDIAL PERFORMANCE

ERIC POTRATZ

(b) (6), (b) (7)(C)

WWW.PRIMORDIALPERFORMANCE.COM

7. ATTACHMENTS:

None