

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:   
UNITED STATES OF AMERICA :   
:   
- v. - : INFORMATION   
:   
SARAH IZHAKI, : S1 20 Cr. 161 (MKV)   
:   
:   
Defendant. :   
:   
- - - - - X

**COUNT ONE**  
**(Drug Adulteration and Misbranding Conspiracy)**

The United States Attorney charges:

1. From at least in or about February 2018 through at least in or about November 2019, in the Southern District of New York and elsewhere, SARAH IZHAKI, together with others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, violations of Title 21, United States Code, Sections 331 and 333(a)(2).

2. It was a part and an object of the conspiracy that SARAH IZHAKI, the defendant, together with others known and unknown, with the intent to defraud and mislead, would and did introduce and deliver for introduction, and would and did cause the introduction and delivery for introduction, into interstate commerce, adulterated and misbranded drugs, as defined by 21 U.S.C.

§§ 351(a)(5), 352(a), 352(b), 352(f), 352(o), 353(f), and 360b, in violation of 21 U.S.C. § 331(a) and 333(a).

3. It was further a part and an object of the conspiracy that SARAH IZHAKI, the defendant, together with others known and unknown, with the intent to defraud and mislead, in interstate commerce, would and did adulterate and misbrand drugs, and would and did cause the adulteration and misbranding of drugs, as defined by 21 U.S.C. §§ 351(a)(5), 352(a), 352(b), 352(f), 352(o), 353(f), and 360b, in violation of 21 U.S.C. § 331(b) and 333(a)(2).

4. It was further a part and an object of the conspiracy that SARAH IZHAKI, the defendant, together with others known and unknown, with the intent to defraud and mislead, would and did receive in interstate commerce adulterated and misbranded drugs, as defined by 21 U.S.C. §§ 351(a)(5), 352(a), 352(b), 352(f), 352(o), 353(f), and 360b, and deliver and proffer delivery thereof for pay and otherwise, and would and did cause the receipt in interstate commerce of adulterated and misbranded drugs, as defined by 21 U.S.C. §§ 351(a)(5), 352(a), 352(b), 352(f), 352(o), 353(f), and 360b, and cause the delivery and proffered delivery thereof for pay and otherwise, in violation of 21 U.S.C. § 331(c) and 333(a)(2).

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, SARAH IZHAKI, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about September 24, 2019, IZHAKI sold a confidential source ("CS-1") ten vials of eythropoietin (the "Firm-1 Drug") obtained from a Mexico-based drug manufacturing company ("Firm-1"), at which time IZHAKI explained to CS-1, in substance and in part, that IZHAKI and others covertly transport the drugs into the United States.

b. On or about October 17, 2019, CS-1 called IZHAKI and arranged to purchase \$5,000 worth of the Firm-1 Drug. During that call, IZHAKI explained to CS-1, in substance and in part, that she had recently depleted a supply of amphetamines, as well as another substance referred to as "The Devil," which IZHAKI described as a masking agent, *i.e.*, a substance used to disguise the presence of other drugs in a human or animal's body. IZHAKI represented that "The Devil" was "[s]omething very new, you put it in the horse, you can use coke: it will come back negative."

c. On or about October 24, 2019, IZHAKI distributed 24 vials of the Firm-1 Drug to an undercover agent posing as a horse owner ("UC-1"), in Manhattan, New York, in exchange for \$2,400. During this meeting, IZHAKI explained, in

substance and in part, that a co-conspirator not named herein had recently sold a large quantity of the Firm-1 Drug. IZHAKI also offered to sell the "Devil's Breath" to UC-1, explaining the masking power of that substance: "You can kill somebody with poison, and you can clean the blood as long as he is still alive." Photographs of the Firm-1 Drug, as sold and delivered to CS-1 by IZHAKI, follow:



(Title 18, United States Code, Section 371.)

#### **FORFEITURE ALLEGATIONS**

6. As a result of committing the offense alleged in Count One of this Information, SARAH IZHAKI, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 334, any and all drugs that were adulterated or misbranded when introduced into or while in interstate commerce or while held for sale (whether or not the first sale) after shipment

in interstate commerce, or which may not, under the provisions of section 331(11), 344, or 355 of this title, have been introduced into interstate commerce.

**Substitute Asset Provision**

7. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

a. Cannot be located upon the exercise of due diligence;

b. Has been transferred or sold to, or deposited with, a third person;

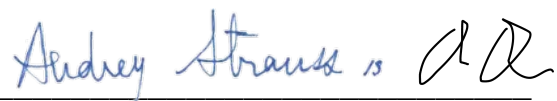
c. Has been placed beyond the jurisdiction of the Court;

d. Has been substantially diminished in value; or

e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

(Title 21, United States Code, Sections 334 and 853, and Title 28, United States Code, Section 2461(c).)



\_\_\_\_\_  
AUDREY STRAUSS  
Acting United States Attorney

---

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

---

UNITED STATES OF AMERICA

- v. -

SARAH IZHAKI,

Defendant.

---

---

SUPERSEDING INFORMATION

S1 20 Cr. 161 (MKV)

(18 U.S.C. § 371)

AUDREY STRAUSS

---

Acting United States Attorney.

---

---