

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X
	:
UNITED STATES OF AMERICA	:
	:
- v. -	: <u>SUPERSEDING INFORMATION</u>
	:
SCOTT ROBINSON,	: S1 20 Cr. 162 (JPO)
	:
	:
Defendant.	:
	:
- - - - -	X

COUNT ONE
(Drug Adulteration and Misbranding Conspiracy)

The United States Attorney charges:

1. From at least in or about 2011 through at least in or about March 2020, in the Southern District of New York and elsewhere, SCOTT ROBINSON, 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 SCOTT ROBINSON, 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 SCOTT ROBINSON, 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 in interstate commerce, 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 SCOTT ROBINSON, 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, SCOTT ROBINSON, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York, the Middle District of Pennsylvania and elsewhere:

a. In or about September 2014, ROBINSON shipped performance-enhancing drugs ("PEDs"), which were misbranded and adulterated, from Florida to a customer located in the Southern District of New York.

b. In or about July 2016, ROBINSON caused a co-conspirator to ship a custom-made drug containing an anabolic steroid from Berwick, Pennsylvania to ROBINSON in Florida, for the purpose of resale.

c. On or about November 5, 2017, ROBINSON, in electronic messages with a wholesale distributor whose warehouse was based in the Southern District of New York, ordered a bulk delivery of a substance that ROBINSON would subsequently package, label, and resell as a race horse PED.

d. In or about September 2019, ROBINSON, and others known and unknown, packaged and offered for sale a misbranded and adulterated PED labeled "RUI-LABS . . . Liquid Viagra . . . For Research Purposes Only. Not for human consumption."

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

FORFEITURE ALLEGATIONS

6. As a result of committing the offense alleged in Count One of this Information, SCOTT ROBINSON, 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 sections 331(11), 344, or 355 of this title, have been introduced into interstate commerce, including but not limited to a sum of money in United States currency representing the value of such property.

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

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(18 U.S.C. § 371)

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