

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 24-01
v. * SECTION: "M"
MICHELLE ANDRE *
* * *

FACTUAL BASIS

The defendant, MICHELLE ANDRE, has agreed to plead guilty to Count 1 of the bill of information. Count 1 charges her with introducing into interstate commerce a drug that is misbranded in violation of Title 21, United States Code, Section 331(a).

Should this matter have gone to trial, the government would have proved through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in the one count bill of information now pending against the defendant. All the below facts occurred in the Eastern District of Louisiana.


From April 2018 through March 2023, ANDRE purchased drugs from British companies in order to distribute them to her patients in the United States. These items included Depo-Provera, Nexplanon, and Skyla. ANDRE bought these products from British companies, including MyMedPharma, GP Meds Direct, and Gold Care Medical, and they arrived in the United States without proper labelling or certifications. ANDRE then distributed these drugs to her patients in the United States without adequate directions for use in their labelling which is required by the Food, Drug, and Cosmetic Act, 21 U.S.C. §331, and related statutes. ANDRE's customers

AUSA PH
Defendant ma
Defense Counsel VM

included patients of her clinic, the Care and Comfort OBGYN clinic, located at 1007 Belanger Street, Houma, Louisiana.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **ANDRE** or the government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **ANDRE**'s plea of guilty to the charged offenses in the bill of information.




PAUL J. HUBBELL, IV
Assistant United States Attorney

2/29/24
Date



MICHELLE ANDRE
Defendant

2/29/24
Date



WILLIAM GIBBENS
Counsel for Defendant

2/29/24
Date