

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 1:20-CR-
 :
 v. : (JUDGE)
 :
 STEFAN KNOCHE, :
 : (ELECTRONICALLY FILED)
 Defendant. :

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
(Trafficking in counterfeit goods)

Between at least as early as on or about May 23, 2017, and continuing through on or about April 12, 2018, in Lebanon County, within the Middle District of Pennsylvania and elsewhere, the defendant,


STEFAN KNOCHE,

aided and abetted by others known and unknown to the United States Attorney, did intentionally traffic and attempt to traffic in goods, namely pharmaceutical drugs, and knowingly used counterfeit marks on and in connection with such goods, those being the Viagra, Aurogra, and Xanax trademarks used to identify pharmaceutical products

marked by Pfizer Pharmaceuticals, the Levitra trademark used to identify pharmaceutical products marked by Bayer AG, the Cialis trademark used to identify pharmaceutical products marked by Eli Lilly and Company, and the Valium trademark used to identify pharmaceutical products marked by Roche Holding AG, which counterfeit marks were identical to and substantially indistinguishable from the genuine marks is use and registered for those purposes on the principle register in the United States Patent and Trademark Office, and the use of which marks was likely to cause confusion, mistake, and deception regarding said marks.

All in violation of Title 18, United States Code, Sections 2320(a) and 2.

DAVID J. FREED
UNITED STATES ATTORNEY


JAMES T. CLANCY
ASSISTANT U.S. ATTORNEY