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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA,)
)
 v.)
)
GEORGE KUIPER)
_____)

1:20-cr-158-PB-01

INFORMATION

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 371 & 545, 21 U.S.C. §§ 331(d) & 333(a)(2)– Conspiracy to smuggle goods into the United States and to introduce into interstate commerce unapproved drugs]

1. From a date uncertain, but at least as early as 2006, and continuing until at least June 2020, in the District of New Hampshire and elsewhere, the defendant,

GEORGE KUIPER,

did knowingly and intentionally combine, conspire, and agree with persons known and unknown to the United States Attorney to commit the following offenses against the United States:

a. to smuggle goods, specifically controlled substances and new drugs that were not approved by the United States Food and Drug Administration, into the United States, in violation of Title 18, United States Code, Section 545; and

b. to introduce into interstate commerce, with the intent to defraud and mislead, new drugs that were not approved by the United States Food and Drug Administration, in violation of Title 21, United States Code, Sections 331(d) and 333(a)(2).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that the defendant and his co-conspirators operated, from the state of Georgia, websites that offered prescription drugs, including controlled substances, for sale to customers in the United States. The defendant arranged for co-conspiring foreign suppliers to ship the prescription drugs to customers in the United States, either directly or through locations in the United States, in fulfillment of orders placed through the websites. Some of the drugs shipped by the foreign suppliers to fulfill orders on behalf of the defendant and his co-conspirators were not approved by the United States Food and Drug Administration and were controlled substances.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects thereof, the defendant and his co-conspirators committed at least one of the following overt acts, among others, in the District of New Hampshire and elsewhere. On or about the following eight occasions from 2009 through June 2020, the defendant caused a Schedule IV controlled substance, modafinil, a new drug, the version of which was not approved by the United States Food and Drug Administration, to be sold and shipped in interstate commerce to a post office box in New Hampshire:

DATE	WEBSITE
April 29, 2009	Nubrain.com
June 25, 2009	Nubrain.com
October 9, 2009	Nubrain.com
May 9, 2012	Nubrain.com

November 4, 2013	Nubrain.com
November 11, 2016	Healthclown.com
September 12, 2019	Healthclown.com
April 9, 2020	Healthclown.com

On each occasion, the substance was shipped from a supplier located outside the United States either directly to New Hampshire, or through another location in the United States to New Hampshire.

In violation of Title 18, United States Code, Sections 371 and 545 and Title 21, United States Code, Sections 331(d) and 333(a)(2).

COUNT TWO

**[21 U.S.C. §§ 331(d) & 333(a)(2) –
Introduction into interstate commerce of unapproved drugs]**

5. Beginning in or about 2006 until in or about June 2020, in the District of New Hampshire and elsewhere, the defendant,

GEORGE KUIPER,

with the intent to defraud and mislead, introduced into interstate commerce a new drug, namely, a version of the Schedule IV controlled substance modafinil that was not approved by the United States Food and Drug Administration in accordance with Title 21, United States Code, Section 355.

In violation of Title 21, United States Code, Sections 331(d) and 333(a)(2).

COUNT THREE
[18 U.S.C. § 545 Smuggling]

6. Beginning in or about 2006 until in or about June 2020, in the District of New Hampshire and elsewhere, the defendant,

GEORGE KUIPER,

did willfully and knowingly import and bring into the United States certain merchandise, that is, the Schedule IV controlled substance and unapproved new drug, modafinil, contrary to law.

In violation of Title 18, United States Code, Section 545.

NOTICE OF FORFEITURE

Upon conviction of one or more offenses alleged in Counts One through Three of this Information, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 545, 982(a)(2)(B), and 21 U.S.C. § 334, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the charged offenses, including, but not limited to: (A) \$19,120.14 in funds from Citibank Account #145922044; (B) \$2,452.00 in U.S. Currency; (C) \$11,090.49 in funds from Fidelity Bank Account #140907596; (D) \$67,028.22 in funds from Renasant Account #1102435; (E) \$21,527.31 in funds from Renasant Account #3417190; (F) \$108,956.13 in funds from TD Ameritrade Account #756471881, and (G) \$19,545.11 in funds from TD Ameritrade Account #862721260.

December 21, 2020

SCOTT W. MURRAY
United States Attorney

By: 

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Sarah Hawkins

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