

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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UNITED STATES OF AMERICA

v.

MANTHAN ROHIT SHAH,
Defendant.

CLERK
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Criminal No. DEPUTY CLERK
2:25-cr-54-1

INDICTMENT

The Grand Jury charges:

GENERAL ALLEGATIONS

At all times relevant to this Indictment, unless otherwise indicated:

The Food, Drug, and Cosmetic Act

1. The U.S. Food and Drug Administration ("FDA") was the federal agency responsible for protecting the health and safety of the American public by, among other things, regulating the distribution and sale of prescription drugs and enforcing the Food, Drug, and Cosmetic Act ("FDCA"). One purpose of the FDCA was to ensure that drugs for use by humans were safe, were effective, and bore labeling containing only true and accurate information.

2. Under the FDCA, "drugs" were defined as, among other things, articles intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease, pursuant to Title 21, United States Code, Section 321(g)(1)(B). A "prescription drug" was any drug intended for use in humans that, because of its toxicity or potentiality for harmful effect, the method of its use, or the collateral measures necessary for its use, was not safe for use except under the supervision of a practitioner licensed by law to administer such drug, or was limited by an approved application under Title 21, United States Code, Section 355 to use under the professional supervision of a

practitioner licensed by law to administer such drug, pursuant to Title 21, United States Code, Section 353(b)(1).

3. The act of dispensing a prescription drug without a written or oral prescription of a licensed practitioner resulted in the drug being “misbranded” while held for sale, pursuant to Title 21, United States Code, Section 353(b)(1).

4. The introduction or delivery for introduction, or the causing thereof, into interstate commerce of any drug that was misbranded was a violation of federal law, pursuant to Title 21, United States Code, Section 331(a).

The Controlled Substances Act

5. The Controlled Substances Act (“CSA”) governed the manufacture, distribution, and dispensing of controlled substances in the United States. With limited exceptions for medical professionals, the CSA made it unlawful for any person to knowingly or intentionally manufacture, distribute, and dispense a controlled substance or conspire to do so.

6. The CSA and its implementing regulations set forth which drugs and other substances were defined by law as “controlled substances,” and assigned those controlled substances to one of five schedules (Schedule I, II, III, IV, or V) depending on their potential for abuse, likelihood of physical or psychological dependency, accepted medical use, and accepted safety for use under medical supervision.

7. A controlled substance assigned to “Schedule II” meant that the drug or other substance had a high potential for abuse, the drug or other substance had a currently accepted medical use in treatment in the United States or a currently accepted medical use with severe restrictions, and abuse of the drug or other substance may have led to severe psychological or physical dependence.

8. A controlled substance assigned to “Schedule IV” meant that the drug or other substance had a low potential for abuse relative to the drugs or other substances in Schedule III, the drug or other substance had a currently accepted medical use in treatment in the United States, and abuse of the drug or other substance may have led to limited physical dependence or psychological dependence relative to the drugs or other substances in Schedule III.

9. Pursuant to the CSA and its implementing regulations:

- a. Tapentadol was classified as a Schedule II controlled substance.
- b. Tramadol was classified as a Schedule IV controlled substance.
- c. Zopiclone was classified as a Schedule IV controlled substance.

10. It was unlawful for any person to knowingly or intentionally distribute or dispense a controlled substance, unless otherwise authorized by law, or to conspire to do so, pursuant to Title 21, United States Code, Sections 841(a)(1) and 846.

Defendant, Related Entities, and Relevant Persons

11. **MANTHAN ROHIT SHAH**, a citizen and resident of the Republic of India, was a director and the principal operator of Company-1.

12. Company-1, a company based in the Mumbai, India, was a distributor of pharmaceutical drugs.

13. Co-conspirator-1, a citizen of the Republic of India and a resident of the United Arab Emirates, facilitated payment processing and the supply of pharmaceutical drugs in furtherance of the conspiracy.

14. Co-conspirator-2, a citizen and resident of the Republic of India, facilitated payment processing and the supply of pharmaceutical drugs in furtherance of the conspiracy.

15. Co-conspirator-3, a citizen of the United States and resident of Minnesota, assisted in the operation of online pharmacies in furtherance of the conspiracy, including by receiving and managing customer orders, facilitating order and shipment tracking, and engaging in financial transactions.

16. Individual-1, a resident of Vermont, ordered Tramadol from an online pharmacy and received shipments of Tramadol from Company-1 at her residence in the District of Vermont.

17. Individual-2, a resident of Vermont, ordered Zopiclone from an online pharmacy and received shipments of Zopiclone from Company-1 at her residence in the District of Vermont.

COUNT 1

**Conspiracy to Violate the Food, Drug, and Cosmetic Act
18 U.S.C. § 371**

18. Paragraphs 1 through 17 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

19. Beginning at least as early as in or around 2017, and continuing at least until in or around 2025, the exact dates being unknown to the Grand Jury, in the District of Vermont, and elsewhere, Defendant **MANTHAN SHAH** knowingly and willfully conspired with others known and unknown to the Grand Jury, to introduce and deliver for introduction, and cause the introduction and delivery for introduction, into interstate commerce, with intent to defraud and mislead, prescription drugs that were misbranded within the meaning of Title 21, United States Code, Section 353(b)(1), in that the drugs were dispensed without the prescription of a practitioner licensed by law to administer such drugs, in violation of Title 21, United States Code, Sections 331(a) and 333(a)(2).

Purpose of the Conspiracy

20. It was the purpose of the conspiracy for Defendant **MANTHAN SHAH** and his co-conspirators, including Co-conspirator-1, Co-conspirator-2, and Co-conspirator-3, to unlawfully enrich themselves by:

- a. illegally offering for sale and selling—without valid prescriptions—misbranded prescription drugs to customers in the United States and elsewhere;
- b. concealing the sale and selling of misbranded prescription drugs and the receipt and transfer of the proceeds of the conspiracy;
- c. diverting proceeds of the conspiracy for the personal use and benefit of the Defendant and his co-conspirators.

Manner and Means of the Conspiracy

21. The manner and means by which Defendant **MANTHAN SHAH** and his co-conspirators sought to accomplish the purpose and object of the conspiracy included, among other things:

- a. Defendant **MANTHAN SHAH**, and others known and unknown to the Grand Jury, operated Company-1, which sold prescription drugs, including misbranded drugs that contained potentially potent, dangerous, and/or addictive substances, for distribution in the United States to customers without a valid prescription.
- b. Defendant **MANTHAN SHAH's** co-conspirators operated an internet pharmacy network that consisted of illicit online pharmacy websites and

call centers that offered prescription drugs not approved for distribution in the United States for sale to customers without a valid prescription.

- c. Defendant **MANTHAN SHAH** and Company-1 shipped large quantities of potentially unsafe prescription drugs from locations in India, Singapore, and elsewhere to customers located throughout New England, including Vermont, and throughout the United States who did not have valid prescriptions for those drugs.
- d. Defendant **MANTHAN SHAH** and Company-1 used fake prescriptions to provide a veneer of legitimacy for customer orders, despite the customers never obtaining such prescriptions.
- e. Payments for prescription drugs purchased from Company-1 were processed through shell companies in the United States and deposited into bank accounts controlled by Defendant **MANTHAN SHAH** and Company-1.

Overt Acts

22. In furtherance of the conspiracy, and to accomplish its object and purpose, at least one of the co-conspirators committed and caused to be committed, in the District of Vermont and elsewhere, the following overt acts, among others:

- a. In or around January 2019, the Defendant **MANTHAN SHAH** and Company-1 caused the shipment and delivery of a package containing the controlled substance Tramadol to Individual-1's residence in the District of Vermont in fulfillment of an order placed by Individual-1, who did not provide a prescription for the order.

- b. In or around June 2020, the Defendant **MANTHAN SHAH** and Company-1 caused the shipment and delivery of a package containing the controlled substance Zopiclone to Individual-2's residence in the District of Vermont in fulfillment of an order placed by Individual-2, who did not provide a prescription for the order.
- c. In or around June 2022, Company-1 caused the shipment and delivery of a package containing the prescription drug Jardiance to an address in Massachusetts in fulfillment of an order placed by an undercover law enforcement agent who did not provide a prescription for the order.
- d. On or about May 6, 2025, the Defendant **MANTHAN SHAH** sent a text message to an undercover law enforcement agent regarding Company-1's fulfillment of an order of 50 pens of the prescription drug Ozempic for approximately \$6,200, to be shipped from a location outside the United States to an address in Vermont. The undercover law enforcement agent did not provide a prescription for the order.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
Conspiracy to Import Controlled Substances
21 U.S.C. § 963

23. Paragraphs 1 through 17 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

24. Beginning at least as early as in or around 2017, and continuing at least until in or around 2022, the exact dates being unknown to the Grand Jury, in the District of Vermont and elsewhere, Defendant **MANTHAN SHAH** knowingly and intentionally conspired with others

known and unknown to the Grand Jury, to violate Title 21, United States Code, Section 963, that is, to knowingly, intentionally, and unlawfully import into the United States from places outside the United States, including India, substances containing a detectable amount of controlled substances, including Tapentadol, a Schedule II controlled substance; Tramadol, a Schedule IV controlled substance; and Zopiclone, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 952, 960(b)(3), and 960(b)(6).

Purpose of the Conspiracy

25. It was the purpose of the conspiracy for Defendant **MANTHAN SHAH** and his co-conspirators, including Co-conspirator-1, Co-conspirator-2, and Co-conspirator-3, to unlawfully enrich themselves by:

- a. importing controlled substances, including Tapentadol, Tramadol, and Zopiclone, into the United States from places outside the United States, including India;
- b. concealing the sale and selling of controlled substances and the receipt and transfer of the proceeds of the conspiracy;
- c. diverting proceeds of the conspiracy for the personal use and benefit of the defendant and his co-conspirators.

Manner and Means of the Conspiracy

26. The manner and means by which Defendant **MANTHAN SHAH** and his co-conspirators sought to accomplish the purpose and object of the conspiracy included, among other things:

- a. Defendant **MANTHAN SHAH**, and others known and unknown to the Grand Jury, operated Company-1, which sold controlled substances,

including highly addictive substances susceptible to abuse and dependency, to customers in the United States and elsewhere.

- b. Defendant **MANTHAN SHAH**'s co-conspirators operated an internet pharmacy network that consisted of illicit online pharmacy websites and call centers that offered controlled substances not approved for distribution in the United States for sale to customers without a valid prescription.
- c. Defendant **MANTHAN SHAH** and Company-1 shipped large quantities of controlled substances, including highly addictive substances susceptible to abuse and dependency, from locations in India and elsewhere to customers located throughout New England, including Vermont, and throughout the United States.
- d. Defendant **MANTHAN SHAH** and Company-1 used fake prescriptions for customer orders to provide a veneer of legitimacy, despite the customers never obtaining such prescriptions.
- e. Payments for some of the controlled substances purchased from Company-1 were processed through shell companies in the United States and deposited into bank accounts controlled by Defendant **MANTHAN SHAH** and Company-1.

All in violation of Title 21, United States Code, Section 963.

COUNT 3
Conspiracy to Launder Monetary Instruments
18 U.S.C. § 1956(h)

27. Paragraphs 1 through 17 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

28. Beginning at least as early as in or around 2017, and continuing until in or around 2025, in the District of Vermont and elsewhere, the Defendant **MANTHAN SHAH** knowingly conspired with others known and unknown to the Grand Jury, to transport, transmit, and transfer and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, knowing that the monetary instrument and funds involved in the transportation, transmission, and transfer represent the proceeds of unlawful activity and knowing that such transportation, transmission, and transfer is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, that is smuggling goods into the United States, in violation of 18 U.S.C. § 545; in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

NOTICE OF FORFEITURE ONE

1. The allegations contained in Count One of this Indictment are hereby realleged and reincorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 334 and 28 U.S.C. § 2461(c).

2. Upon conviction for any and all of the violations alleged in Count One of this Indictment, the defendant, **MANTHAN SHAH**, shall forfeit to the United States any drug that was misbranded when introduced into interstate commerce, pursuant to 21 U.S.C. § 334 and 28 U.S.C. § 2461(c).

3. If any of the property described above, 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 party;

- 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 divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

(21 U.S.C. §§ 334, 853, and 970)

NOTICE OF FORFEITURE TWO

1. The allegations contained in Count Two of this Indictment are hereby realleged and reincorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. §§ 853 & 970.

2. Pursuant to 21 U.S.C. §§ 853 & 970, upon conviction of an offense in violation of 21 U.S.C. § 963, the defendant, **MANTHAN SHAH**, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate, the commission of the offense. The property to be forfeited includes, but is not limited to, United States funds in the amount of gross proceeds obtained as a result of the violation.

3. If any of the property described above, 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 party;
- 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 divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, pursuant to 21 U.S.C. § 853(p).

(21 U.S.C. §§ 853 and 970)

NOTICE OF FORFEITURE THREE

1. The allegations contained in Count Three of this Indictment are hereby realleged and reincorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(1).

2. Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of an offense in violation of 18 U.S.C. § 1956, the defendant, **MANTHAN SHAH**, shall forfeit to the United States any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, all property constituting the subject matter of the money laundering offenses for which the defendant has been convicted, and all property used to commit or facilitate the commission of the money laundering offense for which the Defendant has been convicted.

3. If any of the property described above, 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 party;
- 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 divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

(21 U.S.C. § 853(p); 18 U.S.C. § 982(b)(1); 28 U.S.C. § 2461(c))

A TRUE BILL.

Dated:

6/12/2025



Foreperson of the Grand Jury

MICHAEL P. DRESCHER
Acting United States Attorney
District of Vermont

LORINDA I. LARYEA
Acting Chief, Fraud Section
United States Department of Justice, Criminal Division

By:

A handwritten signature in black ink, appearing to read "Patrick S. Brown", written over a horizontal line.

PATRICK S. BROWN

THOMAS D. CAMPBELL

JOHN W. HOWARD

Trial Attorneys, Fraud Section

United States Department of Justice, Criminal Division