

FILED

May 01, 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

BY: kk
DEPUTY

UNITED STATES OF AMERICA

v

HUGO SANCHEZ
Defendant

INFORMATION

[Vio: Ct. 1: 18 U.S.C. § 371, 15 U.S.C. §§ 2052(a)(6), 2057, 2057b, 2068(a)(1), and 2070, 21 U.S.C. §§ 321(g), 331(a), 333(a)(2), and 352 – Conspiracy to Violate the Consumer Product Safety Act and Food, Drug, and Cosmetic Act]

1:26-CR-00229-RP

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

**Conspiracy to Violate the Consumer Product Safety Act and Food, Drug and Cosmetic Act
18 U.S.C. § 371, 15 U.S.C. §§ 2052(a)(6), 2057, 2057b, 2068(a)(1), 2070, and
21 U.S.C. §§ 321(g), 331(a), 333(a)(2), and 352**

Between in or around June 2022, and in or around February 2025, in the Western District of Texas, and elsewhere, Defendant,

HUGO SANCHEZ

Knowingly and willfully conspired with others, known and unknown to the United States, to:

- a. knowingly and willfully manufacture for sale, offer for sale, distribute in commerce, and import into the United States, in violation of Title 15, United States Code, Sections 2052(a)(6), 2068(a)(1), and 2070, volatile alkyl nitrite, a banned hazardous product as defined in Title 15, United States Code, Sections 2057 and 2057b, with the unlawful commercial purpose of producing consumer products containing volatile alkyl nitrites

that may be used for inhaling and otherwise introducing volatile alkyl nitrite into the human body for euphoric and physical effects; and

- b. with the intent to defraud and mislead, introduce and deliver for introduction, and cause the introduction and delivery for introduction, into interstate commerce, volatile alkyl nitrite, a drug, as defined by Title 21, United States Code, Section 321(g) that was misbranded, as defined by Title 21, United States Code, Section 352.

Overt Acts

In furtherance of the conspiracy, and in order to effect the objects thereof, **HUGO SANCHEZ**, and others known and unknown to the United States, in various combinations, directly and indirectly, within the Western District of Texas and elsewhere, committed overt acts, including, but not limited to, the following:

- a. Between in or around June 2022 until in or around February 2025, **HUGO SANCHEZ** was employed by COMPANY-1 in the Western District of Texas. COMPANY-1 was based in the Western District of Texas and engaged in the manufacture, sale, and distribution of volatile alkyl nitrites intended to be used for human consumption. COMPANY-1 was owned by CO-CONSPIRATOR-1, and CO-CONSPIRATOR-2. **HUGO SANCHEZ** worked for COMPANY-1 as Marketing Director, which involved managing COMPANY-1's advertising, social media, and marketing strategies for volatile alkyl nitrite products.

- b. On or about January 25, 2023, **HUGO SANCHEZ** corresponded via email from the Western District of Texas to Individual-1, a nightclub promoter located in San Francisco, California, about promoting Company-1's products and selling "poppers" at events hosted by Individual-1 in San Francisco, California. **HUGO SANCHEZ** wrote: "As for selling the

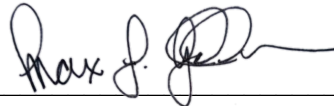
‘cleaners’ (that’s what we must refer to them as lol), send over an email to [Co-conspirator 3’s email address] and he can assist you with wholesale orders.”

All in violation of 18 U.S.C. § 371, 15 U.S.C. §§ 2052(a)(6), 2057, 2057b, 2068(a)(1), and 2070, and 21 U.S.C. §§ 321(g), 331(a), 333(a)(2), and 352.

Respectfully submitted,

JUSTIN R. SIMMONS
UNITED STATES ATTORNEY

LORINDA LARYEA,
CHIEF FRAUD SECTION,
CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE

A handwritten signature in black ink, appearing to read "Max J. Goldman", written over a horizontal line.

MAX J. GOLDMAN
TRIAL ATTORNEY