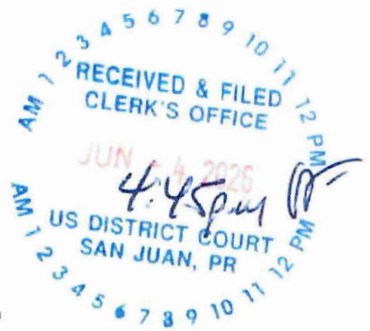


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO



UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] JOSUE SAEZ RODRIGUEZ,
(Counts 1 through 15)
[2] CHANCEY IRMARIES OLMED PEREZ,
(Counts 1, 6, and 12)
Defendants.

INDICTMENT

Criminal No. 26 - 239 (FAB)

Violations:

Count 1:
18 U.S.C. § 1349

Counts 2 through 9:
18 U.S.C. § 1343

Counts 10 and 11:
21 U.S.C. § 841(a)(1)

Counts 12 through 15:
21 U.S.C. § 331(k)

Forfeitures:

18 U.S.C. § 981
21 U.S.C. § 853
28 U.S.C. § 2461(c)

(FIFTEEN COUNTS)

THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

From in or about and between January 9, 2025, through May 14, 2026, both dates being approximate and inclusive, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] JOSUE SAEZ RODRIGUEZ,

[2] CHANCEY IRMARIES OLMED PEREZ,

the defendants herein, knowingly and intentionally combined, conspired, confederated, and agreed with each other and other persons, known and unknown, having devised and intending to devise a

scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice.

The conspiracy and scheme and artifice to defraud involved the advertising, communication, sale, and distribution of products for defendants' financial gain and profit which defendants were not authorized to possess and distribute. The products included Semaglutide, Mounjaro, Steroids, and Tirzepatide.

All in violation of 18 U.S.C. §§ 1343 and 1349.

COUNTS TWO THROUGH NINE
(Wire Fraud)

From in or about and between January 9, 2025, through May 14, 2026, both dates being approximate and inclusive, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] JOSUE SAEZ RODRIGUEZ,

[2] CHANCEY ILMARIES OLMED PEREZ,

the defendants herein, knowingly and willfully, having devised and intending to devise a scheme and artifice to defraud and obtain money by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, as more fully described below:

Count	Defendant(s)	Date	Wire Communication
2	[1] JOSUE SAEZ RODRIGUEZ	January 9-10, 2025	WhatsApp messages sent to undercover agent regarding sale of Semaglutide.

3	[1] JOSUE SAEZ RODRIGUEZ	January 28, 2025	WhatsApp message sent to undercover agent regarding sale of Semaglutide.
4	[1] JOSUE SAEZ RODRIGUEZ	March 26, 2025	WhatsApp message sent to undercover agent regarding sale of Semaglutide.
5	[1] JOSUE SAEZ RODRIGUEZ	April 15-24, 2025	WhatsApp messages sent to undercover agent regarding sale of purported Mounjaro.
6	[1] JOSUE SAEZ RODRIGUEZ [2] CHANCEY IRMARIES OLMED PEREZ	April 30, 2025	WhatsApp messages between [1] JOSUE SAEZ RODRIGUEZ and [2] CHANCEY IRMARIES OLMED PEREZ regarding sale of purported Mounjaro.
7	[1] JOSUE SAEZ RODRIGUEZ	May 5-6, 2025	WhatsApp messages sent to undercover agent regarding sale of steroids.
8	[1] JOSUE SAEZ RODRIGUEZ	January 11-14, 2026	WhatsApp messages sent to undercover agent regarding sale of Tirzepatide.
9	[1] JOSUE SAEZ RODRIGUEZ	May 11-14, 2026	WhatsApp messages sent to undercover agent regarding sale of Tirzepatide and steroids.

All in violation of 18 U.S.C. § 1343.

COUNT TEN

(Possession with Intent to Distribute Anabolic Steroids)

On or about May 6, 2025, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] JOSUE SAEZ RODRIGUEZ,

the defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of anabolic steroids, a Schedule III Controlled Substance.

All in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(E)(i).

COUNT ELEVEN
(Possession with Intent to Distribute Anabolic Steroids)

On or about May 14, 2026, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] JOSUE SAEZ RODRIGUEZ,

the defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of anabolic steroids, a Schedule III Controlled Substance.

All in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(E)(i).

COUNT TWELVE
(Misbranding of Drugs)

On or about April 30, 2025, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] JOSUE SAEZ RODRIGUEZ,

[2] CHANCEY IRMARIES OLMED PEREZ

the defendants herein, aiding and abetting each other, with intent to defraud and mislead, did cause the misbranding of a drug, while such drug was held for sale after shipment in interstate commerce, that is, the defendants dispensed a vial of purported Mounjaro (Tirzepatide), 5mg, a prescription drug, without a written prescription of a licensed practitioner, causing said drug to be misbranded, within the meaning of 21 U.S.C. § 353(b)(1).

All in violation of 21 U.S.C. §§ 331(k) & 333(a)(2) and 18 U.S.C. § 2.

COUNTS THIRTEEN THROUGH FIFTEEN
(Misbranding of Drugs)

From in or about and between January 28, 2025, through May 14, 2026, both dates being approximate and inclusive, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] JOSUE SAEZ RODRIGUEZ,

the defendant herein, with intent to defraud and mislead, did cause the misbranding of a drug, while such drug was held for sale after shipment in interstate commerce, that is, the defendant created false and misleading labeling and caused the following prescription drugs:

Count	Date	Description of Drug
13	January 28, 2025	Semaglutide, one vial, 5mg.
14	January 14, 2026	Tirzepatide, five vials, 30mg per vial.
15	May 14, 2026	Tirzepatide, five vials, 30mg per vial.

to be dispensed without a written prescription of a licensed practitioner, causing said drugs to be misbranded, within the meaning of 21 U.S.C. §§ 353(b)(1) and 352(a)(1).

All in violation of 21 U.S.C. §§ 331(k) & 333(a)(2).

WIRE FRAUD FORFEITURE ALLEGATION

The allegations contained in Counts One through Nine of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C). Upon conviction of the offenses in violation of 18 U.S.C. §§ 1349 and 1343, set forth in Counts One through Nine of this Indictment, the defendants,

[1] JOSUE SAEZ RODRIGUEZ,

[2] CHANCEY IRMARIES OLMED PEREZ,

shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

If any of the property described above, as a result of any act or omission of the defendants: (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, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

NARCOTICS FORFEITURE ALLEGATION

The allegations contained in Counts Ten and Eleven of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853. Upon conviction of the offenses in violation of 21 U.S.C. § 841(a)(1), set forth in Counts Ten and Eleven of this Indictment, the defendant,

[1] JOSUE SAEZ RODRIGUEZ,

shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to the following: (a) all rights, titles, and interest in all property constituting, or derived from, any proceeds defendant obtained, directly or indirectly, as a result of the offenses described in Counts Ten and Eleven of this Indictment and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations alleged in Counts Ten and Eleven of this Indictment; and (b) a sum of money in United States currency equal to the amount of proceeds obtained as a result of the offenses described in Counts Ten and Eleven of this Indictment.

If any of the property described above, as a result of any act or omission of the defendants: (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, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

TRUE BILL

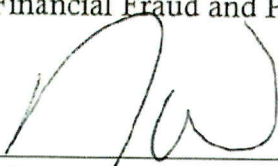
FOREPERSON

DATE: 4-21-2026

W. STEPHEN MULDROW
UNITED STATES ATTORNEY



Seth Erbe
Assistant United States Attorney
Chief, Financial Fraud and Public Corruption Section



José A. Contreras
Assistant United States Attorney