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U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.

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WILLIAM W. BLEVINS  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**INDICTMENT FOR VIOLATIONS OF THE DESIGNER ANABOLIC  
STEROID CONTROL ACT, THE FEDERAL CONTROLLED SUBSTANCES ACT,  
AND THE FOOD, DRUG AND COSMETIC ACT**

UNITED STATES OF AMERICA

v.

NATALIE BARTON

\* CRIMINAL NO.

**19-00161**

\* SECTION:

**SECT. 1 MAG. 2**

\* VIOLATIONS:

- 21 U.S.C. § 846
- 21 U.S.C. § 841(a)(1)
- 21 U.S.C. § 841(b)(1)(E)(i)
- 18 U.S.C. § 371
- 21 U.S.C. § 331(a)
- 21 U.S.C. § 331(k)
- 21 U.S.C. § 333(a)(2)
- 18 U.S.C. § 2

\* \* \*

The Grand Jury charges that:

**AT ALL TIMES MATERIAL HEREIN:**

1. The defendant, **NATALIE BARTON**, resided in and around Mandeville, Louisiana, which was located in the Eastern District of Louisiana.

2. **NATALIE BARTON** and her husband E.B., owned and operated a number of Louisiana corporations, including Celtic Labs LLC; Innovative Body Enhancement, LLC;

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Innovative Research, LLC; Nurave Development Co. L.L.C.; PHF Store LLC; PHF Supplements LLC; Shamrock Nutrition LLC; and Puresol Labs LLC. All of these corporations were registered to either **NATALIE BARTON**, E.B., or **NATALIE BARTON**'s mother, Charlotte Leach, although **NATALIE BARTON** and E.B. were the true owners and operators of these corporations.

3. Through these corporations, **NATALIE BARTON** and E.B. operated websites, including <http://www.phfsupplements.com>; <http://pure-oils.net>; <http://www.puritysolutionsresearch.com>; and <http://www.purityresearchsolutions.com>.

4. **NATALIE BARTON** and E.B. also operated a physical store, located in Metairie, Louisiana, in the Eastern District of Louisiana.

#### *Anabolic Steroids*

5. Under the Controlled Substances Act ("CSA"), the term "anabolic steroid" means drugs or hormonal substances, chemically and pharmacologically related to testosterone, and includes a number of specific chemical substances listed in subparagraph (A) of Title 21, United States Code, Section 802(41).

6. Moreover, the CSA authorizes the Attorney General to schedule additional anabolic steroids after an administrative and evaluation process. Pursuant to that authority, additional anabolic steroids are scheduled under Title 21, Code of Federal Regulations, 1300.01.

7. On December 18, 2014, the Designer Anabolic Steroid Control Act of 2014 ("DASCA") became effective, which amended the definition of "anabolic steroid" in the Controlled Substance Act. After the enactment of DASCA, a drug or hormonal substance that is not listed in subparagraph (A) and is derived from, or has a chemical structure substantially similar to one or more anabolic steroids listed in subparagraph (A) is considered to be an anabolic steroid for the purposes of the CSA if (1) the drug or substance was created or manufactured with the

intent of producing a drug or other substance that either promotes muscle growth or otherwise causes a pharmacological effect similar to that of testosterone; or (2) the drug or substance has been, or intended to be, marketed or otherwise promoted in any manner suggesting that consuming it will promote muscle growth or any other pharmacological effect similar to that of testosterone.

8. After the enactment of DASCA, **NATALIE BARTON** and E.B. marketed and sold substances referred to as “prohormones” on their websites and in their physical store. These substances included, but were not limited to, desoxytestosterone acetate, sold under the name “desoxy-T acetate;”  $2\alpha$ - $17\alpha$ -dimethyl- $5\alpha$ -androstane- $3,17\beta$ -diol, sold under the name “Celtic Mass;” and acetyldienolone, sold under the name “dienolone acetate.”

9. Desoxytestosterone acetate is chemically similar to desoxymethyltestosterone, which is a scheduled anabolic steroid at Title 21, Code of Federal Regulations, 1300.01(b)(17), and has pharmacological effects similar to testosterone, including promoting muscle growth, and therefore, is an anabolic steroid, a Schedule III controlled substance.

10.  $2\alpha$ - $17\alpha$ -dimethyl- $5\alpha$ -androstane- $3,17\beta$ -diol is chemically similar to  $2\alpha$ - $17\alpha$ -dimethyl- $17\beta$ -hydroxy- $5\alpha$ -androstan- $3$ -one, which is a listed anabolic steroid at Title 21, United State Code, Section 802(41)(A)(lviii), and has pharmacological effects similar to testosterone, including promoting muscle growth, and therefore, is an anabolic steroid, a Schedule III controlled substance.

11. Acetyldienolone is chemically similar to methyldienolone, which is a listed anabolic steroid at Title 21, United State Code, Section 802(41)(A)(xxix), and has pharmacological effects similar to testosterone, including promoting muscle growth, and therefore, is an anabolic steroid, a Schedule III controlled substance.

12. Other prohormones sold by **NATALIE BARTON** and E.B. were also chemically similar to testosterone or a listed anabolic steroid, and had pharmacological effects similar to testosterone, including promoting muscle growth, and therefore, were also anabolic steroids, Schedule III controlled substances.

13. Although in some cases the prohormones were sold with provisos indicating that they were not for human consumption or were for research purposes, they were in fact sold with the intent of promoting muscle growth in humans or to cause a pharmacological effect similar to testosterone.

14. For example, on or about December 23, 2014, **NATALIE BARTON** and E.B. caused a package containing desoxytestosterone acetate, 2 $\alpha$ -17 $\alpha$ -dimethyl-5 $\alpha$ -androstane-3,17 $\beta$ -diol, and other prohormones to be shipped to an address in New Orleans, Louisiana.

15. On or about February 28, 2015, E.B. sent a message on Facebook to a Facebook user stating, "You would not believe what I have done to the supplement world..The dianadrol ..It was an illegal steroid called dianabol..AKA D-bol what I done a chemical modification to the steroid by adding a oxime to the keton ..well the out come ..I made it legal and change the way it works from the original steroid..it;s a totally different steroid ...google dianabol ..(Methandrostenolone)..."

16. On April 30, 2015, E.B. sent a message on Facebook to the same user stating, "for the first week you need to take it twice to get a lot in you blood and then go to once a week."

17. On or about May 1, 2015, E.B. sent a message on Facebook to the same user stating, "it's all boxed up I only had 10ml of the injection but it will be enough you started it was form my stash ..lol we should be restocking soon...also the box and label is going to say not for injection and not for human use but that is just the only way I can sell it wit out it be illegal."

18. On or about September 23, 2015, **NATALIE BARTON** and E.B. caused a package containing desoxytestosterone acetate to be shipped to an address in Austin, Texas. Some of that desoxytestosterone acetate was later consumed by a former professional athlete.

19. On or about November 13, 2015, **NATALIE BARTON** and E.B. caused a package containing desoxytestosterone acetate to be shipped to an address in Washington, D.C.

*Misbranded Drugs*

20. Under the Food, Drug, and Cosmetic Act (“FDCA”), the definition of a “drug” includes articles which (1) are intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in man or other animals; or (2) are intended to affect the structure or function of the body of man or other animals. Due to the toxicity and other potential harmful effects, the method of their use, or the collateral measures necessary to their use, certain drugs are not considered safe for use except for use under the supervision of a practitioner licensed by law to administer such drugs. These drugs are known as prescription drugs.

21. Dispensing a prescription drug without a valid prescription of a practitioner licensed by law to administer such drug is an act that results in the drug being misbranded while held for sale. In addition, a prescription drug is misbranded if at any time prior to dispensing, the label of the drug fails to bear, at a minimum, the symbol “Rx only,” if its labeling is false or misleading in any way, and unless its labeling bears (1) adequate directions for use; and (2) such adequate warnings against use in those pathological conditions or by children where its use may be dangerous to health, or against unsafe dosage or methods or duration of administration or application, in such manner and form, as are necessary for the protection of users.

22. The following substances are known as active pharmaceutical ingredients in prescription drug products approved by the Food and Drug Administration (“FDA”) for

distribution within the United States: (1) Albuterol; (2) Anastrozole; (3) Clomiphene Citrate; (4) Dutasteride; (5) Exemestane; (6) Finasteride; (7) Letrozole; (8) Liothyronine Sodium; (9) Pramipexole; (10) Sildenafil Citrate; (11) Tadalafil; (12) Tamoxifen Citrate; (13) Toremifene Citrate; and (14) Vardenafil.

23. Neither **NATALIE BARTON** nor E.B. were practitioners licensed by law to administer prescription drugs.

24. Nevertheless, **NATALIE BARTON** and E.B. dispensed and sold prescription drugs, including drugs consisting of the above-described active pharmaceutical ingredients, on their websites and in their physical store without prescriptions and without labels that complied with the FDCA, in that they did not include the symbol “Rx Only,” did not include adequate directions for use by a layperson, and lacked adequate warnings against use as necessary for the protection of users.

25. For example, on or about February 15, 2017, **NATALIE BARTON** caused a package containing tadalafil and sildenafil citrate to be shipped from an address in Mandeville, Louisiana to an address in Metairie, Louisiana. The package was shipped without the customer providing a prescription issued by a practitioner licensed by law to administer tadalafil and sildenafil citrate. The label for the tadalafil falsely stated “NOT FOR HUMAN CONSUMPTION.”

26. On or about April 20, 2017, **NATALIE BARTON** caused a package containing tadalafil to be shipped from an address in Mandeville, Louisiana to an address in Wilton Manors, Florida. The tadalafil did not bear labeling that complied with the FDCA. In addition, the tadalafil bore a misleading label in that it stated “NOT FOR HUMAN CONSUMPTION,” when it was in fact intended for human consumption.

27. Many of the prescription drugs sold by **NATALIE BARTON** and E.B. are abused in conjunction with the use of anabolic steroids because they either treat negative side effects of anabolic steroids or have complementary effects. For instance, albuterol, which is therapeutically prescribed to treat asthma, has anabolic properties, meaning that it can help to build muscles.

28. Similarly, anastrozole, which is therapeutically prescribed as a non-steroidal aromatase inhibitor in the treatment of metastatic breast cancer in postmenopausal women, is used for treatment of adverse effects of abuse of anabolic steroids, including gynecomastia, which is the development of female breast tissue in men.

29. Although in some cases the prescription drugs were sold with provisos indicating that they were not for human consumption or were for research purposes, they were in fact drugs intended for use by man to affect the structure or function of the body, or to treat or prevent medical conditions associated with the use of anabolic steroids.

*Processing of Anabolic Steroids and Prescription Drugs*

30. **NATALIE BARTON** and E.B., through their corporate entities, also operated warehouses and processing facilities located in St. Tammany Parish, within the Eastern District of Louisiana.

31. At those locations and elsewhere, employees of **NATALIE BARTON** and E.B. received shipments of bulk powder forms of prohormones and prescription drugs through the mail, including shipments that originated outside of the United States.

32. Employees of **NATALIE BARTON** and E.B. processed the bulk powders and packaged them in individualized bottles or packages suitable for retail sale.

33. Employees of **NATALIE BARTON** and E.B. shipped those retail products of prohormones and prescription drugs to customers who placed orders over the websites, including to customers located outside of the United States.

34. Employees of **NATALIE BARTON** and E.B. also sold those retail products at the aforementioned physical store in Metairie, Louisiana.

*GoFundMe Campaign*

35. GoFundMe was an online fundraising platform. GoFundMe allowed users to request donation-based crowdfunding, in which the person running the fundraiser could solicit donations without any obligation to repay the donors or to give them anything in return.

36. On or about January 8, 2017, **NATALIE BARTON** created a campaign entitled “BAs Celtic Labs Recovery Fund,” which solicited donations from individuals and organizations.

37. **NATALIE BARTON** caused the GoFundMe website to state that the campaign was established to “raise money for the basic business expenses needed to keep our business afloat.”

38. In fact, **NATALIE BARTON** established the GoFundMe campaign to receive payment for prescription drugs sold on her websites. Customers who placed orders over websites controlled by **NATALIE BARTON** and E.B. received emails instructing them to make a donation at their GoFundMe campaign because **NATALIE BARTON** and E.B. were unable to receive credit card payments at that time.

**COUNT 1**

**(Conspiracy to Distribute and Possess With the Intent to Distribute Anabolic Steroids)**

Paragraphs 1 through 38 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.



From on or about a date unknown, but sometime prior to December 18, 2014, until on or about August 22, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **NATALIE BARTON**, did unlawfully, knowingly, and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to distribute and possess with the intent to distribute anabolic steroids, as defined in Title 21, United States Code, Section 802(41)(C)(i), to wit, drugs and hormonal substances that are not listed in Title 21, United States Code, Section 802(41)(A) and are derived from and have a chemical structure substantially similar to one or more anabolic steroids listed in Title 21, United States Code, Section 802(41)(A), and have been created and manufactured with the intent of producing a drug or other substance that promotes muscle growth and otherwise causes a pharmacological effect similar to that of testosterone and the drug and substance has been and is intended to be, marketed and otherwise promoted in a manner suggesting that consuming it will promote muscle growth and any other pharmacological effect similar to that of testosterone, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(E)(i), and 846.

**COUNT 2**

**(Conspiracy to Misbrand Drugs)**

**A. THE CONSPIRACY**

Paragraphs 1 through 38 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

From on or about a date unknown, but sometime prior to July 10, 2007, until on or about August 22, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **NATALIE BARTON**, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to, with the intent to mislead,

cause the introduction into interstate commerce drugs that were misbranded within the meaning of Title 21, United States Code, Section 352(a), 352(f), and 353(b)(4)(A) in violation of Title 21, United States Code, Sections 331(a), and 333(a)(2), and to dispense prescription drugs without a valid prescription from a licensed practitioner, an act which caused those drugs to become misbranded while held for sale after shipment in interstate commerce, in violation of Title 21, United States Code, Sections 331(k) and 333(a)(2).

**B. OVERT ACTS**

In furtherance of the conspiracy, and to further the objects of the conspiracy, the defendant, **NATALIE BARTON**, and others known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. On or about June 21, 2016, **NATALIE BARTON**, E.B., and others constructively possessed quantities of sildenafil, tadalafil, and vardenafil at a location in Mandeville, Louisiana.

2. On or about February 9, 2017, an email was sent from [puritysolutionscs@gmail.com](mailto:puritysolutionscs@gmail.com) stating, "We are now accepting donations through a Go Fund Me campaign temporarily to get credit card payments through until other means are integrated."

3. On or about February 15, 2017, **NATALIE BARTON** caused a package containing tadalafil and sildenafil to be shipped from an address in Mandeville, Louisiana to an address in Metairie, Louisiana.

4. On or about April 20, 2017, **NATALIE BARTON** caused a package containing tadalafil to be shipped from an address in Mandeville, Louisiana to an address in Wilton Manors, Florida.

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

**COUNT 3**

**(Distribution of Anabolic Steroids)**

On or about December 23, 2014, in the Eastern District of Louisiana and elsewhere, the defendant, **NATALIE BARTON**, and others known and unknown to the Grand Jury, knowingly and intentionally distributed anabolic steroids, Schedule III controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and 841(b)(1)(E)(i), and Title 18, United States Code, Section 2.

**COUNT 4**

**(Distribution of Anabolic Steroids)**

On or about March 10, 2015, in the Eastern District of Louisiana and elsewhere, the defendant, **NATALIE BARTON**, and others known and unknown to the Grand Jury, knowingly and intentionally distributed anabolic steroids, Schedule III controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and 841(b)(1)(E)(i), and Title 18, United States Code, Section 2.

**COUNT 5**

**(Distribution of an Anabolic Steroid)**

On or about March 10, 2015, in the Eastern District of Louisiana and elsewhere, the defendant, **NATALIE BARTON**, and others known and unknown to the Grand Jury, knowingly and intentionally distributed an anabolic steroid, a Schedule III controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and 841(b)(1)(E)(i), and Title 18, United States Code, Section 2.

**COUNT 6**

**(Misbranding of Prescription Drugs)**

On or about February 15, 2017, in the Eastern District of Louisiana and elsewhere, the defendant, **NATALIE BARTON**, and others known and unknown to the Grand Jury, with the intent to mislead, dispensed prescription drugs, to wit, tadalafil and sildenafil, without the valid prescription of a practitioner licensed by law to prescribe such drugs, an act which under Title 21, United States Code, Section 353(b) caused the drugs to become misbranded while held for sale, after the drugs had been shipped in interstate commerce, in violation of Title 21, United States Code, Section 331(a), and 333(a)(2), and Title 18, United States Code, Section 2.

**COUNT 7**

**(Misbranding of Prescription Drugs)**

On or about April 20, 2017, in the Eastern District of Louisiana and elsewhere, the defendant, **NATALIE BARTON**, and others known and unknown to the Grand Jury, with the intent to mislead, caused the introduction into interstate commerce, from Louisiana to Florida, a drug, to wit, tadalafil, that was misbranded within the meaning of Title 21, United States Code, Sections 352(a), 352(f), and 353(b)(4)(A), in violation of Title 21, United States Code, Section 331(a), and 333(a)(2), and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**

1. The allegations of paragraphs 1 through 38 and Counts 1 through 7 are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

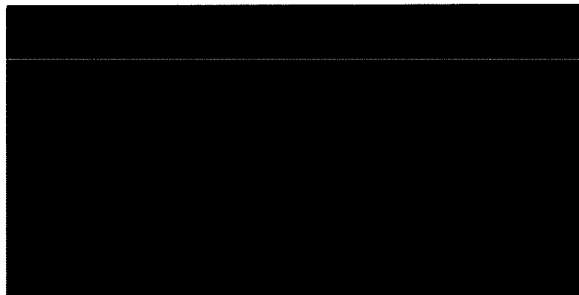
2. As a result of the offenses alleged in Counts 1, 3, 4, and 5, the defendant, **NATALIE BARTON**, shall forfeit to the United States pursuant to Title 21, United States Code,

Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offenses, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offenses.

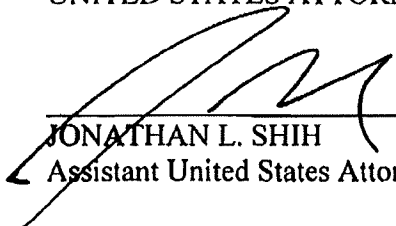
3. If any of the above-described property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond 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 shall, pursuant to Title 21, United States Code, Section 853(p), seek forfeiture of any other property of the defendant up to the value of the above-described property.



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New Orleans, Louisiana  
August 22, 2019