UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA	)	Case No.
	)	
	)	Violations: Title 21, United States
v.	)	Code, Sections 331(a) and 331(i)(3)
	)	
SHARON CHRISTINE SACKMAN	)	

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. The U.S. Food and Drug Administration ("FDA") regulated, among other things, the manufacture, labeling, and distribution of drugs in the United States, including prescription drugs, according to the provisions of the Federal Food, Drug, and Cosmetic Act, Title 21, United States Code, Section 301 *et seq*. ("FDCA").

b. The FDCA defined a "drug," in part, as any article intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in humans and any article (other than food) intended to affect the structure or any function of the human body.

c. Under the FDCA, a prescription drug was one that, because of its toxicity, other potential harmful effects, the methods of its use, or the collateral measures necessary to its use, is not safe for use except under the supervision of a practitioner licensed by law to administer the prescription drug.

d. The FDCA defined a "counterfeit drug," in part, as a drug which, or the container or labeling of which, without authorization, bears the trademark, trade name, or other identifying mark, or any likeness thereof, of a drug manufacturer, and which thereby falsely purports or is represented to be the product of that drug manufacturer.

e. Ozempic®, manufactured by Novo Nordisk, was an FDA-approved prescription drug containing the active ingredient semaglutide that was approved to lower blood sugar levels in adults with type 2 diabetes mellitus, in addition to diet and exercise. Ozempic® was also approved to reduce the risk of heart attack, stroke, or death in adults with type 2 diabetes mellitus and known heart disease.

f. Defendant SHARON CHRISTINE SACKMAN was a registered professional nurse. SACKMAN was not licensed by law to prescribe, administer, dispense, or sell Ozempic.

2. No later than on or about December 2, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARON CHRISTINE SACKMAN,

defendant herein, caused the introduction into interstate commerce of drugs labeled as "Ozempic®," which were misbranded within the meaning of Title 21, United States Code, Section 352(a), because their labeling was false and misleading in that the drugs were not Ozempic® and did not contain semaglutide, and which were misbranded within the meaning of Title 21, United States Code, Section 353(b)(1),

because they were prescription drugs that were sold and dispensed without the valid 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)(1).

COUNT TWO

The UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. On or about October 23, 2023, at Chicago, in the Northern District of Illinois, Eastern Division,

SHARON CHRISTINE SACKMAN,

defendant herein, sold and dispensed counterfeit drugs, namely, products labeled as "Ozempic®," but not manufactured by Novo Nordisk, to Victim 1;

In violation of Title 21, United States Code, Sections 331(i)(3) and 333(a)(1).

COUNT THREE

The UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. On or about December 2, 2023, at Chicago, in the Northern District of Illinois, Eastern Division,

SHARON CHRISTINE SACKMAN,

defendant herein, sold and dispensed counterfeit drugs, namely, products labeled as "Ozempic®," but not manufactured by Novo Nordisk, to Victim 2;

In violation of Title 21, United States Code, Sections 331(i)(3) and 333(a)(1).

COUNT FOUR

The UNITED STATES ATTORNEY further charges:

1. Paragraph 1 of Count One is incorporated here.

2. On or about December 2, 2023, at Chicago, in the Northern District of Illinois, Eastern Division,

SHARON CHRISTINE SACKMAN,

defendant herein, sold and dispensed counterfeit drugs, namely, products labeled as "Ozempic®," but not manufactured by Novo Nordisk, to Victim 3;

In violation of Title 21, United States Code, Sections 331(i)(3) and 333(a)(1).

/s/ Andrew S. Boutros by LHM
UNITED STATES ATTORNEY