

FILED

MAY 25 2022

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

**CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMANDA HOVANEC,
ANTHONY THEODOROU,
ANITA GREEN,

Defendants.

) INDICTMENT
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CASE NO. **3 : 22 CR 274**

Title 21, United States Code,
Sections 841(a)(1), (b)(1)(C),
846, 952(a), 960(a)(1), (b)(3) and
963 and Title 18, United States
Code, Section 3

JUDGE KNEPP

MAG JUDGE CLAY

COUNT 1

(Conspiracy to Import a Controlled Substance, 21 U.S.C. § 963)

The Grand Jury charges:

1. In or around February 2022 and continuing through on or about April 28, 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendants AMANDA HOVANEC and ANTHONY THEODOROU did knowingly and intentionally combine, conspire, confederate, and agree together and with each other, and with others unknown to the Grand Jury, to import into the United States from any place outside thereof, to wit: South Africa, a mixture and substance containing a detectable amount of a Schedule I or II controlled substance, to wit: Etorphine, in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), (b)(3) and 963.

ORIGINAL

ENHANCED PENALTY UNDER TITLE 21,
UNITED STATES CODE, SECTION 960(b)(3)
(Death or Serious Bodily Injury Resulting from Use of Controlled Substance)

2. The allegations of Count 1 are hereby re-alleged and incorporated herein. It is further alleged that the use of the controlled substance by HOVANEK and THEODOROU, on or about April 24, 2022, in Auglaize County, Ohio, resulted in the death of T.H., a person whose identity is known to the Grand Jury.

COUNT 2
(Importation of a Controlled Substance, 21 U.S.C. §§ 952(a), 960(a)(1) and (b)(3))

The Grand Jury further charges:

3. In or around February 2022 and continuing through on or about March 1, 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendants AMANDA HOVANEK and ANTHONY THEODOROU did knowingly and intentionally import into the United States from any place outside thereof, to wit: South Africa, a mixture and substance containing a detectable amount of a Schedule I or II controlled substance, to wit: Etorphine, in violation of Title 21, United States Code, Sections 952(a), 960(a)(1) and (b)(3).

ENHANCED PENALTY UNDER TITLE 21,
UNITED STATES CODE, SECTION 960(b)(3)
(Death or Serious Bodily Injury Resulting from Use of Controlled Substance)

4. The allegations of Count 2 are hereby re-alleged and incorporated herein. It is further alleged that the use of the controlled substance by HOVANEK and THEODOROU, on or about April 24, 2022, in Auglaize County, Ohio, resulted in the death of T.H., a person whose identity is known to the Grand Jury.

COUNT 3

(Distribution of a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

5. In or around February 2022 and continuing through on or about March 1, 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendant ANTHONY THEODOROU did knowingly and intentionally distribute to Amanda Hovanec (not charged in this count) a mixture and substance containing a detectable amount of a Schedule I or II controlled substance, to wit: Etorphine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ENHANCED PENALTY UNDER TITLE 21,
UNITED STATES CODE, SECTION 841(b)(1)(C)
(Death or Serious Bodily Injury Resulting from Use of Controlled Substance)

6. The allegations of Count 3 are hereby re-alleged and incorporated herein. It is further alleged that the use of the controlled substance by THEODOROU and Amanda Hovanec (not charged in this count), on or about April 24, 2022, in Auglaize County, Ohio, resulted in the death of T.H., a person whose identity is known to the Grand Jury.

COUNT 4

(Conspiracy to Possess with Intent to Distribute and Distribution of a Controlled Substance,
21 U.S.C. § 846)

The Grand Jury further charges:

7. In or around February 2022 and continuing through on or about April 28, 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendants AMANDA HOVANEC and ANTHONY THEODOROU did knowingly and intentionally combine, conspire, confederate, and agree together and with each other, and with others unknown to the Grand Jury, to possess with the intent to distribute and to distribute a mixture and substance

containing a detectable of a Schedule I or II controlled substance, to wit: Etorphine, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and 846.

ENHANCED PENALTY UNDER TITLE 21,
UNITED STATES CODE, SECTION 841(b)(1)(C)
(Death or Serious Bodily Injury Resulting from Use of Controlled Substance)

8. The allegations of Count 4 are hereby re-alleged and incorporated herein. It is further alleged that the use of the controlled substance by HOVANEC and THEODOROU, on or about April 24, 2022, in Auglaize County, Ohio, resulted in the death of T.H., a person whose identity is known to the Grand Jury.

COUNT 5
(Distribution of a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

9. On or about April 24, 2022, in the Northern District of Ohio, Western Division, Defendants AMANDA HOVANEC and ANTHONY THEODOROU did knowingly and intentionally distribute a mixture and substance containing a detectable amount of a Schedule I or II controlled substance, to wit: Etorphine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ENHANCED PENALTY UNDER TITLE 21,
UNITED STATES CODE, SECTION 841(b)(1)(C)
(Death or Serious Bodily Injury Resulting from Use of Controlled Substance)

10. The allegations of Count 5 are hereby re-alleged and incorporated herein. It is further alleged that the use of the controlled substance by HOVANEC and THEODOROU, on or about April 24, 2022, in Auglaize County, Ohio, resulted in the death of T.H., a person whose identity is known to the Grand Jury.

COUNT 6

(Accessory After the Fact, 18 U.S.C. § 3)

The Grand Jury further charges:

11. On or about April 24, 2022 and continuing through April 28, 2022, in the Northern District of Ohio, Western Division, Defendant ANITA GREEN, knowing that Amanda Hovanec and Anthony Theodorou had caused the death of T.H. by means of distribution of a controlled substance, did receive, relieve, comfort and assist Hovanec and Theodorou in order to hinder and prevent their apprehension, trial and punishment, in violation of Title 18, United States Code, Section 3.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.