

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 14-
v.	:	DATE FILED: September 4, 2014
SHAWN NEALON ROBINSON	:	VIOLATIONS:
NEIL FRANCIS ROBINSON	:	18 U.S.C. § 371 (conspiracy to traffic in counterfeit goods and to illegally import counterfeit goods – 1 count)
	:	18 U.S.C. § 2320 (trafficking in counterfeit goods - 8 counts)
	:	18 U.S.C. § 545 (smuggling – 5 counts)
	:	18 U.S.C. § 2 (attempt)
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this indictment, the National Hockey League (NHL), the National Football League (NFL), Major League Baseball (MLB), and The National Basketball Association (NBA) owned trademarks, and those trademarks were registered on the principal register in the United States Patent and Trademark Office and were valid and in use.

2. At all times relevant to this indictment, the NHL, NFL, MLB and NBA (the sports leagues) had each filed a copy of the certificate of registration of their trademarks with the Secretary of the Treasury.

3. Beginning in or about August of 2007, and continuing to on or about July 2, 2014, in the Eastern District of Pennsylvania and elsewhere, defendants

**SHAWN ROBINSON and
NEIL ROBINSON**

conspired and agreed with each other and with others, known and unknown to the grand jury, to (1) intentionally traffic in goods, that is sports jerseys, and to knowingly use a counterfeit mark on and in connection with such goods, in violation of 18 U.S.C. § 2320(a), and to (2) knowingly import into the United States merchandise contrary to law, and to sell such merchandise after importation, knowing the same to have been imported or brought into the United States contrary to law, specifically sports jerseys imported into the United States in violation of 19 U.S.C. § 1526, in violation of 18 U.S.C. § 545.

4. At no time did defendants SHAWN ROBINSON and NEIL ROBINSON have the permission of the NHL, NFL, MLB, or NBA, to import or sell merchandise bearing any of those entities' counterfeit trademarks.

5. At no time did any of the individuals who manufactured sports jerseys for defendants SHAWN ROBINSON and NEIL ROBINSON have the permission of the NHL, NFL, MLB, or NBA, to manufacture merchandise bearing any of those entities' trademarks.

MANNER AND MEANS

It was part of the conspiracy that:

6. Defendants SHAWN ROBINSON and NEIL ROBINSON took orders from individuals in the area in and near Philadelphia, Pennsylvania, within the Eastern District of Pennsylvania, and from throughout the United States through online auction sites, for counterfeit sports jerseys, including baseball sports jerseys, hockey sports jerseys, football sports jerseys,

basketball sports jerseys. These sports jerseys which the defendants offered for sale had affixed to them counterfeit trademarks of the sports leagues.

7. Part of the value of owning these sports jerseys for these customers who bought them was the presence of distinctive insignias, patches, lettering, and other features which were associated with the sports leagues and individual teams in those leagues, and which were registered trademarks of those teams and leagues.

8. Defendants SHAWN ROBINSON and NEIL ROBINSON contacted individuals in China who manufactured sports jerseys and affixed counterfeit trademarks and counterfeit trademarked emblems onto such sports jerseys. The defendants at times provided to these vendors information on changes in teams' rosters in order to cause the individuals in China to manufacture new jerseys in conformity with those changes. The defendants at times provided photographs of jerseys to help guide the accuracy of the manufacture of counterfeit jerseys in China.

9. Defendants SHAWN ROBINSON and NEIL ROBINSON ordered counterfeit sports jerseys with counterfeit trademarks affixed from these unauthorized manufacturers in China. The defendants knew that the manufacturers in China would make the ordered sports jerseys look nearly identical to those authorized sports jerseys made by entities authorized by the sports leagues to manufacture such jerseys and sell them in the United States.

10. The unauthorized manufacturers from whom defendants SHAWN ROBINSON and NEIL ROBINSON ordered counterfeit sports jerseys made such jerseys and sent them to the defendants in the United States, usually at the home in Bensalem, Pennsylvania owned by defendant NEIL ROBINSON and where defendant SHAWN ROBINSON also resided during part of the period of this conspiracy. The defendants also directed the unauthorized

manufacturers in China to send some of the counterfeit jerseys to the address of a third party, also in Bensalem, Pennsylvania. Both of these addresses are located within the Eastern District of Pennsylvania. The manufacturers used common carriers such as the postal service, Federal Express, and DHL or others to ship these counterfeit sports jerseys to the defendants.

11. Defendants SHAWN ROBINSON and NEIL ROBINSON paid the unauthorized manufacturers in China by sending money using Western Union or MoneyGram, or by sending funds using the services of PayPal.

12. Defendants SHAWN ROBINSON and NEIL ROBINSON received the counterfeit sports jerseys which they had ordered and which were sent by the unauthorized manufacturers in China, and the defendants then sold these counterfeit sports jerseys to individuals in the Eastern District of Pennsylvania and elsewhere. The defendants personally delivered some of these counterfeit sports jerseys, and in other cases had sold them over the internet (sometimes using the services of eBay).

13. The individuals in China who manufactured these unauthorized sports jersey which were ordered by defendants SHAWN ROBINSON and NEIL ROBINSON knew that they did not have permission to use the trademarks owned by the sports leagues and the teams in those leagues, and are therefore unindicted conspirators in this conspiracy.

14. Defendants SHAWN ROBINSON and NEIL ROBINSON sold counterfeit sports jerseys through personal contacts and through internet sites such as eBay, where both SHAWN ROBINSON and NEIL ROBINSON had accounts.

15. Defendants SHAWN ROBINSON and NEIL ROBINSON received payments from the persons to whom they sold the counterfeit sports jerseys, including payments in cash and payments delivered through PayPal.

16. During the course of the conspiracy defendants SHAWN ROBINSON and NEIL ROBINSON ordered more than 8,500 counterfeit sports jerseys from manufacturers in China, and paid those unauthorized manufacturers approximately \$200,000 for such counterfeit jerseys.

OVERT ACTS

In furtherance of the conspiracy, defendants, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about October 11, 2007, defendant SHAWN ROBINSON ordered twelve NFL sports jerseys, using email Shawn990@yahoo.com (Shawn990), from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania.

2. On or about October 11, 2007, defendant SHAWN ROBINSON paid for the twelve NFL sports jerseys which he ordered on that date using a PayPal account associated with email address SNJerseys@hotmail.com (snjerseys), and which charged a Wachovia bank account in the name of SHAWN ROBINSON, account number ending in 0289, in the amount of \$264.00.

3. On or about October 22, 2007, an individual in China shipped twelve counterfeit NFL sports jerseys to defendant SHAWN ROBINSON via the postal service, and the package had the tracking number EA977753205CN. These jerseys bore counterfeit NFL trademarks.

4. On various dates in August through November, 2007, defendant SHAWN ROBINSON ordered jerseys from individuals in China and paid for these jerseys using PayPal, which charged a credit card issued to defendant NEIL ROBINSON, with an account number

ending in -01470, including on or about September 15, 2007 in the amount of \$930.

5. On or about December 17, 2007, defendant SHAWN ROBINSON, sent an email to a jersey supplier in China using email Shawn990, advising on the appropriate address to use in sending counterfeit jerseys from China to defendant SHAWN ROBINSON: "I still think that the address is alright...i just got a letter from customs says that they seized a package back in october, and if i wanted it i would have to go and get it. but i have received many packages from you and other sellers since october, so there really isn't a problem. i just think that it was one package that they saw the name ROBO'S SPORTS APPAREL and opened the package. i'm just playing it safe and changing the name on the packages. Thanks shawn robinson."

6. On or about December 17, 2007, defendant SHAWN ROBINSON, sent an email to a jersey supplier in China using email Shawn990, seeking to determine whether this supplier could become an additional source for counterfeit jerseys, saying: "I have been buying jerseys for almost a year now (MLB, NFL, NBA, NHL)...on avg. I have been buy about 100-150 a month" and "if you want to check out my ebay name it is ksj4zk."

7. On or about January 21, 2008, defendant SHAWN ROBINSON, sent an email to a customer reassuring the customer about his order, saying "Earlier this afternoon ebay cancelled my account because I was selling jerseys. Just like everyone else on ebay I don't have a license to sell the jerseys. I will still honor all of my open sales."

8. On or about March 12, 2008, defendant SHAWN ROBINSON, sent an email to a representative of eBay, after eBay suspended his account, in an effort to reinstate his account so that he could continue to sell counterfeit jerseys, and in that email he told the eBay representative "She also informed me that I needed to take the tutorial on intellectual property, so I did and I learned a lot about trademark violations."

9. On or about August 26, 2008, defendant NEIL ROBINSON, ordered nineteen NFL sports jerseys, using email neilrobinson331@hotmail.com (neilrobinson331), from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania.

10. On or about November 10, 2008, defendant SHAWN ROBINSON, ordered fifteen MLB sports jerseys, using email Shawn990, from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania.

11. On or about November 13, 2008, an individual in China shipped twelve counterfeit MLB sports jerseys to defendant SHAWN ROBINSON via the postal service, and the package had the tracking number EB082046355CN. These jerseys bore counterfeit MLB trademarks.

12. On or about September 22, 2009, defendant SHAWN ROBINSON sent an email message (using email account shawn990) to an individual in China offering to send photographs of NHL Winter Classic jerseys to assist that individual in making counterfeit versions of those jerseys, saying: "hey peter the flyers winter classic jerseys are out...if you need pics let me know....how long do you think it will take to make them...i have alot of orders already....thanks shawn"

13. On or about September 25, 2009, defendant SHAWN ROBINSON, sent an email message (using email account shawn990) to an individual in China giving direction as to which counterfeit jerseys to manufacturer, saying "FOR THE FLYERS...I WOULD JUST MAKE #17 #18 #20 #28....I WOULDN'T MAKE ANYONE ELSE...THOSE 4 ARE ENOUGH."

14. On or about October 26, 2009, defendant SHAWN ROBINSON, ordered

twelve NFL sports jerseys, using email Shawn990, from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania.

15. On or about October 31, 2009, an individual in China shipped thirteen counterfeit NHL sports jerseys to defendant SHAWN ROBINSON via the postal service, and the package had the tracking number EE132306660CN. These jerseys bore counterfeit NHL trademarks.

16. On or about December 9, 2009, defendant SHAWN ROBINSON sent a Western Union money transfer to one of his jersey manufacturers in China in the amount of \$2,130 with MTCN #739-613-7542, using the destination information supplied by the manufacturer, all for the payment of counterfeit jerseys which defendant SHAWN ROBINSON had ordered.

17. On or about June 11, 2010, defendant NEIL ROBINSON sent a Western Union money transfer to one of his jersey manufacturers in China in the amount of \$2,870 with MTCN #054-591-2226, all for the payment of counterfeit jerseys which defendant SHAWN ROBINSON had ordered.

18. On or about July 20, 2010, defendant NEIL ROBINSON sent an email to an individual in China who supplied counterfeit jerseys saying "This is Shawn's father. Long time since I talked with you. I am running the operation while Shawn is on holiday. I have a question for you. What is our minimum order, and could you send me a tracking number when this order is shipped. Thanks Neil." in furtherance of continuing to traffic in counterfeit sports jerseys.

19. On or about July 21, 2010, defendant SHAWN ROBINSON sent an email (from email account shawn990) to defendant NEIL ROBINSON (at snjerseys) directing him to

do "the orders."

20. On or about July 29, 2010, defendant NEIL ROBINSON sent an email (from email account shawn990) to an individual in China with requests for that person to manufacture certain specific counterfeit jerseys "New player to be announced shortly. ROY OSWALT being traded from Houston Astros to Phillies. I will send you his number when it is announced. Also Phillies new player DOMINIC BROWN #9 was a hit. Hope you started production. I will need ASAP. White pinstripe and grey should be plenty for now. Thanks Neil."

21. On or about December 15, 2010, defendant SHAWN ROBINSON, sent an email message (using email account shawn990) to an individual in China giving direction as to which counterfeit jerseys to manufacturer, saying "It official Lee is wearing #33...how fast do you they can make them. I would start with the white pinstripe 1st. Make sure the factory takes their time though. People are starting to complain about some of the quality of the jerseys. Some crooked letters/numbers and buttons are coming off. I understand things happen but just wanted to let u know. Thanks buddy."

22. On or about June 5, 2011, defendant NEIL ROBINSON sent an email (using email account neilrobinson331) to defendant SHAWN ROBINSON (at Shawn990) reporting "We cleared \$450 today."

23. On or about September 22, 2011, defendant NEIL ROBINSON sent an email to a customer explaining why he had not been selling counterfeit jerseys at a local flea market, saying: "The Feds came in about 2 months ago and confiscated everyone's jerseys. They also warned everyone with future fines and jail time. If u need something just let us know, We still sell. Just not visibly."

24. On or about October 8, 2011, defendant SHAWN ROBINSON sent a Western Union money transfer to one of his jersey manufacturers in China in the amount of \$1,850 with MTCN #548-751-9041, all for the payment of counterfeit jerseys which defendant SHAWN ROBINSON had ordered.

25. On or about October 24, 2011, defendant NEIL ROBINSON sent an email to an individual in China who supplied counterfeit jerseys saying in part "Shawn has been doing the buying for the most part, but that job looks like it's coming back to me. Would you please send me the most upto date stock list as we need to place an order. Thanks Neil Robinson" in furtherance of continuing to traffic in counterfeit sports jerseys.

26. On or about November 21, 2011, defendant SHAWN ROBINSON sent an email to a manufacturer in China along with a photograph of the Philadelphia Flyers' Winter Classic jerseys, saying "'Real winter classic jerseys."

27. In or about early December, 2011, defendant NEIL ROBINSON ordered NHL and MLB sports jerseys, using email snjerseys, from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania.

28. On or about December 20, 2011, an individual in China shipped twenty-nine NHL and four NFL counterfeit sports jerseys to defendant SHAWN ROBINSON via the DHL, and the package had the tracking number 3436782241. These jerseys bore counterfeit NHL and NFL trademarks.

29. On or about December 26, 2011, an individual in China shipped eighteen NHL and five NFL counterfeit sports jerseys to defendant SHAWN ROBINSON via the DHL, and the package had the tracking number 3436859963. These jerseys bore counterfeit NHL and NFL trademarks.

30. On or about March 13, 2012, defendant SHAWN ROBINSON, ordered six counterfeit NFL, NBA and MLB sports jerseys, using email Shawn990, from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania.

31. On or about May 21, 2012, defendant NEIL ROBINSON sent a Western Union money transfer to one of his jersey manufacturers in China in the amount of \$660 with MTCN #006-177-8004, all for the payment of counterfeit jerseys which he had ordered.

32. On or about a day in late May or early June, 2012, an individual in China shipped approximately eight MLB, NFL, and other counterfeit sports jerseys to defendant NEIL ROBINSON via the U.S. Postal Service, and the package had the tracking number EE697624918CN. These jerseys bore counterfeit MLB, NFL, and other trademarks.

33. On or about a day in early August, 2012, an individual in China shipped approximately nineteen MLB, NFL, and other counterfeit sports jerseys to defendant NEIL ROBINSON via DHL, and the package had the tracking number 3197689865. These jerseys bore counterfeit MLB, NFL and other trademarks.

34. On or about October 16, 2012, defendant NEIL ROBINSON, ordered 19 counterfeit NFL and MLB sports jerseys, using email snjerseys, from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania.

35. On or about October 24, 2012, an individual in China shipped approximately 10 counterfeit NFL sports jerseys to defendant NEIL ROBINSON via the postal service, and the package had the tracking number EE 862195754 CN. These jerseys bore counterfeit NFL trademarks.

36. In or about October or November, 2012, an individual in China shipped approximately 13 counterfeit sports jerseys to defendant NEIL ROBINSON via the postal

service, and the package had the tracking number EE 8612611324 CN. These jerseys bore counterfeit trademarks.

37. On or about November 5, 2012, defendant NEIL ROBINSON sent an email (using the snjerseys account) to a customer in response to a question as to whether the customer's jersey order had come in, saying "Actually we're having major problems getting orders through customs. The jersey u r looking for has been confiscated twice."

38. On or about January 5, 2013, defendant NEIL ROBINSON sent an email (using the snjerseys account) to a person in China asking when an order would arrive, saying: "Any idea on when my last order will be shipped?" and receiving a reply sent January 7, 2013 stating that the package had Federal Express tracking number 801623085314.

39. On or about September 19, 2013, defendant NEIL ROBINSON, ordered 16 counterfeit NFL, NBA, NCAA and MLB sports jerseys, using email snjerseys, from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania, and paid for the purchase using a Western Union money transfer in the amount of \$440 with MTCN number 777 062 5305. The email order was signed "Thanks Shawn / Neil. SNJerseys."

40. On or about December 3, 2013, defendant NEIL ROBINSON, ordered 9 counterfeit NFL, NBA and Soccer sports jerseys, using email snjerseys, from an individual in China, for shipment to his home address on Crafton Drive, in Bensalem, Pennsylvania, and paid for the purchase using a Western Union money transfer in the amount of \$220 with MTCN number 356 128 4040.

41. On or about July 1, 2014, defendant NEIL ROBINSON, delivered and sold three counterfeit MLB sports jerseys to an undercover law enforcement officer at a school in

Bensalem, Pennsylvania.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 21, 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

SHAWN ROBINSON

intentionally attempted to traffic in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally attempted to import sports jerseys for resale, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by the National Hockey League, which were attempted to be imported into the United States using postal service tracking number EE132306660CN.

All in violation of Title 18, United States Code, Section 2320(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

intentionally attempted to traffic in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally attempted to import sports jerseys for resale, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by the National Hockey League or the National Football League, which were attempted to be imported into the United States using DHL tracking number 3436782241.

All in violation of Title 18, United States Code, Section 2320(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 30, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

intentionally attempted to traffic in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally attempted to import sports jerseys for resale, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by the National Hockey League or the National Football League, which were attempted to be imported into the United States using DHL tracking number 3436859963.

All in violation of Title 18, United States Code, Section 2320(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2012, in the Eastern District of Pennsylvania and elsewhere,
defendant

NEIL ROBINSON

intentionally attempted to traffic in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally attempted to import sports jerseys for resale, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by the National Hockey League, Major League Baseball, or the National Football League, which were attempted to be imported into the United States using postal service tracking number EE697624918CN.

All in violation of Title 18, United States Code, Section 2320(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 12, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

intentionally attempted to traffic in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally attempted to import sports jerseys for resale, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by Major League Baseball or the National Football League, which were attempted to be imported into the United States using DHL tracking number 3197689865.

All in violation of Title 18, United States Code, Section 2320(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 29, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

intentionally attempted to traffic in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally attempted to import sports jerseys for resale, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by the National Football League, which were attempted to be imported into the United States using United States Postal Service tracking number EE861261324CN.

All in violation of Title 18, United States Code, Section 2320(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 4, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

intentionally attempted to traffic in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally attempted to import sports jerseys for resale, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by the National Football League, which were attempted to be imported into the United States using United States Postal Service tracking number EE862195754CN.

All in violation of Title 18, United States Code, Section 2320(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 1, 2014, in the Eastern District of Pennsylvania and elsewhere,
defendant

NEIL ROBINSON

intentionally trafficked in goods, and knowingly used a counterfeit mark on and in connection with such goods, that is, intentionally sold and transferred counterfeit sports jerseys bearing counterfeit trademarks to another individual, knowing that the sports jerseys were counterfeit and knowing that each bore a counterfeit mark owned by Major League Baseball.

All in violation of Title 18, United States Code, Section 2320(a).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

knowingly imported merchandise into the United States contrary to law, that is, knowingly imported counterfeit sports jerseys into the United States, with DHL tracking number 3436859963, knowing that such sports jerseys bore counterfeit insignias, and which insignias were registered in the United States Patent and Trademark Office by a person domiciled in the United States and a copy of the certificate of registration was filed with the Secretary of the Treasury, contrary to Title 15, United States Code, Section 1526(a).

In violation of Title 18, United States Code, Section 545.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 30, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

knowingly imported merchandise into the United States contrary to law, that is, knowingly imported counterfeit sports jerseys into the United States, with DHL tracking number 3436782241, knowing that such sports jerseys bore counterfeit insignias, and which insignias were registered in the United States Patent and Trademark Office by a person domiciled in the United States and a copy of the certificate of registration was filed with the Secretary of the Treasury, contrary to Title 15, United States Code, Section 1526(a).

In violation of Title 18, United States Code, Section 545.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 5, 2012, in the Eastern District of Pennsylvania and elsewhere,
defendant

NEIL ROBINSON

knowingly imported merchandise into the United States contrary to law, that is, knowingly imported counterfeit sports jerseys into the United States, with postal service tracking number EE697624919CN, knowing that such sports jerseys bore counterfeit insignias, and which insignias were registered in the United States Patent and Trademark Office by a person domiciled in the United States and a copy of the certificate of registration was filed with the Secretary of the Treasury, contrary to Title 15, United States Code, Section 1526(a).

In violation of Title 18, United States Code, Section 545.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 12, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

knowingly imported merchandise into the United States contrary to law, that is, knowingly imported counterfeit sports jerseys into the United States, with DHL tracking number 3197689865, knowing that such sports jerseys bore counterfeit insignias, and which insignias were registered in the United States Patent and Trademark Office by a person domiciled in the United States and a copy of the certificate of registration was filed with the Secretary of the Treasury, contrary to Title 15, United States Code, Section 1526(a).

In violation of Title 18, United States Code, Section 545.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

NEIL ROBINSON

knowingly imported merchandise into the United States contrary to law, that is, knowingly imported counterfeit sports jerseys into the United States, with postal service tracking number EE861261324CN, knowing that such sports jerseys bore counterfeit insignias, and which insignias were registered in the United States Patent and Trademark Office by a person domiciled in the United States and a copy of the certificate of registration was filed with the Secretary of the Treasury, contrary to Title 15, United States Code, Section 1526(a).

In violation of Title 18, United States Code, Section 545.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Sections 2320 and 545, set forth in this indictment, defendants

**SHAWN ROBINSON and
NEIL ROBINSON**

shall forfeit to the United States of America:

(a) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, violations of Section 2320, including but not limited to:

HP Compaq computer, S/N 2UA9060L69
iPhone, S/N C8QGYGDYDP0V

(b) Any merchandise imported into the United States in violation of Title 18, United States Code, Section 545, and any article, the trafficking of which is prohibited by Title 18, United States Code, Section 2320, including all counterfeit jerseys seized.

(c) Any property constituting of, or derived from, any proceeds obtained directly or indirectly as a result of such violations, as charged in this indictment, including but not limited to the sum of at least \$249,000.

2. If any of the property described above as being subject to forfeiture, as a result of any act of 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 person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to both Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Sections 545, 2323, 981(a)(1)(C), and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney