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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

v

JAMES W. FORSYTHE,
aka "Dr. Forsythe"
Defendant.

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03:06:CR-~~144~~-BES-VPC

INDICTMENT FOR VIOLATIONS OF:
TITLE 21, UNITED STATES CODE,
SECTIONS 331(d), 355(a)
CAUSING INTRODUCTION INTO
INTERSTATE COMMERCE UNAPPROVED
NEW DRUGS
TITLE 21 U.S.C. 333(e)
DISTRIBUTION OF HUMAN GROWN
HORMONE
TITLE 18, UNITED STATES CODE,
SECTION 2 - Aiding and Abetting

THE GRAND JURY CHARGES THAT:

COUNT 1

On multiple occasions from on or about between June 2003 and February 2005, in the District of Nevada and elsewhere, defendant JAMES W. FORSYTHE, aka "Dr. Forsythe," as aided and abetted by others in the Century Wellness Clinic, Inc., did, with the intent to defraud and mislead, cause the introduction into interstate commerce, from the nation of Israel to the State of Nevada, a new drug, known as Bio-Tropin (a form of Human Growth Hormone), without the required approval of an application filed with the Secretary of Health and Human Services pursuant to 21 U.S.C. § 355(b) or (j), in violation of 21 U.S.C. §§ 331(d) and 333(a)(2), and 18 U.S.C. § 2.

COUNT 2

On multiple occasions from on or about between June 2003 and February 2005, in the District of Nevada, defendant JAMES FORSYTHE, as aided and abetted by others in the Century Wellness Clinic, Inc, did knowingly distribute human growth hormone (HGH), labeled in English, Arabic, and Hebrew as Bio-Tropin for a purpose other than the treatment of a disease or other recognized medical condition, where such use had been authorized by the Secretary of Health and Human Services, in violation of 21 U.S.C. § 333(e), and 18 U.S.C. § 2.

A TRUE BILL:



FOREPERSON

DANIEL G. BOGDEN
United States Attorney



ROBERT DONAHOE
Assistant United States Attorney