

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington
April 13, 2022
RAVI SUBRAMANIAN, Clerk
By Sofia Katter Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

NO. CR22-049 RSM

INDICTMENT

v.

AVANISH KUMAR JHA, and
RAJNISH KUMAR JHA,

Defendants.

The Grand Jury charges that:

COUNT 1
(Conspiracy)

1. Beginning at a time unknown, but by no later than in or about August 2019, and continuing until at least in or about November 2021, at King County, in the Western District of Washington, and elsewhere, Defendants AVANISH KUMAR JHA and RAJNISH KUMAR JHA, knowingly and willfully conspired and agreed with each other, and others known and unknown to the Grand Jury, to:

a. Commit the following offenses against the United States:

1. Introducing, and delivering for introduction, adulterated and misbranded drugs within the meaning of Title 21, United States Code, Section 351 and 352, into interstate commerce with the intent to defraud and mislead, in violation of Title 21, United States Code, Sections 331(a) and 333(a)(2); Selling, and holding for sale,