

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUKE JOHN FLINT, a/k/a
“coronavaccine.center”;
“coronavaccine.today”;
“coronatesting.site”;
“coronatesting.center”;
“coronavaccine.shop”;
“coronavaccine.club”; and
“covid19vaccine.center”

Defendant.

Case No. 3:20CV-489-CHB

**COMPLAINT FOR PRELIMINARY INJUNCTION
AND PERMANENT INJUNCTION**

For its Complaint against Defendant Luke John Flint a/k/a “coronavaccine.center,” “coronavaccine.today,” “coronatesting.site,” “coronatesting.center,” “coronavaccine.shop,” “coronavaccine.club,” and “covid19vaccine.center” (“Defendant”), the United States of America (“United States”) alleges as follows:

INTRODUCTION

1. Defendant is engaging in and facilitating or is about to engage in and facilitate a wire fraud scheme exploiting the current COVID-19 pandemic.
2. On or about March 13, 2020, Defendant registered the following domain names through GoDaddy.com: coronavaccine.center, coronavaccine.today, coronatesting.site, coronatesting.center, coronavaccine.shop, and coronavaccine.club. On or about March 28, 2020,

Defendant registered the following domain name through GoDaddy.com: covid19vaccine.center. GoDaddy.com is headquartered in Scottsdale, Arizona and incorporated in Delaware.

3. Defendant created a website with the domain name coronavaccine.center, which promotes and purports to allow consumers to pre-order a COVID-19 vaccine. When a consumer enters the Defendant's domain names coronavaccine.today, coronatesting.site, coronatesting.center, coronavaccine.shop, coronavaccine.club, or covid19vaccine.center into a search engine, he or she is automatically directed to Defendant's coronavaccine.center website. The Corona Vaccine Center also has a Facebook page that includes a link to the website.

4. The website includes several false and misleading statements, including that Corona Vaccine Center offers "wholesale distribution online for Corona vaccine and related supplies."

5. The purpose of the website is to induce victims to pay Defendant and those working in concert with him for a non-existent vaccine for COVID-19 amid the global pandemic.

6. The United States seeks to prevent injury to victims of this fraudulent scheme by bringing this civil action under 18 U.S.C. § 1345 to enjoin Defendant's ongoing wire fraud in violation of 18 U.S.C. § 1343.

JURISDICTION AND VENUE

7. The Court has subject matter jurisdiction over this action under 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

8. Venue is proper in this district under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claim occurred in this district.

THE PARTIES

9. Plaintiff is the United States of America.

10. Defendant Luke John Flint, acting alone or in concert with others, is the registrant of coronavaccine.center, coronavaccine.today, coronatesting.site, coronatesting.center, coronavaccine.shop, coronavaccine.club, and covid19vaccine.center, and has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint. Defendant is a licensed commercial real estate broker in Louisville, Kentucky. Defendant is the incorporator of two Kentucky corporations, Lazarus Investments Corp. and Gotta Raise Cash Inc., and the manager of a Kentucky limited liability company, Hard as Steel LLC.

THE FRAUDULENT SCHEME

11. On May 27, 2020, HSI Special Agent Kay Brose, from a computer located in Louisville, Kentucky, visited the “coronavaccine.center” website. Special Agent Brose observed that the website offers “Coronavirus (COVID-19) Vaccine wholesale distribution online!” The main page of the website advertises “Corona Vaccine Center – Corona Testing Center – Corona Vaccine Club”.

12. The website includes several false and misleading statements. Specifically, the website offers “wholesale distribution online for Corona vaccine and related supplies.” It states that the “Corona Vaccine Center is a decentralized blockchain distribution ledger for direct placement of vaccine to be easily obtained by all customers who require cost effect [sic] direct access.”

13. The United States Food and Drug Administration (“FDA”) has confirmed that there is no vaccine for COVID-19. Moreover, the FDA’s Center for Biologics Evaluation and Research (“CBER”) regulates the development and research of new drugs. Defendant is not registered to develop or manufacture a vaccine for COVID-19.

14. If and when a vaccine is developed, in Kentucky, vaccines can only be distributed by a licensed medical professional or a licensed wholesaler. Defendant is not, nor has he ever been registered as a pharmacist or as associated with any wholesaler or manufacturer, nor is he licensed as a medical professional.

15. The website identifies the Corona Vaccine Center's address as 545 S Clay Street, Louisville, Kentucky. However, the Jefferson County PVA public records show this address is a vacant lot owned by Hard as Steel LLC, a Kentucky limited liability company managed by Defendant.

16. The purpose of the website is to induce victims to pay Defendant and those working in concert with him for a non-existent vaccine. The website falsely claims that it can provide a non-existent vaccine for COVID-19 amid the global pandemic. At a minimum, the website is accepting "pre-orders" for a vaccine that does not exist and it is unknown if and when a vaccine will exist. The website provides a link for customers to pay for "pre-orders" with Bitcoin, a form of cryptocurrency. When a consumer follows the link, it requests the consumer's name, shipping address, email, and mobile number. It also has a box to check to make a \$100 BTC payment and a link to send the payment.

17. Victims may suffer financial losses from the wire fraud scheme in which Defendant is engaged and facilitating.

18. Absent injunctive relief by this Court, Defendant's conduct will cause injury to victims.

COUNT ONE 18 U.S.C. § 1345

19. The United States re-alleges and incorporates paragraphs 1 through 18 as though fully set forth herein.

20. By reason of the conduct described herein, Defendant is about to violate, is violating, and/or has violated 18 U.S.C. § 1343 by engaging in and facilitating a scheme and artifice to defraud and obtain money or property by means of false or fraudulent representations with the intent to defraud, and, in so doing, is using or has used interstate or foreign wire communications.

21. Upon a showing that Defendant is committing or is about to commit a violation of 18 U.S.C. § 1343, the United States is entitled, under 18 U.S.C. § 1345, to seek a temporary restraining order, a preliminary injunction, and a permanent injunction restraining all future fraudulent conduct. The Court may also grant such other relief it deems just and proper to prevent a continuing and substantial injury to victims of the fraud scheme.

22. As a result of the foregoing, the Court should enjoin Defendant's conduct under 18 U.S.C. § 1345.

PRAYER FOR RELIEF

WHEREFORE, the United States requests judgment in its favor and against the Defendant, including the following relief:

A. That the Court issue the tendered Agreed Preliminary Injunction, pursuant to 18 U.S.C. § 1345, that Defendant, its agents, officers, and employees, and all other persons or entities in active concert or participation with them, are restrained from committing wire fraud, as defined by 18 U.S.C. § 1343, and from maintaining and doing business through the use of the domains coronavaccine.center, coronavaccine.today, coronatesting.site, coronatesting.center, coronavaccine.shop, coronavaccine.club, or covid19vaccine.center through any website or social media;

B. That the Court issue a permanent injunction, pursuant to 18 U.S.C. § 1345, on the same basis and to the same effect;

C. All such further relief as may be just and proper.

Respectfully submitted,
RUSSELL M. COLEMAN
United States Attorney

s/Nicole S. Elver
William Campbell
Nicole S. Elver
Assistant United States Attorney
717 West Broadway
Louisville, KY 40202
Phone No. (502) 582-6893
Fax No. (502) 625-7110

Counsel for the United States