

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

HENAN OUMENG TRADE CO. LTD.  
and YINXIA ZHAO

CASE NO. 8:24 cr 259 VMC-NHA  
21 U.S.C. § 963  
(Attempt to Import  
Protonitazene into  
the United States)  
18 U.S.C. § 1956  
(Attempted International  
Money Laundering)

SEALED

INDICTMENT

The Grand Jury charges:

JUN 7 2024 AM 9:14  
FILED - USDC - FLMD - TPA

INTRODUCTION

**A. The Opioid Epidemic in America**

1. The opioid epidemic is the worst addiction epidemic in the history of the United States. Opioid overdose is the leading cause of death for Americans ages 18 to 49. Between 2021 and 2022, more than 160,767 Americans died from opioid-involved overdoses. At the current rate, by 2025 more Americans will have died in the 21<sup>st</sup> century from drug overdoses than died in all of America's wars over its entire history combined.

SEALED

2. In 2022, the reported number of drug overdose deaths involving synthetic opioids continued to increase compared to the previous years. Synthetic opioids are the deadliest drug threats facing the United States in its 247-year history.

Since 2021, more than 70% of all reported drug overdose deaths involved synthetic opioids.

3. In Florida in 2022, synthetic opioids were present in approximately 6,898 deaths, an average of over 18 synthetic opioid-related deaths per day.

**B. The Role of Protonitazene**

4. The primary synthetic opioid fueling the opioid epidemic is fentanyl. However, traffickers continue to develop new synthetic opioids for distribution in the United States. The introduction of these new synthetic opioids into the illicit drug market threatens to exacerbate the overdose epidemic.

5. Protonitazene is one such synthetic opioid that has a chemical profile similar to those of other scheduled opioids and is subject to abuse in the same manner.

6. On April 11, 2024, the Drug Enforcement Administration (“DEA”) issued a final scheduling order classifying protonitazene as a Schedule I controlled substance. 89 Fed. Reg. 25514, codified at 21 C.F.R. § 1308(b)(97). There are no approved medical uses for protonitazene in the United States or anywhere in the world. Drug traffickers generally mix protonitazene with other opioids, such as fentanyl, to create new and more lethal cocktails of dangerous opioids.

7. The International Narcotics Control Board (“INCB”) is an independent, quasi-judicial expert body established by the Single Convention on Narcotic Drugs of 1961. INCB has 13 members, each elected for a period of five years. Ten of the members are elected from a list of persons nominated by

participating Governments. The remaining three members are elected from a list of persons that the World Health Organization (“WHO”) nominated for their medical, pharmacological, or pharmaceutical experience. On or about March 15, 2023, INCB released its 2022 Annual Report which updated its established list of synthetic, non-fentanyl opioids with no known legitimate uses. This list included the “nitazene group substances,” of which protonitazene is a member.

8. Chemicals used in interstate and foreign commerce are often identified through a Chemical Abstracts Service (CAS) Registry Number. The CAS is a division of the American Chemical Society and it maintains the CAS Registry, a list of all CAS numbered chemicals and their chemical associations. A CAS Registry Number is a unique and unambiguous identifier for a specific substance.

9. CAS: 119276-01-6 is the CAS Registry Numbers for *N,N*-diethyl-2-(5-nitro-2-(4-propoxybenzyl)-1 *H*-benzimidazol-1-yl)ethan-1-amine – more commonly referred to as protonitazene.

**C. Chinese Chemical Companies Supply Synthetic Opioids to the United States and Mexican Drug Cartels**

10. The primary distributors of synthetic opioids in North America are the Sinaloa Cartel and the Cartel Jalisco Nueva Generación. These two transnational criminal organizations have significant presences throughout Mexico, maintain distribution hubs in various cities across the United States, and control smuggling corridors into the United States.

11. Organizations such as the Sinaloa Cartel and Cartel Jalisco Nueva Generación receive synthetic opioids and precursors either directly through China or from intermediaries in the United States. These substances are then synthesized within clandestine laboratories into finished end-user products. China-based chemical manufacturers ship synthetic opioids from mainland China and employ various tactics to evade law enforcement such as communicating with potential customers on encrypted platforms and accepting cryptocurrency payments.

**D. The Defendants**

12. HENAN OUMENG TRADE CO. LTD. (“HENAN OUMENG”) is a chemical manufacturing company based in the city of Zhengzhou, in Henan Province, China. HENAN OUMENG manufactures, among other things, synthetic opioids and openly advertises the sale of the same to the United States and Mexico through its employees.

13. YINXIA ZHAO is a national of China and listed as the account holder for the Bitcoin account that sales agents shared for HENAN OUMENG.

**E. The Attempt**

14. In or around September 2023, an individual acting on behalf of HENAN OUMENG, began negotiating the sale of CAS: 119276-01-6 to an individual posing as a trafficker in the United States. In reality, the trafficker in the United States was an undercover DEA Special Agent (UC-1).

15. In a series of WhatsApp messages beginning on or about September 9, 2023, HENAN OUMENG represented that it sold and shipped controlled substances to the United States.

16. UC-1 asked HENAN OUMENG, “Do you supply 119276-01-6? . . . . I am a broker, buying for a customer. I’d like the [minimum order quantity] so that they can verify the quality and that delivery is successful and no issues with US customs.” HENAN OUMENG replied that it could “deliver” that product “door-to-door” and “Don’t worry” about United States customs. HENAN OUMENG also quoted a price of “\$5000 per kilogram [i]ncluding weight.” UC-1 responded, “Ok I will start with one kg. So that the customer can verify the quality.” HENAN OUMENG then sent a picture of a Bitcoin wallet to receive payment. HENAN OUMENG subsequently deleted the picture from the chat, along with several of the messages.

17. On or about September 10, 2023, UC-1 messaged HENAN OUMENG that his “customer has agreed to order. If you have further samples that would be good to send. They will send Bitcoin tomorrow.” HENAN OUMENG asked how much UC-1 needed, to which UC-1 replied that UC-1 would “place order for MOQ,” or minimum order quantity. UC-1 also stated, “My customers are also looking for piperidone, 79099-07-3 and also nitazenes, please let me know if you supply and a price.” Piperidone is a List I chemical with no legitimate use except for the manufacture of fentanyl. 88 Fed. Reg. 21902, codified at 21 C.F.R. § 1310(a)(38).

18. HENAN OUMENG then requested UC-1's client's documents and asked where UC-1 found its contact information. After UC-1 stated that UC-1 found HENAN OUMENG on guidechem.com, HENAN OUMENG agreed to help. UC-1 again requested to order a "sample" of one kilogram of 119276-01-6 for \$5,000.

19. UC-1 also asked if HENAN OUMENG could provide a sample of "14188-81-9," which is the CAS registry number for isotonitazene. Isotonitazene is another Schedule I controlled substance and synthetic opioid. 86 Fed. Reg. 60761, codified at 21 C.F.R. § 1308(b)(51). HENAN OUMENG replied that 14188-81-9 was available for \$8,000 per kilogram.

20. On or about September 11, 2023, HENAN OUMENG told UC-1 that "11926 is out of order."

21. On or about September 13, 2023, UC-1 inquired about "79099" instead. In response, HENAN OUMENG asked UC-1 if his client had "proof of purchase." UC-1 answered that they did not, to which HENAN OUMENG replied, "If there are no documents, the price may be higher." HENAN OUMENG then quoted a price of \$400 per kilogram.

22. On or about September 14, 2023, HENAN OUMENG and UC-1 again discussed the price of 79099-07-3. HENAN OUMENG reiterated that "[b]ecause you don't have a purchase certificate, the price is expensive."

23. On or about September 14, 2023, HENAN OUMENG enabled a setting that deleted messages from the WhatsApp chat seven days after they were sent.

24. HENAN OUMENG and UC-1 communicated by WhatsApp until on or about October 18, 2023. Communications did not resume until March 2024.

25. On or about March 29, 2024, HENAN OUMENG initiated the following conversation with UC-1, which continued to on or about April 3, 2024:

HENAN OUMENG: Hi.

UC-1: Hello can you assure the client will receive the product from your customer in Mexico? Do you provide any form of tracking number.

HENAN OUMENG: Yes, I can also ship directly from Hong Kong.

UC-1: Ok. The customer does not have paperwork so I thought the shipment had to go through your Mexico client? If you can ship direct that would be good. You ship to USA and Europe?

HENAN OUMENG: All can be shipped to 111926, don't you need it anymore.

26. On or about April 18, 2024, HENAN OUMENG and UC-1 exchanged the following WhatsApp messages:

UC-1: My friend do you supply 119275-01-6 [sic]? 2-3 kgs MOQ [minimum order quantity]?

HENAN OUMENG: 1kg.

UC-1: What is price for 1kg.

HENAN OUMENG: 7500usd.

UC-1: If they agree to 2 kgs can you offer better price?  
Price includes safe and discreet shipment?  
Can you ship to USA or only Mexico?

HENAN OUMENG: ye s  
[This message was deleted.]  
It can be sent to both the United States and Mexico.

UC-1: Ok they need to pay the same BTC?

HENAN OUMENG: yes.

UC-1: Ok I will advise when payment is confirmed.

HENAN OUMENG: good.

UC-1: My friend I just want to confirm, you have 119276-01-6?  
The client wants to make sure they receive the correct product. They have had problems in the past.

HENAN OUMENG: Yes, rest assured.

UC-1: Ok unfortunately I no longer have the BTC address to pass to the client, can you please let me know where they should pay.



HENAN OUMENG:

[BTC Wallet #1]



HENAN OUMENG

Payment made here.

UC-1:

Ok I will pass to client.



27. According to records obtained from a cryptocurrency exchange, the owner of BTC Wallet #1 was ZHAO.

28. UC-1 asked if HENAN OUMENG could ship 119276-01-6 to an address in San Diego, California. HENAN OUMENG replied, "Okay, please make the payment before shipping." UC-1 noted that his customer "need[s] the package to be unmarked or they will not receive it. The package will be checked by customs in China or USA." HENAN OUMENG reiterated, "Okay, please make the payment before shipping."

**COUNT ONE**  
**(Attempt to Import Protonitazene into the United States)**

Paragraphs 1 to 28 are realleged and incorporated by reference as though fully set forth herein.

In and around September 2023 through April 2024, in the Middle District of Florida, China, and elsewhere, the defendants,

HENAN OUMENG TRADE CO. LTD. and  
YINXIA ZHAO,

did knowingly and willfully attempt to import into the United States protonitazene, a Schedule I controlled substance, contrary to the provisions of 21 U.S.C. § 952.

All in violation of 21 U.S.C. §§ 960(b)(3), and 963.

**COUNT TWO**  
**(Attempted International Money Laundering)**

Paragraphs 1 to 28 are realleged and incorporated by reference as though fully set forth herein.

In and around September 2023 through April 2024, in the Middle District of Florida, China, and elsewhere, the defendants,

HENAN OUMENG TRADE CO. LTD. and  
YINXIA ZHAO,

did knowingly attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, in an amount exceeding \$10,000, with the intent to promote the carrying on of specified unlawful activity, to wit, trafficking of controlled substances and listed chemicals (as those terms are defined in the Controlled Substances Act), including the violation charged in Count One of this Indictment.

All in violation of 18 U.S.C. §§ 1956(a)(2)(A), 1956(f), and 2.

**FORFEITURE**

1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of 21 U.S.C. §§ 853 and 970, and 18 U.S.C. § 982(a)(1).

2. Upon conviction of a violation of Count One of this Indictment, in violation of 21 U.S.C. §§ 960(b)(3) and 963, punishable by imprisonment for more than one year, the defendants,

HENAN OUMENG TRADE CO. LTD. and  
YINXIA ZHAO,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

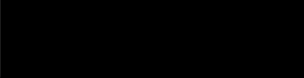
4. The assets to be forfeited include, but are not limited to, an order of forfeiture in the amount of proceeds obtained from the offense.

5. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- 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,

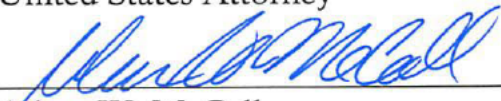
the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), directly and as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL,


  
\_\_\_\_\_  
Foreperson

ROGER B. HANDBERG  
United States Attorney

By:

  
\_\_\_\_\_  
Adam W. McCall  
Assistant United States Attorney

By:

  
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Daniel Baeza  
Assistant United States Attorney  
Chief, Transnational Organized Crime Section

No.

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UNITED STATES DISTRICT COURT  
Middle District of Florida  
Tampa Division

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THE UNITED STATES OF AMERICA

vs.

HENAN OUMENG TRADE CO. LTD.,  
and YINXIA ZHAO

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INDICTMENT

Violations: 21 U.S.C. § 963 and 18 U.S.C. § 1956

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A true bill,



Foreperson

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Filed in open court this 6<sup>th</sup> day

of June 2024.



Clerk

**KARINA NIEVES**

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Bail \$ \_\_\_\_\_

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