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FILED - USDC - FLMD - TPA

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

**SEALED**

UNITED STATES OF AMERICA

v.

JIANGSU JIYI CHEMICAL and  
JI ZHAOHUI

CASE NO. **8:23-cr-440-WFJ-UAM**  
21 U.S.C. § 963  
(Attempt to Import  
Protonitazene Into  
the United States)

**INDICTMENT**

The Grand Jury charges:

**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, over 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.

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 2021, synthetic opioids were present in approximately 6,417 deaths, an average of 17 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 12, 2022, the Drug Enforcement Administration (“DEA”) issued an emergency scheduling order classifying protonitazene as a Schedule I controlled substance. 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 with 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.

10. Protonitazene is a Schedule I controlled substance.

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

11. 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.

12. 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**

13. JIANGSU JIYI CHEMICAL (“JIANGSU JIYI”) is a chemical manufacturing company based in the city of Beijing, in the Hebei Province, China. JIANGSU JIYI manufactures, among other things, synthetic opioids and openly advertises the sale of the same to the United States and Mexico on its website and through its employees.

14. JI ZHAOHUI is a national of China and listed as the account holder for the Bitcoin account that sales agents shared for JIANGSU JIYI.

**E. The Attempt and Conspiracy**

15. In or around September 2023, an individual acting on behalf of JIANGSU JIYI, 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).

16. In a series of WhatsApp messages, JIANGSU JIYI represented that it sold and shipped controlled substances to the United States. JIANGSU JIYI engaged in the following conversation with UC-1:

UC-1: Hello do you offer shipping to the US or Mexico?

JIANGSU JIYI: yes  
What products do you need?

UC-1: Hello I'm looking for a good price for 119276-01-6?

JIANGSU JIYI: I can send you samples first and you can test them  
Do you use it yourself?  
We have 119276-01-6, which is produced by ourselves

UC-1: I am a broker with clients in USA and Mexico. I have customers that are interested in 119276-01-6

JIANGSU JIYI: OK

UC-1: Do you offer safe delivery. Fed ex or UPS?

JIANGSU JIYI: I can send you 1g sample first, and you can test it  
We are a dedicated line

UC-1: Ok yea I would like to make sure it is high quality and my customer would be happy.  
What is the price per kg.?

JIANGSU JIYI: 119 6000USD/kg  
Yes

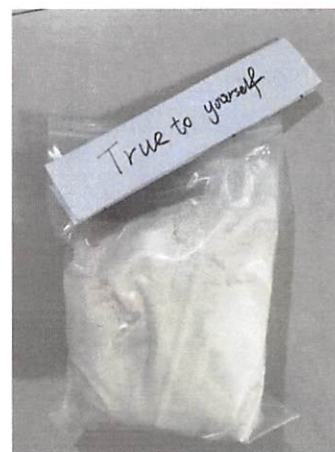
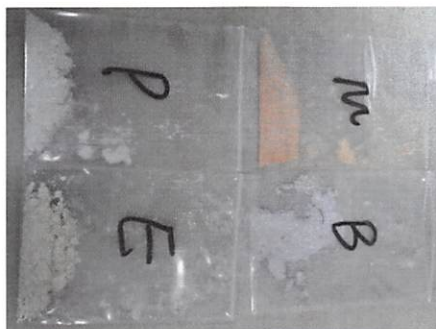
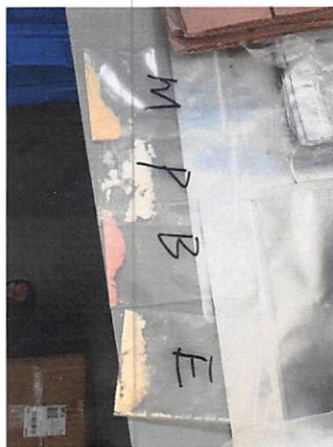
UC-1: Ok that is a good price.

JIANGSU JIYI: OK, I need long-term customers like you

17. JIANGSU JIYI and UC-1 agreed on the price and shipment of one

kilogram of CAS: 119276-01-6. JIANGSU JIYI confirmed that CAS: 119276-01-6 would be shipped to an address in Tampa, within the Middle District of Florida, and would arrive in about 15 days. JIANGSU JIYI sent a screenshot of its Bitcoin Wallet (BTC) for payment. This BTC wallet is registered to JI ZHAOHUI.

18. On or about September 10, 2023, JIANGSU JIYI sent several photographs of products it claimed were protonitazenes.



19. The same day JIANGSU JIYI sent the above product photographs, UC-1 asked for additional products and JIANGSU JIYI immediately responded by sending a photograph of its product list. In this list were various controlled substances to include metonitazene and etonitazepyne, both synthetic opioids.

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

Paragraphs 1 to 19 are realleged and incorporated by reference as though fully set forth herein.

Beginning on an unknown date and continuing until on or about the date of this indictment, in the Middle District of Florida, China, and elsewhere, the



defendants,

JIANGSU JIYI CHEMICAL and  
JI ZHAOHUI,

did knowingly and willfully attempt to manufacture, distribute, and export from China protonitazene, a Schedule I controlled substance, intending, knowing, or having reasonable cause to believe that protonitazene would be unlawfully imported into the United States, contrary to the provisions of 21 U.S.C. § 959.

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

**FORFEITURE**

1. The allegations contained in Count One 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.

2. Upon conviction of a violation of Count One of this Indictment, in violation of 21 U.S.C. §§ 959 and 963, punishable by imprisonment for more than one year, the defendants,

JIANGSU JIYI CHEMICAL and  
JI ZHAOHUI,

shall forfeit to the United States, pursuant to 21 U.S.C. §§ 853 and 970, 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).

A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

ROGER B. HANDBERG  
United States Attorney

By:

  
\_\_\_\_\_  
Ashley Haynes  
Special Assistant United States Attorney

By:

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



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INDICTMENT

Violations: 21 U.S.C. § 963

A true bill,

[Redacted Signature]

Foreperson

Filed in open court this 30<sup>th</sup> day

of November 2023.

Holly Sanders

Clerk

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