

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

SHANGHAI SENRIA BIOTECHNOLOGY
CO. LTD.
and ZHENBO HAN

CASE NO. 8:24 cr 260 KKM-CPT

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 9:16
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 21st 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

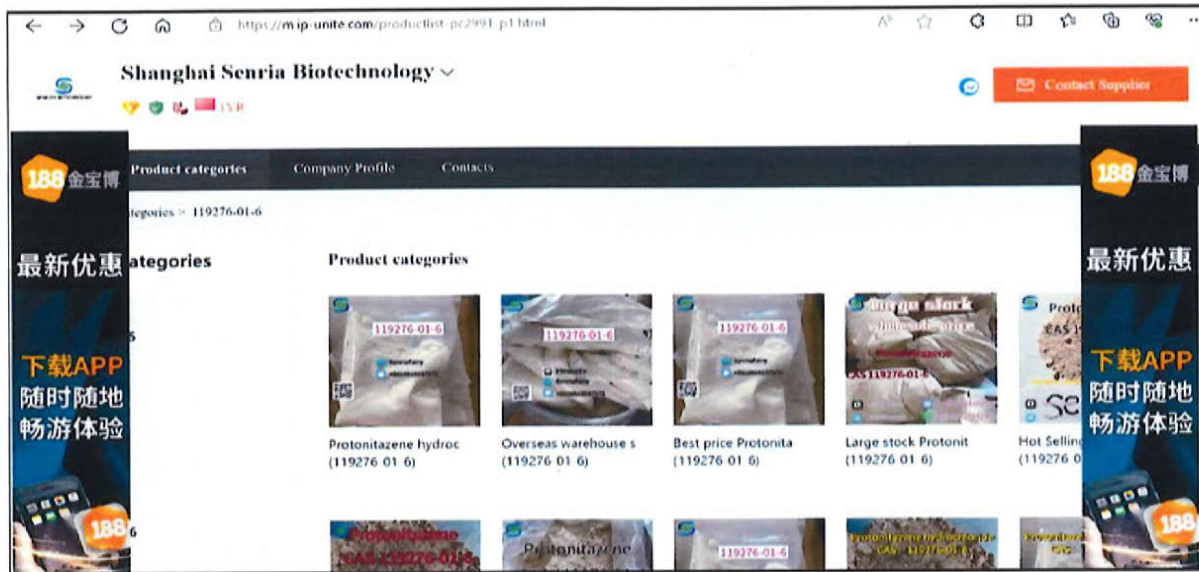
10. The primary distributors of synthetic opioids in North America are the Sinaloa Cartel and the Cartel Jalisco Nueva Generación. These two transnational criminal organizations have significant presences throughout Mexico, maintain distribution hubs in various cities across the United States, and control 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. SHANGHAI SENRIA BIOTECHNOLOGY CO. LTD.
("SHANGHAI SENRIA") is a chemical manufacturing company based in the Fengxian District of Shanghai, China. SHANGHAI SENRIA manufactures, among other things, synthetic opioids and openly advertises the sale of the same to the United States, Mexico, Canada, and Europe on the internet and through its employees.

13. In particular, SHANGHAI SENRIA advertises the sale of protonitazene online:



14. ZHENBO HAN is a national of China and listed as the account holder for the Bitcoin account that sales agents shared for SHANGHAI SENRIA.

E. The Attempt

14. In or around September 2023, an individual acting on behalf of SHANGHAI SENRIA 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 7, 2023, SHANGHAI SENRIA represented that it sold and shipped controlled substances to the United States.

16. On or about September 7, 2023, UC-1 asked SHANGHAI SENRIA if it "ship[ped] products to the USA." SHANGHAI SENRIA confirmed that it did and

asked, "What do you need?" On or about September 8, 2024, UC-1 replied that UC-1 was "looking for a good price for 119276-01-6 and 14188-81-9." 14188-81-9 is the CAS registry number for isotonitazene, which is a Schedule I controlled substance and synthetic opioid. 86 Fed. Reg. 60761, codified at 21 C.F.R. § 1308(b)(51). SHANGHAI SENRIA responded that it did not have those products. UC-1 inquired, "Do you have a product list? My customers are looking for 119276-01-6 and piperidone 79099-07-3 as well." Piperidone is a List 1 chemical with no legitimate use except for the manufacture of fentanyl.

17. SHANGHAI SENRIA did not respond for several months. Then, beginning on or about January 17, 2024, and ending on or about February 7, 2024, SHANGHAI SENRIA exchanged the following WhatsApp messages with UC-1:

SHANGHAI SENRIA: Sorry, friend. It's so late to reply to you. Did you buy the right product?

We have the products you need that 119276 and 79099. You can tell me how much you need. I'll offer you the right price.

UC-1: Hello friend that particular client has been looking for a supplier of high quality 79099 at good price

SHANGHAI SENRIA: Yes friend, we have this product. Can you tell me how much you need so that I can provide you with an accurate price? Because you need more, it will be more favorable

UC-1: What is your [minimum order quantity]? I want to ensure quality. Safe delivery to USA or Mexico? 119276 price per kilogram?

SHANGHAI SENRIA: The minimum order quantity is 10g. The price is 140USD

18. Approximately ten days later, on or about February 17, 2024, SHANGHAI SENRIA followed-up with UC-1 to inform that “We started work. We can deliver the goods normally. You can contact me if you need anything. I will definitely provide the best price and the best service.”

19. Over the course of two days, on or about February 26 and 27, 2024, UC-1 reinitiated the conversation:

UC-1 Are you able to ship safely to US? We have had problems with packages being stopped because they are marked dangerous. If we order 2 kgs of 119276 can you offer a discounted price?

SHANGHAI SENRIA: Hello friend, the lowest price I can offer is 6740 USD/kg

UC-1: Ok if they order the 2 kilograms they would wire \$13,500. That would include freight/ shipping right? Do you accept bitcoin?

SHANGHAI SENRIA: Yes, including shipping costs. We can accept Bitcoin

UC-1: We can send the bitcoin

SHANGHAI SENRIA:

If you need it, this is our Bitcoin address. After payment, please send me a screenshot of the payment record and your shipping address. Once we receive your payment, we will arrange for shipment as soon as possible
[BTC Wallet #1 Provided]
Or if you have any other questions, you can contact me

20. On or about March 4, 2024, UC-1 said UC-1 would confirm when the customer paid and asked, “The package will not be labeled dangerous chemicals correct?” UC-1 noted that his customer did “not want problems with customs.” SHANGHAI SENRIA replied, “Yes, there won't be any problem. If it is deducted, it can be reissued for free. Believe me, it won't be a problem.”

21. Three times—on or about March 10, 17, and 27, 2024—SHANGHAI SENRIA followed up with UC-1 to ask if his customer still needed Protonitazene. On or about March 27, 2024, UC-1 told SHANGHAI SENRIA that UC-1 “believe[d] the client has found another supplier.” But UC-1 stated that UC-1 had another “customer inquiring on 79099-07-3.” CAS 79099-07-3 refers to Piperidone, which (as stated above) is a List I chemical with no legitimate use except for the manufacture of fentanyl. UC-1 said that this customer “require[s it] in USA or Mexico. They are larger long time client so they are looking for good price.” SHANGHAI SENRIA responded that it did not have that product.

22. On or about March 28, 2024, UC-1 noted that UC-1 thought SHANGHAI SENRIA supplied Piperidone in the past. In fact, as stated above, on or about January 17, 2024, SHANGHAI SENRIA confirmed that it had that product. UC-1 asked if SHANGHAI SENRIA knew of another Piperidone supplier, but SHANGHAI SENRIA answered that it did not. SHANGHAI SENRIA reiterated, however, "if you have any other products you need, you can contact me."

23. On or about March 29, 2024, UC-1 messaged that "The customer is requesting a substitute. Do you supply/ship 19099-93-5?" CAS 19099-93-5 is another form of Piperidone. UC-1 added, "The company would like in Mexico but could receive the shipment in Europe." On or about March 31, 2024, SHANGHAI SENRIA responded that it did not have that product.

24. On or about April 18, 2024, UC-1 asked SHANGHAI SENRIA, "if the customer orders 2 kilograms of the 119276-01-6 do you guarantee quality and safe delivery to the customer? Is \$13,500 the best price for 2 kgs?" SHANGHAI SENRIA replied that "I asked the boss, and because the production of this product has been relatively low recently, the price has increased. The lowest price we can offer is 7600 US." On or about April 19, 2024, UC-1 stated that UC-1 would inform the customer of the price increase.

25. On or about April 26, 2024, UC-1 initiated the following conversation:

UC-1 Can you ship 2 kgs of 119276-01-6 to a customer in California USA?
They can pay BTC

SHANGHAI SENRIA: The price of 2kg is 13480USD
Do you think it is okay?
wrong
be sorry
The correct price is 15200USD.
If you agree to this price. Please tell me when you will pay. We can pay by BTC

UC-1: Ok. The price is higher than past orders but the client will pay. They insist on high quality and discreet delivery.
They have had packages taken by customs in China and USA because they are labeled dangerous or chemicals

SHANGHAI SENRIA: When can you pay?

UC-1: You can ship to his USA address in unmarked package?

SHANGHAI SENRIA: You mean you don't want any labels on the packaging bag, right?

UC-1: Yes

SHANGHAI SENRIA: OK
When can you pay? I'll send you the bitcoin address.

UC-1: If you can guarantee. I will pass him the BTC to pay

SHANGHAI SENRIA: OK

UC-1:



SHANGHAI SENRIA:

Just a moment, I'll send you the bitcoin address.
[BTC Wallet #1]
Please send me a screenshot after you pay.

UC-1:

Ok. Delivery of high quality guaranteed, correct? This customer will place future orders I do not want to jeopardize

SHANGHAI SENRIA:

I'm sure you will be satisfied.

UC-1:

Ok my friend I will advise once the client sends payment

SHANGHAI SENRIA:

OK
You need to send me a screenshot after payment. Arrange delivery after we receive the payment.

UC-1

Ok

SHANGHAI SENRIA:

Friend, please don't pay directly first. I'll confirm whether the bitcoin address is correct. I'll tell you after confirmation.
Because it's night here, I'll make sure after work. It may take a little longer.

UC-1:

Ok my friend. The client is awaiting confirmation

SHANGHAI SENRIA:

There is nothing wrong with this bitcoin address.
[BTC Wallet #2]
You can pay directly

26. According to records obtained from a cryptocurrency exchange, the owner of BTC Wallet #2 was HAN.

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

Paragraphs 1 to 26 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,

SHANGHAI SENRIA BIOTECHNOLOGY CO. LTD. and
ZHENBO HAN,

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 26 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,

SHANGHAI SENRIA BIOTECHNOLOGY CO. LTD. and
ZHENBO HAN,

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,

SHANGHAI SENRIA BIOTECHNOLOGY CO. LTD. and
ZHENBO HAN,

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:


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

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

SHANGHAI SENRIA BIOTECHNOLOGY CO. LTD.,
and ZHENBO HAN

INDICTMENT

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

A true bill,



Foreperson

Filed in open court this 6th day

of June 2024



Clerk

KARINA NIEVES

Bail \$ _____
