

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:24 cr 9 WFJ - AEP

WUHAN MINGYUE INFORMATION
TECHNOLOGY and
HUANHUAN SONG

21 U.S.C. § 963
(Attempt to Import
Listed Chemicals
Into the United States)
18 U.S.C. § 1956
(Money Laundering)

SEALED

INDICTMENT

The Grand Jury charges:

JAN 4 2024 PM 4:49
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, over 160,767 Americans died from opioid-involved overdoses. At the current rate, by 2025 more Americans will have died in the 21st century from opioid overdoses than died in all of America's wars over its entire history combined.

2. Of all the opioids involved in overdose deaths, fentanyl is the most prevalent. As such, fentanyl is the deadliest drug threat facing the United States in its 247-year history.

SEALED

3. In Florida in 2021, fentanyl was present in approximately 6,417 deaths, an average of 17 fentanyl-related deaths per day.

B. The Role of Fentanyl Precursors

4. Fentanyl is a chemical that does not occur in nature. It and its analogues therefore need to be synthesized through raw chemicals known as precursors. The term “fentanyl” is intended in this indictment to include fentanyl hydrochloride.

5. Each of the chemicals described herein can be used in the production of fentanyl or fentanyl analogues. The amount of fentanyl or fentanyl analogue that can be generated from a particular chemical is called a yield. Each yield is dependent upon a variety of factors, including the purities of the associated precursors, reagents, and solvents, as well as the expertise and experience of the laboratory operator. A theoretical yield is the maximum amount of fentanyl or fentanyl analogue a precursor could theoretically produce.

6. 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.

7. CAS: 288573-56-8 is the CAS Registry Number for tert-butyl-4-(4-fluoroanilino) piperidine-1-carboxylate. One kilogram of CAS: 288573-56-8 would theoretically yield up to 1.26 kilograms of fluorofentanyl, an analogue of fentanyl.

8. CAS: 125541-22-2 is the CAS Registry Number for tert-butyl-4-(phenylamino) piperidine-1-carboxylate. One kilogram of CAS: 125541-22-2 would theoretically yield up to 1.33 kilograms of fentanyl.
9. CAS: 79-03-8 is the CAS Registry Number for propionyl chloride. One kilogram of CAS: 79-03-8 would theoretically yield up to four kilograms of fentanyl.
10. CAS: 79099-07-3 is the CAS Registry Number for N-Boc-4-Piperidone. One kilogram of CAS: 79099-07-3 would theoretically yield up to 1.83 kilograms of fentanyl.
11. CAS: 288573-56-8, CAS: 125541-22-2, CAS: 79-03-8, and CAS: 79099-07-3 are some of the approximately 30 possible chemical reactants commonly used in the production of fentanyl.
12. 1-Boc-4-AP and any combination thereof is a List I Chemical. Both CAS: 288573-56-8 and CAS: 125541-22-2 are 1-Boc-4-AP combinations and therefore are List I Chemicals.
13. 4-Piperidone and any combination thereof is a List I Chemical. N-Boc-4-Piperidone (CAS: 79099-07-3) is a 4-Piperidone combination and is therefore a List I Chemical.
14. 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. In or around 2018, the INCB established a list of fentanyl-related substances with no known legitimate uses. This list is continually updated.

15. The INCB lists CAS: 288573-26-8 and CAS: 125541-22-2 as fentanyl-related substances with no known legitimate uses.

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

16. The primary distributors of fentanyl and fentanyl analogues 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. The United States is the largest consumer of fentanyl and fentanyl analogues manufactured in Mexico.

17. Organizations such as the Sinaloa Cartel and Cartel Jalisco Nueva Generación receive fentanyl 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 precursors 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

18. WUHAN MINGYUE INFORMATION TECHNOLOGY (“WUHAN MINGYUE”) is a chemical manufacturing company based in Beijing, China. WUHAN MINGYUE manufactures, among other things, fentanyl precursors and openly advertises the sale of the same to the United States and Mexico on its website and through its employees. WUHAN MINGYUE has never registered with the DEA to import regulated chemicals.

19. HUANHUAN SONG is a Chinese national who participates in the operation of WUHAN MINGYUE. HUANHUAN SONG maintains a Western Union account and a cryptocurrency wallet for remittance of payments for precursor chemicals.

E. Contact with Undercover Agent

Summer 2022: WUHAN MINGYUE Negotiates to Send Fentanyl Precursor to the United States with an Undercover Agent

20. Beginning in or around August 2022, WUHAN MINGYUE began communicating with a purported broker over WhatsApp, an encrypted application, for the importation of chemicals on behalf of drug traffickers in Mexico. In reality, this person was an undercover DEA Special Agent (UC-1).

21. In a series of WhatsApp messages, WUHAN MINGYUE represented that it sold fentanyl precursors. WUHAN MINGYUE quoted a price of CAS: 288573-56-8 and offered shipment rates for the chemical to be shipped to the United States.

22. Further negotiations between WUHAN MINGYUE and UC-1 addressed the pricing of the fentanyl precursor, methods of payment, and guarantees as to the quality. For example, between August and September 2022, WUHAN MINGYUE and UC-1 engaged in the following encrypted conversation:

UC-1: Hello. I am looking for product for my business. Can you deliver 288573-56-8 to Mexico or US?

WUHAN MINGYUE: Yes sure
Welcome

UC-1: Please what is your price and [minimum order quantity]? Are you able to send sample? We are looking for large quantity and would like to know kg. price or large order discount

WUHAN MINGYUE: 1-BOC-4-(4-FLUORO-PHENYLAMINO)-PIPERIDINE

UC-1: Please what is your price per kg. how do you accept payment.? Do you offer discount with large order?

WUHAN MINGYUE: Yeah 850 dollars free shipping
If you need 200kg,
If you need a large quantity, I can help you to apply for a discount
The boss said that the one-time 200 kilograms we can give you the five discounts, it means you just only need 500 dollars//kg 😊 ssir
Ggood news

UC-1: Can you send sample first so I can test quality? What payment do you take?

WUHAN MINGYUE: Yes sure, western union and bitcoin are welcome
Well, the quality of our product can definitely

help you expand your business. You will be very surprised when you receive it. We will first send you the minimum order quantity of 100g for you to test. If you give me the detailed address, I will help you to make a quotation.

UC-1: My customer wants to receive the sample to make sure it arrives without problem and is a proper quality. Thank you

WUHAN MINGYUE: Ok well ~ The 100g sample price is ud250 free freight
Once you payment, I will send you 1-BOC-4-(4-FLUORO as soon as possible
we are reliable, we have our own shop in "Made in China" and "E Chemical", we have a business license, we have our own factory, the quality is very good, and there are many repeat customers. Trust me

23. WUHAN MINGYUE and UC-1 agreed on the price and shipment of 100 grams of CAS: 288573-56-8. WUHAN MINGYUE confirmed that CAS: 288573-56-8 would be shipped to an address in Tampa, within the Middle District of Florida. In discussing payment methods for this precursor, WUHAN MINGYUE advised it accepted Western Union and Bitcoin. WUHAN MINGYUE sent a screenshot of its Bitcoin Wallet (BTC) for payment. This BTC wallet is registered to HUANHUAN SONG.

November 2022: WUHAN MINGYUE Negotiates to Send a Second Fentanyl Precursor to the United States with the Undercover Agent

24. In a series of messages beginning in November 2022, WUHAN MINGYUE continued discussing different chemicals for purchase in U.S. dollars. For example, on or about November 18, 2022, UC-1 asked WUHAN MINGYUE if

the company could provide CAS: 125541-22-2 for a “customer in Mexico.”

WUAHN MINGYUE responded, “Yes we have how many grams do you need? Is this 1-N-BOC-4-(Phenylamino) piperidine?” UC-1 confirmed and WUHAN MINGYUE quoted a price for a sample.

25. In later negotiations regarding CAS: 125541-22-2, WUHAN MINGYUE sent Western Union account information for HUANHUAN SONG. WUHAN MINGYUE directed UC-1 to remit payment to HUANHUAN SONG’s Western Union account for the shipment of a 100-gram sample of CAS: 125541-22-2 to an address in Tampa, Florida.

February 2023: WUHAN MINGYUE Negotiates to Send a Third Fentanyl Precursor to the United States with the Undercover Agent

26. WUHAN MINGYUE and UC-1 negotiated the sale of a third precursor, CAS: 79-03-8, in WhatsApp messages exchanged between February and April 2023. WUHAN MINGYUE engaged in the following conversation with UC-1:

UC-1: Friend I have another customer requesting a larger order of propionyl chloride cas 79-03-8. can you please provide USA price and Mexico price? Customer is in Mexico on border so we can provide transport from USA and charge customer if needed.

WUHAN MINGYUE: Okay thanks for your goodness dear Good news 😊 honey, may I know how many kgs do you need? 5 dollar a liter, no shipping 😊

UC-1: \$5 per liter? Is that price correct? And you

can deliver to USA or Mexico? They requested 50 – 150 liters from me in Mexico

WUHAN MINGYUE: yes exacaly (sic)
Its just that the freight is charged separately
😬
Does the customer want to go by air or sea?
If it is shipped by air, it will cost about 1800
US dollars for 150 liters 😂

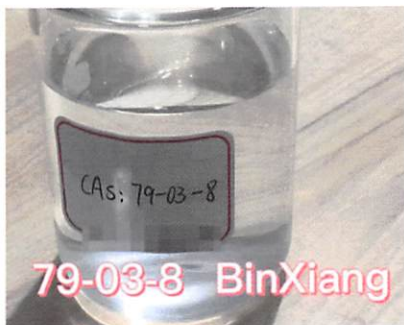
UC-1: Ok I think my client will like the price. If shipped by air into Mexico City how will it be packaged and how will it be labeled. I want to ensure they have no problems picking the product up from Mexico customs. Do you ship to Mexico often, do you have a proof of success that I can share with the client. If they are uncomfortable I can receive at our warehouse in USA and deliver.

WUHAN MINGYUE: Yeah, if shipped by air into Mexico City it be packaged by white bottle 🍷🍷 they have no problems to Mexico customs.

UC-1: If we order a barrel (25 liters) are you able to ship to our company or do we need to arrange transportation from your warehouse? We prefer to pay with Bitcoin

WUHAN MINGYUE: yeah 😊 you can pay 1100 dollars by bitcoin sir

27. After confirming the price in U.S. dollars and again providing a screenshot of the Bitcoin wallet belonging to HUANHUAN SONG, WUHAN MINGYUE transmitted photographs of CAS: 79-03-8, shown below:



October 2023: WUHAN MINGYUE Agrees to Send 100 Liters of CAS: 79099-07-3, a Fourth Precursor

28. In a series of messages beginning in October 2023, more than a year after the first contact, WUHAN MINGYUE and UC-1 engaged in negotiations regarding CAS: 79099-07-3, another fentanyl precursor. UC-1 asked that the price include shipment of 100 liters of this precursor to Mexico. WUHAN MINGYUE asked, "100 liters? N-Boc-4-Piperidone?" UC-1 confirmed, "yes, delivered to Mexico." WUHAN MINGYUE responded, "Darling, 100 liters N-Tert-Butoxycarbonyl-4-Piperidone to Mexico to give you a very favorable price of \$17,000," and then sent another screenshot of the Bitcoin wallet belonging to HUANHUAN SONG.

29. The theoretical yield of 100 liters of CAS: 79099-07-3 is over 180 kilograms of fentanyl.

COUNT ONE
(Attempt to Import Fentanyl Precursor Into the United States)

Paragraphs 1 to 29 are realleged and incorporated by reference as though fully set forth herein.

Beginning in or around August 2022 and continuing through in or around November 2022, in the Middle District of Florida, China, and elsewhere, the defendants,

WUHAN MINGYUE INFORMATION TECHNOLOGY and
HUANHUAN SONG,

did knowingly and intentionally attempt to manufacture, distribute, and export from China a listed chemicals, to wit: tert-butyl-4-(phenylamino) piperidine-1-carboxylate, a 1-Boc-4-AP combination, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States, and knowing and intending that such listed chemicals would be used to manufacture a controlled substance, to wit, fentanyl, contrary to the provisions of 21 U.S.C. §§ 841(a)(1), 959(b)(1)-(2), 960(d)(1) and (3), and 21 C.F.R. Part 1310.02(a)(39).

All in violation of 21 U.S.C. §§ 963 and 960(d)(3), (7).

COUNT TWO
(Attempted Money Laundering)

Paragraphs 1 to 29 are realleged and incorporated by reference as though fully set forth herein.

Beginning in or around August 2022 and continuing through October 2023, in the Middle District of Florida, China, and elsewhere, the defendants,

WUHAN MINGYUE INFORMATION TECHNOLOGY and
HUANHUAN SONG,

did knowingly and intentionally attempt to transport, transmit, and transfer, and 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, felonious narcotics offenses involving controlled substances and listed chemicals (as those terms are defined in the Controlled Substances Act), including but not limited to the violation charged in Count One of this indictment, in violation of 18 U.S.C. § 1956(a)(2)(A).

All in violation of 18 U.S.C. §§ 1956(a)(2)(A), (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. § 963, punishable by imprisonment for more than one year, the defendants,

WUHAN MINGYUE INFORMATION TECHNOLOGY and
HUANHUAN SONG,

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.

3. Upon conviction of a violation of Count Two of this Indictment, in violation of 18 U.S.C. § 1956, punishable by imprisonment for more than one year, the defendants,

WUHAN MINGYUE INFORMATION TECHNOLOGY and
HUANHUAN SONG,

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.

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: 

Ashley Haynes
Special Assistant United States Attorney

By: 

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

FORM OBD-34
January 24

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

WUHAN MINGYUE INFORMATION TECHNOLOGY and
HUANHUAN SONG

INDICTMENT

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

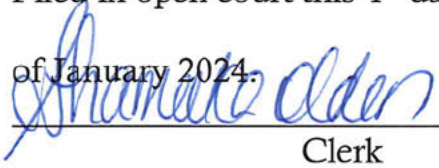
A true bill,



Foreperson

Filed in open court this 4th day of

of January 2024.



Clerk

Bail \$ _____
