

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. **23-60176-CR-SINGHAL/DAMIAN**

21 U.S.C. § 963
21 U.S.C. § 959(a)
21 U.S.C. § 853
18 U.S.C. § 982(a)(1)

FILED BY mdc D.C.

Sep 27, 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - Fort Lauderdale, FL

UNITED STATES OF AMERICA

vs.

HUBEI GUANLANG BIOTECHNOLOGY CO., LTD.,
a/k/a "Crovell Biotech,"
a/k/a "Guanlang Group," and
WEI ZHANG,

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Introduction

1. Methamphetamine is a powerful, highly addictive stimulant that affects the central nervous system. Currently, the majority of the methamphetamine supply in the United States is produced by drug trafficking cartels in Mexico. This methamphetamine is highly pure, potent, and low priced. As with other illicit drugs, methamphetamine is also sometimes laced with fentanyl.

2. Methamphetamine overdose deaths are surging in the United States. Drug overdose deaths involving psychostimulants, primarily methamphetamine, rose from 547 deaths in 1999 to 32,537 deaths in 2021. Methamphetamine is becoming more deadly because it is more frequently

being mixed with highly potent fentanyl. There are currently no FDA-approved medications for treating methamphetamine use disorder or reversing overdoses.

3. Methylamine and its salts are List I chemicals. List I chemicals are used in the manufacturing of controlled substances, such as methamphetamine. Methylamine HCL is an essential precursor chemical that Mexican cartels use to manufacture highly pure and potent methamphetamine. In 2020, almost 70,000 kilograms of methylamine HCL were seized in Mexico.

4. Methamphetamine precursors are primarily sourced from chemical manufacturing companies in China. These China-based chemical manufacturers ship methamphetamine precursors around the world, including to the United States and Mexico, where drug cartels and traffickers use the precursors to synthesize methamphetamine and distribute it throughout the United States.

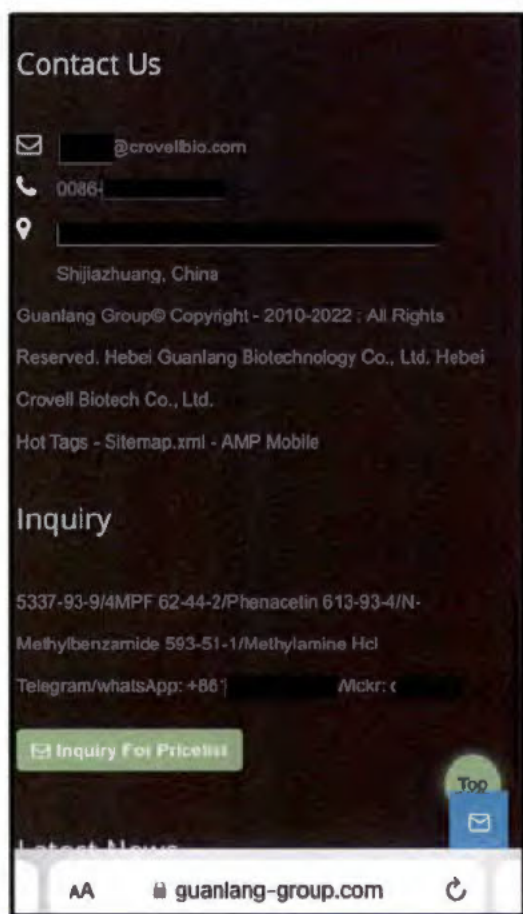
5. These China-based chemical companies often attempt to evade law enforcement by using re-shippers in the United States, false return labels, false invoices, and packaging that conceals the true contents of the parcels and the identity of the distributors. In addition, these companies tend to use cryptocurrency transactions to conceal their identities and the location and movement of their funds.

The Company Defendant

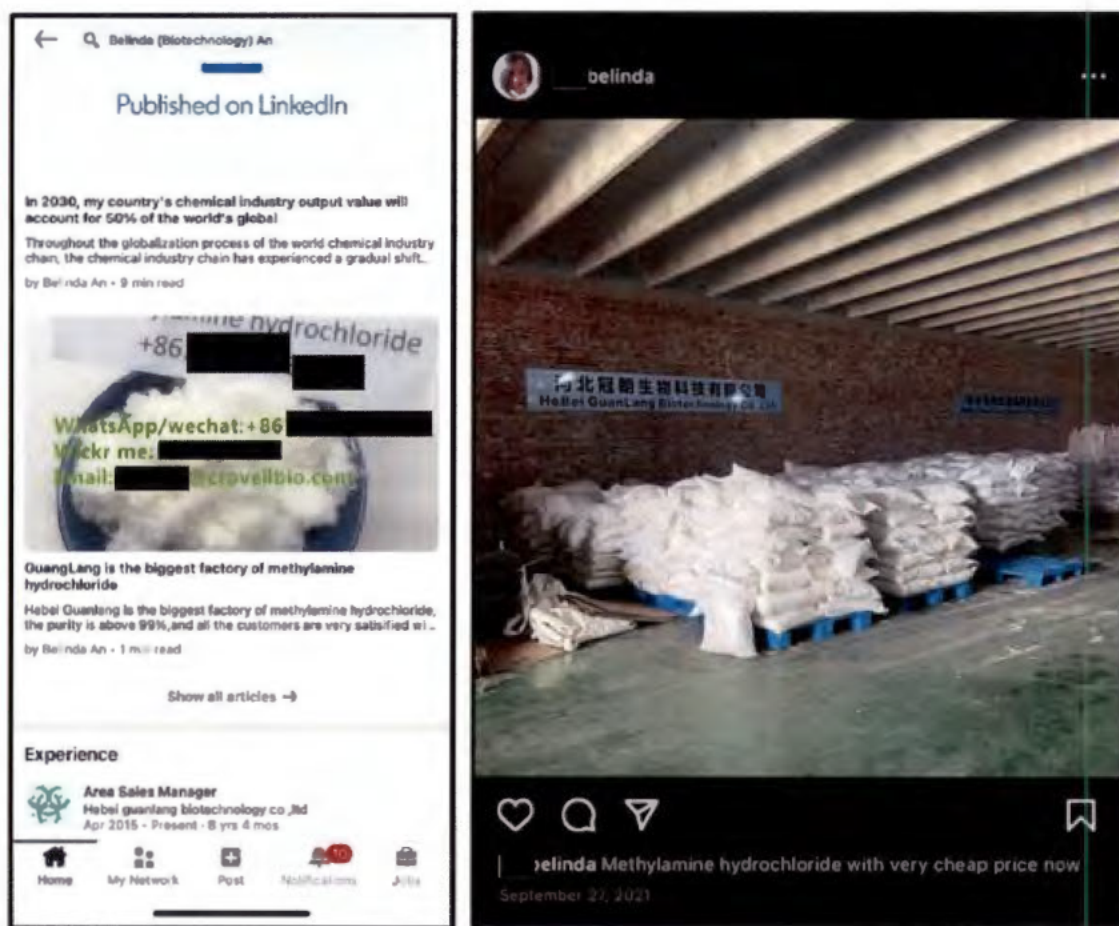
6. Defendant **HUBEI GUANLANG BIOTECHNOLOGY CO., LTD., a/k/a “Crovell Biotech,” a/k/a “Guanlang Group,” (“GUANLANG”)** is a chemical company located in in Shijiazhuang city, Hebei province, China.

7. **GUANLANG** openly advertises online and sells an array of chemicals, including methamphetamine precursors like methylamine HCL. A simple open-source internet search

reveals multiple advertisements for the sale of these substances from GUANLANG sales representatives. These advertisements contain contact information such as WhatsApp numbers or email addresses. Through its own website, a host of storefront websites, and various social media platforms, GUANLANG has advertised to customers in the United States and Mexico. The following images were taken from two of GUANLANG's websites showing advertisements for methylamine HCL and other chemicals:



8. The following are screen shots for a few of **GUANLANG**'s online advertisements for the sale and distribution of the methamphetamine precursor methylamine HCL:



9. Since as early as 2021, **GUANLANG** has shipped methamphetamine precursors from China to the United States and Mexico, including to suspected methamphetamine manufacturers in Mexico and to undercover federal agents in South Florida.

10. Over the past 12 months, **GUANLANG** and certain of its executives and employees sold and shipped more than 9 kilograms of methylamine HCL into the Southern District of Florida. This quantity of precursor could be used to manufacture approximately 22 kilograms of methamphetamine.

The Individual Defendant

11. Defendant **WEI ZHANG** was a citizen of China and the director of **GUANLANG**. **ZHANG** runs the day-to-day operations of **GUANLANG**. **ZHANG** also operates a cryptocurrency wallet that accepts payment for **GUANLANG**'s sales of fentanyl precursors and opioid additives.

12. Co-Conspirator 1 was a sales representative for **GUANLANG**.

The Undercover Transactions and Distributions from GUANLANG

13. Beginning on or around September 7, 2022, an undercover agent ("UC") started negotiating with Co-Conspirator 1 for various methamphetamine precursors. The UC told Co-Conspirator 1 that the product had to be tested. The UC also asked Co-Conspirator 1 if Co-Conspirator 1's company would ship chemicals directly to Mexico. Co-Conspirator 1 stated that **GUANLANG** did ship to Mexico. Co-Conspirator 1 sent the UC a cryptocurrency wallet address to make payment to **GUANLANG**. This cryptocurrency wallet belonged to **WEI ZHANG**.

14. On or about September 22, 2022, the UC ordered one kilogram of Microcrystalline Cellulose (a non-listed chemical binding agent that is used in methamphetamine production) and one kilogram of Boric Acid (a legal chemical that is used in methamphetamine production). On the same date, the UC sent payment to **WEI ZHANG**'s wallet.

15. On or about October 6, 2022, the UC received the parcel containing one kilogram of Microcrystalline Cellulose and one kilogram of Boric Acid from **GUANLANG** at a UC mailbox in Broward County, Florida. Inside the parcel was a "Commercial Invoice" that falsely identified the substances in the package as Carbomer, a thickening agent used in cosmetics, and hand sanitizers.

The December 7, 2022, Distribution

16. Beginning on or about October 18, 2022, and continuing through November 30, 2022, the UC negotiated with Co-Conspirator 1 for 10 kilograms of methylamine HCL, a methamphetamine precursor.

17. On or about On November 30, 2022, the UC sent payment to **WEI ZHANG's** wallet.

18. On or about December 7, 2022, the UC received a parcel from **GUANLANG** in Broward County, Florida. The parcel contained a mylar bag filled with 9.941 kilograms of methylamine HCL. The exterior of the package displayed characters in Mandarin falsely indicating that the shipment contained food. Inside the package was a "Commercial Invoice" that falsely identified the contents of the package as "Deodorizes Piece," a substance used for perfuming or deodorizing rooms. The images below depict the parcel, its contents, and the invoice.



COMMERCIAL INVOICE		INTERNATIONAL AIR WAYBILL NUMBER 576378462584	
DATE OF EXPORTATION 01Dec2022		EXPORT REFERENCES	
INVOICE NUMBER		INVOICE DATE 01Dec2022	
SHIPPER / EXPORTER JI CHENG shijiazhuang pupeng co ltd hebei china heuchongzhuang Shijiazhuang, Hebei 050091 CN 1305037811		CONSIGNEE 	
SHIPPER'S TAX NUMBER		CONSIGNEE OR IMPORTER'S TAX NUMBER	
SHIPPER'S EMAIL CONTACT		CONSIGNEE'S EMAIL CONTACT	
PURPOSE OF SHIPMENT (CHECK ONE) SOLD <input type="checkbox"/> PERSONAL EFFECTS <input type="checkbox"/> NOT SOLD <input type="checkbox"/> RETURN AND REPAIR <input type="checkbox"/> GIFT <input type="checkbox"/> SAMPLE <input checked="" type="checkbox"/> OTHER _____		IMPORTER	
RETURN REASON TYPE _____		IMPORTER'S EMAIL CONTACT _____	
RETURN OTHER REASON _____			

ORIGIN OF MANUFACTURE	FULL DESCRIPTION OF GOODS	QTY	UNIT VALUE	TOTAL VALUE
CHINA	0800000000 PIECE HS 3307490000	10 Kilograms	7.84	78.40
TERMS OF SALE: CP		CURRENCY		USD
made in china JIFG is shipped Carboron is a natural resin used primarily as a thickener in hand sanitizers		TOTAL FREIGHT CHARGES		0.00
		TOTAL INSURANCE CHARGES		0.00
		OTHER COSTS		0.00
		TAX AMOUNT		0.00
		TOTAL INVOICE VALUE		78.40
		TOTAL NUMBER OF PACKAGES		1
		TOTAL WEIGHT		11 KGS

I DECLARE ALL THE INFORMATION CONTAINED IN THIS INVOICE IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.
 (SIGNATURE REQUIREMENTS MAY VARY PER COUNTRY)

DATE **01Dec2022**
 NAME **JI CHENG** SIGNATURE ji peng TITLE _____
 (PLEASE PRINT)

The Defendants' Importation and Distribution of Methamphetamine Precursors to Mexico

19. From in and around September 2022, and continuing through 2023, Co-Conspirator 1 communicated with dozens of Mexican customers. Co-Conspirator 1 negotiated sales of numerous multi-kilogram shipments to GUANLANG's Mexican customers. These shipments were sent to various cities in Mexico.

COUNT 1
Conspiracy to Manufacture and Distribute a Methamphetamine Precursor
with Intent to Unlawfully Import into the U.S.
(21 U.S.C. § 963)

1. The General Allegations section of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. Beginning in and around September 2022, the exact date being unknown to the Grand Jury, and continuing through the date of the return of this Indictment, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

HUBEI GUANLANG BIOTECHNOLOGY CO., LTD.,
a/k/a “Crovell Biotech,”
a/k/a “Guanlang Group,” and
WEI ZHANG,

did knowingly and willfully combine, conspire, confederate, and agree with each other, Co-Conspirator 1, and with other persons known and unknown to the Grand Jury:

(a) to manufacture and distribute a listed chemical intending, knowing, and having reasonable cause to believe that such chemical will be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959(a), and

(b) to manufacture and distribute a listed chemical intending, knowing, and having reasonable cause to believe that such chemical will be unlawfully imported into the United States and intending and knowing that the listed chemical will be used to manufacture a controlled substance, in violation of Title 21, United States Code, Section 959(b).

All in violation of Title 21, United States Code, Section 963.

The listed chemical involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a detectable amount of methylamine HCL, a listed chemical, in violation of Title 21, United States Code, Sections 802(34)(M), 959(a), 960(b)(1), and 960(b)(3).

The controlled substance involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance in violation of Title 21, United States Code, Section 960(b)(1)(H).

COUNT 2
Manufacture and Distribution of a Methamphetamine Precursor
with Intent to Unlawfully Import into the U.S.
(21 U.S.C. § 959(a))

On or about December 7, 2022, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

HUBEI GUANLANG BIOTECHNOLOGY CO., LTD.,
a/k/a “Crovell Biotech,”
a/k/a “Guanlang Group,” and
WEI ZHANG,

did knowingly and intentionally manufacture and distribute a listed chemical intending, knowing, and having reasonable cause to believe that such chemical will be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959(a), and Title 18, United States Code, Section 2.

It is further alleged that the listed chemical is a detectable amount of methylamine HCL, in violation of Title 21, United States Code, Sections 802(34)(M), 959(a), 960(b)(1), and 960(b)(3).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which any of the defendants, **HUBEI GUANLANG BIOTECHNOLOGY CO., LTD., a/k/a “Crovell Biotech,” a/k/a “Guanlang Group,” and WEI ZHANG,** have an interest.

2. Upon conviction of a violation of Title 21, United States Code, Sections 959(a) and/or 963, as alleged in this Indictment, the defendants so convicted shall forfeit to the United States 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, such offense, pursuant to Title 21, United States Code, Section 853.

3. The property subject to forfeiture as a result of the alleged offenses includes, but is not limited to, a sum of at least \$1,679,824 in U.S. currency, which represents the total value of property involved in or derived from the alleged offenses, and may be sought as a forfeiture money judgment.

4. If any of the property 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 or 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 the forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Sections 853 and 970.

A TRUE BILL

FOREPERSON


MARKENZY LAPOINTE
UNITED STATES ATTORNEY


MONIQUE BOTERO
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: _____

v.

Hebei Guanlang Biotechnology Co. LTD.,
a/k/a "Crovell Biotech, a/k/a "Guanlang
Group" and Wei Zhang, _____/
Defendants.

Court Division (select one)

- ☐ Miami ☐ Key West ☐ FTP
☒ FTL ☐ WPB

CERTIFICATE OF TRIAL ATTORNEY

Superseding Case Information:

New Defendant(s) (Yes or No) _____
Number of New Defendants _____
Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes
List language and/or dialect: Chinese
4. This case will take 6-8 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I ☐ 0 to 5 days ☐ Petty
II ☒ 6 to 10 days ☐ Minor
III ☐ 11 to 20 days ☐ Misdemeanor
IV ☐ 21 to 60 days ☒ Felony
V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) Yes
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shanek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By: _____

Monique Botero

Monique Botero
Assistant United States Attorney
FL Bar No. 722286

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Hubei Guanlang Biotechnology Co., Ltd., a/k/a "Crovell Biotech," a/k/a "Guanlang Group"

Case No: _____

Count #: 1

Conspiracy to Import a Methamphetamine precursor

Title 21, United States Code, Sections 963

- * **Max. Term of Imprisonment:** N/A
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** N/A
- * **Max. Fine:** \$250,000

Count #: 2

Importation of Methamphetamine precursor

Title 21, United States Code, Sections 959(a)

- * **Max. Term of Imprisonment:** N/A
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** N/A
- * **Max. Fine:** \$250,000

Count #:

- * **Max. Term of Imprisonment:**
- * **Mandatory Min. Term of Imprisonment (if applicable):**
- * **Max. Supervised Release:**
- * **Max. Fine:**

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Wei Zhang

Case No: _____

Count #: 1

Conspiracy to Import a Methamphetamine precursor

Title 21, United States Code, Section 963

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #: 2

Importation of Methamphetamine precursor

Title 21, United States Code, Sections 959(a)

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #:

- * **Max. Term of Imprisonment:**
- * **Mandatory Min. Term of Imprisonment (if applicable):**
- * **Max. Supervised Release:**
- * **Max. Fine:**

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.