

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term**

**Grand Jury 24-5 Sworn on August 1, 2024**

**UNITED STATES OF AMERICA**

**v.**

**TANWEER AHMED MOHAMED  
HUSSAIN PARKAR,**

**VENKATA NAGA MADHUSUDHAN  
RAJU MANTHENA,**

**KRISHNA VERICHARLA, and**

**VASUDHA PHARMA CHEM LIMITED,**

**Defendants.**

**CRIMINAL NO. \_\_\_\_\_**

21 U.S.C. §§ 959(a), 959(b), 960(d)(7), and 963

(Conspiracy to Manufacture and Distribute a Listed Chemical for Unlawful Importation and to Manufacture or Distribute a Listed Chemical Used to Manufacture a Controlled Substance for Unlawful Importation)

21 U.S.C. §§ 959(a) and 960(d)(7)  
(Manufacture and Distribution of a Listed Chemical for Unlawful Importation) (2 counts)

21 U.S.C. §§ 959(a), 959(b), 960(d)(7), and 963

(Attempted Manufacture and Distribution of a Listed Chemical for Unlawful Importation and Manufacture and Distribution of a Listed Chemical Used to Manufacture a Controlled Substance for Unlawful Importation)

21 U.S.C. §§ 853 and 970  
(Criminal Forfeiture)

18 U.S.C. § 982(a)(1) and 28 U.S.C. § 2461(c) (Criminal Forfeiture)

**INDICTMENT**

The Grand Jury charges that:

**INTRODUCTION**

I. **The Fentanyl Crisis and Fentanyl Precursor Chemicals**

1. Fentanyl is the deadliest drug threat currently facing the United States. It is a highly addictive synthetic opioid that is approximately 50 times more potent than heroin and 100 times more potent than morphine, and a dose of as little as two milligrams can kill an adult. The Centers for Disease Control estimates that overdose deaths resulting from synthetic opioids, principally fentanyl and its analogues, exceeded at least 74,500 in 2023.

2. In 2024, the United States Drug Enforcement Administration (“DEA”) seized over 55.5 million fentanyl-laced counterfeit prescription pills and nearly 8,000 pounds of fentanyl powder—the equivalent of approximately 367 million potentially deadly doses of fentanyl.

3. Fentanyl is not a naturally occurring substance. It is produced by a series of chemical reactions, through a process called synthetic organic chemistry. There are several methods for producing fentanyl, each known as a “pathway.” Each pathway to fentanyl requires the combination of several component chemicals, which are known as “precursors” or “precursor chemicals.” These precursors, when mixed in the right combinations, are the building blocks of the fentanyl distributed in the United States and elsewhere.

4. Chemists can identify which substances contain fentanyl, and the pathway used to produce the fentanyl contained within a given tested substance. Based upon analyses of fentanyl recovered during numerous seizures, including from clandestine laboratories located in both the

United States and Mexico, the DEA has identified the most common pathways used to produce fentanyl, and the necessary precursors needed to produce fentanyl via those pathways.

5. The United States regulates controlled substances and the component chemicals of those controlled substances. Accordingly, the DEA maintains “schedules” regarding the classification of unlawful controlled substances like fentanyl and maintains “lists” regarding the classification of component chemicals that are used to produce controlled substances, including chemicals that can be used to produce fentanyl.

6. Fentanyl is designated as a Schedule II controlled substance, and various precursors that can be used to produce fentanyl are either included on the controlled substance schedules or on List I or List II of the component chemicals classification lists. One fentanyl precursor chemical, 1-(tert-Butoxycarbonyl)-4-piperidone, also called N-BOC-4-piperidone, (“N-BOC-4P”) is classified as a List I chemical. One kilogram of N-BOC-4P theoretically yields up to 1.83 kilograms of Fentanyl. N-BOC-4P bears the unique Chemical Abstracts Service (“CAS”) registry number 79099-07-03. CAS registry numbers are unique numerical identifiers used to distinguish between chemical substances. The CAS registry number assigned to a particular chemical substance unambiguously identifies the chemical substance when there may be multiple common names used to identify that substance.

7. Today, fentanyl-related precursors are principally sourced from China- or India-based chemical manufacturers, many of which openly advertise such precursors on the Internet. Additionally, Indian-based chemical companies source fentanyl precursors to Chinese chemical brokers at a cost as low as \$13 USD per kilogram on multi-ton quantities shipped via sea freight to China. The chemical manufacturers and brokers then ship fentanyl-related precursors around

the world, including to the United States and to Mexico, where the chemicals are used to produce fentanyl or other controlled substances.

II. The Defendants

8. The defendant VASUDHA PHARMA CHEM LIMITED (“VPC”) is one such India-based manufacturer and supplier of fentanyl precursors. VPC is a chemical manufacturing company located in Hyderabad, Telangana, India with a robust offering of chemicals, including fentanyl precursor chemicals such as N-BOC-4P, and an unabashed marketing strategy in which VPC directly markets and advertises the availability of these precursor chemicals at foreign trade shows, in marketing materials sent to potential customers, and on the company’s website. VPC manufactures the chemicals in India and ships worldwide.

9. The defendant TANWEER AHMED MOHAMED HUSSAIN PARKAR (“PARKAR”), a citizen of both the United Kingdom and India, is VPC’s Chief Global Business Officer. PARKAR negotiates the sale of fentanyl precursors with customers on behalf of VPC.

10. The defendant KRISHNA VERICHARLA (“VERICHARLA”), a citizen of India, is a VPC Marketing Representative. VERICHARLA negotiates with and coordinates the sale of fentanyl precursors to customers on behalf of VPC.

11. The defendant VENKATA NAGA MADHUSUDHAN RAJU MANTHENA (“MANTHENA”), a citizen of India, is VPC’s Marketing Director. MANTHENA solicits customers for VPC and helps to facilitate the sale of fentanyl precursors to customers on behalf of VPC.

III. The Defendants’ Fentanyl Precursor Manufacturing and Distribution Scheme

12. From March 2024 through November 2024, VPC, PARKAR, VERICHARLA, and MANTHENA (collectively, “Defendants”), conspired to distribute a fentanyl precursor chemical, N-BOC-4P, knowing that it would be unlawfully imported into the United States and that it would

be used to manufacture fentanyl, a controlled substance, which would then be unlawfully imported into the United States.

13. In March 2024, as part of an undercover law enforcement investigation by the DEA, Defendants sold a DEA undercover agent 25 kilograms of N-BOC-4P for \$125 USD per kilogram. Less than two weeks after the DEA undercover agent wired \$3,125 USD from the United States to VPC in India, the 25-kilogram shipment of N-BOC-4P arrived in the United States. Defendants knew that the N-BOC-4P would be unlawfully imported into the United States and that it would be used to manufacture fentanyl that would be unlawfully imported into the United States.

14. In August 2024, Defendants again sold the DEA undercover agent 25 kilograms of N-BOC-4P for \$125 USD per kilogram. On August 9, 2024, the DEA undercover agent wired \$3,125 USD from the United States to VPC in India. The 25-kilogram shipment of N-BOC-4P arrived in the United States on or about September 28, 2024. *See Image 1 below.* Defendants knew that the N-BOC-4P would be unlawfully imported into the United States and that it would be used to manufacture fentanyl that would be unlawfully imported into the United States.



Image 1: 25-kilogram shipment of N-BOC-4P received on or about September 28, 2024

15. From August to September 2024, Defendants and the DEA undercover agent negotiated a four-metric-ton (4,000 kilograms) purchase of N-BOC-4P. Defendants agreed to ship two metric tons of N-BOC-4P to Sinaloa, Mexico for \$100 USD per kilogram, and another two metric tons of N-BOC-4P to the United States for \$90 USD per kilogram. *See* Images 2 and 3 below. Defendants began manufacturing N-BOC-4P to fulfill the order and demanded payment from the DEA undercover agent. Defendants knew that the N-BOC-4P would be unlawfully imported into the United States, and that it would be used to manufacture fentanyl that would be unlawfully imported into the United States.



# VASUDHA PHARMA CHEM LIMITED

Contributing to affordable healthcare...

Corporate Office : [REDACTED] Hyderabad,  
Telangana – 500033.

Phone : [REDACTED] Fax : [REDACTED]  
E-mail : [REDACTED] Website : www.vasudhapharma.com  
CIN : [REDACTED] Export Status : Two Star Export House

## PROFORMA INVOICE

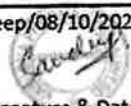
<b>EXPORTER:</b> VASUDHA PHARMA CHEM LIMITED [REDACTED]		Invoice No & Date      Exporter's Ref: 32                      08/10/2024      VPCL/REF/24-25	
[REDACTED]		Buyers Order                      Date [080]                                      13.09.2024	
[REDACTED]		Other Reference (s) NIL	
<b>CONSIGNEE:</b> [REDACTED] SINALOA, MEXICO PHNO [REDACTED]		<b>BUYER:</b> [REDACTED]	
Pre-Carriage by N.A	PLACE OF RECEIPT BY PRE CARRIER N.A	Country of Origin of Goods      Country of final Destination INDIA                                      MEXICO	
Vessel/Flight No: N.A	Port of Loading HYDERABAD, INDIA	Terms of Delivery      and      Payment CIF BY AIR                      50% ADVANCE AND 50 % DISPATCH	
Port Of Discharge: MEXICO	Final Destination: MEXICO	WE SHOULD RECEIVE THE NET AMOUNT OF USD 2,00,000.00 AT HYDERABAD, INDIA (ALL TT REMITTANCE CHARGES TO BUYERS ACCOUNT)	
DESCRIPTION		Quantity KG	Rate (USD)
1-(TERT-BUTOXYCARBONYL)-4-PIPERIDONE		2000.00	100.00
Amount Chargeable (In words) USD Two Lakhs Only.			2,00,000.00
<b>Declaration:</b> We declare that this invoice shows the actual price of the goods described and that all particulars are true and correct.			Sandeep/08/10/2024  Signature & Date
BENEFICIARY NAME : VASUDHA PHARMA CHEM LIMITED BANK NAME: [REDACTED]		INTERMEDIATE BANK DETAILS : - [REDACTED]	

Image 2: Shipment Invoice for Sinaloa, Mexico



# VASUDHA PHARMA CHEM LIMITED

Contributing to affordable healthcare...

Corporate Office : [REDACTED] Hyderabad, Telangana – 500033.

Phone : [REDACTED] Fax : [REDACTED]  
 E-mail : [REDACTED] Website : www.vasudhapharma.com  
 CIN : [REDACTED] Export Status : Two Star Export House

### PROFORMA INVOICE

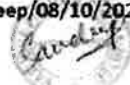
<b>EXPORTER:</b> VASUDHA PHARMA CHEM LIMITED [REDACTED]		<b>Invoice No &amp; Date</b> 31 08/10/2024		<b>Exporter's Ref:</b> VPCL/REF/24-25	
		<b>Buyers Order</b> [079]		<b>Date</b> 13.09.2024	
		<b>Other Reference (s)</b> NIL			
<b>CONSIGNEE:</b> [REDACTED] WESTON, FL, UNITED STATES 33326 PHNO [REDACTED]		<b>BUYER:</b> [REDACTED]			
<b>Pre-Carriage by</b> N.A	<b>Place of Receipt by pre Carrier</b> N.A	<b>Country of Origin of Goods</b> INDIA		<b>Country of final Destination</b> UNITED STATES	
<b>Vessel/Flight No:</b> N.A	<b>Port of Loading</b> HYDERABAD, INDIA	<b>Terms of Delivery</b> CIF BY AIR		<b>and Payment</b> 50% ADVANCE AND 50 % DISPATCH	
<b>Port Of Discharge:</b> UNITED STATES	<b>Final Destination:</b> UNITED STATES	<b>WE SHOULD RECEIVE THE NET AMOUNT OF USD 1,80,000.00 AT HYDERABAD, INDIA (ALL TT REMITTANCE CHARGES TO BUYERS ACCOUNT)</b>			
<b>DESCRIPTION</b>		<b>Quantity</b> KG	<b>Rate (USD)</b>	<b>Amount</b>	
1-(TERT-BUTOXYCARBONYL)-4-PIPERIDONE		2000.00	90.00	1,80,000.00	
<b>Amount Chargeable (In words) USD One Lakh Eighty Thousand Only.</b>				1,80,000.00	
<b>Declaration:</b> We declare that this invoice shows the actual price of the goods described and that all particulars are true and correct.				<b>Sandeep/08/10/2024</b>  Signature & Date	
<b>BENEFICIARY NAME : VASUDHA PHARMA CHEM LIMITED</b> <b>BANK NAME:</b> [REDACTED]			<b>INTERMEDIATE BANK DETAILS :-</b> [REDACTED]		

Image 3: Shipment Invoice for Weston, Florida



**COUNT ONE**

Beginning in and around March 2024, and continuing up to and including November 2024, both dates being approximate and inclusive, in the countries of India, the United States, and elsewhere, Defendants VASUDHA PHARMA CHEM LIMITED, TANWEER AHMED MOHAMED HUSSAIN PARKAR, KRISHNA VERICHARLA, and VENKATA NAGA MADHUSUDHAN RAJU MANTHENA, together with others, both known and unknown to the Grand Jury, did knowingly, intentionally, and willfully combine, conspire, confederate, and agree (a) to manufacture or distribute 1-(tert-Butoxycarbonyl)-4-piperidone, also known as N-BOC-4-piperidone, a List I chemical, intending, knowing, or having reasonable cause to believe that such chemical would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(d)(7), and (b) to manufacture or distribute 1-(tert-Butoxycarbonyl)-4-piperidone, also known as N-BOC-4-piperidone, a List I chemical, intending or knowing that the listed chemical would be used to manufacture fentanyl, a Schedule II controlled substance, and intending, knowing, or having reasonable cause to believe that such controlled substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(b) and 960(d)(7), all in violation of Title 21, United States Code, Section 963.

(Conspiracy to Manufacture and Distribute a Listed Chemical for Unlawful Importation into the United States and for the Manufacture and Distribution of a Controlled Substance for Unlawful Importation into the United States, in violation of Title 21, United States Code, Sections 959(a), 959(b), 960(d)(7), and 963.)

**COUNT TWO**

In and around March 2024, Defendants VASUDHA PHARMA CHEM LIMITED, KRISHNA VERICHARLA, and VENKATA NAGA MADHUSUDHAN RAJU MANTHENA (a) manufactured or distributed 1-(tert-Butoxycarbonyl)-4-piperidone, also known as N-BOC-4-

piperidone, a List I chemical, intending, knowing, or having reasonable cause to believe that such chemical would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(d)(7).

(Manufacture and Distribution of a Listed Chemical for Unlawful Importation into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(d)(7).)

### **COUNT THREE**

In and around August and September 2024, Defendants VASUDHA PHARMA CHEM LIMITED, TANWEER AHMED MOHAMED HUSSAIN PARKAR, KRISHNA VERICHARLA, and VENKATA NAGA MADHUSUDHAN RAJU MANTHENA manufactured or distributed 1-(tert-Butoxycarbonyl)-4-piperidone, also known as N-BOC-4-piperidone, a List I chemical, intending, knowing, or having reasonable cause to believe that such chemical would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(d)(7).

(Manufacture and Distribution of a Listed Chemical for Unlawful Importation into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(d)(7).)

### **COUNT FOUR**

In and around August and September 2024, Defendants VASUDHA PHARMA CHEM LIMITED, TANWEER AHMED MOHAMED HUSSAIN PARKAR, KRISHNA VERICHARLA, and VENKATA NAGA MADHUSUDHAN RAJU MANTHENA attempted to (a) manufacture or distribute 1-(tert-Butoxycarbonyl)-4-piperidone, also known as N-BOC-4-piperidone, a List I chemical, intending, knowing, or having reasonable cause to believe that such chemical would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(d)(7), and (b) manufacture or distribute 1-(tert-Butoxycarbonyl)-4-piperidone, also known as N-BOC-4-piperidone, a List I chemical, intending

or knowing that the listed chemical would be used to manufacture fentanyl, a Schedule II controlled substance, and intending, knowing, or having reasonable cause to believe that such controlled substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(b) and 960(d)(7), all in violation of Title 21, United States Code, Section 963.

(Attempted Manufacture and Distribution of a Listed Chemical for Unlawful Importation into the United States and for the Manufacture and Distribution of a Controlled Substance for Unlawful Importation into the United States, in violation of Title 21, United States Code, Sections 959(a), 959(b), 960(d)(7), and 963.)

**CRIMINAL FORFEITURE ALLEGATION: COUNTS ONE THROUGH FOUR**

The United States hereby gives notice to the Defendants that upon conviction of the Title 21 offenses alleged in Counts One through Four of this Indictment, the Government will seek forfeiture in accordance with Title 21, United States Code, Sections 853 and 970, of all property constituting or derived from any proceeds the Defendants obtained directly or indirectly as a result of the alleged Title 21 violations, and all property used or intended to be used in any manner or part to commit, and to facilitate, the commission of such offenses.

If any of the above-described forfeitable property, as a result of any act or omission of the Defendants:

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the Defendant up to the value of the above forfeitable property.

(Criminal Forfeiture, <sup>pursuant to</sup> ~~in violation of~~ Title 21, United States Code, Sections 853 and 970.)


A TRUE BILL:

\_\_\_\_\_  
Foreperson



\_\_\_\_\_  
MARLON COBAR  
Chief  
Narcotic and Dangerous Drug Section  
Criminal Division

By: \_\_\_\_\_



MELANIE ALSWORTH  
Acting Deputy Chief  
JAYCE BORN  
LERNIK BEGIAN  
Trial Attorneys  
Narcotic and Dangerous Drug Section  
Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530