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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. FUJING ZHENG, aka, GORDON JIN, aka, MR. JIN, aka, GORDON ZHENG, aka, JINXINXIN, aka, FU JING ZHENG, aka, DENG GAO, GUANGHUA ZHENG, aka, GUANG HUA ZHENG, Defendants.	)	INDICTMENT JUDGE POLSTER CASE NO. 1:18 CR 474 Title 21, Sections 331(a), 333(b)(7), 351(d), 841(a)(1), (a)(2), (b)(1)(A), (b)(1)(C), (h), 843(c)(2)(A), 846, 848, 853, 952(a), 959(a), 960(a)(1) and (3), (b)(1), (b)(3), 963, and 970, Title 18, Sections 1956(a)(2), (h), and 2, United States Code

COUNT 1
(Conspiracy to Manufacture, Distribute, and Possess with the Intent to Distribute Controlled Substances and Controlled Substance Analogues Resulting in Death, 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(C), all in violation of 21 U.S.C. § 846)

The Grand Jury charges:

1. From on or about January 1, 2008 to the Present, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO; GUANGHUA ZHENG, aka GUANG HUA ZHENG; Guangfu Z.; Guifeng C.; Songyan J.; Longbao Z.; Qinghua Y., aka Jason Yen; Lynn X.; Leroy S.; (individuals whose names are known to the Grand Jury); Global United Biotechnology; Global United Holdings; Global Biotech, Inc.; Global Holdings, Inc.; Top Lab RC; Global RC; Golden Chemicals; Cambridge Chemicals; Wonda Science; OneChem;

ChemCloud; Daniel Lab; and Shanghai Pharmaceutical Company 1 (named but not indicted herein), Bin Wang (indicted in case number 1:18-CR-123), and others known and unknown to the Grand Jury (hereinafter, the "ZHENG Drug Trafficking Organization" or "the Organization" and also known as the "JIN Drug Trafficking Organization"), did knowingly, and intentionally combine, conspire, confederate, and agree with each other to manufacture, distribute, and possess with the intent to distribute mixtures and substances containing a detectable amount of the following controlled substance analogues, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, and controlled substances, including the following:

A. 100 grams or more of Acetyl Fentanyl, a Schedule I controlled substance analogue until July 17, 2015, and a Schedule I controlled substance thereafter;

B. Carfentanil, a Schedule II controlled substance;

C. Furanyl Fentanyl (Fu-F), a Schedule I controlled substance analogue until November 29, 2016, and a Schedule I controlled substance thereafter;

D. 4-Fluoroisobutyrfentanyl (4-FIBF), a Schedule I controlled substance analogue until May 3, 2017, and a Schedule I controlled substance thereafter;

E. Methoxyacetyl Fentanyl, a Schedule I controlled substance analogue until October 26, 2017, and a Schedule I controlled substance thereafter;

F. U-47700 (Pink Heroin), a Schedule I controlled substance analogue until November 14, 2016, and a Schedule I controlled substance thereafter;

G. U-48800, a Schedule I controlled substance analogue;

H. 4-CL-PVP (Flakka), a Schedule I controlled substance analogue;

I. Dibutylone, a Schedule I controlled substance;

J. N-Ethylpentylone (BK-EDBP or Ephylone), a Schedule I controlled substance analogue;

K. Alpha-Pyrrolidinopentiophenone (Alpha PVP or A-PVP), a Schedule I controlled substance;

L. 3,4-methylenedioxy-N-ethylcathinone (BK-MDEA or Ethylone), a Schedule I controlled substance;

M. FUB-AMB, a Schedule I controlled substance analogue until November 3, 2017, and a Schedule I controlled substance thereafter;

N. ADB-FUBINACA, a Schedule I controlled substance analogue until April 10, 2017, and a Schedule I controlled substance thereafter;

O. 4-Methyl-Alpha-PHP (MPHP), a Schedule I controlled substance analogue;

P. 4-Methyl-N-Ethylcathinone (4-MEC); a Schedule I controlled substance analogue until March 7, 2014, and a Schedule I controlled substance thereafter;

Q. 3,4-Methylenedioxyamphetamine (MDA), a Schedule I controlled substance;

R. 4-Methylmethcathinone (4-MMC or Mephedrone); a Schedule I controlled substance;

S. Methylone, a Schedule I controlled substance;

T. Methedrone, a Schedule I controlled substance analogue;

U. Methylenedioxypyrovalerone (MDPV), a Schedule I controlled substance;

V. 5F-AKB48, a Schedule I controlled substance analogue until April 10, 2017, and a Schedule I controlled substance thereafter;

W. BK-MBDB (Butylone), a Schedule I controlled substance;

X. 5F-UR144 (XLR11), a Schedule I controlled substance analogue until May 16, 2013, and a Schedule I controlled substance thereafter;

Y. Pentedrone, a Schedule I controlled substance analogue until March 7, 2014, and a Schedule I controlled substance thereafter;

Z. 5F-ADB, a Schedule I controlled substance analogue until April 10, 2017, and a Schedule I controlled substance thereafter;

AA. 5F-AMB, a Schedule I controlled substance analogue until April 10, 2017, and a Schedule I controlled substance thereafter;

BB. MMB-CHMICA, a Schedule I controlled substance analogue until July 10, 2018, and a Schedule I controlled substance thereafter; and

CC. Methoxetamine (MXE), a Schedule I controlled substance analogue.

DD. AB-CHMINACA, a Schedule I controlled substance analogue until January 30, 2015, and a Schedule I controlled substance thereafter;

EE. ADB-CHMINACA, a Schedule I controlled substance analogue until February 5, 2016, and a Schedule I controlled substance thereafter;

FF. MAM-2201, a Schedule I controlled substance analogue;

GG. NM-2201, a Schedule I controlled substance analogue until July 10, 2018, and a Schedule I controlled substance thereafter;

HH. 6-EAPB, a Schedule I controlled substance analogue;

II. 3-FPM, a Schedule I controlled substance analogue; and

JJ. Ethylphenidate, a Schedule I controlled substance analogue.

In violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), (b)(1)(A), and (b)(1)(C.

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

a. The ZHENG Drug Trafficking Organization created, maintained, and controlled companies in China whose purpose was to engage in drug trafficking, smuggling, and money laundering. These companies include Global United Biotechnology, Global United Holdings, Global Biotech, Inc., Global Holdings, Inc., Global RC, Top Lab RC, and Golden Chemicals. The Organization did not officially register all of these companies. The purpose of these companies was to act as a front, concealing the real identities of the individuals and companies engaged in the criminal enterprise.

b. The ZHENG Drug Trafficking Organization created, maintained, and controlled Shanghai Pharmaceutical Company 1 (a company whose name is known to the Grand Jury) in Shanghai, China. The purpose of Shanghai Pharmaceutical Company 1 was to act as the legitimate face of the drug trafficking organization and a location from which the co-conspirators created, manufactured, and prepared narcotics for mass distribution around the world. Shanghai Pharmaceutical Company 1 listed one of FUJING ZHENG's email addresses as a point of contact on its website: gordonzheng@[redacted].com.

c. The ZHENG Drug Trafficking Organization touted its ability as a large-scale synthetic narcotics manufacturer to distribute "over 16 tonnes of chemicals every month" from "our own laboratory" and "synthesize nearly any chemical on a bespoke basis in any quantity." The Organization primarily specialized in the production for mass distribution of three types of synthetic narcotics: opioids, including fentanyl, fentanyl analogues, and other synthetic opioids; cathinones (commonly referred to by terms such as "bath salts," "flakka," and "gravel"); and synthetic cannabinoids (commonly referred to by terms such as "K2" and

"Spice"). Many of these drugs are associated with overdose deaths. Some are associated with causing irreversible physiological damage from non-fatal overdoses.

d. Through chemical expertise, the ZHENG Drug Trafficking Organization manufactured new and oftentimes deadly analogues of synthetic opioids, pharmaceuticals, cathinones, and other controlled substances. The Organization called this process "custom synthesis." Throughout the course of the conspiracy, the Organization had manufactured and distributed over 250 types of synthetic narcotics.

e. The ZHENG Drug Trafficking Organization manufactured counterfeit pills for mass distribution from China into the United States and around the world, adulterating trademarked and other pharmaceuticals with synthetic narcotics, including those that had a reasonable probability of causing serious adverse health consequences or death.

f. The ZHENG Drug Trafficking Organization also created, maintained, and controlled foreign web sites as online storefronts for the controlled substances that the Organization created, manufactured, and distributed. These websites included www.globalrc.net, www.goldenrc.com, and www.TopLabRC.com. On these websites, the co-conspirators advertised the following:

i. Controlled substances and controlled substance analogues for sale, with the Organization's website www.globalrc.net boasting that the Organization distributed over "16 tonnes a month" of illicit chemicals and had the ability to make "any quantity of desired chemicals for immediate distribution."

ii. Guaranteed delivery of products, including "100% deliver[y] and reshipment of products if package got seized by customs," its ability to

ship "worldwide to Australia, Europe, Asia, and Africa," "special ways to [ship narcotics] to USA, Russia, Europe and other countries," and "warehouses available in USA and Europe" for reshipment of controlled substances in the destination countries as a means of bypassing customs at the border.

iii. "Custom Synthesis," a process through which the ZHENG Drug Trafficking Organization used its chemical expertise to create "every possible chemical to meet the needs of [its] customers," including "many other products than the ones [] found on [its] website."

iv. Secured lines of communication for customers to contact the Organization, including end-to-end encrypted platforms like WhatsApp and ProtonMail.

g. In order to maximize their global customer base, the ZHENG Drug Trafficking Organization regularly maintained and updated mirror websites of www.globalrc.net advertising their synthetic narcotics for sale in over 35 languages. These languages included Arabic, Bengali, Catalan, Croatian, Danish, Dutch, Estonian, Farsi, Finnish, French, Gaelic (Irish), Greek, Haitian Creole, Hebrew, Hindi, Hmong, Hungarian, Icelandic, Indonesian, Italian, Japanese, Korean, Lithuanian, Malay, Maltese, Norwegian, Polish, Portuguese, Romanian, Russian, Serbian, Slovenian, Spanish, Turkish, Ukrainian, Urdu, Uzbek, and Vietnamese.

h. The ZHENG Drug Trafficking Organization also created, maintained, and controlled vendor accounts on various foreign-hosted "trading" websites for the purpose of advertising and distributing controlled substances. These websites included EC21, TradeKey, China Quality Lighting, TradeIndia, and TradeLead.

i. The ZHENG Drug Trafficking Organization not only passively advertised to customers on these websites, but also actively solicited sales of controlled substances, including through sending private messages on the "trading" websites to individuals who it believed may be interested in purchasing narcotics.

j. The ZHENG Drug Trafficking Organization additionally communicated with current and prospective customers through email accounts. These included MagicChemical@hotmail.com; goldenchemical@live.com; 3507656950@qq.com; and Sales@globalrc.net. On these accounts, the Organization referred to the account user as "GORDON JIN." The Organization also used WhatsApp, Skype, and other communication platforms to speak with its customers. When communicating with customers, the Organization consistently referred to itself in the plural as "we" and "us."

k. FUJING ZHENG used the moniker "JINXINJIN" and ultimately "GORDON JIN" on the Organization's websites, its vendor accounts, and various email accounts to advertise and communicate with customers. The ZHENG Drug Trafficking Organization also used the moniker "GORDON JIN" as a form of branding, letting customers know that they are buying from the same supplier despite a change in website, email account, or underlying company name.

l. The ZHENG Drug Trafficking Organization also made periodic updates to its websites and account pages as a means of mass communication to apprise customers of narcotics available for sale, order protocols, shipping issues, and business logistics.

m. The ZHENG Drug Trafficking Organization took numerous steps in an attempt to conceal its activities and the identities of its members from law enforcement. These steps included:

i. Communicating through secure private messaging, including ProtonMail, an end-to-end encrypted email service; WhatsApp, an end-to-end encrypted messaging service; and WeChat, a Chinese web communications platform that is beyond the reach of U.S. legal process;

ii. Maintaining web sites and trade service accounts abroad and outside the reach of U.S. legal process;

iii. Accessing the internet through Virtual Private Networks (VPNs);

iv. Periodically changing its email addresses and front company names;

v. Using aliases such as "GORDON JIN" and " JINXINJIN;"

vi. Utilizing front and shell companies in the United States, China, and around the world; and

vii. Incorporating its criminal organizations such as Global United Biotechnology, in the British Virgin Islands (BVI) and other similar locations. BVI's laws prevents the identification of owners, directors, and shareholders of companies incorporated in BVI and similarly forbids the disclosure of corporate tax and banking information.

n. From its base of operations in China, the ZHENG Drug Trafficking Organization communicated with drug customers, received drug proceeds, and/or shipped narcotics to over 25 countries, including:

i. The United States;

ii. Australia;

iii. Belarus;

iv. Brazil;

v. Cambodia;

vi. Canada;

vii. Cyprus;

viii. France;

ix. Germany;

x. Kazakhstan;

xi. Lithuania;

xii. Maldives;

xiii. Mauritius;

xiv. Netherlands;

xv. New Zealand;

xvi. Poland;

xvii. Portugal;

xviii. Russia;

xix. South Africa;

xx. Spain;

xxi. Sweden;

xxii. Switzerland;

xxiii. Thailand;

xxiv. Taiwan;

xxv. Tonga;

xxvi. Turkey;

xxvii. Ukraine; and

xxviii. The United Kingdom.

o. In the United States, specifically, the ZHENG Drug Trafficking Organization communicated with drug customers, received drug proceeds, and/or shipped narcotics to over 35 states, including:

i. Alabama;

ii. Arizona;

iii. Arkansas;

iv. California;

v. Colorado;

vi. Florida;

vii. Georgia;

viii. Illinois;

ix. Indiana;

x. Iowa;

xi. Kansas;

xii. Kentucky;

xiii. Louisiana;

xiv. Maine;

xv. Maryland;

xvi. Massachusetts;

xvii. Michigan;

xviii. Minnesota;

xix. Mississippi;

xx. Missouri;

xxi. Nevada;

xxii. New Hampshire;

xxiii. New Jersey;

xxiv. New Mexico;

xxv. New York;

xxvi. North Carolina;

xxvii. Ohio;

xxviii. Oklahoma;

xxix. Pennsylvania;

xxx. South Carolina;

xxxi. South Dakota;

xxxii. Tennessee;

xxxiii. Texas;

xxxiv. Virginia;

xxxv. Washington, DC;

xxxvi. West Virginia; and

xxxvii. Wisconsin.

p. The ZHENG Drug Trafficking Organization also maintained operations, corporate records, and/or financial holdings in the following countries:

i. The People's Republic of China (including Hong Kong);

ii. The British Virgin Islands;

iii. Japan;

iv. The Marshall Islands;

v. Poland;

vi. Tonga;

vii. The United Kingdom; and

viii. The United States.

q. The ZHENG Drug Trafficking Organization employed a variety of methods to smuggle or otherwise traffic narcotics from China to destination countries such as the United States. These methods included:

i. False manifesting of narcotics as non-controlled chemicals;

ii. Using freight forwarders, thereby hiding that the Organization's companies were the origin point for the narcotics;

iii. Concealing narcotics within bulk freight containing legal goods; and

iv. Using re-shippers in the destination countries.

r. One technique was to have co-conspirators form or otherwise use companies in the destination countries for the purpose of re-shipping narcotics within the destination country. The ZHENG Drug Trafficking Organization would ship bulk quantities of narcotics to the re-shipping companies, often through shell companies or freight forwarders in China. The re-shipping companies would receive the bulk shipments of narcotics, separate them into individual parcels for each narcotics customer, and then re-distribute the drugs within the destination country. In doing so, the ZHENG Drug Trafficking Organization largely avoided detection by customs.

s. For instance, the ZHENG Drug Trafficking Organization used chemical companies run by its co-conspirator Bin Wang in both China and the United States to smuggle

narcotics past both countries' customs agents. These companies – Cambridge Chemicals, Wonda Science, OneChem, Daniel Lab, and ChemCloud – had separate articles of incorporation and/or offices in both the United States and China. The ZHENG Drug Trafficking Organization had its narcotics shipments hidden within bulk freight shipments sent between the Chinese and United States offices of these chemical companies. Employees at these companies created false manifests for these narcotics or otherwise hid them in the bulk chemical shipments.

t. The ZHENG Drug Trafficking Organization maintained properties in the United States for the purpose of distributing controlled substances. These properties included the office address of Cambridge Chemicals, Wonda Science, OneChem, and ChemCloud in the United States: 5 Walnut Hill Park, Unit 13 in Woburn, Massachusetts.

u. The ZHENG Drug Trafficking Organization laundered its criminal proceeds through a variety of means. These laundering techniques included:

i. Utilized digital currency (such as Bitcoin) to conceal and disguise the nature, location, source, ownership and control of the drug proceeds;

ii. Maintained and controlled digital currency addresses that were used by drug traffickers and co-conspirators to make payments for narcotics;

iii. Utilized digital currency exchanges to convert cryptocurrency drug trafficking proceeds into official fiat currency;

iv. Misrepresented fund transfers and directed customers to misrepresent fund transfers in order to conceal and disguise the nature, location, source, ownership and control of the drug proceeds;

v. Structured transactions to avoid financial institution reporting and recordkeeping requirements;

vi. Transmitted drug proceeds into and out of bank accounts in Hong Kong and elsewhere, with the purpose of obfuscating the nature of the proceeds; and

vii. Bypassed Chinese restrictions and reporting requirements on fiat currency entering and leaving the People's Republic of China through the use of co-conspirators who received drug payments through money transmitting businesses (including Money Transfer Company 1, Money Transfer Company 2, OKPay, and Skrill) on behalf of the FUJING ZHENG, GUANGHUA ZHENG, and other members of the conspiracy. These co-conspirators include, Guangfu Z., Guifeng C., Songyan J., Longbao Z, and others.

v. The People's Republic of China imposed strict identification laws for monetary transfers and transmissions, particularly those going into and out of its country. These laws required FUJING ZHENG and GUANGHUA ZHENG to provide their real identities from time to time when straw recipients were unavailable. The Organization later instructed drug traffickers and co-conspirators to pay them in cryptocurrencies, and acquired accounts with numerous cryptocurrency exchanges outside of China to exchange cryptocurrencies into fiat currency like the U.S. dollar. These exchanges, however, had strict Know Your Customer legal requirements, forcing both FUJING ZHENG and GUANGHUA ZHENG to provide their real identities, including their Chinese passports, in order to use their services.

w. Defendants FUJING ZHENG and GUANGHUA ZHENG managed and controlled the ZHENG Drug Trafficking Organization. Each had largely separate roles within the conspiracy.

x. Defendant FUJING ZHENG managed and controlled Shanghai Pharmaceutical Company 1 and used its facilities for manufacturing and producing the synthetic narcotics that the ZHENG Drug Trafficking Organization distributed around the world. In this role, he primarily used the alias "GORDON ZHENG" and the email address gordonzheng@[redacted].com. FUJING ZHENG also managed foreign trading and customer relations for the Organization's global network of drug trafficking clients and co-conspirators. In this role, he primarily used the alias "GORDON JIN." As GORDON JIN, FUJING ZHENG used email addresses such as MagicChemicals@hotmail.com, goldenchemical@live.com, sales@globalrc.com, as well as WhatsAPP, QQ, WeChat, and China-based telephone numbers to communicate with drug traffickers. FUJING ZHENG additionally handled negotiations with third party re-shippers, which the Organization used to mask its connection to the narcotics packages in case law enforcement or customs intercepted the drug parcels. When interacting with co-conspirators handling re-shipments, FUJING ZHENG often used the aliases "MR. JIN" or "DENG GAO."

y. Defendant GUANGHUA ZHENG, FUJING ZHENG's father, managed the financial and money laundering side of the ZHENG Drug Trafficking Organization. GUANGHUA ZHENG used various bank accounts around the world, and particularly in Hong Kong, to launder drug proceeds. The Organization also ensured that drug traffickers were instructed to misstate the purpose of drug payments to the ZHENG Drug Trafficking Organization for wire transfers and money orders. For example, the drug traffickers were instructed to state that the purpose of the wire transfers was for "tuition" or "family maintenance." In doing so, GUANGHUA ZHENG's financial transactions violated financial reporting requirements in China and numerous destination countries. GUANGHUA ZHENG

additionally used cryptocurrencies such as Bitcoin and cryptocurrency exchanges to launder drug proceeds.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance thereof, and to effect and conceal the existence of the conspiracy, the Defendants and others performed acts in the Northern District of Ohio and elsewhere, including, but not limited to, the following:

4. On April 8, 2009, the ZHENG Drug Trafficking Organization posted advertisements for controlled substances and controlled substance analogues, such as Methedrone, 4-FMP, MDPV, and Butylone, on its website www.globalrc.net. Under "Privacy Notice," the Organization stated, "GlobalRC stores only the information provided by the customers that render the delivery possible of purchased merchandise. All information provided is stored on secure servers." Under "Shipping and Returns," the Organization stated, "GlobalRC delivers worldwide. All products are packed in discreet unmarked envelopes and sent by mail." The website had versions for multiple languages, including English, German, and Spanish.

5. On or about June 3, 2011, the ZHENG Drug Trafficking Organization distributed approximately two kilograms of methedrone that was sent to a drug trafficker in Minnesota.

6. On February 29, 2012, an American drug trafficker emailed the ZHENG Drug Trafficking Organization's email account MagicChemical@hotmail.com, requesting $4,000 worth of narcotics. The Organization responded using the "JINXINJIN" moniker on MagicChemical@hotmail.com, "We ship big quantity to US each month, we have a lot of experience in it [. . .] we guarantee delivery, in case seized by customs, we re-ship free, OK?" The Organization also provided its expertise on how best to bypass customs, advising, "[i]f you have address in Eastern US state, that would be best, cos New York customs is easiest to pass."

7. On August 1, 2012, the ZHENG Drug Trafficking Organization distributed kilogram amounts of 4-MEC to a drug trafficker operating in and around Austin, Texas. The ZHENG Drug Trafficking Organization initially communicated with the drug traffickers through its vendor accounts on tradekey.com and EC21.com.

8. On March 2, 2013, the ZHENG Drug Trafficking Organization distributed approximately 2.5 kilograms of Methylone to a drug trafficker in Minnesota using the email account MagicChemical@hotmail.com. The Organization instructed the drug trafficker to structure its payments to avoid reporting requirements in Money Transfer Company 1, asking "can you divide into [Money Transfer Company 1] money? For example, 5,875 = 2900 + 2975. Do not exceed 3000 USD." Under federal law, financial institutions have recordkeeping requirements for all transactions in the amount of $3,000 or more.

9. On March 8, 2013, the ZHENG Drug Trafficking Organization used the email account MagicChemical@hotmail.com to provide the following bank account information to undercover law enforcement ordering 4-MEC:

> Beneficiary Name: Global United Biotechnology Inc.
> Account Number: 787-[redacted]-883
> Beneficiary Bank Name: Hang Seng Bank Limited
> Beneficiary Bank Address: 83 Des Voeux Road Central, Hong Kong
> Chips No.： [redacted]522
> Swift Code: [redacted]KHH
> Company Address: Quastisky Building, P.O. Box 4389, Road Town, Tortola, British Virgin Islands

10. On or about March 16 and 25, 2013, the ZHENG Drug Trafficking Organization distributed approximately 12 kilograms of 4-MEC that were sent to multiple addresses in the United Kingdom.

11. On March 26, 2013, the ZHENG Drug Trafficking Organization used its email account, MagicChemical@hotmail.com, to respond to a drug trafficker expressing concern about

customs intercepting the drug packages containing three kilograms of Methylone. The Organization explained that it will mislabel the products to reduce the chance that customs will inspect it, falsely labeling the contents of three drug parcels as "sebacic acid," "hydrogen peroxide resin," and "azelaic acid," respectively.

12. On or about April 11, 2013, the ZHENG Drug Trafficking Organization distributed approximately two packages each containing one kilogram of Methylone that were sent to two addresses in the greater London area in the United Kingdom.

13. After the United Kingdom apprehended its UK-based co-conspirators, the ZHENG Drug Trafficking Organization changed some of its communication methods, including changing its email address to goldenchemical@live.com, its website to www.goldenrc.com, and its Skype address to GordonJinChina.

14. On April 11, 2014, the ZHENG Drug Trafficking Organization posted the following statement on its new website, www.goldenrc.com: "We are professional Pentylone manufacturer in China, a lot of US and Europe customers purchase big quantity from us monthly. All chemicals we sell are best quality and competitive price. Generally, we will ship by DHL UPS Fedex or EMS, special way to USA and Russia, we guarantee package can pass your customs." It also listed 19 other synthetic drugs that the Organization professionally manufactured and had available for immediate sale.

15. On July 3, 2014, FUJING ZHENG sent an email from his personal email account, zhengfujing@[redacted].cn, to the ZHENG Drug Trafficking Organization's email address goldenchemical@live.com. In the email, FUJING ZHENG attached an excel spreadsheet containing a drug ledger that listed some of the Organization's drug sales in the last few months.

The ledger included the customer email address, date of drug distribution, type of drug, and amount paid in U.S. dollars.

16. On November 14, 2014, undercover law enforcement received an email from the ZHENG Drug Trafficking Organization via goldenchemical@live.com explaining that the Organization has experience in international drug trafficking and smuggling dating back to at least 2008:

> We are professional Methylone crystal manufacturer in China, our products are all best quality, pic of merchandise is in the attachment, a lot of US and Europe customers purchase largely from us every month. We are trade pro+ member of ec2l since 2008, our business license and all informations [sic] are verified by ec2l. Pls browse our webs: www.goldenrc.com & goldenrc2008.en.ec21.com .
>
> Generally, we ship merchandise by EMS and special way to USA, we have a lot of experience in shipping, we use aluminum foil bag to wrap, we will declare it as other chemical name, and we will offer a series of certificates, packages we sent can go through customs safely, we guarantee package can pass customs, in case seized by customs, we re-ship free.
>
> Generally, payment we accept is wire transfer to our company bank account. Besides, we also can accept [Money Transfer Company 1].
>
> Pls tell me how many quantity of Methylone you wanna buy? Do you wanna have a sample order?
>
> Regards,
>
> Gordon
> www.goldenrc.com

17. On December 18, 2014, the ZHENG Drug Trafficking Organization posted over 45 narcotics for sale on its EC21 vendor page, listing Global United Biotechnology as the underlying company and "GORDON JIN" as the point of contact.

18. On January 31, 2015, the ZHENG Drug Trafficking Organization used its email account goldenchemical@live.com to respond to a drug trafficker seeking bulk shipments of A-PVP:

OK, I will ship 2.4kg a-pvp pink crystal to the address.

The package of EA091757251CN with 1.425kg ethylone yellow crystal get seized by customs, we will reship 1.425kg to you, still ship to the original address below:

Recipient name: [redacted]

Add: [redacted] Jacksonville, FL 32208 USA

Tel: [redacted] 5592

Right?

Regards,

Gordon

www.goldenrc.com

The ZHENG Drug Trafficking Organization distributed these narcotics shortly thereafter.

19. On February 15, 2015, Leroy S., a drug trafficker operating in the Northern District of Ohio, emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com with the subject, "Acetylfentanyl." In the email, Leroy S. stated, "to whom it may concern I would like to purchase Acetylfentanyl. if possible can you send me prices as well as information on where I can send the money too [sic]. I also would like to no [sic] how long would it take to receive if I purchased Monday."

20. On February 16, 2015, the ZHENG Drug Trafficking Organization responded to Leroy S. using the email account goldenchemical@live.com:

Dear Sir
We are professional acetylfentanyl manufacturer in China, our products are all best quality, a lot of US and Europe customers purchase largely from us every month. Our web is www.goldenrc.com

Price of 1kg acetylfentanyl is $6,800 USD, pls be noted that the price we offer including shipping cost.

> Generally, payment we accept is wire transfer to our company bank account. Besides, we also can accept [Money Transfer Company 1] and skrill (www.skrill.com).
>
> Pls tell me how many quantity you wanna buy? Do you wanna have a sample order? Where are you from?
>
> Regards,
> Gordon
> www.goldenrc.com

21. On February 17, 2015, after Leroy S. stated that he wanted to buy acetyl fentanyl but had concerns about the pricing and potential for law enforcement seizure, the ZHENG Drug Trafficking Organization responded using the email account goldenchemical@live.com:

> 500g------$3,500 USD
> 100g------$860 USD
>
> Generally, we ship merchandise by EMS and special way to USA, we have a lot of experience in shipping, we use aluminum foil bag to wrap, we will declare it as other chemical name, and we will offer a series of certificates, packages we sent can go through customs safely, we guarantee package can pass customs, in case seized by customs, we re-ship free, our service is best.
>
> If you buy l[]kilo, we will divide into 2 packages to ship.
>
> When will you order it? Do you wanna buy 100g or 500g? How do you transfer money?
>
> Regards,
> Gordon
> www.goldenrc.com

22. On February 18, 2015, Leroy S. responded via email, stating, "I want to place my order on or about the 23rd i would prefer the kg to be split sseparatly [sic] but can you please send me the info to ship it too i prefer [Money Transfer Company 1] but. If u no better let me no [know]."

23. On February 25, 2015, Leroy S. emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com:

> im going to send [Money Transfer Company 1] tranfers [sic] today for 500 grams i would like my oder [sic] split 250/250 to 2 diffrent [sic] addresses due to [Money Transfer Company 1]. wanting more identification. over 2999 ill probably do 2600 and 800 is that ok with you. and though 250 seems like a lot [sic] to mail at one time but if its better to do 100 at a time let me no but once i receive [sic] tracking i will place another order for 500.

The next day, the Organization responded, "Ok, 250/250 to 2 different addreses [sic] is OK. 2600 and 800 is also OK."

24. On March 2, 2015, the ZHENG Drug Trafficking Organization advertised that it is a "professional" narcotics manufacturer in China on its website www.goldenrc.com. It guaranteed that it had the means of bypassing customs in foreign countries: "… a lot of US and Europe customers purchase big quantity from us monthly. All chemicals we sell are best quality and competitive price. Generally, we will ship by EMS DHL Fedex or UPS, special way to Russia, UK and USA, we guarantee package can pass customs." The Organization also advertised that "if you want new products, we can make it for you[] and keep secret."

25. On March 13, 2015, the ZHENG Drug Trafficking Organization responded to Leroy S. using the email account goldenchemical@live.com, "I know you've already received packages [of acetyl fentanyl], is everything OK?" The next day, Leroy S. responded,

> I just did a transfer to you for $900.00 im going to do a larger transaction tommorow [sic] and another one monday it will be for 500grams that i want sent to 4 addresses the mtcn for the 900 is [redacted]0092 from [redacted] jackson please email me to let me no [sic] the price you will offer me. I will send addresses once you recieve [sic] my payments

26. On March 15, 2015, the ZHENG Drug Trafficking Organization emailed Leroy S. using the goldenchemical@live.com email account, "Price of 500g acetylfentanyl is $3,500 USD, when will you transfer $2,600 USD left. Sending to 4 different addresses is OK for us. Pls tell me which name you transfer to? FUJING ZHENG?"

27. On March 16, 2015, after Leroy S. indicated that he had the wrong name for the Money Transfer Company 1 transfer for the acetyl fentanyl payment, the ZHENG Drug Trafficking Organization emailed Leroy S. using the goldenchemical@live.com email account, stating (emphasis in original):

> Our [Money Transfer Company 1] name is **FUJING ZHENG**, our [Money Transfer Company 1] informations [sic] are below:
>
> First name: FUJING
> Last name: ZHENG
> Country: China
>
> Price of 500g of acetylfentanyl is $3,600 USD, cost of acetylfentanyl is very high, my friend, your profit is higher too much than us, our product's quality is best.

28. On March 17, 2015, Leroy S. emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com, explaining that he got his refund from another vendor and will send the money the following day. After Leroy S. sent the funds to FUJING ZHENG, the Organization distributed the acetyl fentanyl.

29. The ZHENG Drug Trafficking Organization's distribution of acetyl fentanyl, a controlled substance analogue of fentanyl, to Leroy S. resulted in the death of T.R., an individual whose identity is known to the Grand Jury, in Akron, Ohio, on or about March 21, 2015.

30. The ZHENG Drug Trafficking Organization's distribution of acetyl fentanyl, a controlled substance analogue of fentanyl, to Leroy S. also resulted in the death of C.D., an individual whose identity is known to the Grand Jury, in Akron, Ohio, on or about March 28, 2015.

31. On May 29, 2015, Ohio law enforcement, acting in an undercover capacity, emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com through an

undercover email account, expressing an interest in purchasing a "large amount" of acetyl fentanyl. The Organization responded on May 30, 2015:

> We are professional acetylfentanyl manufacturer in China, our products are all best quality, a lot of US and Europe customers purchase largely from us every month. Our web is www.goldenrc.com
>
> Generally, we ship merchandise by EMS and special way to USA, we have a lot of experience in shipping, we use aluminum foil bag to wrap, we will declare it as other chemical name, and we will offer a series of certificates, packages we sent can go through customs safely, we guarantee package can pass customs, in case seized by customs, we re-ship free. Our service is best.
>
> Generally, payments we accept are Bitcoin, bank wire transfer, [Money Transfer Company 1], [Money Transfer Company 2].
>
> Pls tell me how many quantity you wanna buy from us? Do you wanna have a sample order?
>
> Regards,
>
> Gordon
>
> www.goldenrc.com

32. On May 30, 2015, undercover local law enforcement in the Northern District of Ohio emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com:

> Dear Gordon,
>
> I am interested in purchasing 10 grams of acetylfentanyl. Upon arrival if the quality is to our standards I anticipate making larger purchases from you in the future. Please email me the price for 10 grams and [Money Transfer Company 1] information.

33. On May 31, 2015, the ZHENG Drug Trafficking Organization responded to law enforcement using the goldenchemical@live.com email account:

> cost of 10g sample is $150 USD, our [Money Transfer Company 1] informations
>
> are below:
>
> First name: Guangfu
> Last name: Z[redacted]

Country: China

Pls tell me MTCN, 100% right sender's name (first name.last name), amount and country after you transfer
money.

Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.

Regards,
Gordon
www.goldenrc.com

34. On June 5, 2015, the ZHENG Drug Trafficking Organization distributed 10 grams of acetyl fentanyl to the undercover local law enforcement, with it arriving in the Northern District of Ohio on June 15, 2015.

35. On July 1, 2015, the ZHENG Drug Trafficking Organization advertised on its website www.goldenrc.com that it is a "professional chemical manufacturer in China" and that "a lot of US and European customers purchase huge quantity from us monthly." The Organization listed over 40 narcotics for sale, in addition to its custom synthesis. It noted that for all parcels going to "USA, Russia and European countries, we guarantee package can pass customs." It also stated that it accepted payment in Bitcoins.

36. On August 14, 2015, the ZHENG Drug Trafficking Organization distributed narcotics to a drug trafficker operating in Denver, Colorado. The Organization instructed the drug re-distributor to send money to the following individuals for the narcotics sales:

GUANGHUA ZHENG ([redacted]/55); China Identification Number [redacted]1616; ROOM 503 NO 168 CAO YANG ER CUN PUTUO ROOM 503 NO 168 CAO YANG ER CUN PUTUO, Shanghai, China.

Guifeng C[redacted], China Identification Number [redacted]; ROOM503 NO 168 CAOYANGERCUN SHANGHAI ROOM 503 NO 168 CAOYANGERCUN SHANGHAI, Shanghai, China

The drug parcel also contained a piece of paper with the following payment information:

ZHENG FUJING
China Merchants Bank
Hong Kong Branch
[redacted]6721
[redacted]KHH
21/F. Bank of America Tower, 12 Harcourt RD
Central Hong Kong, China

37. On October 6, 2015, the ZHENG Drug Trafficking Organization posted a blog on BlogSpot under the username "GORDON JIN" entitled, "BK-MDEA | MDEA | Sell BK-MDEA |Sell MDEA | Buy BK-MDEA." BK-MDEA is a Schedule I controlled substance. In the post, the Organization explained that "Global United Biotechnology Inc. is a leading pharmaceutical company. Located in Shanghai and Jiangsu province [and] registered in British Virgin Islands." It then explained that BK-MDEA is "a stimulant, and psychedelic of the phenethylamine, amphetamine" that "has same effects like MDMA." Noting the chemical's strength, the ZHENG Drug Trafficking Organization stated, "[i]n recent times, the chemical has been studied in death case investigations." It then linked to the website globalrc.com, inviting readers to "please visit our website today."

38. On October 22, 2015, the ZHENG Drug Trafficking Organization advertised its narcotics by posting a comment on the blog post, "Q&A - What supplements do you give Kai?" In the post, a father living in Australia discussed the difficulties of finding the proper nutritional supplements for his autistic son. In one of the comments, the ZHENG Drug Trafficking Organization posted the following advertisement:

> Global united biotechnology inc. offering many chemicals worldwide for legal use like manufacturing unit who are making medicine and have the right in state or country. See our product alpha-pvp and a-pvp and its details.
>
> <u>sell alpha-PVP</u>

The comment contained a link to buying A-PVP, a highly potent and dangerous "bath salt" with no known medical use, from www.GoldenRC.com.

39. On November 7, 2015, the ZHENG Drug Trafficking Organization advertised on its website www.goldenrc.com the sale of over a dozen chemicals, listing goldenchemical@live.com as the contact email address and GordonJinChina as the Skype address.

40. On November 23, 2015, the ZHENG Drug Trafficking Organization posted on its website www.goldenrc.com, "We are professional AMB-FUBINACA manufacturer in China, a lot of US and European customers purchase big quantity from us monthly. All chemicals we sell are best quality. Generally, we will ship chemicals by EMS DHL Fedex or UPS, special way to USA, Russia and European countries, we guarantee package can pass customs." The Organization stated that, if customs somehow seized the items, "we will reship free." Payment options included, "[Money Transfer Company 1], Bank wire transfer, Bitcoin and [Money Transfer Company 2]." It also explained, "[i]f you want new products, we can do custom synthesis for you and keep secret." The Organization listed over a dozen other drugs that it professionally manufactured in China.

41. On December 6, 2015, FUJING ZHENG sent a test email from GordonZheng@[redacted].com – an email account affiliated with his front company, Shanghai Pharmaceutical Company 1 – to zhengfujing@[redacted].cn, his personal email account.

42. On or about December 7, 2015, the ZHENG Drug Trafficking Organization posted an advertisement on one of its EC21 vendor pages, stating that it delivers "to all 50 USA states" and "also ship[s] worldwide to Australia, Europe, Asia, and Africa."

43. On February 23, 2016, and on March 29, 2016, the ZHENG Drug Trafficking Organization advertised its narcotics by posting two comments on a blog post. The original March 6, 2015 blog post "Case Report - Pentedrone and Alpha-PVP Associated Death" was written by a forensic toxicologist. The blog detailed how a 28-year-old Polish drug user overdosed while using alpha-PVP (commonly referred to as a-PVP), including how the drug user suffered "pulmonary edema" and "chronic changes in the heart." The ZHENG Drug Trafficking Organization posted the following two comments in reply:

> Thankx for Sharing this Nice blog Post. You May follow alpha-PVP to Buy this.
>
> [. . .]
>
> Global united biotechnology inc. offering many chemicals worldwide for legal use like manufacturing unit who are making medicine and have the right in state or country. See our product alpha-pvp and a-pvp and its details.
> buy alpha-PVP

Both of the comments included a link that redirected the reader to purchase A-PVP from GoldenRC.com, the same drug tied to the overdose death reported in the blog. The ZHENG Drug Trafficking Organization sold A-PVP in the United States and Poland at that time.

44. On March 29, 2016, FUJING ZHENG received a contract for services relating to his front company, Shanghai Pharmaceutical Company 1, at his personal email account, zhengfujing@[redacted].cn.

45. On June 15, 2016, the ZHENG Drug Trafficking Organization distributed over 800 grams of U-47700 ("pink heroin") that was being sent to a drug trafficker in Washington. The Organization attempted to smuggle the narcotics in parcels sent from Cambridge Chemicals' office in China.

46. On June 6, 2016, the ZHENG Drug Trafficking Organization emailed a Russian drug trafficker operating in and around Vladivostok City, Russia using its

goldenchemical@live.com email account. In the email, the Organization explained how it circumvents China's ban on certain chemicals by creating "legal substitutes:"

> Since 1.Oct 2015, a lot of chemical have been banned in China, now we can offer their legal substitutes, their effect and potency are almost as before, they all have good feedback, we sell them in big quantity every month now, prices are almost as before, they are below:
>
> Substitutes of ethylone and Methylone are Dibutylone(crystal), bk-ebdp(crystal), thirtylone(crystal)
>
> Substitutes of alpha-PVP are 4F-PHP(crystal), th-PVP(crystal), MPHP(crystal)
>
> Substitutes of ab-fubinaca are FUB-AMB(powder), adb-fubinaca(powder)
>
> Substitutes of ab-chminaca are adb-chminaca(powder), mmb-chminaca(powder)
>
> Substitutes of MAM-2201 are 5F-NNE1(powder), NM-2201(powder)
>
> Substitutes of acetylfentanyl are 4-fluoroisobutyrfentanyl(powder), furanylfentanyl(powder)
>
> Substitutes of 4-cec and 3-cec are 2-nmc(crystal), 4-cec(crystal)
>
> Substitute of 5-MAPB is 6-EAPB(powder)
>
> Substitute of pentedrone is 4-Methylpentedrone(crystal)
>
> Substitutes of ethylphenidate are dimethylphenidate(crystal&powder), isopropylphenidate(powder)
>
> Pls browse our web to know more details about them. If you are interested [in] them, we can offer samples.
>
> Now we have better customized shipping way to your country compared to last year, packages we sent can go through customs safely, we will reship free in case package get seized by customs, our service is best.
>
> Besides, we also can offer custom synthesis service now, you just offer CAS number, IUPAC or picture of chemical structure to us.
>
> If you have anything else about the business, pls feel free to contact us.
>
> Regards,
> Gordon

www.goldenrc.com

47. On June 27, 2016, the ZHENG Drug Trafficking Organization emailed a customer requesting a quote for a fentanyl analogue, stating, "10g sample of 4-fluoroisobutyrfentanyl is $100 USD, when will you order? How do you pay?"

48. On August 26, 2016, undercover law enforcement inquired on the website www.ec21.com, requesting a reliable supplier of "RC" with "good purity and discreet shipping." RC is shorthand for "research chemicals," coded language referring to synthetic narcotics. That same day, "GORDON JIN" responded using the email account goldenchemical@live.com, stating:

> We are professional research chemicals manufacturer in China, our products are all best quality, a lot of US and European customers purchase largely from us every month. Pls tell me which products you wanna buy?
>
> Regards,
> Gordon
> www.goldenrc.com

49. On September 4, 2016, the ZHENG Drug Trafficking Organization responded using goldenchemical@live.com to a drug customer in Florida ordering 4FPHP and MPBP, stating,

> I give you another name to transfer by [Money Transfer Company 1], it's below:
> First name: FUJING
> Last name: ZHENG
> Country: CHINA

50. On September 8, 2016, a drug trafficker emailed ZHENG Drug Trafficking Organization at goldenchemical@live.com, asking why there was a significant delay in the narcotics shipment. The Organization responded the next day, explaining that they "color" the narcotics chemicals, thereby tricking Chinese officials and making it "easier to pass customs."

51. On September 13, 2016, the ZHENG Drug Trafficking Organization responded using goldenchemical@live.com to a drug trafficker in Poland seeking 20 kilograms of narcotics. The Organization provided payment information for the transaction.

52. On September 13, 2016, the ZHENG Drug Trafficking Organization used goldenchemical@live.com to email a drug distributor, stating, "It's [sic] showed that U-47700 is delivered online, but you told me that it's [sic] get caught by police, pls tell me your thinking how to deal with it." After the drug distributor told the Organization that he "won't risk my freedom trying to get it," and the Organization agreed to re-ship it a different way, the customer confirmed that he sent the payment for the narcotics to "GUANGHUA ZHENG" with additional identifiers via Money Transfer Company 2.

53. On September 15, 2016, the ZHENG Drug Trafficking Organization discussed bulk shipment of narcotics with a drug trafficker in Singapore.

54. On September 16, 2016, the ZHENG Drug Trafficking Organization distributed ADB-FUBINACA to a drug trafficker operating in Russia after receiving payment in Bitcoin.

55. On September 16, 2016, the ZHENG Drug Trafficking Organization distributed MMC to a drug trafficker operating in the United Kingdom after receiving payment in Bitcoin.

56. On September 18, 2016, the ZHENG Drug Trafficking Organization provided an Nuclear Magnetic Resonance Spectroscopy (NMR) – an expert analytical examination to confirm the purity of a drug – to a drug trafficker to demonstrate the purity and quality of the MPHP that he was purchasing.

57. On November 21, 2016, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com, using Chemical Abstracts Service (CAS) numbers as code for narcotics:

> To Gordon
> We recently settled accounts and parted ways with our former supplier for CAS 59708-52-0 [Carfentanil] and 3258-84-2 [Acetyl Fentanyl] due to purity and reliability issues. We have an urgent need to resume service as quickly as possible. Do you have CAS 59708-52-0, 3258-84-2 or even 121348-98-9 [U-47700] in stock? Please let us know

The Organization responded the same day, stating:

> 59708-52-0 is carfentanyl, if we synthesize it for you, how many quantity you will buy? 3258-84-2 is acetylfentanyl, it's banned in China, we don't offer it. 121348-98-9 is U-47700, we can offer it, how many quantity you wanna buy?
>
> Regards,
> Gordon
>
> www.goldenrc.com

58. From November 30 to December 7, 2016, the ZHENG Drug Trafficking Organization discussed pricing, shipping, and terms with undercover law enforcement, ultimately deciding on a purchase of U-47700. When undercover law enforcement asked for payment information, the Organization provided GUANGHUA ZHENG's name as the recipient of the drug money:

> Our [Money Transfer Company 2] information are below:
> First name: GUANGHUA
> Last name: ZHENG
> Country: China

59. On December 16, 2016, undercover law enforcement asked for the tracking information for the parcel containing the U-47700 shipment. The ZHENG Drug Trafficking Organization responded, "We ship package to warehouse in USA at first, then ship to you by FedEx" and provided the FedEx tracking number. The Organization was referring to Bin Wang's warehouse in Woburn, Massachusetts. The ZHENG Drug Trafficking Organization used Bin Wang's companies – including Cambridge Chemicals, Wonda Science, OneChem,

Daniel Lab, and ChemCloud – to smuggle narcotics into the United States and distribute them within the country.

60. On December 20, 2016, undercover law enforcement retrieved the parcel containing U-47700. The Organization shipped the U-47700 in such a way that it appeared that it was a purely U.S. domestic shipment sent from Cambridge Chemicals at 5 Walnut Hill Park, Unit 13, Woburn, Massachusetts, 01801.

61. On January 2, 2017, a Florida drug trafficker expressed concern to the ZHENG Drug Trafficking Organization that customs was increasingly seizing its drug parcels. The Organization responded using goldenchemical@live.com that it would no longer be a concern:

> Now we have a new shipping way, package is sent to a warehouse in Boston at first, then shipping to you by FedEx, it's safer, we will offer your address after package arrived in Boston. In case package get seized by customs, we will not offer your address to shipping company, nobody can find you, it also can be waive signature if you operate online, pls see pic below, is this OK with you?

The Organization explained that it used Bin Wang's companies in the Boston area to re-ship drugs in order to limit customs' interdiction and protects customers' information.

62. On January 10, 2017, Bin Wang, Qinghua Y., aka Jason Yen, Lynn X., and other employees of Wang's companies communicated over the WeChat communication platform regarding the ZHENG Drug Trafficking Organization's parcels. After reviewing the large numbers of customers receiving bulk chemical shipments from the ZHENG Drug Trafficking Organization, Wang expressly informed his employees that these parcel deliveries were "very risky" for them as they were "prohibited by law."

63. On January 18, 2017, undercover law enforcement contacted FUJING ZHENG at goldenchemical@live.com, asking for a list of their available products. That same day, FUJING ZHENG responded:

> My friend, besides U-47700, during these time our hot sale products are 2-NMC, 4-CEC, Hexen, Ephylone, 4F-PHP, 3-FPM, MPHP, 4-CL-PVP, Dibutylone and 4-methylpentedrone, FUB-AMB, ADB-FUBINACA, 5F-MDMB-2201, MMB-CHIMINACA, 5F-ADB, eitzolam and 25I-NBOH. Which products are you interested?
>
> Regards, Gordon
> www.goldenrc.com
> whats app +86 18117528156

64. On January 23, 2017, law enforcement purchased 50 grams of 4-CL-PVP ("flakka") from the ZHENG Drug Trafficking Organization at goldenchemical@live.com to be sent to Ohio. On January 24, 2017, JIN responded with payment information:

> Our [Money Transfer Company 1] information are below:
>
> First name: Longbao
> Last name: Z[redacted]
> Country: China
>
> These information are enough to transfer money for you.
>
> Public holiday of China spring festival already begin, it's the most important festival in China, just like Christmas in USA, so we ship at about 6th Feb., is this OK with you?
>
> Regards,
> Gordon
> www.goldenrc.com
> whatsapp +86 18117528156

The Organization distributed the 4-CL-PVP shortly afterwards around February 15, 2017 through Bin Wang's front companies.

65. On February 12, 2017, Bin Wang, Qinghua Y., Lynn X., and other employees of Wang's companies communicated over a group WeChat regarding the ZHENG Drug Trafficking Organization's parcels. Lynn X. explained that the Organization's "red powder dyes are all hazardous; I don't care to submit them for testing." "Red powder dyes" and "hazardous chemicals" were code for controlled substances. "Testing" referred to submitting the chemicals

to Chinese customs for chemical analysis, which would have revealed the chemicals' true nature as narcotics. Lynn X. proposed a solution involving smuggling narcotics underneath legal chemicals: "Why don't I just take a risk this time? I'll send the red one along with 750 grams of the whitish one, and I'll place the red one underneath." In response, Bin Wang suggested smuggling them in certain types of bottles. Lynn X. responded that this was not possible due to their size. Bin Wang replied that from now on they will instead "use a foil bag" and "heat seal it and mark it as nitrogen sealed on the label." Certain chemicals are transported in nitrogen sealed containers. For these chemicals, opening a nitrogen sealed bag would render them inert and thus valueless. Qinghua Y. responded to Wang's suggestion, "Yes. This way, they won't check it." After discussing how to accomplish this new packaging method, Lynn X. stated, "Let Mr. JIN pack it in a bottle." Qinghua Y. replied, "Tell him at a later time." Lynn X. concluded the conversation discussing how to mislabel the narcotics, reminding the others that "previously Mr. JIN's dark-red colored product was sent out as Portland cement," referring to the term they previously used to mislabel types of narcotics for the Organization.

66. On March 7, 2017, undercover law enforcement inquired about purchasing Dibutylone for re-distribution in Ohio. The ZHENG Drug Trafficking Organization responded using goldenchemical@live.com:

> [CAS number] 17763-12-1 is Dibutylone, 1kg is $1,300 USD including shipping cost to USA, we will reship in case package get seized by customs, when will you order? Do you pay by bitcoin, [Money Transfer Company 2], bank wire or [Money Transfer Company 1] this time?
>
> Please send reply to our new email later, it's sales@globalrc.net.
>
> Regards,
> Gordon
> www.globalrc.net
> whatsapp +86 18117528156

Around this time, the Organization began recommending that its customers communicate with it through its sales@globalrc.net email account, which was hosted by ProtonMail in Switzerland. ProtonMail is an end-to-end encrypted email service. The Organization increasingly pressured its customers to contact it using this this end-to-end encrypted account going forward.

67. On March 8, 2017, the ZHENG Drug Trafficking Organization emailed undercover law enforcement with payment information for the Dibutylone purchase:

> 500g Dibutylone is $700 USD, our [Money Transfer Company 1] information are below:
>
> First name: Songyan
>
> Last name: J[redacted]
>
> Country: China
>
> Pls tell me MTCN, 100% right and detailed address, recipient name and telephone number for shipping.
>
> We changed our email cos new email looks more formal, our websit [sic] is www.globalrc.net
>
> Regards,
> Gordon
> www.globalrc.net
> whatsapp +86 18117528156]]

The ZHENG Drug Trafficking Organization distributed the Dibutylone to the Ohio undercover law enforcement address on March 31, 2017 through Bin Wang's front companies.

68. On May 11, 2017, the ZHENG Drug Trafficking Organization attempted to distribute one kilogram of synthetic narcotics using Bin Wang's front companies in Woburn, Massachusetts as a re-distribution point for drug traffickers in Florida and Pennsylvania. The parcel was shipped from Qinghua Y., who used his alias, Jason Yen: "JASON YEN, 509-2 Building C, Changzhou, Tianan City, China." The listed recipient for the parcel coming from China was the Organization's narcotics redistribution point in the United States at that time:

"Chemcloud, Inc., 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts 01801." The product was mislabeled as a non-controlled chemical that acts as a fire retardant.

69. On May 11, 2017, the ZHENG Drug Trafficking Organization distributed one kilogram of FUB-AMB. It used Bin Wang's front companies in Woburn, Massachusetts as a re-distribution point to send it to a drug customer in Lancaster, Pennsylvania. The parcel was listed as coming from Qinghua Y.'s alias, Jason Yen: JASON YEN, 509-2 Building C, Changzhou, Tianan City, China to Chemcloud, Inc., 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts 01801.

70. On May 11, 2017, the ZHENG Drug Trafficking Organization distributed a drug parcel containing 4'-methyl-alpha-PHP, 4'-fluoro-alpha-PHP, FUB-AMB, all synthetic narcotics. The drug parcels were addressed from Jason Yen, Qinghua Y.'s alias: "JASON YEN, 509-2 BLDG C, Changzhou Tianan CY, Changzhou, JS, 213164, China, CN" and addressed to "BIN WANG, CHEMCLOUD, INC., 5 Walnut Hill Park, Suite 13, Woburn, MA 01801, 617-935-2742." The supporting documentation the Organization provided falsely stated that the package contained a flame retardant compound. The drugs were labeled for reshipping to different individuals in different states.

71. On or about May 23, 2017, the ZHENG Drug Trafficking Organization co-conspirators operating in Missouri possessed with intent to distribute 145.4 kilograms of synthetic narcotics, as well as several firearms. The ZHENG Drug Trafficking Organization used Bin Wang's companies in Woburn, Massachusetts to smuggle the kilograms of synthetic narcotics into Missouri.

72. On or about June 5, 2017, the ZHENG Drug Trafficking Organization distributed ADB-FUBINACA to an undercover law enforcement address in Ohio through Bin Wang's front companies in Woburn, Massachusetts

73. On June 9, 2017, the ZHENG Drug Trafficking Organization received an alert on its goldenchemical@live.com email account from its vendor page on TradeIndia.com for a buyer interested in purchasing bulk 3-CMC. The buyer was interested in buying "6-10 kg per month."

74. On June 10, 2017, a drug customer in Maryland confirmed that he sent payment for 4-MPD (a psychoactive cathinone) to the following Money Transfer Company 2 account:

> [Money Transfer Company 2] Reference number is 75468889
>
> Recipient: Guifeng C[redacted]

75. On June 12, 2017, a drug trafficker emailed the ZHENG Drug Trafficking Organization at goldenchemical@live.com, stating, "Looking for something that is legal and doesn't show up on drug screens in the US. Let me Know what you have that fits the criteria." The next day, the Organization replied using goldenchemical@live.com, "My friend, our website is www.globalrc.net Pls tell me which products you wanna buy. Now we have warehouse in USA, we can ship to you from warehouse in USA. Please send reply to our new email later, it's sales@globalrc.net."

76. On July 6, 2017, undercover law enforcement emailed sales@globalrc.net and purchased ADB-FUBINACA from the ZHENG Drug Trafficking Organization. When requesting payment information, the ZHENG Drug Trafficking Organization directed the undercover agent to wire money directly into GUANGHUA ZHENG's bank account, but to conceal the nature of the transaction:

> Please do not label the money is for buying adb-fubinaca when you transfer money, don't label any chemical name, otherwise I worry the account will be cancelled. I

suggest that you label it as tuition fee or Family maintenance when transfer money, our bank information is below:

Beneficiary Name: ZHENG GUANGHUA
Bank Name: China Merchants Bank Hong Kong Branch
Account number: [redacted]1756
Swift code: [redacted]KHH
Address: 21/F, Bank of America Tower, 12 Harcourt Road, Hong Kong

The same China Merchants Bank Hong Kong Branch ending in 1756 to which "GORDON JIN" instructed the undercover agent to wire drug money had significant wire activity involving both FUJING ZHENG's and GUANGHUA ZHENG's Bank of China accounts located in China. Numerous clients and co-conspirators of the ZHENG Drug Trafficking Organization were also instructed to send funds into GUANGHUA ZHENG's China Merchants Bank Hong Kong Branch account ending in x1756 for the purchase of synthetic narcotics.

77. On July 14, 2017, the ZHENG Drug Trafficking Organization distributed Schedule I controlled substances and analogues Dibutylone, 4-Methyl-PHP (MPHP), and ADB-FUBINACA. It shipped the synthetic narcotics in bulk freight to Bin Wang's front companies in Woburn, Massachusetts as a re-distribution point to send to drug customers in Alabama, Florida, and Ohio, respectively. The parcel was listed as coming from Jason Yen, Qinghua Y.'s alias: "JASON YEN, CHEMCLOUD, INC., Room 920, Changwu Road 888, Jiangsu, Changzhou 213164, China" and was addressed to Bin Wang at 5 Walnut Hill Park, Suite 13, Woburn, Massachusetts 01801. The products were mislabeled as a non-controlled chemical compound. The drugs were stored in heat-sealed foil bags addressed to individuals residing in separate states. In addition, the parcel contained printed waybills that falsely stated, "This is to certify that [. . .] this chemical is not listed in Controlled Chemical Act in US. Yours sincerely, Sales Manager JASON YEN." JASON YEN also signed a Toxic Substance Control Act (TSCA) form

dated July 12, 2017, certifying that "all chemicals in this shipment are not subject to TSCA." The package of ADB-FUBINACA was an undercover purchase destined for Ohio.

78. On July 14, 2017, Bin Wang learned that he was the target of a federal drug trafficking investigation while returning from China. On July 17, 2017, Wang distributed numerous ZHENG Drug Trafficking Organization parcels that had been stored at a warehouse at 5 Walnut Hill Park, Woburn, MA. On July 21, 2017, Wang attempted to leave the country and was arrested by law enforcement.

79. On August 2, 2017, after undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net to inquire as to the status of a drug package that Bin Wang and his companies were originally going to re-ship but that law enforcement had seized. As an explanation for the non-delivery of the drug shipment from Bin Wang's companies, the Organization indicated that the "shipping company is still solving problems of FedEx." The Organization instead sent undercover law enforcement a "replacement package" of ADB-FUBINACA via a freight forwarder located in the Republic of Tonga. On August 24, 2017, after a U.S. federal judge ordered Wang's pretrial detention, the Organization informed undercover law enforcement, "sorry, we can not ship by FedEx now, we ship by special way from Tonga, just same as last time, is this OK with you?"

80. On September 19, 2017, FUJING ZHENG emailed an Asian Cryptocurrency Exchange from his personal email account, zhengfujing@[redacted].cn:

> I have an account on [Asian Cryptocurrency Exchange]. my login name is zhengfujing@[redacted].cn ,
>
> I'm a China resident, Can I withdraw USD to my bank account in Hongkong?
>
> Regards,

GORDON

The ZHENG Drug Trafficking Organization used the Asian Cryptocurrency Exchange account to obtain and launder drug proceeds. FUJING ZHENG received periodic emails from the Asian Cryptocurrency Exchange to his personal email account, zhengfujing@[redacted].cn, updating him with payments and withdrawals made into the ZHENG Drug Trafficking Organization criminal account.

81. On November 10, 2017, the ZHENG Drug Trafficking Organization updated its vendor page on the trade website www.chinaqualitylighting.com to list over 30 controlled substances for sale. On the product page for U-47700, the Organization noted that "investigated toxicity levels of U-47700 for sale are extremely high." The People's Republic of China banned the manufacture and distribution of U-47700 on June 19, 2017, several months before the Organization updates its list of synthetic narcotics for sale to include U-47700. On the page, the Organization also claimed that it and the trade website had a valid internet content license "by the Chinese Ministry" to operate the web page.

82. On or about December 1, 2017, the ZHENG Drug Trafficking Organization updated its website www.globalrc.net. On the site, the Organization described itself as a large-scale synthetic drug manufacturer, stating that it "produces and sells more than 16 tonnes of chemicals every month" from "our own laboratory." The only chemicals listed on the website were synthetic narcotics. According to the Organization, its laboratory was able to "synthesize nearly any chemical on a bespoke basis in any quantity." The Organization also explained that it had small- and large-scale drug distributors ("retailers and wholesalers") operating as part of its conspiracy around the world (emphasis added):

> Located in China, we are a leading pharmaceutical company, honored as the high-tech enterprise which engaged in researching, manufacturing and exporting

> research chemicals, sedatives, active pharmaceutical ingredients (API) and other fine chemicals. **We have our own laboratory so that we can research, synthesize and produce all our own production and perform quality control procedures. We produce and sell more than 16 tonnes of chemicals every month**. Besides, **we also can synthesize nearly any chemical on a bespoke basis in any quantity**, what we need are chemical name, CAS number, IUPAC name or chart of chemical structure. **We have developed many retailers and wholesalers in US and Europe during these years, their sales amount is constantly growing every month**. Almost all our customers are loyal to cooperate us because they know that they have wide range of best products, flexible payment options, fast and insured delivery, secured and comfortable ordering process, prompt and effective customer service.

In addition, the Organization explained that it has advanced smuggling methods that complement its abilities as a large-scale synthetics manufacturer. These methods include "warehouses" (reshipping locations) in multiple locations that makes drug shipments in destination countries appear to be purely domestic mailings:

> The best way to save time and money is to deal with a reliable company. Globalrc.net guarantees 100% deliver and reshipment of products if package got seized by customs. We ship the chemicals by EMS, USPS, TNT, DHL, Fedex, UPS and special ways to USA, Russia, Europe and other countries, there are Warehouse available in USA and Europe, the delivery is to your door.

The Organization also explained that it uses techniques to reduce the probability that law enforcement would find narcotics in its packaging, stating, "We understand that our customers require privacy, so special care is taken when packaging products." It also offered special deals and expedited shipping for bulk narcotics purchase of 25 kilograms or more.

83. On December 4, 2017, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at Sales@globalrc.net regarding opioids it had for sale, "I've heard good things about methoxyacetyl-fentanyl. What are your prices? Also do you have any reviews for BUC-188?" GORDON JIN sent the following response:

> My friend, I suggest that you pay by [Money Transfer Company 2], Bitcoin or OKPAY (www.okpay.com) when you buy sample. We can accept [Money

Transfer Company 2], Bitcoin, Bank wire transfer or OKPAY (www.okpay.com) when formal order.

Prices of 1kg are below:

methoxyacetyl-fentanyl----------$5,500 USD
BUC-188----------$5,200 USD

Pls be noted that the price we offer including shipping cost.

we have a lot of experience in shipping, packages we sent can go through customs safely, we guarantee that package can pass customs, we will reship free in case of package get seized by customs. What we offer is not only product, but also service behind the product. It's very important for customer, if you don't receive anything after you pay, it will make no sense

Currently, payments we accept are Bitcoin, OKPAY (www.okpay.com), [Money Transfer Company 2] and bank wire transfer.

Pls tell me how many quantity of each you wanna buy? Do you wanna have a sample order to try?

Kind Regards,
GORDON JIN
www.globalrc.net
WhatsApp: +86 18117528156

84. On January 10, 2018, GUANGHUA ZHENG sent an email relating to an investment opportunity from his personal email account, zhengguanghua1955@[redacted].com, with an attachment. The attachment contained information relating to FUJING ZHENG, including that FUJING ZHENG owned a home worth more than $1.2 million U.S. dollars in China.

85. On January 14, 2018, the ZHENG Drug Trafficking Organization listed over a dozen synthetic narcotics for sale on ruglobalrc.net, a Russian language mirror of the Organization's primary website, www.globalrc.net.

86. On February 7, 2018, a foreign entity emailed FUJING ZHENG and GUANGHUA ZHENG at their respective personal email accounts, asking for more information

about their finances. Earlier in the conversation, FUJING ZHENG and GUANGHUA ZHENG indicated to the foreign entity that they plan to move "3 million" and "2 million" in deposits, respectively, into the foreign entity's account.

87. On February 22, 2018, FUJING ZHENG spoke with an undercover law enforcement officer over the telephone regarding smuggling bulk shipments of narcotics into the United States. The conversation was in Mandarin, with undercover law enforcement dialing the number for "GORDON JIN" listed on www.globalrc.net. On the call, the undercover officer discussed ordering approximately 15 kilograms or more of potent synthetic opioid U-48800 and other dangerous controlled substance analogues a month and having the Organization smuggle them into the United States. FUJING ZHENG described himself as "GORDON" and the "manager for foreign trading" and explained that he handled all interactions with customers. FUJING ZHENG also noted that the Organization operated out of Taizhou, Jiangsu in China, which is near Shanghai. When undercover law enforcement mentioned that they would initially order 10 kilograms of U-48800 that the Organization would need to smuggle into Florida, FUJING ZHENG responded that 10 kilograms of U-48800 per order is not a problem and that "we have a route to Florida." FUJING ZHENG also guaranteed that his chemical's purity "is 99.5% and up."

88. On March 11, 2018, after undercover law enforcement asked about payment methods for a proposed purchase of 4-CL-PVP, the ZHENG Drug Trafficking Organization replied, "Yes, we have it in stock. Can you pay by Bitcoin or Litecoin? Bitcoin and Litecoin belong to encrypt currency, they are anonymous, safe, fast and convenient. I recommend some website below to you, they need to register at first, then just can transfer by Litecoin or Bitcoin."

89. From on or about March 12, 2018 to on or about March 19, 2018, the ZHENG Drug Trafficking Organization attempted to distribute over 50 packages containing kilogram quantities of synthetic narcotics across the United States. These packages were destined for individual customers across 23 states.

90. On March 16, 2018, after the parties agreed that undercover law enforcement would pay for the 4-CL-PVP in Bitcoin, the ZHENG Drug Trafficking Organization sent the following email containing the Bitcoin public key needed to finalize the transaction:

> Our Bitcoin address is **[redacted]PA1xX8A**
>
> Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.
>
> Our WhatsApp number changed, new number is + 852 62326317
>
> Kind Regards,
>
> GORDON JIN
>
> www.globalrc.net
>
> WhatsApp: + 852 62326317

91. The Bitcoin public key address **[redacted]PA1xX8A** related back to an account with a European Cryptocurrency Exchange. GUANGHUA ZHENG opened this account on October 5, 2017, listing his contact email address as ZHENGGUANGHUA1955@[redacted].com. GUANGHUA ZHENG's birth year is 1955. As part of the European Cryptocurrency Exchange account creation process, GUANGHUA ZHENG provided a photograph of himself along with his valid People Republic of China's passport. Within a short time in 2017, GUANGHUA ZHENG transferred $184,844.32 from his x1756 account into his European Cryptocurrency Exchange account. The x1756 account and the European Cryptocurrency Exchange are only two of numerous other bank accounts and

cryptocurrency exchanges that GUANGHUA ZHENG used to launder drug proceeds for the ZHENG Drug Trafficking Organization

92. On March 9, 2018, GUANGHUA ZHENG responded to the European Cryptocurrency Exchange's request for information responsive to its Know Your Customer requirements. GUANGHUA ZHENG alleged that he only made $50,000 (U.S. dollars) a year in salary. Despite allegedly earning only $50,000 a year in income, GUANGHUA ZHENG informed the Exchange that he had over $1,000,000 in savings, planned to deposit approximately $1,000,000 per year into his European Cryptocurrency Exchange account going forward, and withdraw approximately $700,000 per year from the Exchange account. GUANGHUA ZHENG's stated purpose for the monetary transfers was "investing." This was one of many cryptocurrency exchange accounts used by the Organization to launder funds.

93. In his response to the European Cryptocurrency Exchange, GUANGHUA ZHENG also provided his personal bank account information:

Beneficiary Name: ZHENG GUANGHUA

Bank Name: China Merchants Bank Hong Kong Branch

Account number: [redacted]1756

Swift Code : [redacted]KHH

Address: 21/F, Bank of America Tower, 12 Harcourt Road, Central, Hong Kong

The ZHENG Drug Trafficking Organization previously had repeatedly instructed drug traffickers and undercover law enforcement to wire drug payments to GUANGHUA ZHENG's x1756 account at China Merchants Bank.

94. When the European Cryptocurrency Exchange had further questions based on his responses and requested additional documentation, GUANGHUA ZHENG threatened to

terminate his business with the exchange, stating, "[i]f you don't accept all documents I can offer, then I will not invest Cryptocurrency on [the European Cryptocurrency Exchange], just return my money."

95. On March 23, 2018, undercover law enforcement transferred bitcoins to the ZHENG Drug Trafficking Organization's Bitcoin wallet as payment for the 4-CL-PVP. On April 12, 2018, the ZHENG Drug Trafficking Organization distributed 500 grams of 4-cl-PVP to an undercover law enforcement address in the Northern District of Ohio.

96. On April 16, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net about the Organization creating counterfeit Oxycodone pills that instead contained U-48800, a potent opioid. The email contained pictures of the pills and asked if the Organization can "make a custom order and press the U-48800 to look like these tablets?" The Organization responded, "If we press so for you, how many tablets will [you] buy from us?"

97. On April 18, 2018, FUJING ZHENG sent an email from his personal email account, zhengfujing@[redacted].cn, to info@TopLabRC.com, an email account associated with the ZHENG Drug Trafficking Organization's latest drug trafficking website, www.TopLabRC.com. In reference to the new website, FUJING ZHENG emailed, "this is very good."

98. On April 19, 2018, law enforcement requested a quote from FUJING ZHENG at sales@globalrc.net for two kilograms of Dibutylone. The ZHENG Drug Trafficking Organization provided a quote shortly thereafter. Law enforcement then indicated it would pay in Bitcoin, asking for a Bitcoin address. On May 3, 2018, undercover law enforcement received the following reply from the Organization using sales@globalrc.net:

Our Bitcoin address is **[redacted]F4uhiy**

Pls inform me after you transfer money. Pls also tell me 100% right and detailed address, recipient name and telephone number for shipping.

Kind Regards,
GORDON JIN
www.globalrc.net
WhatsApp: + 852 62326317

The Bitcoin address **[redacted]F4uhiy** associated to an Asian Cryptocurrency Exchange account that used the email address ZHENGFUJING@[redacted].cn as a point of contact.

99. On April 20, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net, asking if the Organization could create Adderall pills that include the "bath salt" Dibutylone. The Organization replied, "we can do so, please tell me how many pills or tablets of each you want?" On April 22, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net, "how many tablets [of counterfeit Adderall] can you make with a kilogram of Dibutylone? What would the cost run us?" The Organization responded, "We made pills for USA customers before. You need to tell me formula at first, then I just can tell you that how many tablets we can make with a kilogram of Dibutylone."

100. On April 23, 2018, FUJING ZHENG received a test email from the ZHENG Drug Trafficking Organization's new email account info@TopLabRC.com to his QQ email (3507656950@qq.com) and his personal email account (zhengfujing@[redacted].cn).

101. On April 24, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net, providing pictures of trademarked Adderall 20mg tablets and stating, "We'd like you to make these up to look like Adderall 20's." Undercover law enforcement then provided the chemical formula and asked for the Organization

to "replace the active ingredients with the Dibutylone." In subsequent emails, undercover law enforcement emphasized, "Again, these should look like exact copies of the tablet I sent to you" and "these should look like Adderall IR (immediate release) 20mg tablets, like in the photo." On April 28, 2018, after confirming the final chemical formula for the counterfeit pills, the Organization stated that it could prepare "50,000 pills" of Adderall laced with Dibutylone. On or about May 10, 2018, undercover law enforcement paid in Bitcoin to the ZHENG Drug Trafficking Organization's [redacted]F4uhiy Bitcoin wallet for the 50,000 "Adderall" pills that in fact contained Dibutylone. The Organization subsequently manufactured and imported the adulterated Adderall pills containing Dibutylone into the United States.

102. On or about May 18, 2018, the ZHENG Drug Trafficking Organization advertised its ability to operate as a large-scale drug laboratory on the "Custom Synthesis" page of its website, www.globalrc.net. This advertisement was one of many the Organization made over several years touting its process of creating and manufacturing synthetic narcotics:

> Globalrc.net has more than 7 years experience in providing custom synthesis in our laboratory. We work diligently to make every possible chemical to meet the needs of our customers. What this means is that you can purchase many other products than the ones you found on our website. We will create custom-made products for you. The new product will satisfy your requirements.
>
> [. . .]
>
> Our laboratory is equipped with latest technological innovations and all the necessary instruments and process vessels. We also have a large variety of chemicals. This allows synthesizing of all kinds of chemical compounds even when no data about previous synthesis method or IP basis is available. We work out our own methodology and make the initial research. Our customers are not involved in this process as it can be very complex but will receive the final product with their required parameters.

103. On May 18, 2018, undercover law enforcement transferred Bitcoins as payment to the ZHENG Drug Trafficking Organization's [redacted]F4uhiy Bitcoin wallet for a two kilogram

shipment of Dibutylone. On June 6 and 14, 2018, the ZHENG Drug Trafficking Organization distributed the two kilograms of Dibutylone into the Northern District of Ohio as part of an undercover purchase from ZHENG via sales@globalrc.net.

104. On June 27, 2018, the ZHENG Drug Trafficking Organization advertised on its website, www.globalrc.net, that it has developed expertise "making pill or tablet of sedative."

105. On June 28, 2018, law enforcement transferred Bitcoins as payment for the two kilograms of Dibutylone to the ZHENG Drug Trafficking Organization's [redacted]F4uhiy Bitcoin wallet.

106. On or about July 3, 2018, the ZHENG Drug Trafficking Organization used its Tradelead.com account page to advertise its expertise in manufacturing synthetic narcotics and smuggling them into countries around the world. On the account page, the Organization stated, "We have our own laboratory so that we can research, synthesize and produce all our own production and perform quality control procedures. We produce and sell more than 16 tonnes of chemicals every month. Besdies [sic], we also can synthesize nearly any chemical on a bespoke basis in any quantity."

107. On or about July 15, 2018, the ZHENG Drug Trafficking Organization maintained its vendor page on www.tradekey.com. There, it stated that it had manufactured "research chemical" and "pharmaceutical chemical" since 2007. It stated that its "main market" was "worldwide." The Organization also stated that its "total annual sales volume" was "more than 100 million USD" and that it employed more than 50 employees.

108. On July 16, 2018, the ZHENG Drug Trafficking Organization updated its website globalrc.net. Under "News," the Organization posted, "New Product 2-FDCK: After our unremitting efforts in researching, we can provide 2-FDCK at present." The Organization's new

site, TopLabRC.com, had the identical notification posted in August 2018. The Organization described the product as "a lesser-known novel dissociative substance of the arylcyclohexylamine class that produces dissociative, anesthetic, and hallucinogenic effects when administered."

109. On July 27, 2018, undercover law enforcement emailed the ZHENG Drug Trafficking Organization at sales@globalrc.net, asking if the Organization would be willing to adulterate cancer drugs with cathinones tied to serious adverse health consequences and overdose deaths:

> While we're waiting on our previous tablet delivery, could you do a "custom synthesis" price quote for us for more tablets?
>
> Would you make copies of either of the following tablets, substituting the active ingredients with BK-EDBP ? We can get you the exact formula, but we're looking for a ballpark figure so we know how much BTC to obtain for the purchase.
>
> Tarceva 150mg
>
> Afinitor 5mg

The email contained pictures of the two drugs, with instructions to make it "look like either of those tablets." Tarceva® (Erlotinib) and Afinitor® (Everolimus) are both cancer treatment drugs. Tarceva treats lung and pancreatic cancer. Afinitor treats renal cancer and other tumors. Both cancer drugs are trademark protected in both the United States and China. The Organization responded, acknowledging that it was aware that it would be creating adulterated cancer drugs, "we can make pills according to your requirement. But Tarceva and Afinitor all belong to anti-cancer drug." Undercover law enforcement confirmed that they were cancer drugs and asked, "Please let us know if you can do these or not, as we have to let a new buyer know soon." The Organization responded, "Do you mean that make pill of BK-EBDP, but shape of

pill look like in the picture you gave me?" Undercover law enforcement replied, "exactly." The Organization confirmed that it would make the cancer drugs adulterated with deadly synthetic narcotics, "yes, we can do so."

110. On or about July 27, 2018, the ZHENG Drug Trafficking Organization listed over 30 drugs on its website, www.globalrc.net. The Organization included descriptions for these drugs. Many of these descriptions included information regarding the Organization's chemical expertise in (1) creating new drugs; and (2) bypassing China's controlled substance list by creating near-identical analogues of substances that are otherwise illegal under Chinese law:

> 4-CDC
> 4-CDC is a kind of legal analogue of 4-CMC. It's our new products, we don't offer its chemical structure and other information about it because keeping the business secret.
>
> BD-EBDP
> BK-EBDP was developed in 1960s as one of stimulant agents. BK-EBDP for sale has become a quality replacement of Ethylone and Methylone. Numerous trials, tests and researches prove that the drug evokes reactions identical to results produced by ethylone. Among them there are desired effects and those that should better be avoided.
>
> MPHP
> Chemically, MPHP is better known as 4'-Methyl-α-pyrrolidinohexiophenone. It is a close homologue of pyrovalerone (Centroton, 4-Methyl-β-keto-prolintane, Thymergix, O-2371), differeing only in that it has been chain-lengthened. As its pyrrolidinyl, ketone and aryl groups remain in place, it retains pyrovalerone's stimulant function.
>
> 2-NMC
> Those, who buy 2NMC Crystal, must know that its action method is really closely related to all the cathinones. The compound encourages the discharge of dopamine, yet inhibits the re-uptake of three elements: epinephrine, serotonin, norepinephrine in the brain, affecting the overall central nervous system of a user. The chemical agent crosses almost all other membranes and successfully interacts with monoamine transporters.
>
> 4-CEC
> 4-CEC is known as 4-Chloroethcathinone or a relatively new replacement of 4-CMC, 4-MEC and an analogue of 4-MMC. 1-(4-Chloro-phenyl)-2-ethylamino-

propan-1-one is its full chemical name. 4-CEC online is available on the market in form of crystals and it acts like a psycho stimulants, thus has identical effects, both expected and some of the adverse ones.

U-48800
U-48800 is a kind of legal analogue of U-47700.

111. On or about July 30, 2018, the ZHENG Drug Trafficking Organization maintained mirror websites of www.globalrc.net in over 35 languages, ranging from Japanese to Creole.

112. On August 10, 2018, the ZHENG Drug Trafficking Organization emailed undercover law enforcement using its email account, sales@globalrc.net. The Organization informed undercover law enforcement that it had created the counterfeit Adderall adulterated with Dibutylone, a form of bath salts.

113. Throughout the conspiracy, the ZHENG Drug Trafficking Organization utilized Money Transfer Companies 1 and 2 to receive funds from drug trafficking. Within the last few years, FUJING ZHENG and GUANGHUA ZHENG alone received over $1 million through money service business transfers directly to them through these companies. This amount does not include other accounts at Money Transfer Companies 1 and 2, other financial and digital currency services, and other co-conspirators used to obtain the drug proceeds.

114. From in or about August 2017 – shortly after law enforcement stopped Bin Wang's operation – to the filing of this indictment, the ZHENG Drug Trafficking Organization attempted to use other companies such as Shipping Company 1, a company whose name is known to the Grand Jury, to illegally import narcotics into the United States and re-ship them throughout the country while avoiding detection. In early 2018 alone, Shipping Company 1 was the return addressee and responsible for the postage on over 200 packages containing controlled substances and/or controlled substance analogues. Furthermore, around this time, the ZHENG

Drug Trafficking Organization used the services of Shanghai Freight Forwarder 1, a company whose name is known to the Grand Jury, to import controlled substances and controlled substance analogues into the United States in coordination with the Organization and Shipping Company 1.

All in violation of Title 21, United States Code, Section 846.

ENHANCEMENT UNDER TITLE 21,
UNITED STATES CODE, SECTIONS 841(b)(1)(A) and (b)(1)(C)
(Death Resulting from Use of Controlled Substance Analogue)

115. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

116. On or about March 21, 2015, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG and GUANGHUA ZHENG did manufacture and distribute a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance analogue, which resulted in the death of T.R., an individual whose identity is known to the Grand Jury, who ingested Defendants' acetyl fentanyl and fatally overdosed.

117. On or about March 28, 2015, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG and GUANGHUA ZHENG did manufacture and distribute a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance analogue, which resulted in the death of C.D., an individual whose identity is known to the Grand Jury, who ingested Defendants' acetyl fentanyl and fatally overdosed.

118. The deaths of T.R. and C.D. resulted from FUJING ZHENG and GUANGHUA ZHENG's manufacture and distribution of the mixtures and substances containing a detectable amount of acetyl fentanyl, as alleged in Count 1.

All in violation of the enhanced penalty provisions of Title 21, United States Code, Sections 841(b)(1)(A) and (b)(1)(C).

COUNT 2

(Conspiracy to Import Controlled Substances and Controlled Substance Analogues into the United States Resulting in Death, 21 U.S.C. §§ 952(a), 960(a)(1), (b)(1), and (b)(3), all in violation of 21 U.S.C. § 963)

The Grand Jury further charges:

119. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

120. From on or about January 1, 2008 to the Present, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO; GUANGHUA ZHENG, aka GUANG HUA ZHENG; Guangfu Z.; Guifeng C.; Songyan J.; Longbao Z.; Qinghua Y., aka Jason Yen; Lynn X.; Leroy S.; Global United Biotechnology; Global United Holdings; Global Biotech, Inc.; Global Holdings, Inc.; Top Lab RC; Global RC; Golden Chemicals; Cambridge Chemicals; Wonda Science; OneChem; ChemCloud; Daniel Lab; and Shanghai Pharmaceutical Company 1 (named but not indicted herein), Bin Wang (indicted in case number 1:18-CR-123), and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to import into the United States from any place outside thereof mixtures and substances containing a detectable amount of controlled substance analogues, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in

21 U.S.C. § 813, and controlled substances listed in Count 1 of this indictment, which is re-alleged and incorporated by reference in this count, as though fully set forth herein.

All in violation of Title 21, United States Code, Sections 802(32), 813, 952(a), 960(a)(1), (b)(1), (b)(3), and 963.

ENHANCEMENT UNDER TITLE 21,
UNITED STATES CODE, SECTIONS 960(b)(1) and (b)(3)
(Death Resulting from Use of Controlled Substance Analogue)

121. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

122. On or about March 21, 2015, Defendants FUJING ZHENG and GUANGHUA ZHENG did import into the United States from the People's Republic of China and elsewhere a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance analogue, which resulted in the death of T.R., an individual whose identity is known to the Grand Jury, who ingested Defendants' acetyl fentanyl and fatally overdosed.

123. On or about March 28, 2015, Defendants FUJING ZHENG and GUANGHUA ZHENG did import into the United States from the People's Republic of China and elsewhere a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance analogue, which resulted in the death of C.D., an individual whose identity is known to the Grand Jury, who ingested Defendants' acetyl fentanyl and fatally overdosed.

124. The deaths of T.R. and C.D. resulted from FUJING ZHENG and GUANGHUA ZHENG's importation into the United States of the mixtures and substances containing a detectable amount of acetyl fentanyl, as alleged in Count 2.

All in violation of the enhanced penalty provisions of Title 21, United States Code, Sections 960(b)(1) and (b)(3).

COUNT 3

(Conspiracy to Manufacture and Distribute Controlled Substances and Controlled Substance Analogues for Purpose of Unlawful Importation and Resulting in Death, 21 U.S.C. §§ 959(a), 960(a)(3), (b)(1), and (b)(3), all in violation of 21 U.S.C. § 963)

The Grand Jury further charges:

125. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

126. From on or about January 1, 2008 to the Present, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO; GUANGHUA ZHENG, aka GUANG HUA ZHENG; Guangfu Z.; Guifeng C.; Songyan J.; Longbao Z.; Qinghua Y., aka Jason Yen; Lynn X.; Leroy S.; Global United Biotechnology; Global United Holdings; Global Biotech, Inc.; Global Holdings, Inc.; Top Lab RC; Global RC; Golden Chemicals; Cambridge Chemicals; Wonda Science; OneChem; ChemCloud; Daniel Lab; and Shanghai Pharmaceutical Company 1 (named but not indicted herein), Bin Wang (indicted in case number 1:18-CR-123), and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree to manufacture and distribute mixtures and substances containing a detectable amount of controlled substance analogues, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, and controlled substances listed in Count 1 of this indictment, which is re-alleged and incorporated by reference in this count, as though fully set forth herein, intending, knowing, and having reasonable cause to believe that these controlled substances and controlled substance analogues will be unlawfully imported into the United States.

All in violation of Title 21, United States Code, Sections 802(32), 813, 959(a), 960(a)(3), (b)(1), (b)(3), and 963.

ENHANCEMENT UNDER TITLE 21,
UNITED STATES CODE, SECTIONS 960(b)(1) and (b)(3)
(Death Resulting from Use of Controlled Substance Analogue)

127. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

128. On or about March 21, 2015, in the People's Republic of China, and elsewhere, Defendants FUJING ZHENG and GUANGHUA ZHENG did manufacture and distribute a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance analogue, intending and knowing that it will be imported into the United States, which resulted in the death of T.R., an individual whose identity is known to the Grand Jury, who ingested Defendants' acetyl fentanyl and fatally overdosed.

129. On or about March 28, 2015, in the People's Republic of China, and elsewhere, Defendants FUJING ZHENG and GUANGHUA ZHENG did manufacture and distribute a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance analogue, intending and knowing that it will be imported into the United States, which resulted in the death of C.D., an individual whose identity is known to the Grand Jury, who ingested Defendants' acetyl fentanyl and fatally overdosed.

130. The deaths of T.R. and C.D. resulted from FUJING ZHENG's and GUANGHUA ZHENG's manufacture and distribution of the mixtures and substances containing a detectable amount of acetyl fentanyl, intending and knowing that they will be unlawfully imported into the United States, as alleged in Count 3.

All in violation of the enhanced penalty provisions of Title 21, United States Code, Sections 960(b)(1) and (b)(3).

COUNT 4
(Continuing Criminal Enterprise, in violation of 21 U.S.C. §§ 848(a) and (c))

The Grand Jury further charges:

131. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

132. From on or about January 1, 2008 to the Present, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally engage in a Continuing Criminal Enterprise in that they violated Title 21, United States Code, Sections, 813, 841(a)(1), (b)(1)(A), (b)(1)(C), 846, 952(a), 959(a), 960, and 963, including, but not limited to, the violations alleged in Counts 1-3 and 5-19 of this Indictment, which are incorporated herein by reference. The above-described violations were, and are, part of a continuing series of violations of those statutes.

133. These continuing series of violations were undertaken by FUJING ZHENG and GUANGHUA ZHENG in concert with at least five other persons with respect to whom FUJING ZHENG and GUANGHUA ZHENG both occupied a position of organizer, a supervisory position, and any other position of management, including, but not limited to, the following individuals: Guangfu Z., Guifeng C., Songyan J., Longbao Z., Qinghua Y., and Lynn X.

134. From this continuing series of violations, FUJING ZHENG and GUANGHUA ZHANG obtained substantial income and resources.

All in violation of Title 21, United States Code, Sections 848(a) and (c).

COUNT 5
(Manufacture and Distribution of Acetyl Fentanyl for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

135. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

136. On or about March 12, 2015, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Acetyl Fentanyl, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending and knowing that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 6
(Manufacture and Distribution of Acetyl Fentanyl for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

137. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

138. On or about March 21, 2015, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON

JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Acetyl Fentanyl, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending and knowing that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 7
(Manufacture and Distribution of Acetyl Fentanyl for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

139. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

140. On or about March 28, 2015, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Acetyl Fentanyl, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending and knowing that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 8
(Manufacture and Distribution of Acetyl Fentanyl for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

141. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

142. On or about April 2, 2015 in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Acetyl Fentanyl, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending and knowing that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 9
(Manufacture and Distribution of Acetyl Fentanyl for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

143. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

144. On or about April 3 and continuing to on or about April 16, 2015, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN,

aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Acetyl Fentanyl, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending and knowing that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 10
(Manufacture and Distribution of Acetyl Fentanyl for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

145. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

146. On or about June 15, 2015, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Acetyl Fentanyl, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending and knowing that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 11
(Manufacture and Distribution of U-47700 for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

147. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

148. On or about December 20, 2016, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of U-47700, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 12
(Manufacture and Distribution of 4-CL-PVP for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

149. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

150. On or about February 15, 2017, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known

and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of 4-CL-PVP, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 13
(Manufacture and Distribution of Dibutylone for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(1), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

151. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

152. On or about March 31, 2017, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Dibutylone, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 14
(Manufacture and Distribution of ADB-FUBINACA for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

153. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

154. On or about June 5, 2017, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of ADB-FUBINACA, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 15
(Manufacture and Distribution of ADB-FUBINACA for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

155. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

156. From on or July 6, 2017, and continuing to on or about July 21, 2017, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka

GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of ADB-FUBINACA, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 16
(Manufacture and Distribution of ADB-FUBINACA for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

157. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

158. On or about August 2, 2017, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of ADB-FUBINACA, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(1), (b)(3), and Title 18, United States Code, Section 2.

COUNT 17
(Manufacture and Distribution of 4-CL-PVP for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

159. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

160. On or about April 12, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of 4-CL-PVP, a Schedule I controlled substance analogue, as defined in 21 U.S.C. § 802(32), intended for human consumption, as provided in 21 U.S.C. § 813, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 18
(Manufacture and Distribution of Dibutylone for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

161. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

162. On or about June 6, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG

GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Dibutylone, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(3), (b)(3), and Title 18, United States Code, Section 2.

COUNT 19
(Manufacture and Distribution of Dibutylone for Purpose of Unlawful Importation, in violation of 21 U.S.C. §§ 959 and 960(a)(3), (b)(3), and 18 U.S.C. § 2)

The Grand Jury further charges:

163. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein

164. On or about June 14, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally manufacture and distribute a mixture and substance containing a detectable amount of Dibutylone, a Schedule I controlled substance, intending, knowing, and having reasonable cause to believe that such substance will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959 and 960(a)(1), (b)(3), and Title 18, United States Code, Section 2.

COUNT 20
(Creating and Distributing a Counterfeit Substance,
in violation of 21 U.S.C. §§ 841(a)(2), (b)(1)(C) and 18 U.S.C. § 2)

165. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

166. On or about August 10, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally create and distribute a counterfeit substance, to wit: Defendants created and distributed the controlled substance Dibutylone in the form of the pharmaceutical pill Adderall that, without authorization, bore the trademark, trade name, or other identifying mark, imprint, number, or device, or any likeness thereof, of a manufacturer, distributor, or dispenser other than the person or persons who in fact manufactured, distributed, or dispensed such substance and which thereby falsely purported or represented to be the product of, or to have been distributed by, such other manufacturer, distributor, or dispenser, all in violation of 21 U.S.C. §§ 841(a)(2), (b)(1)(C) and 18 U.S.C. § 2.

COUNT 21
(Knowing and Intentional Adulteration of Drugs,
in violation of 21 U.S.C. §§ 331(a), 333(b)(7)), 351(d), and 18 U.S.C. § 2)

The Grand Jury further charges:

167. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

168. On or about August 10, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON

JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, with the intent to defraud or mislead, did cause the introduction and delivery for introduction into interstate commerce of an adulterated drug containing any substance that has been substituted wholly or in part, and such adulteration has a reasonable probability of causing serious adverse health consequences or death to humans and animals: to wit, Defendants caused the introduction and delivery for introduction into interstate commerce Adderall pills that were in fact adulterated with Dibutylone, commonly referred to as "bath salts," a substance known to cause serious adverse health consequences and deaths in humans, in violation of Title 21, United States Code, §§ 331(a), 333(a)(2), (b)(7), 351(d), and Title 18, United States Code, § 2.

COUNT 22
(Distributing Controlled Substances by Means of the Internet,
in violation of 21 U.S.C. §§ 841(h), (b)(1)(A) and (b)(1)(C))

The Grand Jury further charges:

169. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

170. From on or about January 1, 2008 to the Present, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally deliver, distribute, and dispense a controlled substance by means of the internet: to wit, FUJING ZHENG and GUANGHUA ZHENG used their websites

www.globalrc.net and www.goldenrc.com, vendor accounts on EC21, TradeKey, China Quality Lighting, TradeIndia, and TradeLead, email, Skype, WhatsApp, WeChat, and other communication applications to distribute controlled substances over the internet to customers, in violation of Title 21, United States Code, Sections 841(h), (b)(1)(A), and (b)(1)(C).

COUNTS 23-38
(Advertising Controlled Substances Sales by Means of the Internet,
in violation of 21 U.S.C. § 843(c)(2)(A))

The Grand Jury further charges:

171. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

172. On or about the following dates, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly and intentionally use the internet and cause the internet to be used, to advertise the sale of and to offer to sell, distribute, and dispense, a controlled substance where such sale, distribution, or dispensing is not authorized by law, in violation of Title 21, United States Code, Section 843(c)(2)(A).

Count	Date	Internet Site
23	April 8, 2009	www.globalrc.net
24	April 11, 2014	www.goldenrc.com
25	December 18, 2014	www.GoldenRC2008.en.EC21.com
26	March 2, 2015	www.goldenrc.com
27	July 1, 2015	www.goldenrc.com

28	October 6, 2015	http://goldenrc.blogspot.com/2015/
29	October 22, 2015	Comment on "Stay at Home Dad" Blog
30	November 7, 2015	www.goldenrc.com
31	February 23, 2016	Comment on "Forensic Toxicologist" Blog
32	March 29, 2016	Comment on "Forensic Toxicologist" Blog
33	December 1, 2017	www.globalrc.net
34	May 18, 2018	www.globalrc.net
35	June 27, 2018	www.globalrc.net
36	July 15, 2018	www.tradekey.com
37	July 27, 2018	www.globalrc.net
38	August 14, 2018	www.toplabrc.com

COUNT 39
(Money Laundering Conspiracy, in violation of 18 U.S.C. § 1956(h))

The Grand Jury further charges:

173. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

174. From on or about January 1, 2008 to the Present, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO; GUANGHUA ZHENG, aka GUANG HUA ZHENG; Guangfu Z.; Guifeng C.; Songyan J.; Longbao Z.; Qinghua Y., aka Jason Yen; Lynn X.; Leroy S.; Global United Biotechnology; Global United Holdings; Global Biotech, Inc.; Global Holdings, Inc.; Top Lab RC; Global RC; Golden Chemicals; Cambridge

Chemicals; Wonda Science; OneChem; ChemCloud; Daniel Lab; and Shanghai Pharmaceutical Company 1 (named but not indicted herein), Bin Wang (indicted in case number 1:18-CR-123), and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree to:

a. Conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, to wit: illegal controlled substance and controlled substance analogue manufacture, distribution, importation, manufacture and distribution for purpose of unlawful importation, conspiracy to commit the same, and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), 846, 848, 952, 959, 960, and 963, and knowing that the transactions were designed in whole and in part to conceal and disguise the location, source, ownership and control of the proceeds of said specified unlawful activity, and while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

b. 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, knowing that the monetary instrument and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission and transfer was designed in whole and in part to conceal and

disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, to wit: illegal controlled substance and controlled substance analogue manufacture, distribution, importation, manufacture and distribution for purpose of unlawful importation, conspiracy to commit the same, and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), 846, 848, 952, 959, 960, and 963, all in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

c. 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, with the intent to promote the carrying on of specified unlawful activity, to wit: illegal controlled substance and controlled substance analogue manufacture, distribution, importation, manufacture and distribution for purpose of unlawful importation, conspiracy to commit the same, and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), 846, 848, 952, 959, 960, and 963, all in violation of Title 18, United States Code, Section 1956(a)(2)(A).

175. It was a part and object of the conspiracy that the ZHENG Drug Trafficking Organization:

a. Utilized digital currency (such as Bitcoin) to conceal and disguise the nature, location, source, ownership and control of the drug proceeds;

b. Maintained and controlled digital currency addresses that were used by drug

traffickers and co-conspirators to make payments for narcotics;

c. Utilized digital currency exchanges to convert cryptocurrency drug trafficking proceeds into official fiat currency;

d. Misrepresented fund transfers and directed customers to misrepresent fund transfers in order to conceal and disguise the nature, location, source, ownership and control of the drug proceeds;

e. Structured transactions to avoid financial institution reporting and recordkeeping requirements;

f. Transmitted drug proceeds into and out of bank accounts in Hong Kong and elsewhere, with the purpose of obfuscating the nature of the proceeds; and

g. Bypassed Chinese restrictions and reporting requirements on fiat currency entering and leaving the People's Republic of China through the use of co-conspirators who received drug payments through money transmitting businesses on behalf of the FUJING ZHENG, GUANGHUA ZHENG, and other members of the conspiracy. These co-conspirators include, Guangfu Z., Guifeng C., Songyan J., Longbao Z, and others.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 40

(International Promotional Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2)

The Grand Jury further charges:

176. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

177. On or about July 6, 2017, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, and elsewhere, Defendants FUJING ZHENG, aka

GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly 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, with the intent to promote the carrying on of specified unlawful activity, to wit: illegal controlled substance manufacture, distribution, importation, manufacture and distribution for purpose of unlawful importation, and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), 846, 848, 952, 959, 960, and 963, all in violation of Title 18, United States Code, Section 1956(a)(2)(A) and 2.

COUNT 41

(International Promotional Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2)

The Grand Jury further charges:

178. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

179. On or about March 23, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly 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, with the intent to promote the carrying on of specified unlawful activity, to wit: illegal controlled substance manufacture, distribution, importation, manufacture and distribution for purpose of unlawful importation, and

any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), 846, 848, 952, 959, 960, and 963, all in violation of Title 18, United States Code, Section 1956(a)(2)(A) and 2.

COUNT 42

(International Promotional Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2)

The Grand Jury further charges:

180. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

181. On or about May 18, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly 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, with the intent to promote the carrying on of specified unlawful activity, to wit: illegal controlled substance manufacture, distribution, importation, manufacture and distribution for purpose of unlawful importation, and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), 846, 848, 952, 959, 960, and 963, all in violation of Title 18, United States Code, Section 1956(a)(2)(A) and 2.

COUNT 43

(International Promotional Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2)

The Grand Jury further charges:

182. The factual allegations in paragraphs 1 through 114 are re-alleged and incorporated by reference in this count, as though fully set forth herein.

183. On or about June 28, 2018, in the Northern District of Ohio, Eastern Division, the People's Republic of China, and elsewhere, Defendants FUJING ZHENG, aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO, and GUANGHUA ZHENG, aka GUANG HUA ZHENG, and others known and unknown to the Grand Jury, did knowingly 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, with the intent to promote the carrying on of specified unlawful activity, to wit: illegal controlled substance manufacture, distribution, importation, manufacture and distribution for purpose of unlawful importation, and any act or acts constituting a continuing criminal enterprise, in violation of Title 21, United States Code, Sections 802(32), 813, 841(a)(1), 846, 848, 952, 959, 960, and 963, all in violation of Title 18, United States Code, Section 1956(a)(2)(A) and 2.

FORFEITURE

The Grand Jury further charges:

184. The allegations contained in Counts 1-20 and Counts 22-38 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 21 U.S.C. § 853 and 21 U.S.C. § 970. As a result of these offenses, FUJING ZHENG (aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO) and GUANGHUA

ZHENG (aka GUANG HUA ZHENG), the defendants herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such offenses; and, any and all of the defendant's property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offenses; including, but not limited to, the following:

a. All Contents of China Merchants Bank Hong Kong Branch, Account number: xxxxxxxxxxxx1756; Beneficiary Name: ZHENG GUANGHUA, Swift Code: xxxxxKHH; Bank Address: 21/F, Bank of America Tower, 12 Harcourt Road, Central, Hong Kong.

b. All Contents of China Merchants Bank Hong Kong Branch, Account number: xxxxxxxxxxxx6721; Beneficiary Name: ZHENG FUJING, Swift Code: xxxxxKHH; Bank Address: 21/F, Bank of America Tower, 12 Harcourt Road, Central, Hong Kong.

c. All contents of crypto-currency account described as follows: XXXXXXX account in the (full) name of GUANGHUA ZHENG; Username: zhengfujing@[redacted].cn, Account Type: Individual, E-mail: zhengfujing@[redacted].cn, Status: Verified, Phone #: xxxx-xx-xxxx6175, ID: xxx415, Address: Room xxx, No. xx, Huochezhan Rd., Lane 118, Jiading, Shanghai, China 201802, Nationality: China. The crypto-currency deposit address associated with this user is as follows:

BITCOIN: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxF4uhiy (date created: 17-09-18).

d. The domain names globalrc.net, toplabrc.com, goldenrc.com, ar.plglobalrc.net, ar.ruglobalrc.net, fj.globalrc.net, af.plglobalrc.net, esplglobalrc.net, ba.ruglobalrc.net,

ht.plglobalrc.net, sl.ruglobalrc.net, pt.plglobalrc.net, ruglobalrc.net, nl.plglobalrc.net, id_ruglobalrc.net, pk.plglobalrc.net, tr.plglobalrc.net, lt.ruglobalrc.net, gr.ruglobalrc.net, sria.ruglobalrc.net, srcyrl.plglobalrc.net, otq.ruglobalrc.net, ua.plglobalrc.net, ko.ruglobalrc.net, mww.plglobalrc.net, dk.plglobalrc.net, fi.ruglobalrc.net, vn.ruglobalrc.net, fr.plglobalrc.net, hu.ruglobalrc.net, it.ruglobalrc.net, plglobalrc.net, yua.plglobalrc.net, mt.ruglobalrc.net, il.ruglobalrc.net, ja.plglobalrc.net, ee.plglobalrc.net, tlh.ruglobalrc.net, my.plglobalrc.net, se.ruglobalrc.net, and ro.plglobalrc.net.

185. The allegations contained in Counts 39-43 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(1). As a result of these offenses, FUJING ZHENG (aka GORDON JIN, aka MR. JIN, aka GORDON ZHENG, aka JINXINXIN, aka FU JING ZHENG, aka DENG GAO) and GUANGHUA ZHENG (aka GUANG HUA ZHENG), the defendants herein, shall forfeit to the United States all property, real and personal, involved in such offenses, and all property traceable to such property; including, but not limited to, the following:

a. All Contents of China Merchants Bank Hong Kong Branch, Account number: xxxxxxxxxxxx1756; Beneficiary Name: ZHENG GUANGHUA, Swift Code: xxxxxKHH; Bank Address: 21/F, Bank of America Tower, 12 Harcourt Road, Central, Hong Kong.

b. All Contents of China Merchants Bank Hong Kong Branch, Account number: xxxxxxxxxxxx6721; Beneficiary Name: ZHENG FUJING, Swift Code: xxxxxKHH; Bank Address: 21/F, Bank of America Tower, 12 Harcourt Road, Central, Hong Kong.

c. All contents of crypto-currency account described as follows: XXXXXXX account in the (full) name of GUANGHUA ZHENG; Username: zhengfujing@[redacted].cn, Account Type: Individual, E-mail: zhengfujing@[redacted].cn, Status: Verified, Phone #: xxxx-xx-xxxx6175, ID: xxx415, Address: Room xxx, No. xx, Huochezhan Rd., Lane 118, Jiading, Shanghai, China 201802, Nationality: China. The crypto-currency deposit address associated with this user is as follows:

BITCOIN: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxF4uhiy (date created: 17-09-18).

d. The domain names globalrc.net, toplabrc.com, goldenrc.com, ar.plglobalrc.net, ar.ruglobalrc.net, fj.globalrc.net, af.plglobalrc.net, esplglobalrc.net, ba.ruglobalrc.net, ht.plglobalrc.net, sl.ruglobalrc.net, pt.plglobalrc.net, ruglobalrc.net, nl.plglobalrc.net, id_ruglobalrc.net, pk.plglobalrc.net, tr.plglobalrc.net, lt.ruglobalrc.net, gr.ruglobalrc.net, sria.ruglobalrc.net, srcyrl.plglobalrc.net, otq.ruglobalrc.net, ua.plglobalrc.net, ko.ruglobalrc.net, mww.plglobalrc.net, dk.plglobalrc.net, fi.ruglobalrc.net, vn.ruglobalrc.net, fr.plglobalrc.net, hu.ruglobalrc.net, it.ruglobalrc.net, plglobalrc.net, yua.plglobalrc.net, mt.ruglobalrc.net, il.ruglobalrc.net, ja.plglobalrc.net, ee.plglobalrc.net, tlh.ruglobalrc.net, my.plglobalrc.net, se.ruglobalrc.net, and ro.plglobalrc.net.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.