

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA SEP 27 2023 PM 4:24  
TAMPA DIVISION FILED - USDC - FLMD - TPO

UNITED STATES OF AMERICA

v.

CASE NO. 3:23cv338 VMC-JSS  
21 U.S.C. § 963  
18 U.S.C. § 1956

ANHUI RUIHAN TECHNOLOGY CO. LTD.

INDICTMENT

The Grand Jury charges:

INTRODUCTION

**A. The Fentanyl Epidemic in America**

1. Fentanyl is the deadliest drug threat facing the United States in its 247-year history. Not only is fentanyl 50 times more potent than heroin and 100 times more potent than morphine, a dose of as little as two milligrams can kill a grown adult. Fentanyl analogues are similar in chemical structure and effects as fentanyl.

2. Fentanyl is the leading cause of death for Americans ages 18 to 49. From February 2022 to January 2023, at least 105,263 Americans died of drug overdoses, the majority of which involved synthetic opioids such as fentanyl and fentanyl analogues. In Florida in 2021, fentanyl was present in approximately 6,417 deaths, an average of 17 fentanyl-related deaths per day.

## **B. The Role of Fentanyl Precursors**

3. Fentanyl is a chemical that does not occur in nature. It and its analogues therefore need to be synthesized through raw chemicals known as precursors.

4. The International Narcotics Control Board (INCB) is an independent, quasi-judicial expert body established by the Single Convention on Narcotic Drugs of 1961. INCB has 13 members, each elected for a period of five years. Ten of the members are elected from a list of persons nominated by participating Governments. The remaining three members are elected from a list of persons that the World Health Organization (WHO) nominated for their medical, pharmacological, or pharmaceutical experience. In or around 2018, the INCB established a list of fentanyl-related substances with no known legitimate uses. This list is continually updated.

5. Chemicals used in interstate and foreign commerce are often identified through a Chemical Abstracts Service (CAS) Registry Number. The CAS is a division of the American Chemical Society and it maintains the CAS Registry, a list of all CAS numbered chemicals and their chemical associations. A CAS Registry Number is a unique and unambiguous identifier for a specific substance.

6. CAS: 125541-22-2 is the CAS Registry Numbers for 1-boc-4-AP. This chemical compound is commonly used in the production of fentanyl.

7. 1-boc-4-AP is a Listed Chemical therefore CAS: 125541-22-2 is a Listed Chemical. The INCB includes CAS: 125541-22-2 on its list of fentanyl-related

substances with no currently known legitimate uses.

8. CAS: 125541-22-2 can be used in the production of fentanyl. The amount of fentanyl that can be generated from a particular chemical is called a yield. Each yield is dependent upon a variety of factors, including the purities of the associated precursors, reagents, and solvents, as well as the expertise and experience of the laboratory operator. A theoretical yield is the maximum amount of fentanyl or fentanyl analogue a precursor could theoretically produce.

9. One kilogram of CAS: 125541-22-2 would theoretically yield up to 1.3 kilograms of fentanyl.

### **C. Chinese Chemical Companies Supply Fentanyl Precursors to the United States and Mexican Drug Cartels**

10. The primary distributors of fentanyl and fentanyl analogues in North America are the Sinaloa Cartel and the Cartel Jalisco Nueva Generación. These two transnational criminal organizations have significant presences throughout Mexico, maintain distribution hubs in various cities across the United States, and control smuggling corridors into the United States.

11. Organizations such as the Sinaloa Cartel and Cartel Jalisco Nueva Generación receive fentanyl precursors from China that are then synthesized within clandestine laboratories into finished fentanyl at scale. China-based precursor chemical manufacturers ship precursors from mainland China by mislabeling the products being shipped and using containers and other packaging to mask their illicit contents.

**D. The Defendant**

12. ANHUI RUIHAN TECHNOLOGY COMPANY (“ANHUI RUIHAN”) is a chemical manufacturing company based in the city of Hefei, in the Anhui Province, China. ANHUI RUIHAN openly advertises the sale of chemicals to the United States and Mexico on its website and through its employees.

13. ANHUI RUIHAN ships fentanyl precursors to the United States, including CAS: 125541-22-2, and represents it can deliver parcels the United States customs authorities will not seize.

**E. The Attempt**

14. In and or around September 2023, an individual acting behalf of ANHUI RUIHAN, began negotiating the sale of fentanyl precursors to an individual posing as a fentanyl precursor trafficker in the United States. The trafficker was a DEA undercover agent (UC-1) acting at the direction of law enforcement.

15. In a series of messages using an encrypted messaging application, ANHUI RUIHAN represented that it sold and shipped fentanyl precursor chemicals to the United States and Mexico. ANHUI RUIHAN engaged in the following conversation with UC-1:

UC-1: do you ship products to the USA.

ANHUI RUIHAN: Yes, we ship products to USA. What products do you need? Maybe we can supply it to you.

UC-1: Do you supply 125541-22-2? Your shipping is guaranteed and safe to USA.

ANHUI RUIHAN: Please do not worry about the shipping, we have many US customers and they got the goods safely and timely. 125541-22-2, usd 480/kg.

ANHUI RUIHAN: we accept bitcorn and western union and for 125541-22-2 we cannot offer sample, and the moq (minimum order quantity) is 25kg. If ok you can pay the mony and we can arrange the delicery. [sic]

UC-1: My customer is prepared to order but is concerned with the shipment being stopped by US or Mexico customs.

ANHUI RUIHAN: Our company has mature operational experience in customs clearance. We ship our major clients by tons, 25kg please no worry.

16. To reassure UC-1 the shipping was safe, ANHUI RUIHAN noted they would “not paste the real name of the goods.” ANHUI RUIHAN agreed to sell 25 kilograms of CAS: 125541-22-2 to UC-1, and said, this is our bitcorn [sic] address...we will arrange delivery for you tomorrow.” ANHUI RUIHAN sent a screenshot of their Bitcoin Wallet (BTC-1) for payment.

17. Lastly, UC-1 confirmed the price for 25 kilograms of CAS: 125541-22-2 and a sample of another chemical. ANHUI RUIHAN said the total price was \$12,200. UC-1 agreed to pay \$12,200 dollars for the shipment. Twenty-five kilograms of CAS: 125541-22-2 would theoretically yield 32.5 kilograms of fentanyl.

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

Paragraphs 1 to 17 are realleged and incorporated by reference as though fully set forth herein.

In or around August and September 2023, in the Middle District of Florida, China, and elsewhere, the defendant,

ANHUI RUIHAN TECHNOLOGY CO. LTD.,

did knowingly and willfully attempt to manufacture, distribute, and export from China a listed chemical, to wit: 1-boc-4-AP, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States, and knowing and having reasonable cause to believe that such listed chemical would be used to manufacture a controlled substance, to wit: fentanyl.

All in violation of 21 U.S.C. §§ 963, 960(d)(3), and 960(d)(7), and 21 C.F.R. Part 1310.02(a)(39).

**COUNT TWO**  
**(Attempted Money Laundering)**

Paragraphs 1 to 17 are realleged and incorporated by reference as though fully set forth herein.

In or around August and September 2023, in the Middle District of Florida, China, and elsewhere, the defendant,

ANHUI RUIHAN TECHNOLOGY CO. LTD.,

did knowingly and intentionally attempt to transport, transmit, and transfer, and

attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, in an amount exceeding \$10,000, with the intent to promote the carrying on of specified unlawful activity, to wit, felonious narcotics offenses involving controlled substances and listed chemicals (as those terms are defined in the Controlled Substances Act), including the violation charged in Count One of this indictment, in violation of 18 U.S.C. § 1956(a)(2)(A).

All in violation of 18 U.S.C. § 1956(h), (f).

### **FORFEITURE**

1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of 21 U.S.C. §§ 853 and 970, and 18 U.S.C. § 982(a)(1).

2. Upon conviction of a violation of Count One of this Indictment, in violation of 21 U.S.C. §§ 959 and 963, punishable by imprisonment for more than one year, the defendant,

ANHUI RUIHAN TECHNOLOGY CO. LTD.,

shall forfeit to the United States, pursuant to 21 U.S.C. §§ 853 and 970, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

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

ANHUI RUIHAN TECHNOLOGY CO. LTD.,

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

4. The assets to be forfeited include, but are not limited to, an order of forfeiture in the amount of proceeds obtained from the offense.


5. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be subdivided without difficulty,



the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), directly and as incorporated by 18 U.S.C. § 982(b)(1).

A TRUE BILL,

  
Foreperson

ROGER B. HANDBERG  
United States Attorney

By: 

By: 

No. \_\_\_\_\_

UNITED STATES DISTRICT COURT  
Middle District of Florida  
Tampa Division

THE UNITED STATES OF AMERICA

vs.

ANHUI RUIHAN TECHNOLOGY CO. LTD.

INDICTMENT

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

A true bill,

\_\_\_\_\_  
Foreperson

Filed in open court this 27<sup>th</sup> day  
of September 2023.

\_\_\_\_\_  
Clerk

Bail \$ \_\_\_\_\_