

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. **23-20393-CR-ALTMAN/REID**

21 U.S.C. § 963
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 371
18 U.S.C. § 501
21 U.S.C. § 853
18 U.S.C. § 982(a)(2)(B)
18 U.S.C. § 492

FILED BY mdc D.C.

Sep 27, 2023

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

UNITED STATES OF AMERICA

vs.

JIANGSU BANGDEYA
NEW MATERIAL TECHNOLOGY CO. LTD., and
Jiantong Wang,
a/k/a "Jack,"

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Protonitazene and Mctonitazene

1. The United States is experiencing an opioid overdose epidemic. Opioid overdose is the leading cause of death for Americans between the ages of 18 and 49. Between 2021 and 2022, over 160,767 Americans died from opioid-involved overdoses. In 2022, the reported number of drug overdose deaths involving synthetic opioids continued to increase compared to the previous years.

2. The introduction of synthetic opioids into the illicit drug market threatens to exacerbate the overdose problem. Protonitazene and metonitazene are two such synthetic opioids that have pharmacological profiles similar to those of other scheduled opioids and they are subject to abuse in the same manner.

3. Protonitazene and metonitazene are listed Schedule I controlled substances. There are no approved medical uses for protonitazene and metonitazene in the United States, or anywhere else in the world. Drug traffickers typically mix protonitazene and metonitazene with other opioids, such as fentanyl, to create new and more powerful cocktails of dangerous opioids. In certain instances, metonitazene was identified as the sole opioid detected in overdose autopsies.

4. Synthetic opioids like protonitazene and metonitazene are manufactured and distributed by China-based chemical companies, many of which openly advertise on the internet. These China-based manufacturers ship synthetic opioids around the world, including to the United States, where drug dealers often combine them with other opioids and/or further distribute them to individual end users. These China-based chemical companies often attempt to evade law enforcement by using re-shippers in the United States, false return labels, false invoices and packaging that conceals the true contents, such as using dog food bags. These companies also used fraudulent postage to conceal the true identity and location of the shipper and to avoid payment of shipping costs.

The Company Defendant

5. Defendant **JIANGSU BANGDEYA NEW MATERIAL TECHNOLOGY CO. LTD.** (“**BANGDEYA**”) is a pharmaceutical company located in Jiangsu, China that manufactures, amongst other things, synthetic opioids.

6. The following image was taken from the **BANGDEYA** website:



7. **BANGDEYA** advertises openly online as an export company for chemicals, including protonitazene and metonitazene. A simple open-source internet search reveals multiple advertisements for the sale of these controlled substances from **BANGDEYA** sales representatives. These advertisements contain contact information such as WhatsApp numbers, Wickr monikers, or email addresses. **BANGDEYA**, through their own website, a host of storefront websites, and social media platforms, has advertised to customers in the United States, Europe, Asia, and South America.

8. The following are screen shots for two of BANGDEYA's online advertisements for the sale and distribution of protonitazene and metonitazene:



Protonitazene
CAS 119276-01-6
Whatsapp
+86 [REDACTED]
Wickr:st [REDACTED]

Jiangsu Bangdeya New Material Technology Co.,Ltd.
WhatsApp:+86 [REDACTED]
Email:[REDACTED]@bangdeya.com
Wickr:st [REDACTED]
Website:<http://bangdeya.com>
Self-built Website:<http://sijinchem.com>

Metonitazene CAS14680-51-4



Metonitazene CAS14680-51-4
Thaisy
Email:[REDACTED]@bangdeya.com
Whatsapp +86 [REDACTED]
Wickr:st [REDACTED]

Country of Origin
Keywords
Price
Payment Terms
[Send Inquiry](#)

Description

Metonitazene CAS14680-51-4
Our company can provide best price , highest quality and safest delivery.
we also supply bmk oil ,pmk oil ,dimethocaine
Payment: TT,Western Union or BTC ADDRESS
Delivery time: 1-3 days
Product purity: 99%

9. Since as early as April 2022, **BANGDEYA** has shipped protonitazene and metonitazene from China to the Southern District of Florida. These controlled substances were sent to a known drug trafficker based in Deerfield Beach, Florida, and to undercover federal agents.

The Individual Defendant and Co-Conspirators

10. Defendant **JIANTONG WANG, a/k/a “Jack,”** was a citizen of China and an owner and operator of **BANGDEYA**. Over the past 18 months, **BANGDEYA** and certain of its executives and employees, including **JIANTONG WANG, a/k/a “Jack,”** sold and shipped more than six kilograms of metonitazene and nine kilograms of protonitazene into the United States, specifically into the Southern District of Florida.

11. Co-Conspirator 1 was a citizen of China and a sales representative for **BANGDEYA**.

12. Co-Conspirator 2 was a resident of Deerfield Beach, Florida.

**The Defendants’ Importation and Distribution
of Protonitazene and Metonitazene to Co-Conspirator 2**

13. Co-Conspirator 2 was a drug trafficker who sold fentanyl in distribution quantity amounts to other drug traffickers in South Florida.

14. Beginning in late 2021 and continuing through mid-2023, Co-Conspirator 2 sought chemicals to mix with fentanyl and heroin in order to increase his supply of opioids and to enhance their effects on consumers. Through an open internet search, Co-Conspirator 2 found advertisements for metonitazene and protonitazene from **BANGDEYA**. Co-Conspirator 2 began ordering these substances from **BANGDEYA** sales representatives, including Co-Conspirator 1, via WhatsApp. Co-Conspirator 2 made payment in Bitcoin to cryptocurrency wallets held in the name of **JIANTONG WANG** that were provided to Co-Conspirator 2 by **BANGDEYA** representatives.

15. Co-Conspirator 2 ordered 300 to 500 grams of protonitazene and/or metonitazene each month from **BANGDEYA**. In sum, **BANGDEYA** sold and distributed more than four kilograms of protonitazene and metonitazene to Co-Conspirator 2 in the Southern District of Florida. Co-Conspirator 2 would then mix the protonitazene or metonitazene with fentanyl or heroin and sell the ultra-powerful substance in South Florida.

16. On or about October 22, 2022, law enforcement in the Southern District of Florida seized a parcel sent from **BANGDEYA** intended for Co-Conspirator 2. This parcel contained 172.3 grams of protonitazene.

17. On or about June 15, 2023, Co-Conspirator 2 was arrested in the Southern District of Florida. During a search executed at the time of Co-Conspirator 2's arrest, agents found 8.734 kilograms of controlled substances containing a mixture of opioids. Co-Conspirator 2 mixed several different opioids and pressed them together. The resulting mixture was a powerful and dangerous combination of protonitazene, metonitazene, fentanyl, fluorofentanyl, and heroin.

The Undercover Transactions and Distributions from BANGDEYA

18. Beginning on or about January 26, 2023, an undercover agent began negotiating with **JIANTONG WANG** regarding the purchase of synthetic opioids. **WANG** stated that **BANGDEYA** was willing to distribute three such chemicals, including metonitazene, protonitazene and bromozolam. As part of that negotiation, agents asked for verification of safe shipping to the United States. **WANG** provided the undercover agent two U.S. Postal Service tracking numbers. A review of those tracking numbers revealed that the parcels were destined for the State of Georgia.

19. On or about February 2, 2023, agents in Georgia seized one of the parcels shipped by **JIANTONG WANG** on behalf of **BANGDEYA**. A search of the parcel revealed 453.59 grams

of protonitazene.

The February 22, 2023, Distribution

20. On or about January 29, 2023, the undercover agent continued negotiations with **Jiantong Wang**. The undercover agent asked whether **Bangdeya** had safe shipping. **Wang** stated that **Bangdeya** has “100% clearance delivery” and would “re-ship the goods to you for free of charge in case of transportation problems.”

21. On or about January 30, 2023, the undercover agent asked **Wang** if his protonitazene was the yellow powder. **Wang** responded by replying with the below image of two large bags of yellow powder:



22. On or about February 3, 2023, the undercover agent ordered 100 grams of protonitazene. **Wang** replied that the price was “\$1,200 for 100 grams.” **Wang** provided several ways to send payment, including a Bitcoin wallet address that was determined to be held in **Wang**’s name.

23. On or about February 22, 2023, agents received a parcel sent by **Bangdeya** to an address in Hialeah, Florida. The parcel contained 101.6 grams of protonitazene.

The April 28 and July 7, 2023, Distributions

24. Beginning on or about April 4, 2023, and continuing through April 5, 2023, the undercover agent negotiated with **JIANTONG WANG** for 250 grams of protonitazene from **BANGDEYA. WANG** provided the same Bitcoin wallet address for payment as previously used for the February 22, 2023, distribution.

25. On or about April 28, 2023, agents received a parcel sent by **BANGDEYA** to an address in Weston, Florida. The parcel only contained 50 grams of protonitazene.

26. After the undercover agent told **JIANTONG WANG** that only about 50 grams were received, **WANG** sent another parcel. **WANG** explained that “this is a replacement 200 grams” of protonitazene.

27. On or about July 7, 2023, agents received a parcel from **BANGDEYA** sent to an address in Weston, Florida. The parcel contained 202.4 grams of protonitazene.

The May 16, 2023, Distribution

28. Beginning on or about April 14, 2023, and continuing through on or about May 1, 2023, an undercover agent negotiated with **JIANTONG WANG** for the purchase of 530 grams of protonitazene from **BANGDEYA**.

29. On or about April 21, 2023, agents sent payment using Bitcoin to a cryptocurrency wallet held in **WANG**’s name.

30. On or about May 16, 2023, agents received a parcel sent by **BANGDEYA** to an address in Weston, Florida. The parcel contained 529.9 grams of protonitazene.

The United States Postal Service

31. The United States Postal Service (USPS) was an agency of the executive branch of the United States government responsible for providing postal services. The USPS was explicitly

authorized by Article I, Section 8, of the U.S. Constitution.

32. The United States Postal Inspection Service (USPIS) was the law enforcement arm of the USPS whose mission was to support and protect the USPS, enforce the laws that defend the nation's mail system from illegal or dangerous use, and ensure public trust in the mail.

33. The USPS offered many postal services, including the delivery of parcels. All parcels required evidence of appropriate valid postage prior to delivery.

34. One type of parcel delivery service offered by the USPS was known as the Electronic Verifications System or "eVS." This system allowed USPS customers to pay postage and document deliveries remotely using electronically uploaded files.

35. To participate in the eVS mailing system, the USPS customer applied for and was assigned a unique Mailer ID or "MID." The MID was used to print postage associated with that particular USPS customer, and the MID was incorporated into the printed postage meter stamp affixed to the parcel.

COUNT 1
Conspiracy to Import Protonitazene and Metonitazene
(21 U.S.C. § 963)

1. Paragraphs 1 through 30 of the General Allegations section of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. Beginning at least as early as on or about April 12, 2022, and continuing through the date of the return of this Indictment, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

JIANGSU BANGDEYA NEW MATERIAL TECHNOLOGY CO., LTD., and
Jiantong Wang,
a/k/a "Jack,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and with Co-Conspirator 1, Co-Conspirator 2, and other persons known and unknown to the Grand Jury, to

import into the United States, from a place outside thereof, a controlled substance, in violation of Title 21, United States Code, Section 952(a); all in violation of Title 21, United States Code, Section 963.

The controlled substance involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a detectable amount of protonitazene, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 960(b)(3).

The controlled substance involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a detectable amount of metonitazene, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 960(b)(3).

COUNT 2
Conspiracy to Distribute Protonitazene and Metonitazene
(21 U.S.C. § 846)

1. Paragraphs 1 through 30 of the General Allegations section of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. Beginning at least as early as on or about April 12, 2022, and continuing through the date of the return of this Indictment, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

JIANGSU BANGDEYA NEW MATERIAL TECHNOLOGY CO., LTD., and
JIANTONG WANG,
a/k/a “Jack,”

did knowingly and willfully combine, conspire, confederate, and agree with each other and with Co-Conspirator 1, Co-Conspirator 2, and other persons known and unknown to the Grand Jury, to

distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

The controlled substance involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a detectable amount of protonitazene, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

The controlled substance involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a detectable amount of metonitazene, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNTS 3-7
Distribution of Protonitazene
(21 U.S.C. § 841(a)(1))

On or about the dates specified as to each count below, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

JIANGSU BANGDEYA NEW MATERIAL TECHNOLOGY CO., LTD., and
JIANTONG WANG,
a/k/a “Jack,”

did knowingly and intentionally distribute a controlled substance, as specified in each count below:

Count	Approx. Date	Controlled Substance	Amount
3	10/22/2022	Protonitazene	172.3 grams
4	02/20/2023	Protonitazene	101.6 grams
5	04/28/2023	Protonitazene	50.0 grams
6	05/16/2023	Protonitazene	529.9 grams
7	07/07/2023	Protonitazene	202.4 grams

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 8
Conspiracy to Defraud the United States and to
Make, Print, and Use Forged and Counterfeited Postage Meter Stamps
(18 U.S.C. § 371)

1. Paragraphs 5 through 12 and Paragraphs 31 through 35 of the General Allegations section of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. Beginning at least as early as March of 2022, the exact date being unknown to the Grand Jury, and continuing through the date of the return of this Indictment, in the Southern District of Florida and elsewhere, the defendants,

JIANGSU BANGDEYA NEW MATERIAL TECHNOLOGY CO. LTD. and
JIANTONG WANG,
a/k/a “Jack,”

did knowingly and willfully, that is, with the intent to further the objects of the conspiracy, combine, conspire, confederate, and agree with each other, and with Co-Conspirator 1 and others known and unknown to the Grand Jury, to commit offenses against the United States, that is:

(a) to defraud the United States by impairing, impeding, obstructing and defeating through deceitful and dishonest means, the lawful government functions of the United States government and any of its departments and agencies, namely, the U.S. Postal Service and U.S. Postal Inspection Service; and

(b) to knowingly make, print, and use a forged and counterfeited postage meter stamp, in violation of Title 18, United States Code, Section 501.

Purpose of the Conspiracy

3. It was a purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves and to avoid detection in their distribution of controlled substances by sending parcels containing controlled substances to the United States using forged and counterfeited postage meter stamps in order to avoid paying the cost of shipping and to conceal the co-conspirators' true identities and locations, among other things.

Manner and Means of the Conspiracy

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among other things:

4. **BANGDEYA, JIANTONG WANG**, Co-Conspirator 1, and their co-conspirators obtained unauthorized access to MIDs belonging to legitimate USPS customers.

5. **BANGDEYA, JIANTONG WANG**, Co-Conspirator 1, and their co-conspirators used the unauthorized MIDs to make, print, and use forged and counterfeited postage meter stamps to mail parcels containing controlled substances to addresses in the Southern District of Florida and elsewhere in the United States.

6. **BANGDEYA, JIANTONG WANG**, Co-Conspirator 1, and their co-conspirators added false information to the shipping labels, including the false return address of the sender, in order to conceal their true identity and location.

7. During the course of the conspiracy, by making, printing, and using the unauthorized postage meter stamps to deliver controlled substances to locations in the United States, **BANGDEYA, JIANTONG WANG**, Co-Conspirator 1, and their co-conspirators failed to pay postage due and owing to the USPS.

8. **BANGDEYA, JIANTONG WANG**, Co-Conspirator 1 and their co-conspirators used the proceeds of the conspiracy to benefit themselves and others, and to further the conspiracy.

Overt Acts

In furtherance of the conspiracy, and to accomplish its objects and purpose, at least one co-conspirator committed and caused to be committed, in the Southern District of Florida, at least one of the following overt acts, among others:

1. On or about April 19, 2022, Co-Conspirator 1, acting on behalf of **BANGDEYA**, texted a purchaser of synthetic opioids in the Southern District of Florida to provide a tracking number ending in 2844 for a parcel with a forged and counterfeited postage meter stamp.

2. On or about June 25, 2022, Co-Conspirator 1, acting on behalf of **BANGDEYA**, texted a purchaser of synthetic opioids in the Southern District of Florida to provide a tracking number ending in 9364 for a parcel with a forged and counterfeited postage meter stamp.

3. On or about July 1, 2022, Co-Conspirator 1, acting on behalf of **BANGDEYA**, texted a purchaser of synthetic opioids from the Southern District of Florida to provide the tracking number ending in 1648 for a parcel with a forged and counterfeited postage meter stamp, along with the message “tracking No. for 150g protonitizine.”

4. On or about July 25, 2022, Co-Conspirator 1, acting on behalf of **BANGDEYA**, texted a purchaser of synthetic opioids from the Southern District of Florida to provide the tracking number ending in 6240 for a parcel with a forged and counterfeited postage meter stamp, along with the message “tracking Number , will show on the web later .”

All in violation of Title 18, United States Code, Section 371.

COUNTS 9-12
Making, Printing, and Using Forged and Counterfeited Postage Meter Stamps
(18 U.S.C. § 501)

1. Paragraphs 8 through 14 and Paragraphs 33 through 37 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

2. On or about the date specified in each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

JIANGSU BANGDEYA NEW MATERIAL TECHNOLOGY CO. LTD. and
JIANTONG WANG,
a/k/a “Jack,”

did knowingly make, print, and use a forged and counterfeited postage meter stamp, as set forth in each count below:

Count	Approx. Date	Description of Parcel Containing Unauthorized Postage Meter Stamp
9	06/25/2022	Parcel bearing tracking number ending in 9364 addressed to Deerfield Beach, Florida
10	07/01/2022	Parcel bearing tracking number ending in 1648 addressed to Deerfield Beach, Florida
11	07/25/2022	Parcel bearing tracking number ending in 6240 addressed to Deerfield Beach, Florida
12	10/11/2022	Parcel bearing tracking number ending in 4089 addressed to Deerfield Beach, Florida

In violation of Title 18, United States Code, Sections 501 and 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendants, **JIANGSU BANGDEYA NEW MATERIAL TECHNOLOGYCO., LTD., and JIANTONG WANG, a/k/a “Jack,”** have an interest.

2. Upon conviction of a violation of Title 21, United States Code, Sections 841, 846, and/or 963, as alleged in this Indictment, the defendant shall forfeit to the United States any

property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, pursuant to Title 21, United States Code, Section 853.

3. Upon conviction of a violation of, or conspiracy to violate, Title 18, United States Code, Section 501, as alleged in this Indictment, the defendant shall forfeit to the United States any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such offense, and all counterfeits of any coins or obligations or other securities of the United States or of any foreign government, or any articles, devices, and other things made, possessed, or used in the offense, or any material or apparatus used or fitted or intended to be used, in the making of such counterfeits, articles, devices or things, found in the possession of any person without authority from the Secretary of the Treasury or other proper officer, pursuant to Title 18, United States Code, Sections 492 and 982(a)(2)(B).

4. The property subject to forfeiture as a result of the alleged offenses includes, but is not limited to, a sum of at least \$1,372,861 in U.S. currency, which represents the total value of property involved in or derived from the alleged offenses, and may be sought as a forfeiture money judgment.

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or


(e) has been commingled with other property which cannot be subdivided
without difficulty;

the United States shall be entitled to the forfeiture of substitute property under the provisions of
Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Sections 492 and 982(a)(2)(B), Title 21,
United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON


MARKENZY LAPOINTE
UNITED STATES ATTORNEY


MONIQUE BOTERO
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.: _____

v.

Jiangsu Bangdeya New Material
Technology Co. LTD. and
Jiantong Wang, a/k/a "Jack,"

Defendants.

Court Division (select one)

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

CERTIFICATE OF TRIAL ATTORNEY

Superseding Case Information:

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.

3. Interpreter: (Yes or No) Yes
List language and/or dialect: Chinese

4. This case will take 6-8 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)

- I ☐ 0 to 5 days
II ☒ 6 to 10 days
III ☐ 11 to 20 days
IV ☐ 21 to 60 days
V ☐ 61 days and over

(Check only one)

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No
15. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

By:



Monique Botero

Assistant United States Attorney

FL Bar No. 722286

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: Jiangsu Bangdeya New Material Technology Co. LTD.

Case No: _____

Count #: 1

Conspiracy to Import Protonitazene and Metonitazene

Title 21, United States Code, Sections 952(a) and 963

- * **Max. Term of Imprisonment:** N/A
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** N/A
- * **Max. Fine:** \$5,000,000

Count #: 2

Conspiracy to Distribute Protonitazene and Metonitazene

Title 21, United States Code, Sections 841(a)(1) and 846

- * **Max. Term of Imprisonment:** N/A
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** N/A
- * **Max. Fine:** \$5,000,000

Counts #: 3-7

Distribution of Protonitazene

Title 21, United States Code, Sections 841(a)(1) and 846

- * **Max. Term of Imprisonment:** N/A
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** N/A
- * **Max. Fine:** \$5,000,000

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Jiangsu Bangdeya New Material Technology Co. LTD.

Case No: _____

Count #: 8

Conspiracy to Defraud the U.S. and to Make and Print Unauthorized Postage Meter Stamps

Title 18, United States Code, Section 371

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

Counts #:9-12

Making and Printing Unauthorized Postage Meter Stamps

Title 18, United States Code, Section 501

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

Count #:

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

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

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: Jiantong Wang, a/k/a "Jack"

Case No: _____

Count #: 1

Conspiracy to Import Protonitazene and Metonitazene

Title 21, United States Code, Sections 952(a) and 963

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** At least 3 years and up to life
- * **Max. Fine:** \$1,000,000

Count #: 2

Conspiracy to Distribute Protonitazene and Metonitazene

Title 21, United States Code, Sections 841(a)(1) and 846

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** At least 3 years and up to life
- * **Max. Fine:** \$1,000,000

Counts #: 3-7

Distribution of Protonitazene

Title 21, United States Code, Sections 841(a)(1) and 846

- * **Max. Term of Imprisonment:** 20 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** At least 3 years and up to life
- * **Max. Fine:** \$1,000,000

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Jiantong Wang, a/k/a "Jack"

Case No: _____

Count #: 8

Conspiracy to Defraud the U.S. and to Make and Print Unauthorized Postage Meter Stamps

Title 18, United States Code, Section 371

- * **Max. Term of Imprisonment:** 5 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Counts #:9-12

Making and Printing Unauthorized Postage Meter Stamps

Title 18, United States Code, Section 501

- * **Max. Term of Imprisonment:** 5 years
- * **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- * **Max. Supervised Release:** 3 years
- * **Max. Fine:** \$250,000

Count #:

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

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