

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

WENFENG CUI,
a/k/a "Vincen,"
FAN PANG,
a/k/a "Jerry,"

Defendants.

INDICTMENT

26 Cr.

26 CRIM 159

COUNT ONE
(Conspiracy to Distribute Methamphetamine)

The Grand Jury charges:

1. Between February 2025 and February 2026, two Chinese national engineers, WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, developed novel industrial technology for the mass-scale production of methamphetamine. CUI and PANG estimated that the technology, which they sought to market to international narcotics traffickers, could produce approximately 400 kilograms of methamphetamine daily. CUI and PANG designed, built, and marketed the technology; exported more than 21,000 kilograms of machinery and equipment from China to Europe for the production of methamphetamine; conspired to sell methamphetamine precursor chemical to be used to supply the technology; and sold at least approximately forty kilograms of methamphetamine precursor chemical in furtherance of future such sales.

BACKGROUND

2. DEA statistics show that for 2023 alone, 2.6 million Americans aged 12 or older reported having used methamphetamine in the past year. The same year, 36,000 Americans died from psychostimulant overdoses, the majority of which were linked to methamphetamine.

According to DEA analyses, the Sinaloa and Jalisco cartels have become the main suppliers of the methamphetamine sold in the United States as domestic production has fallen to multi-decade lows. Narcotrafficking cartels are known to operate clandestine methamphetamine production labs throughout Mexico using massive quantities of chemicals obtained primarily from laboratories in Asia in order to manufacture methamphetamine for export into the United States.

3. The manufacture of methamphetamine begins with raw chemicals, known as precursors. Like the chemicals used to manufacture fentanyl and its analogues, methamphetamine-related precursors are principally sourced from chemical manufacturers based in China and India. Those manufacturers ship chemical precursors around the world, including to the United States, Central and South America, and elsewhere, where laboratories use the precursors to synthesize finished methamphetamine and methamphetamine analogues at scale, and distribute methamphetamine into and throughout the United States. These methamphetamine precursor chemical manufacturers often evade law enforcement seizure of their shipments in the United States and elsewhere by mislabeling the products being shipped or using containers and other packaging that masks their illicit contents.

CUI AND PANG DEVELOPED INDUSTRIAL-SCALE METHAMPHETAMINE PRODUCTION TECHNOLOGY

4. In or around May 2025, a confidential source ("CS-1") acting at the direction of the DEA contacted WENFENG CUI, a/k/a "Vincen," the defendant, via an encrypted messaging application ("Application-1") to discuss, among other things, the production of chemicals used for the production of methamphetamine. CS-1, posing as a narcotics trafficker and money launderer living between the United States and Mexico, informed CUI that CS-1 had contacts in the United States, Central America, and elsewhere who wanted to purchase chemicals in order to synthesize and then traffic methamphetamine within the United States. Over the course of approximately

eight months, CS-1 and other confidential sources acting at the direction of the DEA posing as narcotics traffickers, including CS-2, CS-3, and CS-4, and CS-5, communicated regularly with CUI and FAN PANG, a/k/a "Jerry," the defendant, in order to broker chemical agreements that CUI and PANG knew would result in the production of methamphetamine for sale in the United States and elsewhere.

5. On or about August 19, 2025, CS-1 introduced CUI in a video call to CS-3, who purported to be a business partner of CS-1's located in Guatemala who was posing as a narcotics trafficker interested in acquiring methamphetamine production technology. The call was audio- and video-recorded. CUI said, in sum and substance, that he could produce customized machinery for CS-3 over the course of several months, and additional machines with subsequently refined designs in as few as 30 days. CUI said, in sum and substance, that he would train CS-3 in the assembly, installation, and operation of the equipment once it was produced, and offered CS-3 ongoing parts and technical support on-site in Central America. CS-3 and CUI discussed, among other things, the trade-offs between ease of setup, output capacity, the need to hide drug production operations, and the effect of excessive production on the price of methamphetamine.

6. On the August 19, 2025 call, CUI said, in sum and substance, that in addition to his industrial fabrication work, he had a longstanding business with many European customers for whom he supplied raw methamphetamine precursor chemicals. CUI said, in sum and substance, that he had so much business that he could not keep up with the demand. CUI said that he sold only to a small number of people whom he trusted, even as he has received far more lucrative offers from others.

7. In or about June 2025, CUI and CS-1 met twice in-person in Los Angeles to discuss CUI's newly developed manufacturing technology. At a meeting at a restaurant on or about June 3, 2025, which was audio and video recorded, and surveilled by DEA agents, CUI introduced CS-1

to a colleague of his, FAN PANG, a/k/a "Jerry," the defendant. CUI said, in sum and substance, that he and PANG were business partners who traveled frequently together throughout Europe and the Middle East. CS-1 explained that they had relationships with other colleagues of CUI's who had been impressed by CUI's work. CUI said, in sum and substance, that he had recently fabricated machinery for friends of CS-1's.

8. On or about June 5, 2025, CUI, PANG, and CS-1 met again in Los Angeles. CUI said, in sum and substance, that he had many repeat customers who purchased hundreds of kilograms of precursor chemical from him and PANG. PANG said, in sum and substance, that their Indian competitors produced lower quality products. CUI said, in sum and substance, that he could automate the synthesis of narcotics from the raw materials he sold. PANG said that final product was "meth" and "methamphetamine." CUI told CS-1, in sum and substance, that he had developed technology to complete the most complex parts of the production process, and only the last step might require manual labor. PANG said, in sum and substance, that he had worked with CUI since PANG graduated, and that their business required working with only people who could be trusted. CUI said, in sum and substance, that the fewer people who knew about their work, the better. CS-1 proposed that CUI and PANG travel to a country in Europe where they could demonstrate the manufacturing technology to other narcotics traffickers, suggesting that CUI bring a colleague whom CUI described as a PhD scientist to oversee a demonstration.

CUI AND PANG MARKETED THEIR TECHNOLOGY IN NEW YORK CITY

9. On or about June 17, 2025, CUI and PANG met again with CS-1 and several others, including CS-2, at a restaurant in Manhattan. The meeting was audio- and video-recorded. During the meeting, CS-1 told CUI and PANG that CS-2 and a third individual were partners who split their narcotics businesses between the United States and Europe. CUI said, in sum and substance, that a prototype machine was already working but could then only produce several kilograms of

amphetamine hydrochloride, a methamphetamine precursor chemical, per day. PANG said, in sum and substance, that a completed machine could be ready by July, *i.e.*, the following month, and could produce as much as 800 kilograms of methamphetamine per production cycle.

10. CUI explained, in sum and substance, that he had produced methamphetamine using the precursor chemical methylamine before, but that the chemical was easily traced by the police in China, so CUI had to switch to another chemical, ethylamine, instead. PANG explained, in sum and substance, that their technology would process the chemicals in two cycles, first adding hydrochloric acid to manufacture ephedrine before then producing methamphetamine. CUI said, in sum and substance, that 800 kilograms of methamphetamine could be produced over the course of two 24-hour cycles. CS-2 offered to buy the machine after it could be demonstrated that it worked and could be transported out of China. PANG proposed selling a single industrial-sized machine to CS-2 or as many of twenty to thirty smaller versions. CUI said, in sum and substance, that other scientists at the Chinese Academy of Sciences were also working on the technology but that, PANG said, those scientists did not know what it would be used for.

11. During the meeting, CUI and PANG also offered to facilitate the sale of a sample of approximately forty kilograms of methylamine hydrochloride, a List I chemical CUI used in the synthesis of methamphetamine. CUI offered to deliver the chemical from China to New York in exchange for \$4,000 in cash. CS-1 and CS-2 agreed to purchase the chemical, explaining that it would be used to manufacture methamphetamine for resale. PANG said, in sum and substance, that he could accept cryptocurrency for larger purchases in the future.

12. On or about June 18, 2025, CUI and PANG met again with CS-1 and CS-2 the next day at another restaurant in downtown Manhattan. The meeting was audio- and video-recorded.

13. During the meeting, CUI and PANG said, in sum and substance, that a smaller version of the machine would cost approximately \$115,000. The larger machine, CUI and PANG

said, in sum and substance, consisted of at least 25 components and that multiple shipping containers would be needed to transport it. CS-2 told CUI and PANG that he first wanted to test a smaller machine in New York with the chemical that CUI sold to them.

14. CUI and PANG explained the process by which their technology would produce methamphetamine, first by producing hydrochloric acid and then ephedrine hydrochloride. CUI said, in sum and substance, that by cycling the ephedrine hydrochloride, he and PANG had successfully manufactured methamphetamine. PANG said, in sum and substance, that the process had been successful using ethylamine as a replacement for methylamine, a precursor chemical outlawed in China. CUI said, in sum and substance, that his connections in China would permit him to stay in business even if other chemicals were banned in the future. PANG said, in sum and substance, that their method using ethylamine still produced crystal methamphetamine, which he could refine to a purity level exceeding 95%.

15. CUI and PANG asked CS-1 and CS-2 about their role in the methamphetamine market. CS-2 said that he worked with a chemist located in Mexico and distributed methamphetamine in New York City. CS-2 showed CUI and PANG photographs of methamphetamine crystals, explaining that they would use the methylamine hydrochloride chemical CUI and PANG sold them in order to manufacture methamphetamine for distribution to customers in New York City. After the meeting, on or about June 18, 2025, using Application-1, CUI sent CS-1 screenshots of the chemical compositions of controlled substances his synthesis techniques could produce, including the CAS Registry number for methamphetamine and a photo of crystal methamphetamine which CUI purported to have produced:



CUI PRODUCED DETAILED SCHEMATICS AND INSTRUCTION MANUALS FOR MANUFACTURING METHAMPHETAMINE

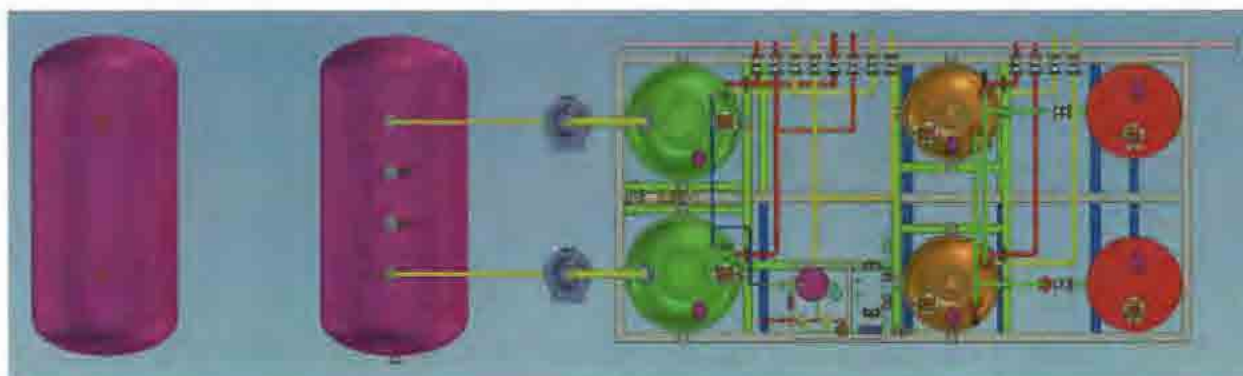
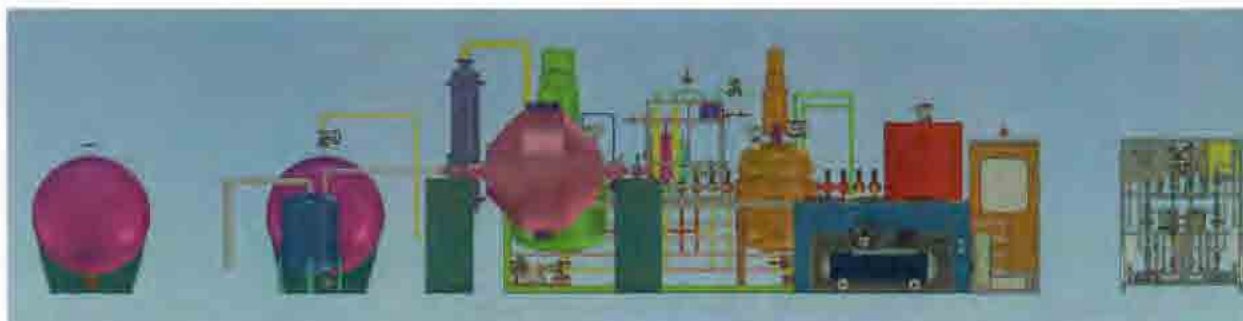
16. In the course of developing the technology, CUI produced and disseminated detailed blueprints and schematics, technical specifications, equipment lists, and instruction manuals for both the assembly of the machinery into an industrial laboratory, as well as the operational synthesis of methamphetamine using the machinery. For example, CUI provided: a spreadsheet identifying dozens of necessary component parts, including stainless steel reactors, condensers, storage tanks, valves, explosion-proof pumps, refrigeration and hydrogenation systems, cylinders, centrifuges, and compressors; AutoCAD renderings of the laboratory assembly; a detailed, nearly 5,000-word instruction manual for synthesizing meth using the technology, specifying, among other things, chemical proportions, pressure levels, and temperature controls; and a flowchart visualizing the steps of production. The metadata for the flowchart document indicates that it was last modified by “Jerry Pang” on or about October 22, 2025.

17. Marketing materials CUI sent to CS-1 using Application-1 explain that the system was designed to automate three processes: a methylation reaction, a hydrogenation reduction reaction, and salt formation and purification. A document CUI sent to CS-1 on or about January 22, 2026, for example, explained how the machinery was designed to control hydrogen pressure, maintain temperature, avoid over-acidification and impurity formation, and purify and dry methamphetamine crystals. The methylation reactor and hydrogenation systems were designed with monitors and "explosion-proof" devices as well as emergency pressure relief valves and automatic ventilation and alarm systems. The document said, among other things, that the machine's "reactor is equipped with an intelligent temperature and stirring speed control system" and that an "automated recrystallization unit" would "automatically control[] heating, cooling, and stirring operations to achieve purification based on solubility differences." The document explained that the technology was designed to automate chemical reactions by feeding raw materials in pre-set ratios, "continuously monitor[ing] flow rates and ratios, automatically correcting any deviation and triggering alarms if necessary," and pre-mixing solvents "to ensure consistent [] composition."

18. On or about June 18, 2025, CUI sent CS-1 a detailed instruction manual for synthesizing the methamphetamine itself, including describing four phases of "pre-reaction preparation," "material transfer and hydrogenation preparation," "high-pressure hydrogenation reaction," and "post-reaction processing." The document included step-by-step instructions describing, among other things, the quantities, ratios, and temperatures of chemicals; flow rates; stirring times; mixture pressures; and filtration processes. For example, an excerpt of the instructions describes how to achieve "uniform crystal formation." The document's metadata indicates it was created by "vincen" on or about June 18, 2025.

Further cool to crystallize (control cooling rate for uniform crystal formation).
Solid-Liquid Separation and Drying:
Filter the crystals under vacuum and wash with cold ethanol (removes impurities).
Dry the product (temperature must be below its melting point to avoid decomposition)

19. CUI also sent CS-1 AutoCAD schematics providing assembly blueprints for portions of the machinery:



CUI SHIPPED CHEMICAL METHYLAMINE TO NEW YORK CITY

20. In the weeks after the meetings in or about June 2025, CUI sent CS-1 several messages on Application-1, explaining that the chemical shipment was running behind because “China is restrictive with chemicals right now,” and “the inspection rate is very high right now. . . we are all in trouble.” CUI explained that “in Shenzhen, the punishment is harsh” for exporting “drug precursors” and there had been “many raids.” CUI explained that “recently the inspections have been very strict” and that one courier had refused to ship the chemical. CUI said he was “asking another courier company [who] might send the product.” CUI said that there were also

customs challenges because the “product can be used to make drugs, [so] many warehouses won’t receive it.” CUI said that if he would “go to jail” if he “[got] caught” sending “wrongfully declared dangerous goods.”

21. In or about August 2025, CUI said in a message to CS-1 sent on Application-1 that he “changed the chemical name” in customs documents for the shipment. CUI sent CS-1 a tracking number which he said contained the methylamine hydrochloride chemical. According to courier documents, the shipment originated in Shanghai, with a destination address in the Southern District of New York. On or about August 7, 2025, three packages with the same tracking number were intercepted by law enforcement officers, searched, and found to contain approximately twenty manila envelopes, each containing bags of a crystalline substance. Each manila envelope was falsely labeled as containing “acrylic pigment.” In field and laboratory testing, the substance tested positive for methylamine hydrochloride. In total, the packages weighed approximately 90 pounds. Law enforcement officers took the below images of the packages on or about August 7, 2025:



CUI AND PANG TRANSPORTED THE METH MACHINE
TO EUROPE TO BEGIN OPERATION

22. On or about September 22, 2025, CS-1 and CS-4—whom CS-1 introduced as a potential investor in the methamphetamine technology, willing to operate it in a European factory—met with CUI and PANG at a restaurant in Tokyo, Japan. The meeting with audio- and video-recorded, and surveilled by DEA agents. During the meeting, CUI said, in sum and substance, that the machinery he had developed had been tested and was operational, but that other colleagues were still programming a control panel. CUI explained that the precursor chemical necessary to operate the machine was difficult to obtain, but that he could provide it, adding that it would be easier to ship to Europe than the United States. CS-1 assured CUI and PANG, in sum and substance, that the precursor chemical they had shipped to New York was very good, and that CS-2 controlled the methamphetamine market in New York.

23. PANG explained, in sum and substance, that he and CUI hoped to have a long-term business relationship supplying precursor chemicals for CS-1 and CS-2 to use with their manufacturing technology. CUI and PANG offered to permit CS-4 to sell and operate the equipment at a warehouse in Europe in order to facilitate future narcotics business.

24. In or about January 2026, using Application-1, CUI sent CS-1 multiple photos and videos of the machinery as it neared completion:



25. After completing fabrication in or about December 2025, CUI and PANG directed the shipment of the full-scale meth factory to a port in a European country. According to freight records, the laboratory equipment—weighing more than 21,120 kilograms and measuring nearly 200 cubic meters—was packed into multiple shipping containers and dispatched from a port in Shanghai in or around December 2025. On or about January 22, 2026, using Application-1, CUI sent CS-1 photographs of workers loading the equipment into shipping containers. Standing next to the machine, CUI’s workers boasted that the technology—a “complete set of automated equipment”—represented the “future of the global chemical industry”:



26. On or about February 2, 2026, CUI and PANG met again with CS-1 and CS-2 in New York City. During the meeting, CUI and PANG agreed, in sum and substance, to travel to a European country in or around March 2026 to begin testing. CUI said, in sum and substance, that it would take approximately two to three weeks to assemble the machinery, which would occupy factory space of more than six hundred square meters. CUI agreed, in sum and substance, to provide metric-ton quantities of precursor chemical to operate the machine in the future.

27. In or around February 2026, law enforcement officials in a European country seized multiple shipping containers containing the machinery, including the components pictured below:



STATUTORY ALLEGATIONS

28. From at least in or around February 2025, up to and including in or around January 2026, in the Southern District of New York, China, and elsewhere, WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

29. It was a part and an object of the conspiracy that WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, and others known and unknown, would and did manufacture, distribute, possess with intent to manufacture, and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

30. The controlled substance that WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, conspired to manufacture, distribute, possess with intent to manufacture, and possess with intent to distribute was 500 grams and more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO **(Conspiracy to Import Methamphetamine Precursor Chemical with Intent to Manufacture Narcotics)**

The Grand Jury further charges:

31. The allegations contained in paragraphs 1 through 27 of this Indictment are repeated and realleged as if fully set forth herein.

32. From at least in or around February 2025, up to and including in or around January 2026, in the Southern District of New York, China, and elsewhere, WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, and others known and unknown,

intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United State.

33. It was a part and an object of the conspiracy that WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, and others known and unknown, would and did manufacture and distribute a listed chemical, intending, knowing, and having reasonable cause to believe that such substance and chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Section 959(a).

34. The listed chemical that WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, and others known and unknown, conspired to manufacture and distribute, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, was methylamine hydrochloride, which the defendants knowingly and intentionally imported with the intent to manufacture a controlled substance, to wit, methamphetamine, and knowingly and intentionally imported, knowing and having reasonable cause to believe that such listed chemical would be used to manufacture a controlled substance, to wit, methamphetamine, in violation of Title 21, United States Code, Sections 812, 813, 841(a)(1), 960(b)(3), 960(d)(1), and 960(d)(3), and Title 21, Code of Federal Regulations, Part 1310.02(a)(14).

(Title 21, United States Code, Section 963.)

COUNT THREE
(Importation of Methamphetamine Precursor Chemical)

The Grand Jury further charges:

35. The allegations contained in paragraphs 1 through 27 of this Indictment are repeated and realleged as if fully set forth herein.

36. In or around August 2025, in the Southern District of New York, China, and elsewhere, WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, knowingly and intentionally manufactured and distributed listed chemicals and controlled substances, and attempted and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemicals would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States.

37. The listed chemical that WENFENG CUI, a/k/a "Vincen," and FAN PANG, a/k/a "Jerry," the defendants, and others known and unknown, knowingly and intentionally manufactured and distributed, and attempted and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, was methylamine hydrochloride, which the defendants knowingly and intentionally imported with the intent to manufacture a controlled substance, to wit, methamphetamine, and knowingly and intentionally imported, knowing and having reasonable cause to believe that such listed chemical would be used to manufacture a controlled substance, to wit, methamphetamine, in violation of Title 21, United States Code, Sections 812, 813, 841(a)(1), 960(d)(1), and 960(d)(3), and Title 21, Code of Federal Regulations, Part 1310.02(a)(14).

(Title 21, United States Code, Sections 841(a)(1), 959(a), 960(d)(1), 960(d)(3), and 963;
and Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

38. As a result of committing the offenses alleged in Count Three of this Indictment, WENFENG "VINCENT" CUI and FAN "JERRY" PANG, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

- a. Industrial equipment contained in the shipping containers OOCU9712096, OOCU6939527, ONEU7401228, ONEU7472480, ONEU7365455, MRKU107726, OOLU1973607, PSXU3506660, and MRSU8384887.

Substitute Assets Provision

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

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

it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 and 970; and
Title 28, United States Code, Section 2461.)



FOREPERSON


JAY CLAYTON
United States Attorney