

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CHRISTOPHER BANTLI,

Also known as "Chris Bantli,"

Defendant.

)
)
) CRIMINAL NO.: 1:16-cr-00157 (ABJ)
)
)

FILED

FEB 13 2019

Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

JOINT STATEMENT OF STIPULATED FACTS

1. The following statement of facts does not purport to include all of the Defendant's illegal conduct during the course of his charged offense. Nor does it purport to be an inclusive recitation of all that the Defendant heard, knew, or witnessed concerning the illegal activities of himself or those of his conspirators. It represents sufficient information for the Court to find a factual basis for accepting the Defendant's guilty plea in the above-captioned matter and is not intended to represent all of the Defendant's relevant conduct for sentencing purposes. Had the Defendant proceeded to trial, the Defendant agrees that the Government's evidence would show the following beyond a reasonable doubt:

1. Beginning in or around November 2015 and continuing thereafter up to and including September 8, 2016, within the countries of the United States and Canada, the Defendant, CHRISTOPHER BANTLI, did unlawfully, knowingly, willfully, and intentionally combine, conspire, confederate and agree with other conspirators, both known and unknown, to commit the following offense against the United States: to knowingly and intentionally import 100 grams or more of a mixture and substance containing a detectable amount of a Schedule I controlled

CS 2/13/19

substance, and a controlled substance analogue intended for human consumption, in violation of 21 U.S.C. §§ 813, 952(a), 960(b)(1)(F), and 963, and 18 U.S.C. § 2. The controlled substances involved in the conspiracy attributable to the Defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 100 grams or more of a mixture and substance containing a detectable amount of an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, (hereinafter "fentanyl"), to wit: N-(1-phenethylpiperidin-4-yl)-N-phenylacetamide (hereinafter "acetyl fentanyl") and N-(1-phenethylpiperidin-4-yl)-N-phenylpentanamide (hereinafter "pentanoyl fentanyl").

2. During the course and in furtherance of the conspiracy, while based in Calgary, Canada, the Defendant advertised, distributed, and imported controlled substances, including powerful fentanyl analogues and synthetic opiates, through the encrypted website AlphaBay. The Defendant accepted virtual currency such as Bitcoin as payment for the illegal substances, and used Canadian and U.S. mail to distribute the illicit substances to consumers.

3. AlphaBay was a "darknet" internet website which operated on the TOR network¹ until it was shut down by law enforcement in July 2017. AlphaBay served as a platform for vendors to advertise and sell illicit merchandise, with a portion of sales being paid as a commission to the platform for providing the advertising forum for the vendor. Beginning at least in approximately March 2015 and continuing until at least September 2016, the Defendant operated a vendor profile on AlphaBay under the name "Canadasunshine." The Defendant used the Canadasunshine vendor profile on AlphaBay to facilitate his illegal enterprise of buying,

¹ TOR, an acronym for "The Onion Router," is a special network of computers around the world that run free and readily available software that conceals the true Internet Protocol (IP) addresses of the computers on the network and, as a result, the identities of the network's users. TOR enables websites to operate on the network in a way that conceals the true IP addresses of the computer servers hosting the website. Such "hidden services" are servers that are configured to operate within the TOR network to provide anonymity to websites and other services.

63 2/13/19

advertising, and distributing illegal substances.

4. The Defendant also used a non-encrypted website, Canadasunshinemart.com, to advertise controlled substances and direct potential customers to his AlphaBay vendor profile. The non-encrypted website listed for sale the same controlled substances that were listed on Canadasunshine's AlphaBay site, but the non-encrypted site indicated that it was for "product listing purposes only." The site then had a link to Canadasunshine's AlphaBay marketplace.

5. To assist with his distribution enterprise, the Defendant used his apartment in Calgary, Canada, as a drug laboratory and de facto fulfillment center for the orders placed on Canadasunshine's AlphaBay profile. The Defendant's apartment contained a pill press, packaging, cutting agents, as well as the controlled substances themselves.

6. During the course of the conspiracy, the Defendant completed several sales of acetyl fentanyl, pentanoyl fentanyl, U-47700, and alprazolam to DEA agents acting in an undercover capacity (hereinafter referred to as the "DEA undercover agent(s)");

7. On November 18, 2015, a DEA undercover agent purchased 800 mg of "pure" (powder) acetyl fentanyl from the Defendant's Canadasunshine vendor account on AlphaBay.² The DEA undercover agent paid for the acetyl fentanyl with Bitcoin valued at \$216. The Defendant caused a package containing 0.86 grams of acetyl fentanyl to be delivered to an undercover mailbox in Washington, D.C., on December 3, 2015. The package originated in Calgary, Canada, and was sent through the Canada Post Service and U.S. Postal Service. The Customs declaration stated that the package contained "toys." Between December 2-4, 2015, a DEA undercover agent engaged in several undercover conversations with the Defendant's Canadasunshine account to confirm delivery of the package.

² By regulation pursuant to 21 U.S.C. §811(h), acetyl fentanyl was temporarily placed in Schedule I on July 17, 2015. 137 Fed. Reg. 42381 (July 17, 2015).

UB 2/13/19

8. On December 14, 2015, a DEA undercover agent purchased 100 units of acetyl fentanyl dosed into "Pez" style candy from the Defendant's Canadasunshine vendor account, using Bitcoin valued at \$275. The DEA undercover agent also purchased 1000 mg of "pure" (powder) acetyl fentanyl using Bitcoin valued at \$396. The Defendant caused a package containing 86.9 grams of acetyl fentanyl (in the form of "Pez" style candy) and 0.57 grams of acetyl fentanyl (in powder form) to be delivered to an undercover mailbox in Washington, D.C., on January 11, 2016. The package originated in Calgary, Canada, and was sent through the Canada Post Service and U.S. Postal Service. The Customs declaration stated that the package contained "kid's toys."

9. On February 5, 2016, a DEA undercover agent purchased 200 units of butyrfentanyl, a fentanyl analogue, from the Defendant's Canadasunshine vendor account.³ The DEA undercover agent paid for the butyrfentanyl, which was dosed into "Pez" style candy, with Bitcoin valued at \$550. The Canadasunshine vendor page also contained dosing instructions for the butyrfentanyl. The Defendant caused two packages containing 154.3 grams of acetyl fentanyl (in "Pez" style candy") to be delivered to an undercover mailbox in Washington, D.C., on February 19, 2016. The packages originated in Calgary, Canada, and was sent through the Canada Post Service and U.S. Postal Service. The Customs declarations stated that the packages contained "kid's toys."

10. On March 15, 2016, a DEA undercover agent purchased 120 units of U-47700, a synthetic opioid dosed into "Pez" style candy, from the Defendant's Canadasunshine vendor account using \$344 in Bitcoin. The DEA undercover agent also purchased 10 oxycodone tablets using Bitcoin valued at \$60. The following day, the Defendant informed the DEA undercover

³ By regulation, butyrfentanyl was temporarily placed in Schedule I on May 12, 2016. 81 Fed. Reg. 29492 (May 12, 2016). Prior to May 12, 2016, butyrfentanyl was a controlled substance analogue of fentanyl under 21 U.S.C. § 802(32).

agent that the oxycodone tablets were not available and refunded the Bitcoin used to purchase the oxycodone pills. The Defendant then caused a package containing 106.1 grams of a mixture of acetyl fentanyl and pentanoyl fentanyl to be delivered to an undercover mailbox in Washington, D.C., on March 28, 2016.⁴ The package originated in Calgary, Canada, and was sent through the Canada Post Service and U.S. Postal Service. The Customs declaration stated that the package contained “kid’s toys.”

11. On March 18, 2016, a DEA undercover agent purchased 50 dosage units of what was advertised as Xanax/alprazolam from the Defendant’s Canadasunshine vendor account with Bitcoin valued at \$79. The Defendant caused a package containing 44.0 grams of alprazolam to be delivered to an undercover mailbox in Orlando, Florida, on April 7, 2016.

12. On July 22, 2016, a DEA undercover agent purchased 160 units of U-47700 dosed into “Pez” style candy from the Defendant’s Canadasunshine vendor account. The Defendant caused a package containing 74.55 grams of a mixture of U-47700 and pentanoyl fentanyl to be delivered to an undercover mailbox in Washington, D.C., on August 10, 2016. The package contained a product description for U-47700, which read, “U-47700 is approximately seven times more potent than morphine. Use care and start with very small doses. From Canada to Worldwide. Note: Tolerance depends on many factors including weight, previous experience with other opiates, time since last used, method of use or route of administration and purity of the product. Beginners should start with 1 candy, wait 30 minutes and take more if desired. Experienced users can add gradual doses every half hour from there to find your sweet spot. Heavy opiate users may need 30mg+.”

13. In addition to the controlled purchases described above, the “Feedback” section of

⁴ Pentanoyl fentanyl is a controlled substance analogue of fentanyl pursuant to 21 U.S.C. § 802(32), and is treated as a Schedule I drug where, as here, it is intended for human consumption.

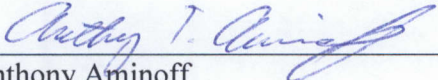
12 2/13/19

Canadasunshine's vendor page on AlphaBay indicated that the Defendant completed in excess of 131 sales of controlled substances on that website. The Defendant also previously used the hidden marketplaces Silk Road, Agora, and Evolution to distribute controlled substances under the Canadasunshine name. In particular, the Defendant completed approximately 1,998 sales of illegal substances over the Silk Road hidden service, and used a separate account named "CalgaryDealer" to place orders for illegal substances which the Defendant then resold.

14. The Defendant admits that he was aware that the illegal substances he distributed to the undercover DEA agents were imported into the United States. The Defendant agrees venue and jurisdiction lie with this Court. The Defendant further admits that the substances he caused to be imported into the United States were intended for human consumption.

15. The Defendant also agrees that his participation as a conspirator in the above-described acts were in all respects knowing, intentional, and willful, reflecting an intention and deliberation to do something the law forbids, and were not in any way the product of any accident, mistake of law or fact, duress, entrapment, or public authority.

ARTHUR G. WYATT
CHIEF, NARCOTIC & DANGEROUS DRUG SECTION
CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE


Date: 2/13/19 By: 
Anthony Aminoff
Trial Attorney

Approved by:
Date: 2/13/19 By: 
Michael Lang
Acting Deputy Chief

15 2/13/19

DEFENDANT'S ACKNOWLEDGMENT

I have reviewed this factual proffer and have discussed it with my attorney, Joshua Dratel. I fully understand this factual proffer. I agree and acknowledge by my signature that this proffer of facts is true and accurate. I do this voluntarily and of my own free will. No threats have been made to me, nor am I under the influence of anything that could impede my ability to understand this factual proffer fully.



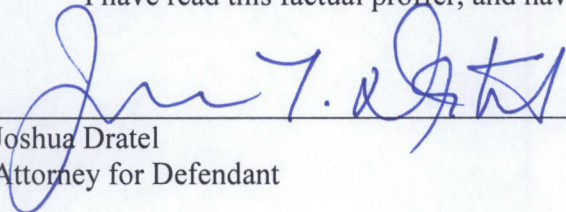
Christopher Bantli
Defendant

2/13/19

Date

ATTORNEY'S ACKNOWLEDGMENT

I have read this factual proffer, and have reviewed it fully with my client.



Joshua Dratel
Attorney for Defendant

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Date

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