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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2024 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
HUBEI AOKS BIO-TECH CO. LTD.,  
aka "Hubei Aoks Trading  
Company,"  
aka "Aoks Trade Co., Ltd.,"  
XUENING GAO,  
GUANGZHOU GAO,  
YAJING LI,  
aka "Alsa Lee," and  
FNU LNU,  
aka "Jessie Lee,"  
  
Defendants.

CR No. 2:24-cr-00299-GW

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Manufacture and Distribute Fentanyl, and to Distribute Listed Chemicals for the Manufacture of Fentanyl; 21 U.S.C. § 963: Conspiracy to Distribute Listed Chemicals for Importation to the United States; 21 U.S.C. §§ 959(a), 960(d)(7): Distribution of Listed Chemicals for Importation; 21 U.S.C. § 841(c)(2): Distribution of Listed Chemicals for Manufacture into Controlled Substances; 21 U.S.C. §§ 331(a), 333(a)(2), 352: Introduction of Misbranded Drugs into Interstate Commerce; 21 U.S.C. §§ 853 and 881(a)(6), 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(7) and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1 A. INTRODUCTION

2 1. The United States is experiencing an opioid overdose  
3 epidemic. Between 2021 and 2022, at least 160,767 Americans died  
4 from opioid-involved overdoses. Opioid overdose is the leading cause  
5 of death for Americans between the ages of 18 and 45.

6 2. The introduction of synthetic opioids into the illicit drug  
7 market has exacerbated the overdose problem. Fentanyl is a highly  
8 addictive synthetic opioid that is approximately 50 times more potent  
9 than heroin. A two-milligram dose of fentanyl can be deadly. In  
10 2023, the Drug Enforcement Administration ("DEA") seized over 79.5  
11 million fentanyl-laced counterfeit pills and nearly 12,000 pounds of  
12 fentanyl powder. The 2023 fentanyl seizures are equivalent to more  
13 than 376.7 million lethal doses of fentanyl.

14 3. Manufacturing fentanyl begins with raw chemicals, known as  
15 fentanyl precursors. One such fentanyl precursor commonly used to  
16 manufacture fentanyl is 1-Boc-4-Piperidone ("1-Boc-4P"), which bears  
17 the Chemical Abstracts Service ("CAS") registry number 79099-07-3.  
18 CAS registry numbers are unique numerical identifiers used to  
19 distinguish between chemical substances. The CAS registry number  
20 assigned to a particular chemical substance unambiguously identifies  
21 the chemical substance when there may be multiple common names used  
22 to identify that substance. Two other common fentanyl precursors  
23 commonly used to manufacture fentanyl are Benzyl 4-oxopiperidine-1-  
24 carboxylate ("1-Cbz-4-Piperidone" or "1-Cbz-4P"), which bears CAS  
25 registry number 19099-93-5, and Ethyl 4-oxo-1-piperidinecarboxylate  
26 ("N-Carbethoxy-4-Piperidone" or "N-Carbethoxy-4P"), which bears CAS  
27 registry number 29976-53-2. All three aforementioned fentanyl  
28 precursors are classified as List I chemicals.

1 4. Fentanyl is often mixed with adulterants. One common  
2 adulterant is xylazine, which is a tranquilizer that is available in  
3 liquid and powder form. Xylazine, as a liquid injectable only, is  
4 approved by the United States Food and Drug Administration ("FDA")  
5 for veterinary use. In the veterinary context, xylazine is used as  
6 an injectable for sedation, anesthesia, muscle relaxation, and pain  
7 relief in horses, cattle, and other animals. Xylazine is not  
8 approved by the FDA for human use and xylazine powder is not approved  
9 by the FDA for any use.

10 5. Drug traffickers often solicit and mix xylazine, commonly  
11 referred to on the street as "tranq," with other opioids like  
12 fentanyl. Drug traffickers use xylazine in this manner to enhance  
13 and/or prolong the effects of the opioid, to increase profits by  
14 increasing the weight of the substance, and to decrease manufacturing  
15 costs because adding xylazine as an adulterant allows drug  
16 traffickers to use less of the opioid while still maintaining the  
17 same or similar psychoactive effects. Many opioid users are unaware  
18 they are taking xylazine. Xylazine causes sedation, slowed  
19 breathing, low blood pressure, slowed heart rate, among other  
20 effects. Drug users who inject xylazine, or drug mixtures containing  
21 xylazine, often develop necrotic tissue resulting in disfiguring  
22 wounds or amputation. Given xylazine's sedative effects, its use in  
23 opioid cocktails increases the likelihood of a deadly overdose.  
24 Moreover, naloxone (brand name Narcan), which is a life-saving opioid  
25 overdose reversal treatment, does not reverse the effects of  
26 xylazine. Indeed, overdose deaths involving xylazine have steadily  
27 increased year after year. In 2023, 30% of all fentanyl powder and  
28 6% of all fentanyl pills seized by the DEA contained xylazine.

1           6. Fentanyl is also often mixed with other adulterants, such  
2 as analgesics like acetaminophen, benzocaine, procaine, and  
3 lidocaine. These are pain relieving drugs. Drug traffickers often  
4 mix analgesics with fentanyl and other opioids to enhance the effects  
5 of those drugs, to increase profits, and to decrease manufacturing  
6 costs.

7           7. Fentanyl precursors and adulterants are primarily sourced  
8 from chemical manufacturing and distribution companies in China  
9 ("chemical companies"). These chemical companies openly advertise  
10 their products all over the world, including to the United States and  
11 Mexico, on their websites as well as on various other online  
12 platforms, including WhatsApp, Instagram, Twitter, LinkedIn,  
13 Pinterest, and chemical e-commerce sites. These chemical companies  
14 frequently guarantee that all shipments of precursors and other  
15 chemicals will safely arrive at their destination without any issues.  
16 These chemical companies utilize various methods to obfuscate their  
17 employees' identities and to conceal their criminal activities,  
18 including by using false names and profile pictures, encrypted  
19 messaging applications, and payments through cryptocurrency wallets.  
20 These chemical companies ship fentanyl precursors and adulterants  
21 around the world, including to the United States and Mexico, where  
22 drug cartels and traffickers use the precursors to synthesize and  
23 manufacture fentanyl into powder and pills, mix the fentanyl with  
24 various adulterants, and distribute it throughout the United States.

25           8. These chemical companies also often attempt to evade law  
26 enforcement detection and interception by using false return labels,  
27 false documentation in the parcel, falsified customs forms and  
28

1 declarations, and packaging that conceals the true contents of the  
2 parcels and the identity of the distributors.

3 B. FEDERAL FOOD, DRUG AND COSMETIC ACT

4 9. Congress enacted the Federal Food, Drug and Cosmetic Act,  
5 which is set forth in Sections 301 to 397 of Title 21 of the United  
6 States Code, to protect the public from, among other things, drugs  
7 that are misbranded or not proven to be safe and effective for their  
8 intended uses.

9 10. Sections 331(a) and 333(a)(2) of Title 21, United States  
10 Code, prohibit the introduction or causing the introduction into  
11 interstate commerce of any drug that is misbranded with the intent to  
12 defraud or mislead.

13 11. Pursuant to Title 21, United States Code, Section  
14 352(a)(1), a drug is deemed to be misbranded if its labeling is false  
15 or misleading. Labeling is defined under the Act to include the  
16 written, printed, or graphic matter on the container, any wrapping,  
17 or accompanying the drug.

18 12. Pursuant to Title 21, United States Code, Section 352(b), a  
19 drug is misbranded if the label does not contain the name and place  
20 of business of the manufacturer, packer, or distributor, and an  
21 accurate statement of the quantity of the contents in term of weight,  
22 measure, or numerical count.

23 13. Pursuant to Title 21, United States Code, Section  
24 352(e)(1), a drug is misbranded if the label does not contain the  
25 established name and active ingredients of the drug.

26 14. Pursuant to Title 21, United States Code, Section 352(f), a  
27 drug is deemed to be misbranded unless its labeling bears, among  
28 other things, adequate directions for its use and adequate warnings

1 against its use where such use could be dangerous to the user's  
2 health.

3 15. Pursuant to Title 21, United State Code, Section 352(o), a  
4 drug is also deemed to be misbranded unless it is manufactured,  
5 prepared, propagated, compounded, or processed in an establishment  
6 that is duly registered with the Secretary of the United States  
7 Department of Health and Human Services.

8 C. DEFENDANTS XUENING GAO AND GUANGZHOU GAO

9 16. For over a decade, defendants XUENING GAO and GUANGZHOU GAO  
10 ("G. GAO") have operated with impunity selling controlled substances  
11 and precursor chemicals, including fentanyl precursors, to customers  
12 throughout the United States and receiving hundreds of thousands of  
13 dollars from the sale and distribution of such chemicals, including  
14 chemicals that can be synthesized into fentanyl and other dangerous  
15 drugs, and are contributing to the opioid crisis in the United  
16 States. Since at least 2011, defendant XUENING GAO operated and/or  
17 was affiliated with numerous chemical companies in China that sold  
18 and distributed controlled substances and precursor chemicals to  
19 customers and drug traffickers in the United States. In 2015,  
20 defendant G. GAO was affiliated with another chemical company that  
21 sold fentanyl and acetyl-fentanyl to drug traffickers in the United  
22 States.

23 17. In 2013, defendant XUENING GAO received wire transfer  
24 payments from chemical sales made through two chemical companies  
25 operating in China - KaiKai Technologies Co., Inc. and Kerry Industry  
26 Co., Ltd. - both of which sold 3,4-Methylenedioxy-N-methycathinone  
27 hydrochloride ("methydone" or "MDMC"), a Schedule I controlled  
28

1 substance similar to 3,4-methylenedioxymeth-amphetamine, commonly  
2 known as "MDMA" or "ecstasy," to customers in the United States.

3 18. In 2014, defendant XUENING GAO was also affiliated with  
4 Shijiazhuang Sute Trade Co. Ltd., another chemical company operating  
5 in China that sold 25-I-NBOME, a Schedule I controlled substance  
6 commonly known as "N-Bomb," to customers in the United States.

7 19. In 2015, defendant G. GAO received wire transfer payments  
8 from chemical sales made through Shanxi Zhongwei Industrial, a  
9 chemical company operating in China that sold fentanyl and acetyl-  
10 fentanyl to drug traffickers in the United States.

11 20. In November 2016, defendant XUENING GAO founded defendant  
12 HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks  
13 Trading Company" and "Aoks Trade Co., Ltd." ("HUBEI AOKS"), which  
14 sold precursors and listed chemicals globally, including to the  
15 United States.

16 D. DEFENDANT HUBEI AOKS

17 21. Defendant HUBEI AOKS was a pharmaceutical company located  
18 in Wuhan, Hubei Province, China. It was founded on November 24,  
19 2016, and defendant XUENING GAO was the sole owner. The company  
20 operated the following websites: aoksbio.com, bmkoil.com,  
21 bmkpowder.com, 69673-92-3.com, and phenacetinchina.com. The website  
22 domains "bmkoil" and "bmkpowder" refer to Benzyl Methyl Ketone, also  
23 known "BMK," which is a methamphetamine precursor. The website  
24 domain "69673-92-3" refers to CAS Registry Number 69673-92-3, which  
25 corresponds to 2-Chloro-1-(4-methylphenyl)-1-propanone, a precursor  
26 for a drug that is similar to MDMA and methylone.

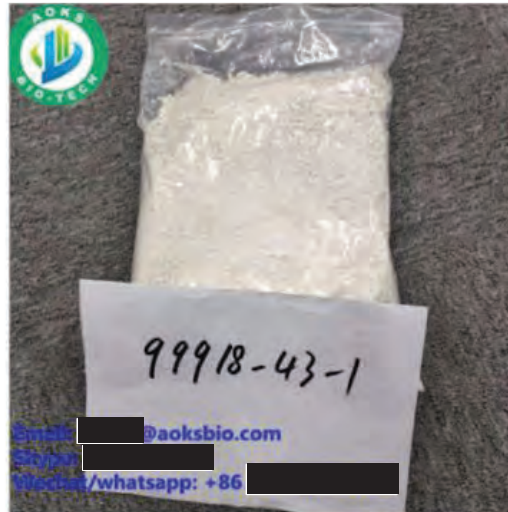
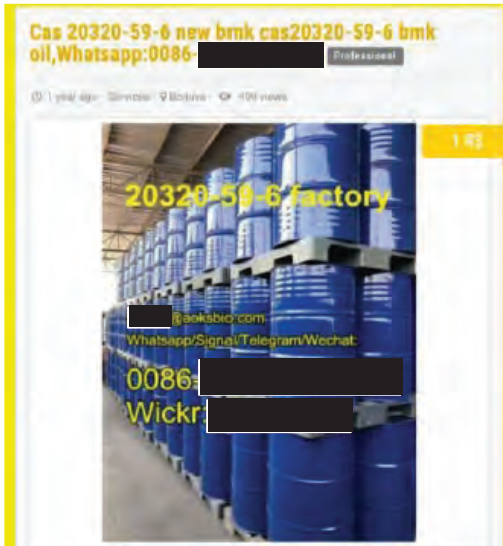
27 22. Defendant HUBEI AOKS openly advertised online and sold an  
28 array of chemicals, including fentanyl precursors like 1-Boc-4P, 1-



1 Cbz-4P, and N-Carbethoxy-4P, methamphetamine precursors, MDMA  
2 precursors, reagents necessary for controlled substance  
3 manufacturing, and various adulterants like xylazine, lidocaine,  
4 benzocaine, procaine, acetaminophen, and others. Defendant HUBEI  
5 AOKS employed at least 13 sales representatives who were grouped into  
6 two sales teams. Sales team 1 was managed by defendant First Name  
7 Unknown Last Name Unknown, aka "Jessie Lee" ("JESSIE") and sales team  
8 2 was managed by defendant YAJING LI, aka "Alsa Lee" ("LI").  
9 Defendant HUBEI AOKS and its sales representatives, including  
10 defendants JESSIE and LI, openly advertised the sale of these  
11 substances on various online platforms and provided their contact  
12 information such as WhatsApp numbers, Wickr handles, and e-mail  
13 addresses. Through its own website, advertisements and engagements  
14 on social media platforms, defendant HUBEI AOKS targeted customers in  
15 the United States, Europe, Mexico, and elsewhere. Some of the  
16 advertisements are depicted below.







23. Defendant HUBEI AOKS sales representatives, including defendants JESSIE and LI, were knowledgeable about the chemicals that defendant HUBEI AOKS sold, and they readily distinguished to customers that they sold precursors, such as 1-Boc-4P (fentanyl precursor), BMK (methamphetamine precursor), PMK (MDMA precursor), but not the final product. The sales representatives suggested alternative chemicals if a particular chemical was out of stock or was otherwise not available, and they tailored their precursor recommendations depending on the customer's geographical market. The sales representatives, including defendants JESSIE and LI, also offered to customers adulterants along with precursor purchases, including xylazine, lidocaine, benzocaine, and procaine. The sales representatives, including defendants JESSIE and LI, guaranteed that the shipments would arrive safely in the United States and provided customers with examples of defendant HUBEI AOKS's recent shipments to various states within the United States, including Georgia, Pennsylvania, and Washington.

1 E. DEFENDANT HUBEI AOKS SOLD PRECURSORS GLOBALLY

2 24. Defendant HUBEI AOKS sold precursors to customers in the  
3 United States, Mexico, Europe, and elsewhere. Defendant HUBEI AOKS  
4 claimed to export to more than 300 "pharmaceutical and chemical  
5 enterprises" across 100 different countries, with 80% of its business  
6 involving chemical exportation to Europe and America, and 20% to  
7 Asia, the Middle East, South Africa and other regions.

8 25. Defendant HUBEI AOKS claimed that BMK (methamphetamine  
9 precursor) and PMK (MDMA precursor) were popular in the United States  
10 and Europe.

11 26. Defendant HUBEI AOKS claimed that fentanyl precursors,  
12 including 1-Boc-4P, were most popular in Mexico. Defendant HUBEI  
13 AOKS claimed that the profit from selling fentanyl precursors was  
14 worth the risk, so long as it was a large quantity, such as more than  
15 100 kilograms at a time.

16 27. Mexican drug trafficking organizations, including the  
17 Sinaloa and New Generation Jalisco cartels, are prolific producers of  
18 fentanyl, which is then imported into the United States, fueling the  
19 opioid crisis. Fentanyl precursors sold by China-based chemical  
20 companies enable such cartels and other drug trafficking  
21 organizations to produce fentanyl on a massive scale for importation  
22 into and distribution within the United States.

23 28. These Introductory Allegations are incorporated into each  
24 count of the Indictment.

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COUNT ONE

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, but no later than November 24, 2016, and continuing to on or about November 2, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd." ("HUBEI AOKS"), XUENING GAO, GUANGZHOU GAO ("G. GAO"), YAJING LI, aka "Alsa Lee" ("LI"), and First Name Unknown Last Name Unknown, aka "Jessie Lee" ("JESSIE"), and others known and unknown to the Grand Jury, conspired to knowingly and intentionally commit one or both of the following offenses:

1. Manufacture and distribution of at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide ("fentanyl"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(vi); and

2. Distribution of 1-Cbz-4-Piperidone and N-Carbethoxy-4-Piperidone, both of which are List I chemicals, knowing and having reasonable cause to believe that such listed chemicals will be used to manufacture a controlled substance, namely fentanyl, in violation of Title 21, United States Code, Section 841(c)(2).

B. MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished, in substance, as follows:

1           1. Defendants HUBEI AOKS, LI, and JESSIE, and other sales  
2 representatives known and unknown to the Grand Jury, would advertise  
3 the sale of fentanyl precursors, including List I chemicals, and  
4 fentanyl adulterants, including xylazine, globally, including to  
5 customers in Los Angeles, California on various online platforms and  
6 websites.

7           2. Defendant XUENING GAO would operate defendant HUBEI AOKS,  
8 which would sell fentanyl precursors, including List I chemicals, and  
9 fentanyl adulterants, including xylazine, globally, including to  
10 customers in Los Angeles, California.

11           3. Defendants LI and JESSIE, and other sales representatives  
12 at defendant HUBEI AOKS known and unknown to the Grand Jury, would  
13 communicate with customers with the purpose of enticing customers to  
14 make chemical purchases, including fentanyl precursors, List I  
15 chemicals, and adulterants, from defendant HUBEI AOKS.

16           4. Defendants LI and JESSIE, and other sales representatives  
17 at defendant HUBEI AOKS known and unknown to the Grand Jury, would  
18 work with the defendant HUBEI AOKS's chemical factory, including by  
19 checking chemical inventory, including fentanyl precursors and List I  
20 chemicals, for customer orders.

21           5. Defendants LI and JESSIE, and other sales representatives  
22 at defendant HUBEI AOKS known and unknown to the Grand Jury, would  
23 assure customers that defendant HUBEI AOKS's chemicals could be  
24 successfully shipped to the United States, including by providing  
25 customers with information about prior shipments by defendant HUBEI  
26 AOKS to various states in the United States.

27           6. Defendants LI and JESSIE, and other sales representatives  
28 at defendant HUBEI AOKS known and unknown to the Grand Jury, would

1 process customer orders for chemicals, including fentanyl precursors,  
2 List I chemicals, and fentanyl adulterants, which would include  
3 sending invoices to customers for chemical purchases, confirming  
4 payments received, facilitating the shipment of chemicals to  
5 customers, and providing customers with tracking numbers of the  
6 parcels containing the chemicals.

7 7. Defendant HUBEI AOKS would send chemicals to freight  
8 forwarders for shipment to customers in the United States.

9 8. Defendants XUENING GAO and G. GAO would receive payments,  
10 including in cryptocurrency, from chemical purchases made by  
11 customers through defendant HUBEI AOKS.

12 C. OVERT ACTS

13 On or about the following dates, in furtherance of the  
14 conspiracy and to accomplish its objects, defendants HUBEI AOKS,  
15 XUENING GAO, G. GAO, LI, and JESSIE, together with others known and  
16 unknown to the Grand Jury, committed and caused to be committed  
17 various overt acts within the Central District of California, and  
18 elsewhere, including, but not limited to, the following:

19 Overt Act No. 1: On July 25, 2022, defendant LI, who at all  
20 times relevant to this Indictment was the sales manager of team 2 at  
21 defendant HUBEI AOKS, told a person who defendant LI believed was a  
22 customer in the Los Angeles area, but who, in fact, was an undercover  
23 agent ("UC"), that the minimum quantity for purchase of 1-Boc-4P (a  
24 fentanyl precursor) was 25 kilograms, that the price was \$5,250, that  
25 1-Boc-4P could easily be shipped to Los Angeles, and that most of  
26 defendant HUBEI AOKS's customers who liked 1-Boc-4P were located in  
27 Mexico.

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1 Overt Act No. 2: On July 25, 2022, defendant LI offered an  
2 alternative fentanyl precursor available for purchase from defendant  
3 HUBEI AOKS, CAS 40064-34-4, which corresponds to 4-Piperidone  
4 Monohydrate Hydrochloride, and explained that it was the "same kind  
5 of product" as 1-Boc-4P.

6 Overt Act No. 3: On July 25, 2022, defendant LI provided the  
7 UC with images depicting partial tracking numbers corresponding to  
8 two United States Postal Service parcels that defendant LI purported  
9 to contain purchases made from defendant HUBEI AOKS and were  
10 successfully delivered to customers in Acworth, Georgia on June 7,  
11 2022, and in Seattle, Washington on June 23, 2022.

12 Overt Act No. 4: On July 27, 2022, defendant LI provided the  
13 UC with the cryptocurrency wallet address where chemical purchase  
14 payments to defendant HUBEI AOKS could be sent, which was a wallet  
15 owned by defendant XUENING GAO.

16 Overt Act No. 5: On July 27, 2022, defendant LI advised the  
17 UC that 1-Boc-4P was sold in powder form and was shipped in 25-  
18 kilogram increments typically in fiber drums, but that it could also  
19 be re-packaged in cardboard boxes, and provided the following  
20 photograph:



1           Overt Act No. 6:       On August 18, 2022, a sales representative  
2 for defendant HUBEI AOKS provided the UC with an image depicting a  
3 United Postal Service ("UPS") parcel that the sales representative  
4 purported to contain purchase made from defendant HUBEI AOKS and  
5 was successfully delivered to a customer in Philadelphia,  
6 Pennsylvania on July 1, 2022.

7           Overt Act No. 7:       On November 2, 2022, defendant JESSIE, who  
8 at all times relevant to this Indictment was the sales manager for  
9 team 1 at defendant HUBEI AOKS, advised the UC that 1-Boc-4P was  
10 available for purchase with 25 kilograms as the minimum order  
11 quantity, and asked how many kilograms would be ordered from  
12 defendant HUBEI AOKS each month or each year.

13           Overt Act No. 8:       On or before February 1, 2023, defendant LI  
14 obtained permission from a manager at defendant HUBEI AOKS to sell  
15 five kilograms of 1-Boc-4P to the UC, to which the UC explained it  
16 would make two million pills and that the UC wanted to also purchase  
17 xylazine to mix with the pills.

18           Overt Act No. 9:       On February 1, 2023, during a conversation  
19 about mixing xylazine with other substances to manufacture pills,  
20 defendant LI sent the UC an image of the powder xylazine that  
21 defendant HUBEI AOKS sold, as depicted below, and asked when the UC  
22 would be making a purchase and what method of payment would be used.





1 Overt Act No. 10: On February 9, 2023, defendant LI provided  
2 the UC with images depicting three UPS parcels that defendant LI  
3 purported to contain purchases made from defendant HUBEI AOKS and  
4 were successfully delivered to customers in Buena Park, California,  
5 within the Central District of California, on December 19, 2022, and  
6 Philadelphia, Pennsylvania on January 25 and 26, 2023.

7 Overt Act No. 11: On February 9, 2023, defendant LI sent the  
8 UC an invoice from defendant HUBEI AOKS for the purchase of five  
9 kilograms of 1-Boc-4P, one kilogram of xylazine Hcl, and one kilogram  
10 of 3,4-MDP-2-P Ethyl Glycidate (commonly known as PMK), which  
11 contained information for a cryptocurrency wallet where payment could  
12 be made and which was owned by defendant XUENING GAO, as depicted

13 below:

AOKS BIO-TECH CO.,LTD			
[Redacted]		Hubei, Hubei Province, China	
Web: www.aoksbio.com		Tel: 0086 [Redacted]	
PROFORMA INVOICE			
To: [Redacted]			Date: 10th-February-2023
Add: USA			[Redacted]
Commodity&Description	Quantity (Kilogram)	Price (USD)	Total Amount (USD)
cas 12076-35-9	1	\$550	\$550
Cas 79099-07-3	5	\$420	\$2100
CAS 28378-16-7	1	\$350	\$350
<b>Total (USD)</b>			<b>\$3000</b>
TOTAL VALUE SAY USD DOLLARS THREE THOUSAND			
<b>Remark:</b>			
Trade term: EXPRESS			
Payment term:			
BANK TRANSFER OR BITCOIN			
<b>BANK INFORMATION:</b>			
BENEFICIARY BANK: [Redacted]			
BENEFICIARY BANK ADDRESS: [Redacted]			
[Redacted]			
SWIFT CODE: [Redacted]			
BENEFICIARY: [Redacted]			
BENEFICIARY: [Redacted]			
[Redacted]			
<b>BITCOIN WALLET:</b>			
[Redacted]			
Prepared by and on behalf of		Accepted and Confirmed by	
HUBEI AOKS BIO-TEC CO.LTD		[Redacted]	
[Redacted]			

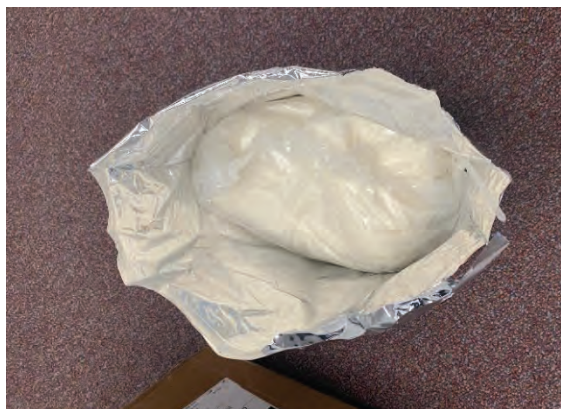
25 Overt Act No. 12: On February 14, 2023, defendant HUBEI AOKS  
26 received \$3,000 via wire transfer to the bank account listed on the  
27 invoice provided to the UC on February 9, 2023.

1 Overt Act No. 13: On February 14, 2023, defendant LI confirmed  
2 that the UC's wire transfer payment was received by defendant HUBEI  
3 AOKS for the purchase of five kilograms of 1-Boc-4P, one kilogram of  
4 xylazine Hcl, and one kilogram of 3,4-MDP-2-P Ethyl Glycidate.

5 Overt Act No. 14: On February 16, 2023, defendant LI informed  
6 the UC that defendant HUBEI AOKS sent the chemicals to the freight  
7 forwarder and that it would arrive in the United States in  
8 approximately three days.

9 Overt Act No. 15: From February 16-21, 2023, defendant LI sent  
10 the UC three tracking numbers corresponding to parcels containing the  
11 three chemicals, including a fentanyl precursor, that were purchased  
12 from defendant HUBEI AOKS on February 14, 2023.

13 Overt Act No. 16: On March 7, 2023, defendant LI informed the  
14 UC that all three parcels were successfully delivered. The parcels  
15 were subsequently determined to contain 5,016 grams of 1-Boc-4P,  
16 1,040.8 grams of xylazine, and 1,005 grams of 3,4-MDP-2-P Ethyl  
17 Glycidate, as depicted below. Shipping records indicated that the  
18 parcels contents were falsely listed as: "furniture parts," "vases,"  
19 and "towel."



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Overt Act No. 17: On March 8, 2023, defendant LI asked the UC if the UC would be making another purchase of 1-Boc-4P.

Overt Act No. 18: On March 29, 2023, after the UC advised defendant LI that the "final product" from the 1-Boc-4P mixed with xylazine was "selling quickly," defendant LI advised that if the UC needed more 1-Boc-4P and xylazine to let her know.

Overt Act No. 19: On April 17, 2023, defendant LI asked the UC, "How about business? Is there any new purchase plan?" to which the UC responded that business was doing well.

Overt Act No. 20: On April 18, 2023, defendant LI asked the UC if the UC had additional demand for the chemicals, to which the UC responded that 1-Boc-4P was good for the end product "F," a slang term for fentanyl.

Overt Act No. 21: On May 3, 2023, defendant LI sent the UC a list of defendant HUBEI AOKS's "hot selling products," which included over 40 chemicals including precursors, xylazine, and others.

Overt Act No. 22: On May 7, 2023, defendant LI messaged, "Hi friend, do you still need xylazine hcl?"

Overt Act No. 23: On June 6, 2023, defendant HUBEI AOKS willfully caused to be imported into Los Angeles, California a parcel containing xylazine, which was destined to a fentanyl trafficker in

1 Philadelphia, Pennsylvania, and which bore markings falsely  
2 representing that the contents were makeup, as set forth below.




13 Overt Act No. 24: On June 24, 2023, defendant LI messaged, "Hi  
14 friend, do you have [an] order demand? If so, we can send you some  
15 presents free."

16 Overt Act No. 25: On June 26, 2023, defendant JESSIE sent the  
17 UC an invoice from defendant HUBEI AOKS for the purchase of five  
18 kilograms of 1-Boc-4P, one kilogram of xylazine Hcl, and 100 grams of  
19 pronitazene (a synthetic opioid), which contained information for a  
20 cryptocurrency wallet where payment could be made and which was owned  
21 by defendant G. GAO, as depicted below. Defendant JESSIE explained  
22 that the price of xylazine Hcl increased because the "raw materials"  
23 were more difficult to get.

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 <b>Hubei Aoks Bio-Tech Co.,Ltd</b> Wuxue Hubei Province, China E-mail: [REDACTED]				
<b>PROFORMA INVOICE</b>				
Company Information: To USA: [REDACTED]				Date: 27-June-2023
The seller agrees to sell and the Buyer agrees to buy The under mentioned goods on the terms and conditions stated below.				
Item	Description	Quantity	Unit Price(USD)	Total Amount (USD)
	100 grams of 119278-01-B	100gram	1	1,000
	1 kg xylazine hcl	1kg	650	650
	5 kg of 79099 (\$2100)	5kg	420	2,100
<b>TOTAL USD</b>				<b>3,750</b>
SAYS US DOLLARS: THIRTY SEVEN HUNDRED FIFTY USD ONLY.				
<b>Remark</b>				
Trade Term: FedEx/ups based on customer's request.				
Delivery time: Within 7 working days after receive the payment.				
Payment Term: 100% T/T in advance.				
Banking transfer fee is at customer's side.				
TT Bank account:			BITCOIN: [REDACTED]	
BENEFICIARY NAME: [REDACTED] BENEFICIARY BANK ADDRESS: [REDACTED] SWIFT CODE: [REDACTED] BENEFICIARY: [REDACTED] BENEFICIARY A/C NO.: [REDACTED] INTERMEDIARY BANK: [REDACTED]				
Prepared by and on behalf of			Accepted and confirmed by	
HUBEI AOKS BIO-TECH CO.,LTD				


14 Overt Act No. 26: On June 27, 2023, defendant JESSIE provided  
 15 the UC with an image depicting a UPS parcel that defendant JESSIE  
 16 purported to contain a purchase made from defendant HUBEI AOKS and  
 17 was successfully delivered to a customer in Philadelphia,  
 18 Pennsylvania on June 13, 2023.

19 Overt Act No. 27: On June 29, 2023, defendant JESSIE messaged  
 20 the UC, "Can I know your plan for these[,] friend?" referring to the  
 21 invoice defendant JESSIE sent on June 26, 2023.

22 Overt Act No. 28: On July 6, 2023, defendant LI advised the UC  
 23 that defendant HUBEI AOKS did not want to sell 1-Boc-4P to American  
 24 customers because the United States "is very strict with it" and that  
 25 xylazine Hcl was also "a little sensitive," and questioned, "Why do  
 26 they mess with all this stuff?" "Let's do it without 79099 this time  
 27 okay?" "We can't take risk to so it under this situation."



1 Overt Act No. 29: On July 6, 2023, defendant LI sent the UC an  
 2 invoice for five kilograms of 1-Cbz-4P (a fentanyl precursor and List  
 3 I chemical), one kilogram of N-Carbethoxy-4P (a fentanyl precursor  
 4 and List I chemical), and one kilogram of xylazine Hcl, which  
 5 contained information for a cryptocurrency wallet ending in -PuM  
 6 where payment could be made and which was owned by defendant G. GAO,  
 7 as depicted below. During the conversation, defendant LI also  
 8 offered for purchase: benzocaine, procaine, lidocaine, and  
 9 pregabalin, claiming that American customers also purchase these  
 10 chemicals and that they "sell well."

 <b>AOKS BIO-TECH CO.,LTD</b> Wuhai, Hubei Province, China Web: www.aoksbio.com Tel: 0086-			
PROFORMA INVOICE			
To: [REDACTED] Add: USA			Date: 7th-July-2023
Commodity&Description	Quantity (Kilogram)	Price (USD)	Total Amount (USD)
-cas 23076-35-9	1	\$800	\$800
Cas 19099-93-5	5	\$400	\$2000
CAS 29976-53-2	1	\$400	\$400
<b>Total (USD)</b>		<b>\$3200</b>	
<b>TOTAL VALUE: SAY USD DOLLARS THREE THOUSAND AND TWO HUNDRED</b>			
Remark: Trade term: EXPRESS Payment term: BITCOIN  BITCOIN WALLET: [REDACTED]			
Prepared by and on behalf of		Accepted and Confirmed by	
HUBEI AOKS BIO-TEC CO.LTD Alva Lee		_____ _____	

24 Overt Act No. 30: On or after July 7, 2023, defendant HUBEI  
 25 AOKS received Bitcoin valued at roughly \$3,596.41 in the -PuM wallet,  
 26 which was owned by defendant G. GAO, and about five hours after  
 27 receiving the Bitcoin, the Bitcoin was exchanged into 3,571.24 Tether  
 28 ("USDT"), another type of cryptocurrency.

1           Overt Act No. 31:    On July 9, 2023, defendant LI advised that  
2 defendant HUBEI AOKS's "factory" needed to know the use for the  
3 products that were purchased and for the UC to provide defendant LI  
4 with a "good answer." Defendant LI elaborated that it was a new  
5 question that they were asking and she explained that if the answer  
6 provided was not a good one then she would rather not know at all.

7           Overt Act No. 32:    On July 10, 2023, defendant LI told the UC  
8 that defendant HUBEI AOKS's new policy required that sales  
9 representatives inform customers of the following: "Our products are  
10 for scientific research only, and are not used as drugs, family spare  
11 medicines or other purposes."

12           Overt Act No. 33:    On July 11, 2023, defendant LI told the UC  
13 that the UC's order might be delayed because shipping to the United  
14 States "is not as good as before."

15           Overt Act No. 34:    On July 12, 2023, defendant G. GAO  
16 exchanged, or willfully caused to be exchanged, 3,571.24 USDT, plus  
17 an additional 16,739.06 USDT, in the -PuM wallet into 146,031.05  
18 Chinese Yuan Renminbi.

19           Overt Act No. 35:    On July 14, 2023, defendant LI told the UC,  
20 "Hi friend, goods are ready" "We are waiting to send them to freight  
21 forwarder."

22           Overt Act No. 36:    On July 26, 2023, defendant LI told the UC  
23 that "days prior" defendant HUBEI AOKS sent the chemicals that the UC  
24 purchased on July 7, 2023, to the freight forwarder and that she was  
25 checking on the shipping status every day.

26           Overt Act No. 37:    On June 27, 2023, defendant LI provided the  
27 UC with the tracking number for the parcel containing the chemicals  
28 that the UC purchased on July 7, 2023.



1 Overt Act No. 38: On August 9, 2023, defendant LI told the UC  
2 that the parcel containing the chemicals that the UC purchased on  
3 July 7, 2023, was in customs clearance.

4 Overt Act No. 39: On August 15, 2023, defendant LI messaged  
5 the UC that the parcel containing the chemicals that the UC purchased  
6 on July 7, 2023, would be "delivered soon" and to keep the "line  
7 open."

8 Overt Act No. 40: On August 16, 2023, defendant LI confirmed  
9 that the parcel containing the chemicals that the UC purchased on  
10 July 7, 2023 was delivered. The parcel was subsequently determined  
11 to contain 1,014.1 grams of Ethyl 4-oxo-1-piperidinecarboxylate (a  
12 fentanyl precursor and List I chemical); 5,012 grams of Benzyl 4-  
13 oxopiperidine-1-carboxylate (a fentanyl precursor and List I  
14 chemical), and 815.2 grams of xylazine, as depicted below. Shipping  
15 records indicated that the parcel's contents were falsely described  
16 as "apparel."



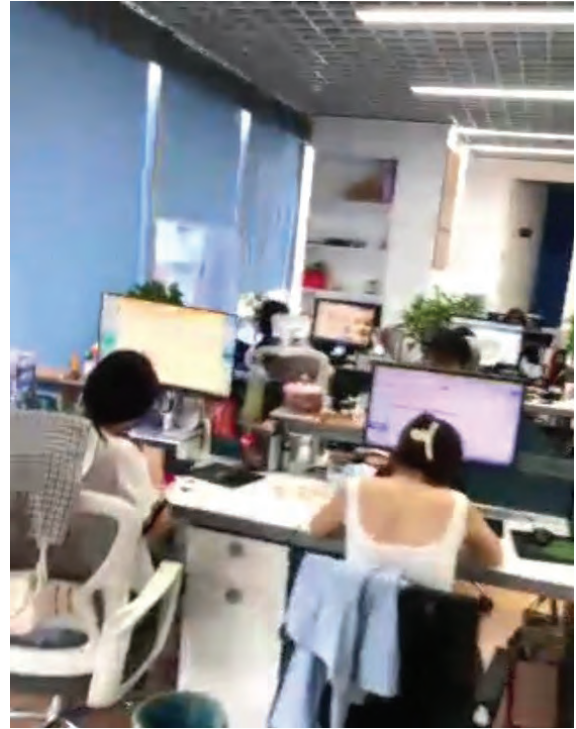
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1           Overt Act No. 41:    On August 16, 2023, defendant LI advised the  
2 UC to order larger quantities from defendant HUBEI AOKS in the next  
3 order stating, "our boss told me not to accept small quantity orders  
4 after trial order. The profit is not worth [the] risk." Defendant LI  
5 explained that orders would need to be more than one drum (25  
6 kilograms) because smaller quantity orders would necessitate more  
7 deliveries, which in turn, caused a greater risk that the chemicals  
8 would not clear customs.

9           Overt Act No. 42:    On August 21, 2023, defendant LI assured the  
10 UC that 1-Boc-4-Piperidone was "not impossible to find, but there's  
11 no need to risk it. If the quantity is big and the profits are good,  
12 there are still people willing to do it."

13           Overt Act No. 43:    On September 27, 2023, in furtherance of  
14 another chemical purchase of 100 kilograms of N-Benzyloxycarbonyl-4-  
15 piperidone (a fentanyl precursor and List I chemical) and 25  
16 kilograms of xylazine Hcl, defendant LI conducted a video call with  
17 the UC and represented that defendant HUBEI AOKS was a "real  
18 company," and showed the UC defendant XUENING GAO's office and the  
19 sales floor, as depicted below:

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13 Overt Act No. 44: On October 23, 2023, after the public  
14 announcement of several indictments in United States District Courts  
15 in Florida of chemical companies in China, defendant LI told the UC,  
16 "your USA government i[s] not kind to our Chinese suppliers" "So now  
17 we are very sensitive to American customers, your American government  
18 always likes to make some trumped-up charges to sanction us."  
19 Defendant LI advised to "wait for awhile" before placing another  
20 order.  
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COUNT TWO

[21 U.S.C. § 963]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, but no later than November 24, 2016, and continuing to on or about November 2, 2023, in the country of China, and elsewhere, defendants HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd." ("HUBEI AOKS"), XUENING GAO, GUANGZHOU GAO ("G. GAO"), YAJING LI, aka "Alsa Lee" ("LI"), and First Name Unknown Last Name Unknown, aka "Jessie Lee" ("JESSIE"), each of whom will be arrested and first brought to the Central District of California, and others known and unknown to the Grand Jury, conspired to distribute 1-Cbz-4-Piperidone and N-carbethoxy-4-Piperidone, both of which are List I chemicals, intending, knowing, and having reasonable cause to believe such chemicals will be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a), 960(d)(7).

B. MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished, in substance, through the manner and means set forth in Section B, Paragraphs 1 through 8, of Count One of this Indictment, which are re-alleged and incorporated here.

C. OVERT ACTS

On or about the following dates, in furtherance of the conspiracy, and to accomplish its objects, defendants HUBEI AOKS, XUENING GAO, G. GAO, LI, and JESSIE, together with others known and unknown to the Grand Jury, committed and caused to be committed

1 various overt acts within the Central District of California, and  
2 elsewhere, including, but not limited to, Overt Acts 1-44, as set  
3 forth in Count One, Section C of this Indictment, which are re-  
4 alleged and incorporated here.

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COUNT THREE

[21 U.S.C. §§ 959(a), 960(d)(7); 18 U.S.C. §§ 2(a), (b)]

[DEFENDANTS HUBEI AOKS, G. GAO, AND LI]

On or about July 26, 2023, in the country of China, and elsewhere, defendants HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," GUANGZHOU GAO, and YAJING LI, aka "Alsa Lee," each of whom will be arrested and first brought to the Central District of California, aiding and abetting each other, knowingly and intentionally distributed, and willfully caused to be distributed, Ethyl 4-oxo-1-piperidinecarboxylate, a List I chemical, knowing, intending, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States.

COUNT FOUR

[21 U.S.C. §§ 959(a), 960(d)(7); 18 U.S.C. §§ 2(a), (b)]

[DEFENDANTS HUBEI AOKS, G. GAO, AND LI]

On or about July 26, 2023, in the country of China, and elsewhere, defendants HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," GUANGZHOU GAO, and YAJING LI, aka "Alsa Lee," each of whom will be arrested and first brought to the Central District of California, aiding and abetting each other, knowingly and intentionally distributed, and willfully caused to be distributed, Benzyl 4-oxopiperidine-1-carboxylate, a List I chemical, knowing, intending, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States.



COUNT FIVE

[21 U.S.C. § 841(c)(2); 18 U.S.C. §§ 2(a), (b)]

[DEFENDANTS HUBEI AOKS, G. GAO, AND LI]

On or about August 16, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," GUANGZHOU GAO, and YAJING LI, aka "Alsa Lee," aiding and abetting each other, knowingly and intentionally distributed, and willfully caused to be distributed, Ethyl 4-oxo-1-piperidinecarboxylate, a List I chemical, knowing, intending, and having reasonable cause to believe that the listed chemical will be used to manufacture a controlled substance.

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COUNT SIX

[21 U.S.C. § 841(c)(2); 18 U.S.C. §§ 2(a), (b)]

[DEFENDANTS HUBEI AOKS, G. GAO, AND LI]

On or about August 16, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," GUANGZHOU GAO, and YAJING LI, aka "Alsa Lee," aiding and abetting each other, knowingly and intentionally distributed, and willfully caused to be distributed, Benzyl 4-oxopiperidine-1-carboxylate, a List I chemical, knowing, intending, and having reasonable cause to believe that the listed chemical will be used to manufacture a controlled substance.

COUNT SEVEN

[21 U.S.C. §§ 331(a), 333(a)(2), 352; 18 U.S.C. §§ 2(a), (b)]

[DEFENDANT HUBEI AOKS]

On or about February 16, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," knowingly and with intent to defraud and mislead, introduced and delivered for introduction, aided and abetted the introduction and delivery for introduction of, and willfully caused the introduction and delivery for introduction of, a misbranded drug, namely, 1-Boc-4-Piperidone, into interstate commerce.

COUNT EIGHT

[21 U.S.C. §§ 331(a), 333(a)(2), 352; 18 U.S.C. §§ 2(a), (b)]

[DEFENDANT HUBEI AOKS]

On or about February 16, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," knowingly and with intent to defraud and mislead, introduced and delivered for introduction, aided and abetted the introduction and delivery for introduction of, and willfully caused the introduction and delivery for introduction of, a misbranded drug, namely, 3,4-MDP-2-P Ethyl Glycidate, into interstate commerce.

COUNT NINE

[21 U.S.C. §§ 331(a), 333(a)(2), 352; 18 U.S.C. §§ 2(a), (b)]

[DEFENDANT HUBEI AOKS]

On or about February 16, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," knowingly and with intent to defraud and mislead, introduced and delivered for introduction, aided and abetted the introduction and delivery for introduction of, and willfully caused the introduction and delivery for introduction of, a misbranded drug, namely, xylazine, into interstate commerce.

COUNT TEN

[21 U.S.C. §§ 331(a), 333(a)(2), 352; 18 U.S.C. §§ 2(a), (b)]

[DEFENDANT HUBEI AOKS]

On or about June 6, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," knowingly and with intent to defraud and mislead, introduced and delivered for introduction, aided and abetted the introduction and delivery for introduction of, and willfully caused the introduction and delivery for introduction of, a misbranded drug, namely, xylazine, into interstate commerce.

COUNT ELEVEN

[21 U.S.C. §§ 331(a), 333(a)(2), 352; 18 U.S.C. §§ 2(a), (b)]

[DEFENDANT HUBEI AOKS]

On or about July 26, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," knowingly and with intent to defraud and mislead, introduced and delivered for introduction, aided and abetted the introduction and delivery for introduction of, and willfully caused the introduction and delivery for introduction of, a misbranded drug, namely, Ethyl 4-oxo-1-piperidinecarboxylate, into interstate commerce.



COUNT TWELVE

[21 U.S.C. §§ 331(a), 333(a)(2), 352; 18 U.S.C. §§ 2(a), (b)]

[DEFENDANT HUBEI AOKS]

On or about July 26, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," knowingly and with intent to defraud and mislead, introduced and delivered for introduction, aided and abetted the introduction and delivery for introduction of, and willfully caused the introduction and delivery for introduction of, a misbranded drug, namely, Benzyl 4-oxopiperidine-1-carboxylate, into interstate commerce.

COUNT THIRTEEN

[21 U.S.C. §§ 331(a), 333(a)(2), 352; 18 U.S.C. §§ 2(a), (b)]

[DEFENDANT HUBEI AOKS]

On or about July 26, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant HUBEI AOKS BIO-TECH CO. LTD., also known as ("aka") "Hubei Aoks Trading Company," aka "Aoks Trade Co., Ltd.," knowingly and with intent to defraud and mislead, introduced and delivered for introduction, aided and abetted the introduction and delivery for introduction of, and willfully caused the introduction and delivery for introduction of, a misbranded drug, namely, xylazine, into interstate commerce.

FORFEITURE ALLEGATION ONE

[21 U.S.C. § 881(a)(6), 28 U.S.C. § 2461(c)  
and 21 U.S.C. § 853]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 881(a)(6), Title 28, United States Code, Section 2461(c) and Title 21, United States Code Section 853, in the event of any Defendant's conviction under any of Counts One and Two of this Indictment.

2. Defendants shall forfeit to the United States the following property:

a. all right, title and interest in any and all property, real or personal:

i. constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any offense set forth in any of Counts One through Three of this Indictment; or

ii. used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any offense set forth in any of Counts One through Three of this Indictment; and

b. a sum of money equal to the total value of the property described in subparagraph a above.

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), Defendants shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of any Defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon

1 the exercise of due diligence; (b) has been transferred, sold to, or  
2 deposited with a third party; (c) has been placed beyond the  
3 jurisdiction of the court; (d) has been substantially diminished in  
4 value; or (e) has been commingled with other property that cannot be  
5 divided without difficulty.

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FORFEITURE ALLEGATION TWO

[21 U.S.C. § 881(a)(6), 28 U.S.C. § 2461(c)  
and 21 U.S.C. § 853]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to defendants HUBEI AOKS, G. GAO and LI that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 881(a)(6), Title 28, United States Code, Section 2461(c) and Title 21, United States Code Section 853, in the event of any of defendants HUBEI AOKS, G. GAO and LI's conviction under any of Counts Four through Six of this Indictment.

2. Defendants HUBEI AOKS, G. GAO and LI shall forfeit to the United States the following property:

a. all right, title and interest in any and all property, real or personal:

i. constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any offense set forth in any of Counts Four through Seven of this Indictment; or

ii. used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any offense set forth in any of Counts Four through Seven of this Indictment; and

b. a sum of money equal to the total value of the property described in subparagraph a above.

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), Defendants HUBEI AOKS, G. GAO and LI shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of any of

1 defendants HUBEI AOKS, G. GAO and LI, the property described in the  
2 preceding paragraph or any portion thereof (a) cannot be located upon  
3 the exercise of due diligence; (b) has been transferred, sold to, or  
4 deposited with a third party; (c) has been placed beyond the  
5 jurisdiction of the court; (d) has been substantially diminished in  
6 value; or (e) has been commingled with other property that cannot be  
7 divided without difficulty.

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FORFEITURE ALLEGATION THREE

[18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c)  
and 18 U.S.C. § 982(a)(7)]

1 Pursuant to Rule 32.2 of the Federal Rules of Criminal  
2 Procedure, notice is hereby given to defendant HUBEI AOKS  
3 ("Defendant") that the United States will seek forfeiture as part of  
4 any sentence in accordance with Title 18, United States Code, Section  
5 981(a)(1)(C), Title 28, United State Code, Section 2461(c) and Title  
6 18, United States Code, Section 982(a)(7), in the event of  
7 Defendant's conviction under any of Counts Seven through Thirteen of  
8 this Indictment.  
9

10 2. Defendant shall forfeit to the United States the following  
11 property:

12 a. all right, title and interest in any and all property,  
13 real or personal, constituting, or derived from, any gross proceeds  
14 obtained, directly or indirectly, as a result of any offense set  
15 forth in any of Counts Eight through Fourteen of this Indictment; and

16 b. a sum of money equal to the total value of the property  
17 described in subparagraph a above.  
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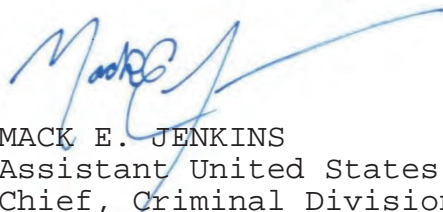
19 3. Pursuant to Title 21, United States Code, Section 853(p),  
20 as incorporated by Title 28, United States Code, Section 2461(c) and  
21 Title 18, United States Code, Section 982(b), Defendant shall forfeit  
22 substitute property, up to the value of the property described in the  
23 preceding paragraph if, as the result of any act or omission of  
24 Defendant, the property described in the preceding paragraph or any  
25 portion thereof (a) cannot be located upon the exercise of due  
26 diligence; (b) has been transferred, sold to, or deposited with a  
27 third party; (c) has been placed beyond the jurisdiction of the  
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1 court; (d) has been substantially diminished in value; or (e) has  
2 been commingled with other property that cannot be divided without  
3 difficulty.

4 A TRUE BILL

5  
6 /s/  
7 \_\_\_\_\_  
Foreperson

8 E. MARTIN ESTRADA  
9 United States Attorney

10   
11 MACK E. JENKINS  
12 Assistant United States Attorney  
Chief, Criminal Division

13 J. MARK CHILDS  
14 Assistant United States Attorney  
15 Chief, International Narcotics,  
Money Laundering, and  
Racketeering Section

16 BRITTNEY M. HARRIS  
17 Assistant United States Attorney  
18 Deputy Chief, International  
Narcotics, Money Laundering, and  
Racketeering Section

19 JENNA WILLIAMS  
20 Assistant United States Attorney  
21 Corporate Securities Fraud Strike  
22 Force  
23  
24  
25  
26  
27  
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