

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA)
)
 v.) Civil Case No.
)
 1.00001188 BITCOINS SEIZED IN OR) FILED UNDER SEAL
 ABOUT MARCH AND APRIL 2024)

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

COMES NOW the United States of America (the “United States” or the “Government”), by and through Margaret E. Heap, United States Attorney for the Southern District of Georgia, and J. Bishop Ravenel, Assistant United States Attorney, and brings this Verified Complaint for Civil Forfeiture *In Rem*, with the following allegations:

NATURE OF THE ACTION

1. *In Rem* civil forfeiture is permissible under Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.
2. The Defendant *In Rem* is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6) (Title 21 Offenses), 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 545 (Customs Offenses), and 18 U.S.C. § 981(a)(1)(A) (Money Laundering Offenses) on the grounds that the Defendant Property, as defined later herein, is property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of violations of 21 U.S.C. §§ 841, 846, 959(a), and 963, and moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in

exchange for a controlled substance or listed chemical in violation of Title 21 of the United States Code, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate violations of 21 U.S.C. §§ 841, 846, 959(a), and 963 (Title 21 Offenses); property constituting, or derived from, any proceeds the person obtained, directly or indirectly from violations of 18 U.S.C. §§ 542 and 545, and the value of merchandise entered into the United States in violation of 18 U.S.C. § 545 (Customs Offenses); as well as any property, real or personal, involved in or attempted to be involved in, or any property traceable to such property involved in violations of 18 U.S.C. § 1956 (Money Laundering Offenses).

THE DEFENDANT *IN REM*

3. The Defendant *In Rem* (hereinafter, the “**Defendant Property**”) represents the following asset: 1.00001188 Bitcoins seized in or about March and April 2024 from the Binance account number 53514319 held and controlled by Wei Gong a/k/a “David” a/k/a “David Gong.”

4. Binance account number 53514319, from which the **Defendant Property** was seized, is referred to as the “**Target Account**” herein.

5. The **Defendant Property** was seized on or about March 11, 2024 and April 4, 2024, from Binance via two separate electronic transfers as the result of a federal seizure warrant authorized in the Southern District of Georgia on December 19, 2023, and served on the same day.

JURISDICTION AND VENUE

6. The United States brings this action *in rem* in its own right to forfeit the **Defendant Property**.

7. This Court has jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345.

8. The Court has jurisdiction over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

9. The Court has *In Rem* jurisdiction over the **Defendant Property** pursuant to 28 U.S.C. § 1355(b).

10. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because acts and/or omissions giving rise to the forfeiture of the **Defendant Property** occurred in this district.

11. The **Defendant Property** is currently in the possession of the United States government and was seized from Binance, a cryptocurrency company operating in the United States including but not limited to in Georgia.

12. The **Defendant Property** is not tangible.

BACKGROUND INFORMATION

13. During the time period of the crimes alleged in this Verified Complaint, between no later than in or about October 2020 and no earlier than in or about September 2024, the following information in this section, titled “Background Information,” was true and correct.

14. Virtual currencies, which include cryptocurrencies, are digital tokens of value circulated over the internet as substitutes for traditional fiat currency. Virtual currencies are not issued by any government or bank like traditional fiat currencies such as the U.S. dollar but are generated and controlled through computer software. Bitcoin is a well-known virtual currency.

15. Virtual currency addresses are the particular virtual locations to which such currencies are sent and received. A virtual currency address is analogous to a bank account number and is represented as a string of alphanumeric characters.

16. Each virtual currency address is controlled through the use of a unique corresponding private key, a cryptographic equivalent of a password needed to access the address. Only the holder of an address's private key can authorize a transfer of virtual currency from that address to another address.

17. A virtual currency wallet is a software application that interfaces with the virtual currency's specific blockchain and generates and stores a user's addresses and private keys. A virtual currency wallet also allows users to send and receive virtual currencies. Multiple addresses can be stored in a wallet.

18. Many virtual currencies publicly record all of their transactions on what is known as a "blockchain." The blockchain is essentially a distributed public ledger, run by a decentralized network, containing an immutable and historical record of every transaction using that blockchain's technology. The blockchain can be updated multiple times per hour and records every virtual currency address that ever received that virtual currency. It also maintains records of every transaction and all the

known balances for each virtual currency address. There are different blockchains for different types of virtual currencies.

FACTS AND BASIS OF FORFEITURE

Rhinehart Investigation and Connection to Wei Gong

19. In or about 2021, the Drug Enforcement Administration (DEA) and Homeland Security Investigations (HSI) initiated an investigation into the drug trafficking activities of Conway James Rhinehart (RHINEHART).

20. As a result of this investigation, evidence has been obtained proving that RHINEHART operated an organization involved in the sale and distribution of Alpha-PHP (also known as a-PHP) and other schedule I controlled substances, particularly synthetic cathinones, in the Augusta, Georgia area, as well as throughout the United States.

21. In or about July 2021, DEA Agents received information from HSI Agents that parcels were seized from carrier UPS that contained a white, powdery substance identified as Alpha-PHP.

22. These parcels were being sent by a “Ryan Hart” of Vitamin Warehouse from 3914 Lake Erie Drive in Hephzibah, Georgia.

23. UPS Investigators relayed that the UPS account information from which parcels were mailed belonged to account number 06V55X under the name of James Rhinehart of 2894 Lake Erie Drive, Hephzibah, Georgia 30815, with email address listed as kimchimando@gmail.com.

24. On or about July 19, 2021, DEA agents obtained federal search

warrants for the residences at 2894 Lake Erie Drive, Hephzibah, Georgia 30815 and 3914 Lake Erie Drive, Hephzibah, Georgia 30815, within the Southern District of Georgia, both known to be associated with RHINEHART.

25. On or about July 21, 2021, DEA and HSI agents executed federal search warrants at 3914 Lake Erie Drive and 2894 Lake Erie Drive in Hephzibah, Georgia 30815.

26. The searches of the residences resulted in the seizure of large quantities of various controlled substances, including Alpha-PHP and Eutylone.

27. Alpha-PHP and Eutylone are and were during the time periods alleged in this civil complaint schedule I controlled substances.

28. The drug exhibits seized were bulk white and yellow powders labeled with various chemical names, as well as various brands of individually packaged crystals/powders with names such as “Kimchi” and “EU” and marketed on the packaging as “energy powders.”

29. RHINEHART was not on the premises during the execution of the search warrants and was not arrested at that time.

30. Following the search warrant execution described above, the United States Postal Inspection Service (USPIS) discovered that RHINEHART had changed his PO BOX address to PO BOX 9234, Augusta, Georgia, in the Southern District of Georgia.

31. The PO BOX 9234 application was signed by RHINEHART on or about August 17, 2021.

32. RHINEHART had been receiving narcotics via the mail and also sending narcotics via mail services in the Southern District of Georgia.

33. In or about January 2022, USPIS advised that multiple parcels had been seized in Pennsylvania containing illegal controlled substances that were mailed from PO BOX 9234, Augusta, GA 30916.

34. USPS relayed packages were being mailed on a regular basis to McAlisterville, PA, and that after they had seized two parcels, the sender began to write “Etsy” on the parcels in an apparent attempt to conceal what was inside the parcels.

35. USPIS obtained search warrants to open the parcels and discovered a white crystal like substance, which their lab confirmed was N,N-dimethylpentylone (a cathinone), which is and was during the time periods alleged in this civil complaint a schedule I controlled substance.

36. In or about March 2022, agents discovered a website on the clear web (*i.e.*, the portion of the internet that is readily available to the general public and searchable with standard web search engines) called sublimespice.net that was associated with RHINEHART.

37. DEA agents used an undercover laptop to navigate to the website <https://sublimespice.net> and observed numerous listings for different brands of individually packaged “energy powders,” amounts of Alpha powder (Alpha PHP) and amounts of 3-MMC (3-methylmethcathinone) powders, both of which are and were during the time periods alleged in this civil complaint schedule I controlled

substances.

38. The powders are synthetic cathinones and are commonly marketed online as research chemicals.

39. The website marketed the products as relaxation and energy powders/crystals, but also stated they were “not for human consumption” on the website.

40. Some of the brands of pre-packaged energy powders were the same brands that were previously seized from RHINEHART’s residence during the search warrant execution in July 2021.

41. Agents also noted a “contact us” page which listed a PO BOX for the company Sublime Air as PO BOX 9234, 30916, within the Southern District of Georgia.

42. This PO BOX was the one USPIS previously identified as being used by RHINEHART.

43. Agents observed two phone numbers listed on the website: 206-659-6807 and 419-862-5658.

44. Phone number 419-862-5658 was previously used on the return address from a UPS shipping label for a parcel that contained Alpha-PHP.

45. On or about April 12, 2022, a DEA agent, working in an undercover capacity, navigated to sublimespice.net to conduct a controlled purchase of various synthetic cathinones, which was done via email and by sending Bitcoin to the listed BTC address for payment, which was 3Kpd1zNXTV2srYEzn53FVLD1TQ1E2VsU2A.

46. The undercover agent later received the package in the undercover mailbox in the Southern District of Georgia and submitted the contents of suspected synthetic cathinones to the DEA lab.

47. According to DEA lab results, the exhibits were found to be either a synthetic cathinone or an analogue substance, which are and were during the time periods alleged in this civil complaint schedule I controlled substances.

48. Previously on or about March 15, 2022, agents obtained information from Coinbase Inc., a cryptocurrency exchange, regarding records pertaining to RHINEHART for the dates between on or about June 1, 2021 through on or about March 3, 2022.

49. A review of these records revealed that RHINEHART had an account under the name Conway Rhinehart bearing his birthdate with an address of 2894 Lake Erie Dr., Hephzibah, Georgia 30815, in the Southern District of Georgia.

50. Also linked to his Coinbase account were photographs of RHINEHART's Georgia driver's license number 49140332 and photographs of RHINEHART sent to Coinbase for Know Your Customer (KYC) compliance purposes.

51. Coinbase records indicated RHINEHART'S account was created on or about May 1, 2019.

52. A DEA cyber intelligence analyst conducted blockchain and cluster

analysis¹ of RHINEHART's Coinbase account between the dates of on or about December 30, 2019, and on or about March 15, 2022, to determine the origin and destination of the cryptocurrency received and withdrawn from RHINEHART's Coinbase account.

53. Analysis of RHINEHART's Coinbase account indicated that RHINEHART received BTC directly from virtual currency exchange Coinbase and virtual currency payment platforms CashApp and CoinPayments.

54. Blockchain analysis of the Bitcoin (BTC), Bitcoin Cash (BCH), and Ether (ETH) blockchains indicated that RHINEHART sent cryptocurrency directly and indirectly to alleged VC exchanges Binance, Coinbase, Huobi, and OKX, as well as virtual currency payment platform CoinPayments.

55. Agents obtained records from Binance in reference to a BTC transaction that occurred from RHINEHART's Coinbase account on or about November 11, 2020 in the amount of 0.06406228 to the **Target Account**.

56. DEA Cyber Analyst reviewed the return information from Binance pertaining to 11 BTC transactions to BTC address 1JNX6cTgSgGCdnzuvQfcbUox2KyPK9BMEa (hereinafter referred to as BTC

¹ Cluster analysis identifies addresses that have been on the input side of a transaction at some point in time, also known as co-spend. The association is based on the bitcoin blockchain protocol which indicates each address has a corresponding private key. In order for funds to be spent, the private key must be present. This then allows clustering to occur with addresses on the input side of a transaction and the assumption that all private keys associated with each address are owned by the same entity. This clustering of addresses comprises a wallet, where the assumption can be made that the same entity is the owner of all addresses contained within a wallet. Direct and indirect transactions are determined through blockchain and cluster analysis. Direct transactions indicate cryptocurrency was sent or received directly from an identified cluster. Indirect transactions indicate cryptocurrency was sent or received one or more hop(s) between one identified cluster, or wallet, to another identified cluster or wallet.

address 1JNX6cTg...) and one ETH transaction to ETH address 0xa442bfdd153987485ee9ec8825cea4fabfa72ea4 (hereinafter referred to as ETH address 0xa442bf...), which were held in the **Target Account**, directly received from RHINEHART's Coinbase account between on or about November 11, 2020 and on or about February 10, 2022.

57. Binance account records indicated that BTC address 1JNX6cTg... and ETH address 0xa442bf... were registered under the user ID number 53514319 (the **Target Account**), an email address of 1731568745@qq.com, and mobile telephone number of +8615122520072 (hereinafter, "GONG's phone number").

58. The account was registered on or about October 16, 2020.

59. Binance provided KYC records for the account owner in the form of a Chinese identification card.

60. The account identification documents listed the name of Wei Gong (GONG).

61. Analysis of GONG's Binance account (the **Target Account**) identified 419 received transactions between on or about November 4, 2020, and on or about March 15, 2022, and one sent transaction on or about December 16, 2020.

62. A DEA cyber analyst conducted blockchain and cluster analysis of incoming and outgoing transactions of GONG's Binance account to determine the origin and destination of the cryptocurrencies.

63. The BTC blockchain indicated that GONG received direct and indirect transactions from virtual currency exchanges Bittrex, Binance, Coinbase, CoinBox,

CoinJar, Crypto.com, Bitso, and Huobi, and virtual currency payment processor SquareUp.

64. Blockchain analysis also identified that 11 out of the 419 BTC transactions received into GONG's Binance account directly derived from RHINEHART's Coinbase account.

65. Additionally, GONG received one direct ETH transaction from RHINEHART's Coinbase account totaling 0.4757 ETH.

66. All of the Binance account log-ins into GONG's account were from Tianjin, China, where GONG lived according to his identification documents and the location of his business.

67. On or about June 9, 2022, an indictment was filed against RHINEHART in the Southern District of Georgia in Case No. 1:22-cr-55, charging him with violating 21 U.S.C. §§ 846 (Conspiracy to Possess with Intent to Distribute Controlled Substances (a-PHP, eutylone, and N-Ethylhelledrone)) and 21 U.S.C. § 841 (Possession with Intent to Distribute Controlled Substances ((a-PHP, eutylone, and N-Ethylhelledrone))), all of which substances are and were during the time periods alleged in this civil complaint schedule I controlled substances.

68. An arrest warrant for RHINEHART was issued as a result of the indictment.

69. On or about June 10, 2022, DEA obtained a federal search warrant for 2894 Lake Erie Drive, Hephzibah, Richmond County, Georgia, the then residence of RHINEHART.

70. On or about June 14, 2022, DEA and USPIS agents executed the federal search warrant on 2894 Lake Erie Drive, Hephzibah, Georgia 30815.

71. RHINEHART was not at the residence at the time of execution.

72. Items located and seized included approximately 44 grams of N,N-dimethylpentylone in three separate exhibits and a small amount of a-PHP.

73. On or about June 23, 2022, DEA and USPIS executed the federal arrest warrant on RHINEHART in Augusta, GA.

74. On or about January 19, 2023, a federal search warrant was authorized for 2756 Royal Street, Augusta, Georgia 30909.

75. Previously, a package containing alpha-PiHP, a schedule I controlled substance now and during the time periods alleged in this civil complaint, was intercepted by CBP and transferred to the custody of the USPIS.

76. This package was destined for 2756 Royal Street, Augusta, Georgia 30909, which was associated with RHINEHART, based on Georgia Power and U.S. postal records.

77. On or about January 20, 2023, DEA and USPIS executed this search warrant and controlled delivery operation at 2756 Royal Street, Augusta, Georgia 30909.

78. The package was found to contain approximately 56.90 grams of suspected alpha-PiHP and was addressed to "S. Washington-RHINEHARDT" at 2756 Royal Street, Augusta, GA 30909.

79. Alpha-PiHP was removed from the package prior to the controlled delivery operation.

80. Upon arrival at the residence on or about January 20, 2023, agents observed a 2018 Dodge Grand Caravan at the residence.

81. The 2018 Dodge Grand Caravan was at the time registered to RHINEHART and his wife through the state of Georgia with registration number CME5087.

82. USPIS personnel, working in an undercover capacity, then conducted the controlled delivery of the package and placed it in a locked mailbox for the residence.

83. RHINEHART and his wife were observed walking back and forth from the residence to the Grand Caravan that was parked in the driveway.

84. Agents then executed the warrant on the residence and detained both RHINEHART and his wife.

85. A mailbox key was found in the driver's side door pocket of the Dodge Caravan.

86. This key was the key for the same mailbox that the undercover USPIS personnel conducted the controlled delivery of the package.

87. Also located within the Dodge Caravan were multiple USPS Priority Flat Rate Envelopes and two USPS receipts.

88. Pursuant to the search of the residence, Agents located a Samsung Galaxy S9 cellular telephone bearing IMEI number 354817090345710 (hereinafter,

the “Device”).

89. On or about February 2, 2023, a federal search warrant was authorized for the Device.

90. On or about March 13, 2023, the contents of the extraction records of the Device were reviewed.

91. The records contained WhatsApp messages from the WhatsApp messenger application.

RHINEHART and GONG WhatsApp Messages

92. RHINEHART had WhatsApp messages with China based phone number 8615122520072 (GONG’s phone number) that stemmed from the dates of in or about August 2021 through in or about January 2023.

93. This phone number was saved under the name, “David.”

94. Phone number 8615122520072 (GONG’s phone number) was associated with GONG from the KYC records previously obtained from Binance in reference to a BTC deposit address that received payments from RHINEHART.

95. RHINEHART’s WhatsApp messages also identified other subordinate drug dealers to Rhinehart as well as GONG as a drug supplier.

96. In the message threads between RHINEHART and GONG, between in or about 2021 and in or about 2023, Rhinehart ordered kilogram quantities of “EU” (referring to eutylone, a/k/a “bath salts,” a schedule I controlled substance) from GONG.

97. GONG further provided tracking numbers permitting RHINEHART to

track the shipments.

98. GONG used UPS to ship drug packages.

99. During one message, GONG mentioned “Shenzhen,” a city in China, as a source city for his drug supply and also discussed shipping delays due to COVID in Shanghai in or about April 2022.

100. GONG stated the shipper was not in his name in the context of a larger conversation regarding law enforcement investigating RHINEHART and possibly GONG.

101. RHINEHART also discussed shipment seizures with GONG and plans to avoid future seizures and business disruptions.

102. GONG provided updates regarding shipments being cleared past customs.

103. GONG’s shipments appeared to go from China to at least one warehouse in the United States and then onward to final buyers.

104. GONG provided his Bitcoin wallet address and Rhinehart sent screen shot payment confirmations to GONG.

105. In one exchange, GONG sent a tracking address that showed a delivery location of Shreveport.

106. GONG acknowledged the mistaken tracking number and stated he had another customer in Shreveport who purchased eutylone and another substance.

107. GONG and RHINEHART communicated via WhatsApp between in or about August 2021 and in or about January 2023, and also referenced earlier

transactions from before August 2021.

108. In or about May 2022, GONG stated he could sell more than 100 kilograms per month to the United States in “EU” (eutylone) before January 2023.

109. GONG sent his BTC deposit address to RHINEHART numerous times and it did not change.

110. GONG sent his BTC deposit address as “1JNX6cTgSgGCdnzuvQfcbUox2KyPK9BMEa”, which was held in the **Target Account**.

111. Binance records received in reference to transactions to GONG’s BTC address from RHINEHART’s Coinbase account showed the **Target Account** to belong to GONG.

112. On or about September 1, 2023, RHINEHART pled guilty to violating 21 U.S.C. § 841(a)(1) (Possession with Intent to Distribute Controlled Substances (a- PHP and eutylone)), as charged in a superseding indictment filed on February 8, 2023.

113. On or about January 5, 2024, RHINEHART was sentenced to a prison term of 108 months among other penalties.

DEA Undercover Operations

114. On or about March 28, 2023, a DEA agent acting in an undercover capacity contacted GONG via WhatsApp at GONG’s phone number and requested a quote for a quantity of five kilograms of eutylone.

115. GONG provided a quote of \$1000 per kilogram and provided the BTC

deposit address held within the **Target Account**.

116. The undercover agent transferred 0.18092382 BTC from an undercover wallet to the payment BTC address provided by GONG held within the **Target Account**.

117. The total purchase price was 0.18092382 BTC, which according to current BTC markets was worth approximately \$4,868.59.

118. The undercover agent then sent a WhatsApp message to GONG's phone number advising that the payment had been sent for the five kilograms via BTC and provided the undercover mailing address for the package.

119. On or about March 31, 2023, the undercover agent received a WhatsApp message from GONG's phone number with the UPS tracking number for the parcel listed.

120. On or about April 10, 2023, the undercover agent retrieved the package containing the suspected synthetic cathinones from the undercover mailing address, which was located in the Savannah Division of the Southern District of Georgia.

121. The package contained approximately 5.20 kilograms of suspected eutylone.

122. The suspected eutylone was confirmed by a USPIS Forensic Chemist to contain approximately 4.9855 kilograms of N,N-Dimethylpentylone.

123. On or about June 20, 2023, the undercover agent conducted another controlled purchase of eutylone from GONG via WhatsApp to GONG's phone number for one kilogram of eutylone.

124. GONG provided a quote of \$1000 per kilogram and provided the BTC deposit address held in the **Target Account**.

125. The undercover agent transferred 0.03589067 BTC from the undercover agent wallet to the payment BTC address provided by GONG associated with the **Target Account**.

126. The total purchase price was 0.03589067 BTC, which according to current BTC markets was worth approximately \$1000.82.

127. On or about June 26, 2023, the undercover agent received a WhatsApp message from GONG's phone number with the UPS tracking number for the parcel listed.

128. On or about July 10, 2023, the undercover agent retrieved the package containing the suspected synthetic cathinones from the undercover mailing address, which was located in the Savannah Division of the Southern District of Georgia.

129. The package contained approximately 1.10 kilograms of suspected eutylone.

130. DEA lab results revealed the substance to contain 999.8 grams of N,N-Dimethylpentylone.

131. Binance supplied updated account records for Bitcoin (BTC) deposit address 1JNX6cTgSgGCdnzuvQfcbUox2KyPK9BMEa which revealed that Binance account number 53514319 (the **Target Account**), with Bitcoin (BTC) deposit address 1JNX6cTgSgGCdnzuvQfcbUox2KyPK9BMEa was identified as a Binance account registered to GONG.

132. GONG's Binance deposit address 1JNX6cTgSgGCdnzuvQfcbUox2KyPK9BMEa (held in the **Target Account**) received two undercover transactions dated on or about March 28, 2023, and on or about June 20, 2023.

133. A DEA cyber research intelligence specialist conducted blockchain and cluster analysis of incoming and outgoing transactions of GONG's Binance account to determine the origin and destination of the cryptocurrencies.

134. Analysis of GONG's Binance account also identified 19 "buys" totaling a USD value equivalent to approximately \$254,281.85 between on or about December 19, 2020 and on or about June 15, 2023, and 204 "sells" totaling approximately \$2,326,169.21 between on or about October 18, 2020 and on or about July 5, 2023.

135. A "buy" occurs when cryptocurrency is purchased by the account holder in exchange for fiat currency or for another type of cryptocurrency.

136. A "sell" occurs when cryptocurrency is sold by the account holder in exchange for another type of cryptocurrency or fiat currency.

137. Blockchain analysis of GONG's transactions indicated that GONG received a total of 666 BTC transactions between on or about October 16, 2020, and on or about July 5, 2023, including the undercover transactions dated on or about March 28, 2023 and on or about June 20, 2023.

138. GONG's Binance account records indicated that GONG sent eight transactions between on or about October 17, 2020, and on or about October 9, 2022.

139. Based on a review of Chinese corporate registry by a DEA Diversion

Investigator, GONG's phone number was listed under an active company as a corporate phone number for the company Tianjin Double International Trading Co. LTD.

140. Additionally, GONG's phone number was used by a DEA undercover officer and RHINEHART to contact GONG to place orders and was listed on borton.guidechem.com website as the WhatsApp contact phone number.

141. The DEA Diversion Investigator also discovered that the listed owners of the company Tianjin Double International Trading Co. LTD included GONG (90% shareholder) and another person.

142. Agents previously navigated to the website borton.guidechem.com, and observed that GONG's phone number appeared as a WhatsApp phone number for a company identified on the website as BORTON BIOTECHNOLOGY.

143. On or about September 6, 2023, a DEA agent, acting in an undercover capacity, sent a screenshot of the website at borton.guidechem.com to GONG at GONG's phone number inquiring if GONG had any of the products listed on the website available for purchase.

144. Later that day, GONG sent a message that the website was old and had not been updated.

145. DEA confirmed GONG's ownership of Tianjin Double International Trading Company, Ltd. / Borton Biotechnology Co., Ltd., a company in China involved in the import and export of chemicals.

146. GONG was listed as the legal representative, executive director, and 90

percent shareholder of the company, which was registered in Tianjin, China.

147. One chemical advertised by Borton Biotechnology was 4fphp, which was also found at RHINEHART's residence in or about July 2021.

148. Additional chemicals advertised by GONG's company included synthetic cathinones, synthetic cannabinoids, and fentanyl analogues.

149. GONG had previously informed the undercover agent, via WhatsApp, that the only product he was currently selling was eutylone.

150. During WhatsApp chats between GONG and the DEA undercover agent, GONG specifically referenced selling eutylone, being able to sell kilogram quantities in the range of \$750 to \$850 per kilogram depending on volume, being able to supply 100 kilograms per month, and accepting payment via Bitcoin.

151. GONG confirmed he was selling N,N-Dimethylpentylone as eutylone to the DEA undercover agent.

152. Additional analysis performed by DEA including of FedEx records of a shipment sent by GONG to Brunswick, Georgia, and shipping records regarding the two undercover shipments, indicate GONG used Chinese persons located in the United States to conduct the final intra-country shipments to purchasers located in the United States.

Additional Conversations between GONG and DEA Confidential Source

153. In or about October 2023, DEA confidential source was introduced to GONG by providing the confidential source with GONG's WhatsApp number.

154. The DEA confidential source and GONG discussed GONG starting with

100 to 200 kilogram shipments of eutylone via ocean transportation into U.S. ports which the confidential source alleged controlling.

155. The confidential source specifically stated the confidential source's people controlled the Port of Savannah.

156. GONG and the confidential source also discussed a 500 kilogram shipment of eutylone into the Port of Savannah.

157. GONG stated he could send 200 kilograms of eutylone to the United States every month, and later stated he could ship 500 kilograms of eutylone per month via ocean shipments.

158. The confidential source and GONG discussed prices between \$700 and \$800 per kilogram of eutylone and a test shipment of 100 kilograms of eutylone by ocean shipment.

159. The WhatsApp chats occurred between in or about October 2023 and in or about January 2024.

160. The confidential source also requested an in person meeting, which eventually became a video chat.

161. In or about January 2024, DEA received a video recording of the DEA confidential source and GONG which was conducted on or about January 12, 2024.

162. The DEA confidential source and GONG had been in communication regarding a test ocean shipment of 100 kilograms of eutylone which would be followed up by a 500 kilogram ocean shipment of eutylone pending a successful test shipment.

163. The person with whom the confidential source communicated on the

video call matched the appearance of the photographs in the Binance KYC information for GONG's cryptocurrency account, including GONG's official Chinese identification card.

164. During the call, GONG advised he could sell the eutylone for \$650 per kilogram and would send it to the Port of Savannah.

165. GONG also advised he could send 1000 kilograms of eutylone per month.

166. DEA obtained the video recording and chats between GONG and the DEA confidential source.

167. The chat messages leading up to the video call discussed ocean shipments of 500 kilograms of eutylone into the Port of Savannah, the associated pricing and payment structure, and use of a test shipment.

Additional Information Regarding GONG

168. In or about December 2023, RHINEHART spoke with DEA pursuant to a proffer agreement and admitted to purchasing eutylone from GONG on five or six occasions for approximately one kilogram per order.

169. RHINEHART made additional admissions about his drug importation and distribution business.

170. In or about January 2024, DEA executed a search warrant on GONG's WhatsApp account, which identified the user as "David Gong" and that the account was being accessed from China with a service start date in September 2017.

171. DEA confirmed GONG's identity and that his Chinese identification card was authentic.

Seizure, GONG Claim, and GONG Indictment

172. On or about December 19, 2023, a federal seizure warrant was obtained for all assets held in the **Target Account**, which was served on Binance that day by the DEA.

173. On or about March 11, 2024, and or about April 4, 2024, via several transactions, Binance provided the **Defendant Property** to DEA in response to the seizure warrant, which had been held in the **Target Account**.

174. On or about July 17, 2024, GONG filed a claim against the administrative forfeiture of his Bitcoin through a lawyer in Flushing, NY, identified himself as Wei Gong, and provided his telephone number (Gong's phone number as referenced herein).

175. On or about September 4, 2024, GONG was charged in a four count sealed indictment, charging him with violations of 21 U.S.C. § 963 (Conspiracy to Import and Distribute with Intent to Import Controlled Substances (Eutylone and N,N-dimethylpentylone)) (Count 1), 21 U.S.C. § 846 (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (Eutylone and N,N-dimethylpentylone)) (Count 2), 21 U.S.C. § 959(a) (Distribution and Intent to Import a Controlled Substance) (Eutylone and N,N-dimethylpentylone)) (Count 3), and Distribution of a Controlled Substance (N,N-dimethylpentylone) (Counts 4 and 5), and listing the **Defendant Property** as property sought for forfeiture.

Summary

176. In total, GONG imported at least 10 kilograms of eutylone and N,N-dimethylpentylone into the United States and intended, based on his conversations with other persons, to import thousands of kilograms via the Port of Savannah, in the Southern District of Georgia, and conspired with other persons to achieve his criminal plan.

177. GONG used the **Target Account** to receive proceeds of his drug trafficking and importation offenses and to launder the illegal proceeds from the drug trafficking and importation offenses.

178. As a result of the facts set forth herein, the **Defendant Property**, seized from the **Target Account**, is subject to forfeiture.

CLAIMS FOR RELIEF

**First Claim for Relief
(Forfeiture Pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6))**

179. The United States incorporates by reference the allegations contained in paragraphs 1 through 178 above as if set forth fully herein.

180. The **Defendant Property** is property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of violations of 21 U.S.C. § 841, and moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of Title 21 of the United States Code, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate violations of 21 U.S.C. § 841.

181. The **Defendant Property** is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

**Second Claim for Relief
(Forfeiture Pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6))**

182. The United States incorporates by reference the allegations contained in paragraphs 1 through 178 above as if set forth fully herein.

183. The **Defendant Property** is property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of a violation of 21 U.S.C. § 846, and moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of Title 21 of the United States Code, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate a violation of 21 U.S.C. § 846.

184. The **Defendant Property** is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

**Third Claim for Relief
(Forfeiture Pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6))**

185. The United States incorporates by reference the allegations contained in paragraphs 1 through 178 above as if set forth fully herein.

186. The **Defendant Property** is property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of a violations of 21 U.S.C. § 959(a), and moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled

substance or listed chemical in violation of Title 21 of the United States Code, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate violations of 21 U.S.C. § 959(a).

187. The **Defendant Property** is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

**Fourth Claim for Relief
(Forfeiture Pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6))**

188. The United States incorporates by reference the allegations contained in paragraphs 1 through 178 above as if set forth fully herein.

189. The **Defendant Property** is property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of a violation of 21 U.S.C. § 963, and moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of Title 21 of the United States Code, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate a violation of 21 U.S.C. § 963.

190. The **Defendant Property** is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

**Fifth Claim for Relief
(Forfeiture Pursuant to 18 U.S.C. § 981(a)(1)(C))**

191. The United States incorporates by reference the allegations contained in paragraphs 1 through 178 above as if set forth fully herein.

192. The **Defendant Property** is property constituting, or derived from, any proceeds the person obtained, directly or indirectly, from violations of 18 U.S.C. § 542.

193. The Defendant Property is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

**Sixth Claim for Relief
(Forfeiture Pursuant to 18 U.S.C. §§ 545 and 981(a)(1)(C))**

194. The United States incorporates by reference the allegations contained in paragraphs 1 through 178 above as if set forth fully herein.

195. The **Defendant Property** is property constituting, or derived from, any proceeds the person obtained, directly or indirectly from violations of 18 U.S.C. § 545, and the value of merchandise entered into the United States in violation of 18 U.S.C. § 545.

196. The Defendant Property is therefore subject to forfeiture pursuant to 18 U.S.C. §§ 545 and 981(a)(1)(C).

**Seventh Claim for Relief
(Forfeiture Pursuant to 18 U.S.C. § 981(a)(1)(A))**

197. The United States incorporates by reference the allegations contained in paragraphs 1 through 178 above as if set forth fully herein.

198. The **Defendant Property** is property that was involved in a transaction or attempted transaction, or is property traceable to such property, in violation of 18 U.S.C. § 1956.

199. The Defendant Property is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

CONCLUSION

200. WHEREFORE, the United States of America prays that:

- a. Process of a Warrant for Arrest and Notice *In Rem* be issued for the arrest of the **Defendant Property**;
- b. The **Defendant Property** be forfeited and condemned to the use and benefit of the United States;
- c. The United States be awarded its costs and disbursements in this action and for such other and further relief as this Court deems just and proper; and
- d. That due notice be given to all parties to appear and show cause why the forfeiture of the **Defendant Property** should not be decreed.

Respectfully submitted,

MARGARET E. HEAP
UNITED STATES ATTORNEY

By: /s/ J. Bishop Ravenel
J. Bishop Ravenel
Assistant United States Attorney
Virginia Bar Number 70250
P.O. Box 8970
Savannah, GA 31412
(912) 652-4422

VERIFICATION OF COMPLAINT FOR FORFEITURE *IN REM*

I, Special Agent Lesley Mace, have read the foregoing Complaint for Forfeiture *In Rem* in this action and state that its contents are true and correct to the best of my knowledge and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 13th day of April 2026.

Lesley Mace

Lesley Mace
Special Agent
Drug Enforcement Administration

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

J. Bishop Ravenel, Assistant United States Attorney
P.O. Box 8970, Savannah, GA 31412
(912) 652-4422

DEFENDANTS

1.00001188 BITCOINS SEIZED IN OR ABOUT MARCH AND APRIL 2024

County of Residence of First Listed Defendant N/A

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location (This State, Another State, Foreign Country).

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
18 U.S.C. sec. 981(a)(1)(A) and (C); 21 U.S.C. sec. 881(a)(6); and 18 U.S.C. sec. 545

Brief description of cause:
CIVIL FORFEITURE OF BITCOINS

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 04/13/2026 SIGNATURE OF ATTORNEY OF RECORD /s/ J. Bishop Ravenel

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.