

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CR 424-087

UNITED STATES OF AMERICA

) INDICTMENT NO.

v.

) FILED UNDER SEAL

WEI GONG,
a/k/a "David Gong,"
a/k/a "David"

) 21 U.S.C. § 963
) Conspiracy to Import and
) Distribute with Intent to Import
) Controlled Substances
)
) 21 U.S.C. § 846
) Conspiracy to Distribute and
) Possess with Intent to Distribute
) Controlled Substances
)
) 21 U.S.C. § 959(a)
) Distribution with Intent to Import
) Controlled Substances
)
) 21 U.S.C. § 841(a)(1)
) Distribution of a Controlled
) Substance

U.S. DISTRICT COURT
2024 SEP -4 P 5:00
CLERK

THE GRAND JURY CHARGES THAT:

COUNT ONE

*Conspiracy to Import and Distribute with Intent to Import Controlled Substances
(Eutylone and N,N-dimethylpentylone)*

21 U.S.C. § 963

Beginning on a date at least as early as in or about October 2020, up to and including the date of this Indictment, in Chatham County, within the Southern District of Georgia, China, and elsewhere, the Defendant,

WEI GONG,
a/k/a "David Gong,"
a/k/a "David,"

did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to unlawfully import into the United States from a place outside thereof and distribute with the intent to unlawfully import into the United States from a place outside thereof quantities of eutylone and N,N-dimethylpentylone, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Sections 952(a), 959(a), and 963.

COUNT TWO

*Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances
(Eutylone and N,N-dimethylpentylone)*

21 U.S.C. § 846

Beginning on a date at least as early as in or about October 2020, up to and including the date of this Indictment, in Chatham County, within the Southern District of Georgia, China, and elsewhere, the Defendant,

**WEI GONG,
a/k/a “David Gong,”
a/k/a “David,”**

did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to distribute and possess with intent to distribute quantities of eutylone and N,N-dimethylpentylone, both Schedule I controlled substances.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT THREE

*Distribution with Intent to Import a Controlled Substance
(Eutylone and N,N-dimethylpentylone)*
21 U.S.C. § 959(a)

Beginning on a date at least as early in or about October 2020, up to and including the date of this Indictment, in Chatham County, within the Southern District of Georgia, China, and elsewhere, the Defendant,

**WEI GONG,
a/k/a “David Gong,”
a/k/a “David,”**

aided and abetted by other persons, did knowingly and intentionally distribute quantities of eutylone and N,N-dimethylpentylone, both Schedule I controlled substances, knowing and having reasonable cause to believe that such substances would be unlawfully imported into the United States.

All in violation of Title 21, United States Code, Section 959(a) and Title 18, United States Code, Section 2.

COUNT FOUR

Distribution of a Controlled Substance (N,N-dimethylpentylone)

21 U.S.C. § 841(a)(1)

Beginning in or about March 2023, through in or about April 2023, in Chatham County, within the Southern District of Georgia, China, and elsewhere, the Defendant,

**WEI GONG,
a/k/a “David Gong,”
a/k/a “David,”**

aided and abetted by other persons, did knowingly and intentionally distribute a quantity of N,N-dimethylpentylone, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FIVE

Distribution of a Controlled Substance (N,N-dimethylpentylone)

21 U.S.C. § 841(a)(1)

Beginning in or about June 2023, through in or about July 2023, in Chatham County, within the Southern District of Georgia, China, and elsewhere, the Defendant,

**WEI GONG,
a/k/a “David Gong,”
a/k/a “David,”**

aided and abetted by other persons, did knowingly and intentionally distribute a quantity of N,N-dimethylpentylone, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

The allegations contained in Counts One through Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Upon conviction of any offense set forth in Counts One through Five of this Indictment, the Defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to: 1.00001188 Bitcoins seized on or about April 4, 2024.


If any of the property described above, as a result of any act or commission of the Defendant:

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

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

(Signatures follow on next page)

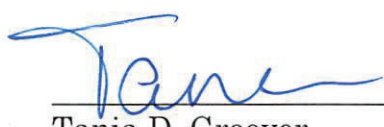
A True Bill.



Jill E. Steinberg
United States Attorney



J. Bishop Ravenel
Assistant United States Attorney
*Lead Counsel



Tania D. Groover
Assistant United States Attorney
Chief, Criminal Division