

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
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:
UNITED STATES OF AMERICA :
:
- v. - :
:
CHUKWUEMEKA OKPARAEKE, :
a/k/a "Emeka," :
:
Defendant. :
:
- - - - - x

SUPERSEDING
INFORMATION

S4 17 Cr. 225 (NSR)

COUNT ONE

The Acting United States Attorney charges:

1. In or about November 2016, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance analogue.

2. The controlled substance analogue that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, intentionally and knowingly distributed and possessed with intent to distribute was 3,4-Dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide (known as "U-47700"), a controlled substance analogue, as defined in Title 21, United States Code, Section 802(32), of 3,4-dichloro-N-[(1-dimethylamino)cyclohexylmethyl]benzamide (known as "AH-7921"), that was

intended for human consumption and is treated as controlled substance in Schedule I of the Controlled Substances Act, in violation of Title 21, United States Code, Sections 813 and 841(b) (1) (C) .

(Title 21, United States Code, Sections 813, 841(a) (1), and 841(b) (1) (C) .)

COUNT TWO

The Acting United States Attorney further charges:

3. From in or about January 2017, up to and including in or about February 2017, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, knowingly and intentionally did import and attempt to import into the United States from any place outside thereof a controlled substance analogue, to wit, OKPARAEKE imported and attempted to import a controlled substance analogue into the United States from Hong Kong, in violation of Title 21, United States Code, Sections 952(a), 960(a) (1), and 963.

4. The controlled substance analogue that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, knowingly and intentionally imported and attempted to import was 100 grams and more of mixtures and substances containing a detectable amount of N-(1-phenethylpiperidin-4-yl)-N-phenylacrylamide (known as "acryl fentanyl" or "acryloylfentanyl"), a controlled substance analogue, as defined in Title 21, United States Code, Section

802(32), that was intended for human consumption and is treated as a controlled substance in Schedule I of the Controlled Substances Act, and that is an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), in violation of Title 21, United States Code, Sections 813 and 960(b)(1)(F).

(Title 21, United States Code, Sections 813, 952(a), 960(a)(1), 960(b)(1)(F), and 963.)

COUNT THREE

The Acting United States Attorney further charges:

5. On or about September 15, 2020, in the Southern District of New York, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, in a matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully falsified, concealed, and covered by a trick, scheme, and device a material fact, and made a materially false, fictitious, and fraudulent statement and representation, to wit, during a meeting with representatives of the United States Attorney's Office for the Southern District of New York and the United States Postal Inspection Service, OKPARAEKE falsely and fraudulently represented, in sum and substance, that approximately 680 bitcoins were not in OKPARAEKE's possession and control and had been stolen from OKPARAEKE by a third party through hacking and other

unauthorized access to OKPARAEKE's electronic accounts.

(Title 18, United States Code, Section 1001.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One and Two of this Information, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to:

a. a sum of money equal to \$105,177.30 in United States currency, representing the amount of proceeds traceable to the commission of said offense other than the specific property described below; and

b. all right, title and interest of the defendant in the following specific property: 680.60963624 bitcoins, contained in the bitcoin address 3DTSBzmieF8tAECqsDJtff2BeKnar8caQU.


Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission 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 person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



AUDREY STRAUSS
Acting United States Attorney

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Defendant.

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(18 U.S.C. § 1001; 21 U.S.C. §§ 813,
841(a)(1), 841(b)(1)(C), 952(a),
960(a)(1), 960(b)(1)(F), 963.)

AUDREY STRAUSS

Acting United States
Attorney.
