

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term  
Grand Jury Sworn on May 5, 2015**

<b>UNITED STATES OF AMERICA</b>	)	<b>CRIMINAL NO. _____</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>21 U.S.C. §§ 952, 960, 963</b>
<b>v.</b>	)	<b>(Conspiracy to Import Controlled</b>
	)	<b>Substances into the United States)</b>
	)	
<b>CHRISTOPHER BANTLI</b>	)	
	)	<b>21 U.S.C. § 952</b>
<b>Also known as “Chris Bantli”</b>	)	<b>(Importation of Controlled</b>
	)	<b>Substances into the United States)</b>
<b>Defendant.</b>	)	
	)	
	)	<b>21 U.S.C. § 853 and 970</b>
	)	<b>(Criminal Forfeiture)</b>
	)	
	)	<b>18 U.S.C. § 2</b>
	)	<b>(Aiding and Abetting)</b>

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

(Conspiracy to Import Controlled Substances and Controlled Substance Analogues into the United States)

Beginning in or around November 2015 and continuing through the date of this Indictment, within the District of Columbia, Canada, and elsewhere, the defendant CHRISTOPHER BANTLI, also known as “Chris Bantli,” did knowingly, intentionally, and willfully conspire, confederate, and agree with others unknown to the Grand Jury, to commit the following offense against the United States: to knowingly and intentionally import into the

United States from a place outside thereof 100 grams or more of a mixture and substance containing a detectable amount of a Schedule I controlled substance, and a controlled substance analogue intended for human consumption, in violation of Title 21, United States Code, Sections 952(a), 813, 960(b)(1)(F); all in violation of Title 21, United States Code, Section 963 and Title 18, United States Code, Section 2.

With respect to the defendant, the controlled substance involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 100 grams or more of a mixture and substance containing a detectable amount of an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, (hereinafter "Fentanyl"), to wit: Acetyl Fentanyl and N-(1-Phenethylpiperidin-4-yl)-N-phenylpentanamide (also known as Pentanoyl Fentanyl), in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Conspiracy to Import 100 Grams or More of a Controlled Substance and a Controlled Substance Analogue Intended for Human Consumption in Violation of Title 21, United States Code, Sections 952(a) and (b), 813, 960(b)(1)(F), and 963, and Title 18, United States Code, Section 2)

## **COUNT TWO**

(Importation of a Controlled Substance into the United States)

On or about December 3, 2015, from the country of Canada, the defendant CHRISTOPHER BANTLI, also known as "Chris Bantli," did knowingly and intentionally import into the United States from a place outside thereof a mixture and substance containing a detectable amount of a Schedule I controlled substance, to wit: Acetyl Fentanyl, in violation of Title 21, United States Code, Section 952(a), 960(b)(3), and Title 18, United States Code, Section 2.

(Importation of Acetyl Fentanyl in Violation of Title 21, United States Code, Sections 952(a), 960(b)(3), and Title 18, United States Code, Section 2)

**COUNT THREE**

(Importation of a Controlled Substance into the United States)

On or about January 11, 2016, from the country of Canada, the defendant CHRISTOPHER BANTLI, also known as “Chris Bantli,” did knowingly and intentionally import into the United States from a place outside thereof a mixture and substance containing a detectable amount of a Schedule I controlled substance, to wit: Acetyl Fentanyl, in violation of Title 21, United States Code, Section 952(a), 960(b)(3), and Title 18, United States Code, Section 2.

(Importation of Acetyl Fentanyl in Violation of Title 21, United States Code, Sections 952, 960(b)(3), and Title 18, United States Code, Section 2)

**COUNT FOUR**

(Importation of a Controlled Substance and Controlled Substance Analogue into the United States)

On or about February 19, 2016, from the country of Canada, the defendant CHRISTOPHER BANTLI, also known as “Chris Bantli,” did knowingly and intentionally import into the United States from a place outside thereof 100 grams or more a mixture and substance containing a detectable amount of a Schedule I controlled substance, and a controlled substance analogue intended for human consumption, to wit: Acetyl Fentanyl and N-(1-Phenethylpiperidin-4-yl)-N-phenylpentanamide (also known as Pentanoyl Fentanyl), in violation of Title 21, United States Code, Section 952(a), 960(b)(1)(F), 813, 802(32), and Title 18, United States Code, Section 2.

(Importation of Controlled Substance and Controlled Substance Analogue in Violation of Title 21, United States Code, Sections 952(a), 960(b)(1)(F), 813, and Title 18, United States Code, Section 2)

**COUNT FIVE**

(Importation of a Controlled Substance and Controlled Substance Analogue into the United States)

On or about March 28, 2016, from the country of Canada, the defendant CHRISTOPHER BANTLI, also known as “Chris Bantli,” did knowingly and intentionally import into the United States from a place outside thereof 100 grams or more a mixture and substance containing a detectable amount of a Schedule I controlled substance, and a controlled substance analogue intended for human consumption, to wit: Acetyl Fentanyl and N-(1-Phenethylpiperidin-4-yl)-N-phenylpentanamide (also known as Pentanoyl Fentanyl), in violation of Title 21, United States Code, Section 952(a), 960(b)(1)(F), 813, 802(32), and Title 18, United States Code, Section 2.

(Importation of Controlled Substance and Controlled Substance Analogue – Title 21, United States Code, Sections 952(a), 960(b)(1)(F), 813, and Title 18, United States Code, Section 2)

**COUNT SIX**

(Importation of a Controlled Substance into the United States)

On or about April 7, 2016, from the country of Canada, pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, the defendant CHRISTOPHER BANTLI, also known as “Chris Bantli,” did knowingly and intentionally import into the United States from a place outside thereof a mixture and substance containing a detectable amount of a non-narcotic Schedule IV controlled substance, to wit: alprazolam, in violation of Title 21, United States Code, Section 952(b), 960(b)(6); and Title 18, United States Code, Section 2.

(Importation of a Non-Narcotic Controlled Substance – Title 21, United States Code, Section 952(b), 960(b)(6), and Title 18, United States Code, Section 2)

**COUNT SEVEN**

(Importation of a Controlled Substance Analogue into the United States)

On or about August 10, 2016, from the country of Canada, the defendant CHRISTOPHER BANTLI, also known as “Chris Bantli,” did knowingly and intentionally import into the United States from a place outside thereof a mixture and substance containing a detectable amount of a controlled substance analogue intended for human consumption, to wit: N-(1-Phenethylpiperidin-4-yl)-N-phenylpentanamide (also known as Pentanoyl Fentanyl) and 3,4-Dichloro-N-[2-(dimethylamino) cyclohexyl]-N-methylbenzamide (also known as U-47700), in violation of Title 21, United States Code, Section 952(a), 960(b)(1)(F), 813, 802(32), and Title 18, United States Code, Section 2.

(Importation of a Controlled Substance Analogue – Title 21, United States Code, Sections 952(a), 960(b)(1)(F), 813, and Title 18, United States Code, Section 2)

**CRIMINAL FORFEITURE ALLEGATION**

The United States hereby gives notice to the defendant that, upon the conviction of the offenses charged in this Indictment, the government will seek forfeiture in accordance with Title 21, United States Code, Section 970 and 853, of:

All property constituting, or derived from any proceeds the person obtained, directly or indirectly, as a result of such violation;

Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation;

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;

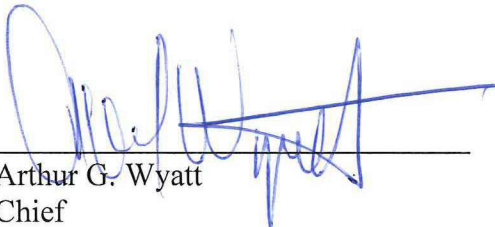
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

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 forfeitable property described in this forfeiture allegation.


(Criminal Forfeiture – Title 21, United States Code, Sections 970 and 853)

A True Bill.

\_\_\_\_\_  
Foreperson

  
\_\_\_\_\_  
Arthur G. Wyatt  
Chief  
Narcotic and Dangerous Drug Section  
Criminal Division  
U.S. Department of Justice  
Washington, D.C. 20530

By:

  
\_\_\_\_\_  
Stephen Sola  
Erin Cox  
Trial Attorneys  
Narcotic and Dangerous Drug Section  
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