

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

Holding a Criminal Term

Grand Jury 24-5 Sworn on August 1, 2024

UNITED STATES OF AMERICA

v.

EWORLDTRADE, LLC

Defendant.

CRIMINAL NO. _____

UNDER SEAL

21 U.S.C. §§ 959(a), 960(a)(3), 960(b)(1)(F),
960(b)(3), and 963
(Conspiracy to Manufacture and Distribute
Isotonitazene and 100 Grams or More of
Carfentanil for Importation into the United
States)

21 U.S.C. §§ 853 and 970
(Criminal Forfeiture)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning in and around March 2024, and continuing up to and including the date of this Indictment, both dates being approximate and inclusive, in the United States and elsewhere, the Defendant, **EWORLDTRADE, LLC**, together with others, both known and unknown to the Grand Jury, did knowingly, intentionally, and willfully combine, conspire, confederate, and agree to distribute: (A) isotonitazene, a Schedule I controlled substance; and (B) one hundred (100) grams or more of a mixture or substance containing a detectable amount of an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, to wit, carfentanil, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States, in violation of Title 21, United

States Code, Sections 959(a) and 960(a)(3); all in violation of Title 21, United States Code, Section 963.

With respect to the Defendant, the amount of a mixture or substance containing a detectable amount of carfentanil involved in the conspiracy attributable to the Defendant as a result of its own conduct, and the conduct of other conspirators reasonably foreseeable to it, is one hundred (100) grams or more, in violation of Title 21, United States Code, Sections 960(b)(1)(F).

(Conspiracy to Distribute Isotonitazene and 100 Grams or More of Carfentanil for Unlawful Importation into the United States, in violation of Title 21, United States Code, Sections 959(a), 960(a)(3), 960(b)(1)(F), 960(b)(3), and 963.)

CRIMINAL FORFEITURE ALLEGATION

The United States hereby gives notice to the Defendant that upon conviction of the Title 21 offense alleged in Count One of this Indictment, the Government will seek forfeiture in accordance with Title 21, United States Code, Sections 853 and 970, of all property constituting or derived from any proceeds the Defendant obtained directly or indirectly as the result of the alleged Title 21 violation, and all property used or intended to be used in any manner or part to commit, and to facilitate, the commission of such offense.

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.

(Criminal Forfeiture, in violation of Title 21, United States Code, Sections 853 and 970.)


A TRUE BILL:

Foreperson



MARLON COBAR
Chief
Narcotic and Dangerous Drug Section
Criminal Division

By:



JAYCE BORN
ANN DANIELS
Trial Attorneys
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U.S. Department of Justice
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

EWORLDTRADE, LLC,

Defendant.

CRIMINAL NO. _____

UNDER SEAL

GOVERNMENT’S MOTION TO SEAL

The United States of America, by and through the undersigned counsel, respectfully moves the Court for an order directing that the Indictment, the summons, and the instant motion to seal remain under seal until further order of the Court and delaying entry on the public docket all related matters. As grounds for the motion, the United States submits the following:

Courts have inherent power to control access to papers filed with the Courts. *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978). Courts have traditionally been “highly deferential to the government’s determination that a given investigation requires secrecy and that warrant materials be kept under seal.” *Times Mirror Co. v. United States*, 873 F.2d 1210 (9th Cir. 1989). Therefore, courts have routinely granted government requests to seal warrant materials—which, for an organizational defendant like the one here, are akin to a summons—where there is a need for secrecy. *See Post v. Robinson*, 935 F.2d 282, 289, n. 10 (D.C. Cir. 1991); *see also* Fed. R. Crim. P. 4 (authorizing judge to issue arrest warrant, or at the Government’s request and for an organizational defendant, a summons). The Government requests the matter remain under seal to avoid jeopardizing its ongoing investigation.

This case involves a U.S.-based company, eWorldTrade, LLC, that operates a public, website purported to be an online business-to-business marketplace. The Defendant, by and through its agents and as intentionally designed by its business model, conspires with its vendors to distribute controlled substances that the Defendant knows, intends, or has reasonable cause to believe will be imported into the United States.

The United States moves to seal the Indictment and related documents in the above-captioned case to ensure the integrity of its ongoing investigation. In particular, as of the date of the Indictment, the Government is preparing to seize the Defendant's website and ensure it can no longer be used to distribute dangerous controlled substances, including the highly potent synthetic opioids charged in the Indictment, for importation into the United States. Public disclosure of the Indictment and summons could jeopardize the ongoing investigation, including the Government's ability to ensure the website is seized before the Defendant becomes aware of the above-captioned matter and can take, or attempt to take, any steps to evade the website's seizure.

WHEREFORE, the United States respectfully requests that this Court grant the Government's motion and order that this motion, the Indictment, and the summons in this case be sealed until further order of the Court, and delay entry on the public docket all related matters.

Respectfully submitted,

Marlon Cobar, Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice

By: /s/ Jayce Born
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

EWORLDTRADE, LLC,

Defendant.

CRIMINAL NO. _____

UNDER SEAL

ORDER

Upon the motion of the United States in the above-captioned matter to seal the Indictment, the summons, the Government's sealing motion, and this order, and to delay entry on the public docket of the filing of these documents and all related matters, and for good cause shown, it is hereby,

ORDERED that the Indictment, the summons, the motion to seal, and this order shall be sealed, and that these documents and all related matters shall be delayed entry on the public document for the reasons outlined in the United States's motion until further order of the Court.

DATED: _____

HON. MATTHEW J. SHARBAUGH
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

UNITED STATES OF AMERICA

v.

EWORLDTRADE, LLC,

Defendant.

Case: 1:25-cr-00083
Assigned To : Reyes, Ana C.
Assign. Date : 3/27/2025
Description: INDICTMENT (B)

ORDER

Upon the motion of the United States in the above-captioned matter to seal the Indictment, the summons, the Government's sealing motion, and this order, and to delay entry on the public docket of the filing of these documents and all related matters, and for good cause shown, it is hereby,

ORDERED that the Indictment, the summons, the motion to seal, and this order shall be sealed, and that these documents and all related matters shall be delayed entry on the public document for the reasons outlined in the United States's motion until further order of the Court.

DATED: 3/27/2025

HON. MATTHEW J. SHARBAUGH
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

UNITED STATES OF AMERICA

v.

EWORLDTRADE, LLC,

Defendant.

CRIMINAL NO. 25-CR-083 (ACR)

Filed Under Seal

GOVERNMENT’S MOTION TO UNSEAL CASE

The United States of America, by and through the undersigned counsel, respectfully moves the Court for an order directing that the public docket in the above-captioned case be unsealed as of 12:00 PM EST on Friday, April 18, 2025.

BACKGROUND

1. On March 27, 2025, a federal grand jury sitting in the District of Columbia returned an original Indictment against the Defendant.
2. On the same day, the Government filed a motion to seal the Indictment, the summons, and the Government’s sealing motion and the associated order, and to delay entry on the public docket of the filing of these documents and all related matters to ensure the integrity of the ongoing law enforcement investigation, in particular the anticipated seizure of the Defendant’s website domain before the Defendant became aware of the above-captioned matter and could take, or attempt to take, any steps to evade the domain’s seizure. The Honorable Magistrate Judge Matthew J. Sharbaugh granted the Government’s motion to seal and ordered the sealing of the Indictment, summons, motion to seal and order, as well as the delayed entry of the documents and all related matters on the public docket.

3. Law enforcement authorities are expected to complete their seizure of the Defendant's website domain by 12:00 PM EST on Friday, April 18, 2025, and thus, at that time, the Government's reasons for seeking a sealing order at the time of Indictment will no longer be applicable and ongoing sealing of the public docket will no longer be necessary.

4. Therefore, the Government moves to unseal the public docket in the above-captioned case as of 12:00 PM EST on Friday, April 18, 2025.

CONCLUSION

For all the foregoing reasons, the Government respectfully requests that the public docket in the above-captioned case be unsealed as of 12:00 PM EST on Friday, April 18, 2025.

MARLON COBAR, Acting Chief
Criminal Division
Narcotic and Dangerous Drug Section

By: /s/ Jayce Born
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

EWORLDTRADE, LLC,

Defendant.

CRIMINAL NO. 25-CR-083 (ACR)

Filed Under Seal

ORDER

Upon Motion of the United States for an order to unseal the case and for good cause shown, it is hereby, ORDERED that the Indictment and public docket in the above-captioned matter be unsealed and that the instant motion and associated order remain under seal.

DATED: _____

HON. ANA C. REYES
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA