JEFF JACKSON **ATTORNEY GENERAL**



NC DEPARTMENT OF JUSTICE 114 WEST EDENTON STREET RALEIGH, NC 27603

May 12, 2025

WeChat US. Inc. c/o Paracorp Inc, Registered Agent 2140 South Dupont Highway Camden, DE 19934

To Whom It May Concern,

We, the undersigned Attorneys General, write today to communicate our serious concerns about WeChat's role in facilitating one of the greatest current threats to our states and our people: fentanyl trafficking.

WeChat has rapidly grown since it launched in 2011. Its main product is a peer-to-peer messaging service that is used by over a billion people in China and an estimated 19 million people in the United States, including in the undersigned states. A growing body of well-documented evidence shows that WeChat is a central conduit for transnational money laundering operations, particularly those linked to the fentanyl trade.² These operations have exacerbated a crisis that is devastating American communities, including in the undersigned states, by enabling drug traffickers to launder drug proceeds with minimal detection.

Multiple law enforcement investigations, financial crime reports, and intelligence assessments have implicated WeChat in facilitating the laundering of drug proceeds from fentanyl sales. Specifically, Chinese underground banking networks, operating in coordination with Mexican cartels, exploit WeChat's encrypted messaging to seamlessly transfer illicit funds across borders. These networks use WeChat to orchestrate cash pickups in U.S. cities, arrange currency swaps between fentanyl traffickers and Chinese money brokers, and move laundered funds through layered transactions that are difficult to trace. In short, as a Congressional Commission found:

¹ Krystal Hu, WeChat U.S. ban cuts off users link to families in China, REUTERS (Aug. 7, 2020, 6:36 PM), https://www.reuters.com/article/us-usa-tencent-holdings-wechat-ban/wechat-us-ban-cuts-off-users-link-tofamiliesin-

chinaidUSKCN253339/#:~:text=In%20the%20past%20three%20months,according%20to%20analytics%2 Ofirms%20Apptopia.

² WeChat has also been used in many countries to facilitate localized drug transactions. See e.g., Pub. Prosecutor v. Lim Wei Fong, No. 16-2023 (High Ct. of the Republic of Sing. Jan. 10, 2024), https://www.elitigation.sg/gd/s/2024 SGHC 3#:~:text=1%20The%20accused%20person%2C%20Mr%C2 %A0Lim,full%20reasons%20for%20my%20decision; Ben Tan, Johor Cops Cripple Drug Ring that Uses WeChat App to Deal with Customers, MALAYMAIL (May 11, 2020, 5:21 PM),

https://www.malaymail.com/news/malaysia/2020/05/11/johor-cops-cripple-drug-ring-that-uses-wechatapp-to-deal-with

customers/1865153#:~:text=Ayob%20Khan%20said%20initial%20investigations,with%20close%20to%20 500%20members; WeChat Drug Dealer Jailed, GLOBAL TIMES (June 16, 2015, 7:13 PM), https://www.globaltimes.cn/content/927377.shtml#:~:text=Source%3AGlobal%20Times%20Published%3 A%202015.

"Chinese money launderers leverage encrypted mobile communications apps like WeChat to move vast sums of money from the United States to China then back to Mexico with great speed, discretion, and efficiency."³

Public reporting confirms WeChat's role in laundering drug proceeds. In 2021, money launderer Xizhi Li was convicted of running a transnational criminal network that used WeChat to coordinate bulk cash movements, linking Chinese financial operatives with cartel drug distributors.⁴ Anne Milgram, former Administrator of the DEA, testified to Congress about "Operation Chem Capture" where eight companies and 12 individuals were indicted in 2023 for using encrypted messenger services, including WeChat, to facilitate the illegal sale of fentanyl precursor chemicals to the United States.⁵ Los Angeles-based associates of Mexico's Sinaloa drug cartel and Chinese money laundering groups used WeChat to facilitate laundering fentanyl proceeds to the United States.⁶ And just last month, three members of an international money laundering organization were charged in federal court in South Carolina with utilizing WeChat and other messaging apps to facilitate their fentanyl money laundering activities.⁷

These are not isolated incidents, but a pattern of WeChat's complicity in facilitating money laundering tied to fentanyl trafficking. As one DEA agent noted regarding laundering of proceeds of fentanyl trafficking, "It is all happening on WeChat," going on to emphasize that "[t]he launderers are not concealing themselves on WeChat."

In North Carolina, New Jersey, and in most states, knowingly facilitating, or aiding and abetting, money laundering is a criminal offense. *See, e.g.*, N.C.G.S. §14-118.8; N.J. Stat. Ann. 2C:21-25. States can also abate an activity as a public nuisance if it "injuriously affects the community at large" including endangering the life and health of the community in general.⁹ WeChat's contribution to the devastating fentanyl crisis endangers the life and health of our people.

Today, we write to demand additional information so that our offices can assess WeChat's compliance with our state laws. By June 11, 2025, provide a response that describes what steps, if any, WeChat has taken in response to the public reports, indictments, intelligence assessments,

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³Lauren Greenwood & Kevin Fashola, *Illicit Fentanyl from China: An Evolving Global Operation*, U.S.-China Econ. and Sec. Rev. Comm'n, Aug. 24, 2021, https://www.uscc.gov/sites/default/files/2021-08/Illicit Fentanyl from China-An Evolving Global Operation.pdf; see also National Money Laundering Risk Assessment, U.S. Treasury Dep't 24 (2022), https://home.treasury.gov/system/files/136/2022-National-Money-Laundering-Risk-Assessment.pdf ("[T[he WeChat messaging application (which offers end-to-end encryption) appears to be a key method used to communicate the transfer of funds among various participants" in Chinese money laundering schemes.).

⁴ Indictment at ¶19, United States v. Xizhi-Li, et al., No. 1:19-cr-00334-LMB (E.D. Va. 2019) (ECF No. 1), https://insightcrime.org/wp-content/uploads/2021/08/Xizhi-Li-Indictment.pdf.

⁵ Fiscal 2025 Request for the Drug Enforcement Administration, House Committee on Appropriations Before the Subcommittee on Commerce, Justice, and Science United States House of Representatives, 118th Cong. 8 (2024) (statement of Anne Milgram, Administrator, Drug Enforcement Administration), https://www.justice.gov/ola/media/1379226/dl?inline.

⁶ Patricia Kowsmann, et al., *How Dirty Money From Fentanyl Sales is Flowing Through China*, WALL STREET JOURNAL (Feb. 18, 2025, 9:00 PM), https://www.wsj.com/world/china/china-fentanyl-trade-network-9685fde2?mod=Searchresults pos2&page=1.

⁷ Indictment at ¶22, United States v. Ullah, et al., 3:25-cr-00606-CRI (D.S.C. 2025) (ECF No. 3).

⁸ Kristen Berg & Sebastian Rotella, *The Gangster Who Changed Money Laundering*, PROPUBLICA (Oct. 11, 2022, 5:00 AM), https://www.propublica.org/article/china-cartels-xizhi-li-money-laundering.

⁹ N.C. ex rel. Howes v. W.R. Peele, Sr., Tr., 876 F. Supp. 733, 741 (E.D.N.C. 1995); State v. Harris, 861 A.2d 165 (App. Div. 2004), certif. denied, 872 A.2d 799 (2005).

and other similar evidence of WeChat being used to facilitate money laundering by fentanyl traffickers, including any relevant terms of service, community guidelines, or other policies and procedures. As you answer, share any documents that may be relevant or that you reference in your response.

Please provide your response to North Carolina Chief Deputy Attorney General Laura Howard (lhoward@ncdoj.gov) and New Jersey Deputy Attorney General Kashif Chand (kashif.Chand@law.njoag.gov).

The consequences of fentanyl trafficking are measured in lives lost and families destroyed. Anyone who knowingly or negligently facilitates the movement of illicit funds bears responsibility for the devastation caused by fentanyl trafficking. Failure to act on these findings would only deepen the crisis and allow criminal enterprises to continue exploiting financial platforms like WeChat with impunity.

We request a timely response and full cooperation in providing the requested information. Given the gravity of this matter, we expect WeChat to engage with the highest degree of responsibility to address these concerns.

Sincerely,

Jeff Jackson

North Carolina Attorney General

Phil Weiser

Colorado Attorney General

John M. Formella

New Hampshire Attorney General

Jum. File

Alan Wilson

South Carolina Attorney General

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