

STATEMENT OF FACTS

In early March 2026, Defendant Mr. L. purchased 80 bottles of raw Isopropoxate oil for NT\$500,000 at a venue in Zhongli District, Taoyuan City. Subsequently, he procured chemical raw materials, containers, and related equipment from e-commerce platforms and hardware stores. Beginning around March 16, 2026, at his rented residence, Defendant Mr. L. mixed the aforementioned Isopropoxate oil with the chemical raw materials according to specific proportions, heated, weighed, and bottled the finished substance into empty dispensers, thereby manufacturing Etomidate-infused vape juice. This operation was undertaken with the intent to sell the illicit product at exorbitant prices for substantial profit.

Separately, at approximately 4:48 AM on February 8, 2026, Defendant Mr. H. sold a 2 ml vape pod containing Etomidate, a Category 2 Controlled Substance, for the price of NT\$1,000 to another individual for financial gain, directly outside his residence located on Ci'an Road, Yilan City, Yilan County.

CHARGES AND STATUTORY OFFENSES

The Prosecutor hereby indicts the Defendants on the following charges:

- Defendant Mr. L. is charged with the manufacturing of a Category 2 Controlled Substance, pursuant to Article 4, Paragraph 2 of the Narcotics Hazard Prevention Act.
- Defendant Mr. H. is charged with the sale of a Category 2 Controlled Substance, pursuant to Article 4, Paragraph 2 of the Narcotics Hazard Prevention Act.

PROSECUTION'S SENTENCING RECOMMENDATION

When determining the appropriate sentences, this Court is respectfully urged to consider the widespread proliferation of Etomidate vape pods—commonly known as "Zombie Vape Pods"—in contemporary society.

Because Etomidate-infused e-liquid is predominantly consumed via electronic cigarettes, it is exceedingly difficult to visually distinguish between ordinary e-cigarettes and those containing Etomidate. This physical similarity, combined with low retail costs, poses severe regulatory challenges and engenders a risk of

distribution far exceeding that of traditional Category 1 and Category 2 narcotics such as heroin or methamphetamine. Furthermore, instances of drugged driving (driving under the influence of drugs) resulting from Etomidate abuse have recurred frequently, causing catastrophic casualties and inflicting immense harm upon public safety. Consequently, neither the illicit manufacture nor the sale of Etomidate can be tolerated or treated with leniency.

Additionally, Defendant Mr. H. committed the present offense intentionally within five years of a prior conviction for an offense of a similar nature under the Narcotics Hazard Prevention Act. Pursuant to the statutory provisions governing repeat offenders (recidivism), an enhancement of his sentence is warranted.

Accordingly, to uphold the rule of law and maintain public order, the Prosecution specifically requests that this Honorable Court sentence Defendant Mr. H. to eleven (11) years of imprisonment, and Defendant Mr. L. to fifteen (15) years of imprisonment.