## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



UNITED STATES OF AMERICA \* CRIMINAL DOCKET NO.

v. \* SECTION:

MINH TRAN

\* VIOLATION: 21 U.S.C. § 846

JOSEPH SANDERS
LIONELL ADAMS

\*
21 U.S.C. § 841(a)(1)

TONELL ADAMS \* 18 U.S.C. § 2

The Grand Jury charges that:

## COUNT 1

Beginning at a time unknown and continuing until on or about February 1, 2010, in the Eastern District of Louisiana and elsewhere, the defendants, MINH TRAN, JOSEPH SANDERS, and LIONELL ADAMS, did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to distribute and possess with the intent to distribute a quantity of 3,4 - methylenedioxymethamphetamine ("MDMA"), a Schedule I drug controlled substance, in violation of Title 21, United States Code,

Sections 841(a)(1) and 841(b)(1)(C); all in violation of Title 21, United States Code, Section 846.

## COUNT 2

On or about February 1, 2010, in the Eastern District of Louisiana, the defendants, MINH TRAN, JOSEPH SANDERS, and LIONELL ADAMS, did knowingly and intentionally possess with the intent to distribute a quantity of 3,4 - methylenedioxymethamphetamine ("MDMA"), a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

## **NOTICE OF FORFEITURE**

- 1. The allegations of Counts 1 and 2 of this indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.
- 2. As a result of the offenses alleged in Counts 1 and 2, the defendants, MINH TRAN, JOSEPH SANDERS, and LIONELL ADAMS, 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 the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations alleged in Counts 1 and 2 of this indictment, including but not limited to the following:
  - a. 2006 Acura TL, bearing Vehicle Identification Number
     19UUA66206A025558.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

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 said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

JAMES B. LETTEN

UNITED STATES ATTORNEY

JAN MASELLI MANN

First Assistant United States Attorney

Chief, Criminal Division

KEVIN G. BOITMANN

Assistant United States Attorney

New Orleans, Louisiana February 11, 2010