

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** 12-059
v. : **DATE FILED:** 2/9/12
YI PING ZHENG, : **VIOLATION:**
a/k/a “Zheng Yi Ping” : **18 U.S.C. §2320 (trafficking in counterfeit**
a/k/a “Ping X. Zhenh” : **goods - 1 count)**
 : **Notice of Forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about December 15, 2011, in the Eastern District of Pennsylvania,
defendant

**YI PING ZHENG,
a/k/a “Zheng Yi Ping,”
a/k/a “Ping X. Zhenh,”**

intentionally trafficked and attempted to traffic in goods, that is, approximately 3,000 items of designer purses, wearing apparel, wallets, sunglasses, jewelry, watches, umbrellas, key chains and handbag locks, all of which were counterfeit, and knowingly used on and in connection with such goods counterfeit marks, that is spurious marks identical to and substantially indistinguishable from the marks which appear on genuine trademarked merchandise, the use of which were likely to cause confusion, to cause mistake and to deceive.

In violation of Title 18, United States Code, Section 2320(a).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 2320 set forth in this indictment, defendant

**YI PING ZHENG,
a/k/a “Zheng Yi Ping,”
a/k/a “Ping X. Zhenh,”**

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, and any property used or intended to be used, in any manner of part, to commit or to facilitate the commission of, such offenses including, but not limited to:

- (a) approximately 3,000 items of designer purses, wearing apparel, wallets, sunglasses, jewelry, watches, umbrellas, key chains and handbag locks seized by agents on December 15, 2011; and
- (b) counterfeit labels for designer merchandise, stamping and sewing machines and soldering and welding equipment utilized to attach, impress or mark items with counterfeit designs seized by agents on December 15, 2011.

2. If any of the property described above, as a result of any actor omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. Has been transferred to, sold to, or deposited with a third party;
- c. Has been placed beyond the jurisdiction of this 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 intention of the United States, pursuant to 18 U.S.C. § 2323(b)(1), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2323, and Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**