

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

UNITED STATES OF AMERICA : **CRIMINAL NO.**
v. : **DATE FILED:**
LYNDA HANG VANG : **VIOLATIONS:**
: **21 U.S.C. § 846 (attempted possession**
: **with intent to distribute Methylenedioxy-**
: **N -methylcathinone (“methylone”) – 1**
: **count)**
: **18 U.S.C. § 924(c) (possession of a firearm**
: **in furtherance of a drug trafficking**
: **crime – 1 count)**
: **18 U.S.C. § 2 (aiding and abetting)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 14, 2014, in Akron, in the Eastern District of Pennsylvania,
defendant

LYNDA VANG

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the attempted possession with intent to distribute of, approximately 1.6 kilograms of a mixture and substance containing a detectable amount of 3,4-Methylenedioxy-N-methylcathinone (“methylone”), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2014, in Akron, in the Eastern District of Pennsylvania,
defendant

LYNDA VANG

knowingly possessed, and aided and abetted the possession of, a firearm, that is, a loaded Mossberg 12-gauge shotgun, serial number G909600, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, attempted possession with intent to distribute of 3,4-Methylenedioxy-N-methylcathinone (“methydone”), a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1 .As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendant

LYNDA VANG

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, 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 party;

(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 divided 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 property subject to forfeiture.

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

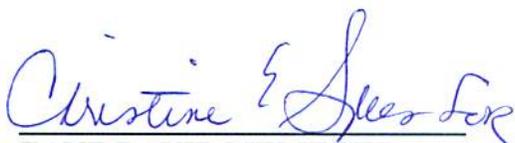
3. As a result of the violation of Title 18, United States Code, Section 924(c)(1), set forth in this indictment, the defendant shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offense, including, but not limited to:

- (a) Mossberg, 12-gauge shotgun, serial number G909600;
- (b) One shotgun shell;
- (c) Mossberg, Model 9200, 12-gauge shotgun, serial number SB5751;
- (d) Ruger, .223 caliber rifle, serial number 18613958.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney