# ED

# UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

UNITED STATES OF AMERICA

V.

ANTHONY JEROME LANG TRAVELL KINKAY JONES VANZINI NICHOLAS HANSELL AMBER MILLER CARLTON REID MALLARD, SR. CASE NO. 8:18 CT 110 T 33 CPT
21 U.S.C. § 846
21 U.S.C. § 841



### INDICTMENT

The Grand Jury charges:

### **COUNT ONE**

Beginning on an unknown date, but not later than in or around June 2017, and continuing through the date of this Indictment, in the Middle District of Florida, and elsewhere, the defendants,

ANTHONY JEROME LANG, TRAVELL KINKAY JONES, VANZINI NICHOLAS HANSELL, AMBER MILLER, and CARLTON REID MALLARD, SR.,

did knowingly, willfully, and intentionally conspire with each other and other persons, both known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute a controlled substance, which violation involved one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; four-hundred grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-

phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; and one-hundred grams or more of a mixture and substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(A)(i), (vi).

All in violation of 21 U.S.C. § 846.

## **COUNT TWO**

On or about October 2, 2017, in the Middle District of Florida, the defendant,

### ANTHONY JEROME LANG,

did knowingly and intentionally possess with the intent to distribute and did distribute a controlled substance, which violation involved a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; and any analogue of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(C).

#### **COUNT THREE**

On or about October 5, 2017, in the Middle District of Florida, the defendant,

#### ANTHONY JEROME LANG,

did knowingly and intentionally possess with the intent to distribute and did distribute a controlled substance, which violation involved a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; and any analogue of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(C).

#### **COUNT FOUR**

On or about October 5, 2017, in the Middle District of Florida, the defendant,

# VANZINI HANSELL, and AMBER MILLER,

did knowingly and intentionally possess with the intent to distribute a controlled substance, which violation involved a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; any analogue of N-phenyl-N-[1-(2-phenylethyl)-4

piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; and cocaine base, a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(C).

In violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(C), and 18 U.S.C. § 2.

#### **COUNT FIVE**

On or about October 7, 2017, in the Middle District of Florida, the defendants,

# ANTHONY JEROME LANG, and TRAVELL KINKAY JONES,

did knowingly and intentionally possess with the intent to distribute and did distribute a controlled substance, which violation involved one-hundred grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; four-hundred grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; and one-hundred grams or more of a mixture and substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(A)(vi), (b)(1)(B)(i).

In violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi), (b)(1)(B)(i), and 18 U.S.C. § 2.

#### **COUNT SIX**

On or about October 11, 2017, in the Middle District of Florida, the defendant,

# ANTHONY JEROME LANG, and CARLTON REID MALLARD, SR.,

did knowingly and intentionally possess with the intent to distribute a controlled substance, which violation involved one-hundred grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; forty grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; and one-hundred grams or more of a mixture and substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1)(A)(vi), (b)(1)(B)(i), (vi).

In violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi), (b)(1)(B)(i), (b)(1)(B)(vi), and 18 U.S.C. § 2.

#### **FORFEITURES**

1. The allegations contained in Counts One through Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under 21 U.S.C. § 853.

2. Upon conviction of the violations alleged in this Indictment, punishable by imprisonment for more than one year, the defendants,

ANTHONY JEROME LANG, TRAVELL KINKAY JONES, VANZINI NICHOLAS HANSELL, AMBER MILLER, and CARLTON REID MALLARD, SR.,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, and derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violations; and property used and intended to be used, in any manner or part, to commit, and to facilitate the commission of such violations.

- 3. The property to be forfeited includes, but is not limited to, an order of forfeiture in the amount of proceeds obtained from the offense.
- 4. If any of the property described above, 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 comingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under 21 U.S.C. § 853(p).

A TRUE BILL,

man pathsto

MARIA CHAPA LOPEZ

United States Attorney

By:

Daniel M. Baeza

Assistant United States Attorney

By:

Assistant United States Attorney

Chief Major Crimes Section