

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

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**CRIMINAL DOCKET NO. 11-007**

**v.**

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**SECTION: "C"**

**MICHAEL L. FULTZ**

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\* \* \*

**FACTUAL BASIS**

The above-named defendant **MICHAEL L. FULTZ** has agreed to plead guilty to count one in the Indictment in this case. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts to support the allegation against the defendant, ("**FULTZ**"):

On December 17, 2010 at approximately 11:11 a.m., Louisiana State Police Trooper Mannio conducted a traffic stop on a 2010 Toyota Camry rental car bearing Maryland tag 6FAL54 traveling eastbound on Interstate 12 in Tangipahoa Parish near mile marker 37. The traffic stop occurred within the Eastern District of Louisiana.

Once the vehicle stopped, Trooper Mannio talked with the driver **ANDREW THOMAS** and asked for his ID. **THOMAS** provided a Mississippi license and informed the Trooper the car

was a rental vehicle that his friend's mother had leased for them but the renter was not in the car. THOMAS advised that he had driven to Pearland, Texas to drop off his friend's Aunt. He further stated they arrived at Pearland Texas at 7 p.m. on December 16<sup>th</sup> and departed at 7 a.m. on December 17<sup>th</sup>.

After talking with the driver, Trooper Mannio talked with the passenger **FULTZ** who was in the passenger seat.

**FULTZ** advised that his mother Sharron Evans Fultz rented the vehicle and he confirmed that she did rent the car for him. **FULTZ** provide a Mississippi ID and **FULTZ** stated he was traveling from Pearland, Texas to Jackson, MS.

The trooper then conducted a license check on THOMAS and the license was valid and not suspended. Upon returning to the vehicle he queried THOMAS on any contraband in the vehicle. THOMAS denied any contraband or narcotics in the vehicle. The trooper then asked THOMAS for permission to search the vehicle. THOMAS consented and signed a waiver to that effect at 11: 23 a.m.

THOMAS and **FULTZ** were both searched for weapons prior to the search of the vehicle. Troopers Mannio and Bethea conducted a search of the vehicle and noticed that the driver's side door plate was recently tampered with as the screws had been removed. They also noticed fingerprints on the molding as well. After checking the passenger's side door molding and noticing it had not been tampered with at all they then began to suspect that contraband might be underneath the driver's side door molding and they easily removed it to find four individually wrapped bricks of cocaine placed inside the cavity under the driver's side door plate. **FULTZ** admits that he and THOMAS drove to Houston, Texas and purchased the cocaine and returned after hiding the cocaine in the rental vehicle under the driver's side door plate.

LSP forensic chemist, Bridgett K. Mack of the Louisiana State Police, in Baton Rouge, Louisiana, analyzed the narcotics seized in this matter on December 17, 2010. The cocaine had a combined net weight of 1952 net grams and tested positive for the presence of cocaine hydrochloride.

**FULTZ** admits that he possessed these four individual bricks of cocaine and was transporting them for distribution within the Eastern District of Louisiana and elsewhere.

**FULTZ** admits that his possession with the intent to distribute in the Eastern District of Louisiana was a violation of the Federal Controlled Substances Act and his transportation of the narcotics was a drug conspiracy in that he agreed to purchase, transport and distribute narcotics in violation of Federal law with co-defendant ANDREW THOMAS.

For purposes of calculating drug quantities pursuant to United States Sentencing Guidelines §2D1.1, **FULTZ** was responsible for the trafficking of 1952 net grams of cocaine hydrochloride in Eastern District of Louisiana during the course and scope of the conspiracy.

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W. SCOTT LARAGY                      Date  
Assistant United States Attorney

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MICHAEL L. FULTZ                      Date  
Defendant

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GARRISON JORDAN                      Date  
Attorney for Defendant

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

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**CRIMINAL DOCKET NO. 11-007**

**v.**

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**SECTION: "C"**

**ANDREW LEE THOMAS**

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**FACTUAL BASIS**

The above-named defendant **ANDREW LEE THOMAS** has agreed to plead guilty to count one of the Indictment in this case. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts to support the allegation against the defendant, ("**THOMAS**"):

On December 17, 2010 at approximately 11:11 a.m., Louisiana State Police Trooper Mannio conducted a traffic stop on a 2010 Toyota Camry rental car bearing Maryland tag 6FAL54 traveling eastbound on Interstate 12 in Tangipahoa Parish near mile marker 37. The traffic stop occurred within the Eastern District of Louisiana.

Once the vehicle stopped, Trooper Mannio talked with the driver (**THOMAS**) and asked for his ID. **THOMAS** provided a Mississippi license and informed the Trooper the car was a

rental vehicle that his friend's mother had leased for them but the renter was not in the car.

**THOMAS** advised that he had driven to Pearland, Texas to drop off his friend's Aunt. He further stated they arrived at Pearland Texas at 7 p.m. on December 16<sup>th</sup> and departed at 7 a.m. on December 17<sup>th</sup>.

After talking with the driver, Trooper Mannio talked with the passenger Michael Ladarryl FULTZ who was in the passenger seat.

FULTZ advised that his mother Sharron Evans Fultz rented the vehicle and he confirmed that she did rent the car for him. FULTZ provide a Mississippi ID and FULTZ stated he was traveling from Pearland, Texas to Jackson, Mississippi.

The trooper then conducted a license check on **THOMAS** and the license was valid and not suspended. Upon returning to the vehicle he queried **THOMAS** on any contraband in the vehicle. **THOMAS** denied any contraband or narcotics in the vehicle. The trooper then asked **THOMAS** for permission to search the vehicle. **THOMAS** consented and signed a waiver to that effect at 11: 23 a.m.

**THOMAS** and **FULTZ** were both searched for weapons prior to the search of the vehicle. Troopers Mannio and Bethea conducted a search of the vehicle and noticed that the driver's side door plate was recently tampered with as the screws had been removed. They also noticed fingerprints on the molding as well. After checking the passenger's side door molding and noticing it had not been tampered with at all they then began to suspect that contraband might be underneath the driver's side door molding and they easily removed it to find four individually wrapped bricks of cocaine placed inside the cavity under the driver's side door plate. **THOMAS** admits that he and FULTZ drove to Houston, Texas and purchased the cocaine and returned after hiding the cocaine in the rental vehicle under the driver's side door plate.

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**THOMAS** admits that he possessed these four individual bricks of cocaine and was transporting them for distribution within the Eastern District of Louisiana and elsewhere.

**THOMAS** admits that his possession with the intent to distribute in the Eastern District of Louisiana was a violation of the Federal Controlled Substances Act and his transportation of the narcotics was a drug conspiracy in that he agreed to purchase, transport and distribute narcotics in violation of Federal law with co-defendant MICHAEL FULTZ.

For purposes of calculating drug quantities pursuant to United States Sentencing Guidelines §2D1.1, **THOMAS** was responsible for the trafficking of 1952 net grams of cocaine hydrochloride in Eastern District of Louisiana during the course and scope of the conspiracy.

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W. SCOTT LARAGY            Date  
Assistant United States Attorney

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ANDREW LEE THOMAS    Date  
Defendant

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CYNTHIA CIMINO            Date  
Attorney for Defendant