

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	Hon.
	:	
v.	:	Crim. No. 16-
	:	
CURTIS E. THOMPSON,	:	18 U.S.C. §§ 2251(a) and 2
a/k/a "Frank Lucas,"	:	
a/k/a "CT West"	:	

**INFORMATION**

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

From in or around May 2015 through in or around September 2015, in Essex and Mercer Counties, in the District of New Jersey, and elsewhere, the defendant,

CURTIS E. THOMPSON,  
a/k/a "Frank Lucas,"  
a/k/a "CT West,"

did knowingly employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, several minors, including Minor Victim 1 and Minor Victim 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that were mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including a computer, and attempted to do so.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

## **FORFEITURE ALLEGATIONS**

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction of the offense set forth in this Information, in violation of Title 18, United States Code, Section 2251(a), the defendant,

CURTIS E. THOMPSON,  
a/k/a Frank Lucas,  
a/k/a "CT West,"

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, all of his right, title, and interest in the following:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, or 2252A, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code Part I, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

The property to be forfeited includes, but is not limited to, one (1) Apple iPhone, Serial No. FK3QDC9GGRYD.

3. 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 commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

  
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PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 16-

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**CURTIS E. THOMPSON,  
a/k/a "Frank Lucas,"  
a/k/a "CT West"**

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**INFORMATION FOR**

18 U.S.C. §§ 2251(a) and 2

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**PAUL J. FISHMAN**

*U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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**SVETLANA M. EISENBERG**

*ASSISTANT U.S. ATTORNEY  
(973) 645-3979*

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