

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR VIOLATIONS OF
THE FEDERAL CONTROLLED SUBSTANCES ACT AND
THE FEDERAL GUN CONTROL ACT

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
SHANNON DUPLESSIS	*	VIOLATIONS: 21 U.S.C. § 841(a)(1)
SABRINA BOURGEOIS	*	21 U.S.C. § 841(b)(1)(A)
	*	21 U.S.C. § 841(b)(1)(B)
	*	21 U.S.C. § 846
	*	18 U.S.C. § 2
	*	18 U.S.C. § 924(c)(1)(A)(i)
	*	18 U.S.C. § 922(g)(1)
	*	18 U.S.C. § 924(a)(2)
	*	21 U.S.C. § 841(b)(1)(C)
	*	
	*	
	*	

The Grand Jury charges that:

COUNT 1

Beginning on a date unknown and continuing until on or about February 8, 2015, in the Eastern District of Louisiana, the defendants, **SHANNON DUPLESSIS** and **SABRINA BOURGEOIS**, did knowingly and intentionally combine, conspire, confederate and agree with each other, and other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a

detectable amount of cocaine hydrochloride and twenty-eight (28) grams or more of a mixture or substance containing a detectable amount of cocaine base (“crack”), Schedule II drug controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B); all in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about February 8, 2015, in the Eastern District of Louisiana, the defendants, **SHANNON DUPLESSIS** and **SABRINA BOURGEOIS**, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18 United States Code, Section 2.

COUNT 3

On or about February 8, 2015, in the Eastern District of Louisiana, the defendant, **SHANNON DUPLESSIS**, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 4

On or about the February 8, 2015, in the Eastern District of Louisiana, the defendant, **SHANNON DUPLESSIS**, did knowingly possess a firearm, that is, an Arminus, .38 caliber revolver, bearing serial number 0096029, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute

cocaine hydrochloride, as alleged in Count 3 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i).

COUNT 5

On or about February 8, 2015, in the Eastern District of Louisiana, the defendant, **SHANNON DUPLESSIS**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on November 5, 2008, in Plaquemines Parish Court, Case No. 07-00489, for possession of cocaine with intent to distribute, in violation of LA. R.S. 40:967, did knowingly possess in and affecting interstate commerce, a firearm, that is, an Arminus, .38 caliber revolver, bearing serial number 0096029, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 6

On or about February 8, 2015, in the Eastern District of Louisiana, the defendant, **SHANNON DUPLESSIS**, did knowingly and intentionally possess with intent to distribute twenty-eight (28) grams or more of a mixture or substance containing a detectable amount of cocaine base (“crack”) and a quantity of a mixture or substance containing a detectable amount of cocaine hydrochloride, Schedule II drug controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C).

COUNT 7

On or about the February 8, 2015, in the Eastern District of Louisiana, the defendant, **SHANNON DUPLESSIS**, did knowingly possess firearms, that is, a Beretta Model PX4 Storm, .40 caliber semi-automatic handgun, bearing serial number PY136715, and a Remington Model 742, .30-06 hunting rifle, bearing serial number B741779, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with

intent to distribute cocaine base and cocaine hydrochloride, as alleged in Count 6 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i).

COUNT 8

On or about February 8, 2015, in the Eastern District of Louisiana, the defendant, **SHANNON DUPLESSIS**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on November 5, 2008, in Plaquemines Parish Court, Case No. 07-00489, for possession of cocaine with intent to distribute, in violation of LA. R.S. 40:967, did knowingly possess in and affecting interstate commerce, firearms, that is, a Beretta Model PX4 Storm, .40 caliber semi-automatic handgun, bearing serial number PY136715, and a Remington Model 742, .30-06 hunting rifle, bearing serial number B741779, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1, 2, 3 and 6 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 25, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1, 2, 3 and 6 of this Indictment, the defendants, **SHANNON DUPLESSIS** and **SABRINA BOURGEOIS**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit

and to facilitate the commission of the violations alleged in Counts 1, 2, 3 and 6 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided 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 said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

NOTICE OF GUN FORFEITURE

1. The allegations of Counts 4, 5, 7, and 8 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Counts 4, 5, 7, and 8, the defendant, **SHANNON DUPLESSIS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), made applicable through Title 28, United States Code, Section 2461(c), any firearm or ammunition, which was involved in or used in a knowing violation of Title 18,

United States Code, Sections 924(c)(1)(A) and 924(o), as alleged in Counts 4, 5, 7, and 8 of this Indictment.

3. If any of the above-described forfeitable property, 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 person;
- c. has been placed beyond jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property, which cannot be subdivided

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 said defendants up to the value of the above-forfeitable property.

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR
UNITED STATES ATTORNEY


BRANDON S. LONG
Assistant United States Attorney
D.C. Bar No. 500721

New Orleans, Louisiana
February 26, 2015