

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

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

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

v.

\*

SECTION:

TOMMMY WAYNE THOMPSON

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VIOLATION: 21 U.S.C. § 841(a)(1)

a/k/a "Gunn"

21 U.S.C. § 841(b)(1)(B)

STACEY MATTHEWS

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21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 841(b)(1)(D)

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21 U.S.C. § 846

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18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 922(g)(1)

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The Grand Jury charges that:

COUNT 1

Beginning at a time unknown and continuing until on or about June 6, 2013, in the Eastern District of Louisiana, and elsewhere, the defendants, **TOMMY THOMPSON**, a/k/a "**Gunn**," and **STACEY MATTHEWS**, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute a quantity 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)(C); all in violation of Title 21, United States Code, Section 846.

**COUNT 2**

Beginning at a time unknown and continuing until on or about June 6, 2013, in the Eastern District of Louisiana, and elsewhere, the defendants, **TOMMY THOMPSON, a/k/a “Gunn,”** and persons known and unknown, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute a quantity of cocaine base (“crack”), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); all in violation of Title 21, United States Code, Section 846.

**COUNT 3**

On or about November 29, 2012, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 4**

On or about December 4, 2012, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 5**

On or about December 12, 2012, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 6**

On or about December 12, 2012, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity of cocaine base (“crack”), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 7**

On or about December 20, 2012, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute 28 grams or more of cocaine base (“crack”), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 8**

On or about January 3, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 9**

On or about January 17, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 10**

On or about January 17, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute 28 grams or more of cocaine base (“crack”), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 11**

On or about January 17, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: distribution of cocaine hydrochloride and distribution of cocaine base (“crack”), as referenced in Count 9 and Count 10 of this Indictment, respectively, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT 12**

On or about March 21, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 13**

On or about March 21, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute 28 grams or more of cocaine base (“crack”), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 14**

On or about April 11, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 15**

On or about May 21, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally distribute a quantity of marijuana, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

**COUNT 16**

On or about June 3, 2013, in the Eastern District of Louisiana, the defendant, **STACEY MATTHEWS** did knowingly and intentionally distribute a quantity 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)(C).

**COUNT 17**

On or about June 6, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a “Gunn,”** did knowingly and intentionally possess with intent to

distribute a quantity of marijuana, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

**COUNT 18**

On or about June 6, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY WAYNE THOMPSON, a/k/a "Gunn,"** did knowingly and intentionally possess with the intent to distribute a quantity 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)(C).

**COUNT 19**

On or about June 6, 2013, in the Eastern District of Louisiana, the defendant, **TOMMY THOMPSON, a/k/a "Gunn,"** having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on August 5, 2004, in the Criminal District Court for the Parish of Assumption, State of Louisiana, Case Number 04-105, for distribution of cocaine, in violation of LA-R.S. 40:967(A)(1); did knowingly possess in and affecting interstate commerce a firearm, to wit: a Lorcin 9mm, semi-automatic handgun, bearing serial number L059553, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT 20**

On or about June 6, 2013, in the Eastern District of Louisiana, the defendant, **STACEY MATTHEWS,** did knowingly and intentionally possess with intent to distribute a quantity 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)(C).

## NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1-10, Counts 12-18, and Count 20 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 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1-10, Counts 12-18, and Count 20, the defendants, **TOMMY WAYNE THOMPSON, a/k/a "Gunn" and STACEY MATTHEWS**, 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 or to facilitate the commission of the violations alleged in Counts 1-10, Counts 12-18, and Count 20 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 acts or omissions 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 11 and 19 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 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 11 and 19, the defendant, **TOMMY WAYNE THOMPSON, a/k/a "Gunn,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in knowing violations of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1), as alleged in Counts 11 and 19 of the 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 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 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 defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(c)(1) and 924(d)(1).

A TRUE BILL:

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FOREPERSON

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY



FREDERICK W. VETERS, JR.  
Assistant United States Attorney  
Louisiana Bar Roll No. 23584

New Orleans, Louisiana  
February 12, 2015