

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

Case No. 3:19-mj- 1285-JBT

SAMUEL ARTHUR THOMPSON

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 17, 2019, in the Middle District of Florida, the defendant,

knowing that he had been previously convicted in any court of a crime punishable by imprisonment for a term exceeding one year, specifically, Sodomy – 2nd Degree, on or about April 22, 1998, did knowingly possess, in and affecting interstate commerce, a firearm, that is, a Smith & Wesson .38 caliber revolver,

in violation of Title 18, United States Code, Section 922(g)(1). I further state that I am a Special Agent of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:  Yes  No

  
Signature of Complainant  
Mark S. Latham

Sworn to before me and subscribed in my presence,

on August 2, 2019 \_\_\_\_\_

at

Jacksonville, Florida \_\_\_\_\_

JOEL B. TOOMEY  
United States Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

**AFFIDAVIT**

I, Mark S. Latham, being duly sworn, depose and state that:

**IDENTITY OF AFFIANT**

1. I am a Special Agent, with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been so employed since July 2001. Currently, I am assigned to the Jacksonville Field Office, Group II. Prior to my employment with ATF, I was employed as a Border Patrol Agent/Pilot for the United States Immigration and Naturalization Service, United States Department of Justice, for more than five years. I am a graduate of the Federal Law Enforcement Training Center, Criminal Investigation Training Program, and the ATF National Academy, Special Agent Basic Training. I am charged with the investigation and enforcement of violations of federal firearms, arson, and explosives laws, as well as any other violations encountered in the course of my duties.

2. In my experience as a Special Agent, I have participated in many investigations involving the unlawful possession of firearms and unlawful possession, sale, and trafficking of narcotics. In addition, I have also participated in many investigations involving forcible sex trafficking. In some of these investigations, I have been the case agent, while in others I have acted in an undercover capacity dealing directly with the targets of the investigation.

3. The information contained in this affidavit is based upon my personal observations and investigation, information relayed to me by other federal, state, and local law enforcement officers, as well as my review of records, documents, and physical evidence obtained during this investigation.

4. The information provided in this affidavit does not include each and every fact known to me, but rather, information sufficient to establish probable cause for the requested criminal complaint.

#### **REQUESTED CRIMINAL COMPLAINT**

5. Based on the information in this affidavit, I request that a criminal complaint be issued for Samuel Arthur THOMPSON for violating the provisions Title 18, United States Code, Section 922(g)(1).

#### **FEDERAL LAW**

6. Your affiant is familiar with federal law including Title 18, United States Code, Section 922(g)(1), which prohibits the unlawful possession of firearms and ammunition by a person who knows he has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year.

#### **INVESTIGATIVE ACTIVITY**

7. On or about July 17, 2019, I received information from Assistant United States Attorney (“AUSA”) Laura Cofer Taylor that the Federal Bureau of Investigation (“FBI”) was executing a federal warrant to search the

premises known as 113 Marsh Island Circle, St. Augustine, Florida 32095, within the Middle District of Florida, which is the residence of THOMPSON and his wife, Jean Louise Puckett. The search warrant was for evidence related to the intentional access of a protected computer or computer network without authorization. *See* Case No. 3:19-mj-1251-MCR. AUSA Taylor advised me that on July 17, 2019, the FBI executed the search warrant and, in the process of searching for the things to be searched and seized, as authorized by the search warrant, recovered a firearm. The firearm was seized by the FBI as contraband.

8. The same day, I spoke with FBI Special Agent Julian Carl Slaughter, who is a case agent for the FBI's computer intrusion investigation into THOMPSON. SA Slaughter confirmed that FBI had executed a federal search warrant at THOMPSON's residence and had recovered a firearm. SA Slaughter later informed me that the firearm recovered from THOMPSON's residence is a Smith & Wesson revolver, model 637, .38 S&W Spl. +P caliber, with serial number DAZ 3430.

9. On July 18, 2019, I completed a firearms trace request for the aforementioned Smith & Wesson revolver (Trace number T20190251034). On July 22, 2019, ATF completed the firearms trace for the Smith & Wesson revolver, the summary of which I have reviewed. The Firearms Trace

Summary shows that Jean Louise Duff purchased the revolver on September 14, 2007, from Shooting Sports Pro Shop, Jacksonville, Florida. I conducted a Florida Driver and Vehicle Information Database (DAVID) search, which showed that Jean Louise Puckett, THOMPSON's wife, had previously used the name Jean Louise Duff.

10. On July 30, 2019, I reviewed an FBI FD-302 report written by FBI SA Michael Day regarding the search of the residence at 113 Marsh Island Circle, St. Augustine, Florida, which is THOMPSON's residence. According to SA Day's report, THOMPSON spoke with SA Day regarding the location of the key to a safe that was found in a nightstand in his bedroom. THOMPSON stated that there was a gun in the safe that was found in the nightstand in his room. THOMPSON stated that the gun was his wife's and that he had not opened the safe in years. When SA Day asked where the key to the safe was located, THOMPSON went to a key rack in the laundry room and retrieved a couple of keys to try. One of the keys opened the safe and the aforementioned .38 caliber Smith & Wesson revolver was found inside along with rounds of ammunition. The gun was loaded with five rounds of .38 caliber Gold Dot ammunition. SA Day noticed that the electronic key pad to the safe was still functioning at the time it was opened.

11. In addition, SA Day spoke with Jean Louise Puckett regarding the safe found in the nightstand in her bedroom. Puckett told SA Day that there was a gun located in a safe in the nightstand of the bedroom she shares with her husband, THOMPSON. Puckett stated that she had not opened the safe in years and was not sure how to open it.

12. On July 30, 2019, I reviewed photographs of the aforementioned Smith & Wesson revolver recovered by the FBI from THOMPSON's residence and contacted Smith & Wesson. One of my roles as a Special Agent with ATF is to serve as a firearms interstate nexus expert, and I have been qualified as such in U.S. District Court in the Middle District of Florida. In this role, I make determinations regarding the travel in interstate and foreign commerce of firearms and ammunition. It is my opinion that the Smith & Wesson revolver possessed by THOMPSON is a firearm as defined by federal law and according to Smith & Wesson was manufactured in Massachusetts prior to its recovery by FBI in Florida.

13. On July 29, 2019, I queried the NCIC database to identify Samuel Arthur THOMPSON's criminal history related to his arrest and later conviction in 1998 for violating Alabama statutes, which prohibit sexual assault - sexual abuse and sodomy (described in further detail in the following paragraph). The query reflected that the Samuel Arthur THOMPSON who

was convicted in 1998 of felony and misdemeanor violations of the Alabama statutes is one and the same with the Samuel Arthur THOMPSON residing at 113 Marsh Island Circle, St. Augustine, Florida, who is the subject of this affidavit.

14. I also reviewed information from a publicly available website maintained by the Florida Department of Law Enforcement (FDLE) showing that THOMPSON is a registered sex offender residing at 113 Marsh Island Circle, Saint Augustine, Florida 32095-9644. According to FDLE, THOMPSON was convicted on April 22, 1998, of Sexual Abuse 2nd and Sodomy 2nd in Mobile, Alabama. On July 30, 2019, I contacted FDLE regarding THOMPSON and verified that THOMPSON is permanently registered at the aforementioned address as of July 2013. In addition, THOMPSON's sexual offender registration does not expire.

15. On August 1, 2019, I interviewed Jean Louise Puckett, wife of THOMPSON, regarding the aforementioned Smith & Wesson revolver. I showed Puckett a picture of THOMPSON, which I had retrieved from National Crime Information Center (also known as "NCIC") sexual offender registry information, and Puckett identified the individual in the photo as THOMPSON. I also showed Puckett several pictures taken by FBI during the execution of the federal search warrant at 113 Marsh Island Circle, St.

Augustine, Florida. Puckett said that she slept on the right side of the bed and THOMPSON slept on the left side of the bed. Puckett stated that the nightstand in closest proximity to her side of the bed was her nightstand, and the nightstand in closest proximity to THOMPSON's side of the bed was his nightstand. Puckett said that the safe containing the revolver was in THOMPSON'S nightstand. Puckett confirmed items that belonged to THOMPSON were on his nightstand, such as a cup, newspapers and a book. Puckett confirmed a picture of her nightstand. Puckett stated that she had purchased the revolver in 2006 or 2007 when she was single and did not recall firing the weapon. Puckett recalled that THOMPSON mentioned that they needed to purchase a safe to store the firearm and that THOMPSON purchased that safe a while ago. Puckett stated that THOMPSON initially showed her how to get into the safe with the access code but she does not recall the code now. Puckett only remembers THOMPSON retrieving the revolver once a while ago when they were startled in the middle the night. Puckett stated she already had ammunition and does not recall THOMPSON purchasing any ammunition. Puckett could not recall ever accessing the safe herself. In addition, Puckett mentioned that THOMPSON told her he was a felon and that he was incarcerated for 18 months.



16. On July 30, 2019, I received a copy of certified court documents related to the Alabama Sexual Abuse 2nd and Sodomy 2nd convictions for THOMPSON, which had been obtained by the FBI. Based on my review of certified copies of the Judgment and Sentence, I have determined that THOMPSON has been convicted in Alabama of one misdemeanor and one felony, to wit:

- a. 13A-6-67, Sexual Abuse - 2nd degree (misdemeanor), case number 98-000072, convicted April 22, 1998, in the Thirteenth Judicial Circuit Court of Mobile County, Alabama;
- b. 13A-6-64, Sodomy - 2nd degree (felony), case number 98-000073, convicted April 22, 1998, in the Thirteenth Judicial Circuit Court of Mobile County, Alabama.

### CONCLUSION

Based on the aforementioned facts, I submit that there is probable cause to believe that on or about July 17, 2019, Samuel Arthur THOMPSON

unlawfully possessed a firearm in violation of Title 18, United States Code, Section 922(g)(1), within St. John's County, in the Middle District of Florida.

This concludes my affidavit.




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MARK S. LATHAM  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Subscribed and sworn to before me

On August <sup>2</sup>~~1~~, 2019:



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JOEL B. TOOMEY  
United States Magistrate Judge