

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

**UNITED STATES OF AMERICA**

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**CRIMINAL NO. 15-200**

**v.**

\*

**SECTION: "J"**

**THOMAS GORDON**

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**FACTUAL BASIS**

The above-named defendant, Thomas GORDON (hereinafter, "GORDON"), has agreed to plead guilty pursuant to a plea agreement with the Government to Count One of the Superseding Indictment. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt the following facts to support the allegations against GORDON:

**Count One - Drug Trafficking Conspiracy**

Beginning on a date unknown, but not later than February 6, 2015, and continuing until on or about August 6, 2015, in the Eastern District of Louisiana, and elsewhere, GORDON conspired with codefendants Donald EALY, Martha QUINONES, Kevin GONZALES, Kenneth HARRIS, Reginald WASHINGTON, Wilbert CLARK, and Earl BROWN, and others, to distribute and to possess with the intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin.

During the course of the conspiracy, on multiple occasions, GORDON traveled to the Houston area to meet with QUINONES and GONZALES, residents of the Houston area, for purposes of obtaining quantities of heroin. In addition, on multiple occasions, QUINONES and GONZALES traveled from the Houston area to New Orleans in order to distribute heroin to

GORDON. For example, sometime immediately prior to July 17, 2015, QUINONES traveled to New Orleans by bus while knowingly possessing approximately one-half kilogram of heroin, which she distributed to GORDON. On July 31, 2015, GONZALES traveled to New Orleans by bus while knowingly possessing approximately one-half kilogram of heroin, which he distributed to GORDON. In the days prior to the July 31 trip, QUINONES had been in communication with GORDON over GORDON's cellular phone in order to help coordinate the logistics of GONZALES's trip to New Orleans for purposes of distributing heroin.

Then, on August 6, 2015, QUINONES again traveled to New Orleans by bus while knowingly possessing approximately one-half kilogram of heroin. Upon arrival into New Orleans, QUINONES was arrested, along with GORDON who had traveled to the bus station to pick up QUINONES. At the time of her arrest, QUINONES was in possession of approximately one-half kilogram of heroin, which she intended to distribute to GORDON. In the days prior to the August 6 trip, GONZALES had been in communication with GORDON over GORDON's cellular phone in order to help coordinate the logistics of QUINONES's trip to New Orleans for purposes of distributing heroin.

GORDON, EALY, and others partnered to sell the heroin that GORDON received from QUINONES and GONZALES. During the course of the charged conspiracy, GORDON, EALY, and others used EALY's apartment building, located at 3027 Loyola Street, New Orleans, Louisiana, as the base of their drug-distribution operation. There, GORDON, EALY and others used cutting agents to dilute the quality of heroin, and used a compression jack to compress the heroin. GORDON, EALY, and others then repackaged the heroin into smaller quantities and sold the heroin to their customers. Specifically, GORDON distributed quantities of heroin to

codefendants HARRIS, BROWN, CLARK, WASHINGTON, and others, who then sold smaller quantities of heroin to customers within the Eastern District of Louisiana. Moreover, GORDON communicated with QUINONES, GONZALES, EALY, HARRIS, BROWN, CLARK, WASHINGTON, and others, using cellular phones in furtherance of their drug-distribution operation.

On at least seven occasions during the conspiracy, GORDON sold multiple-gram quantities of heroin to an FBI confidential source in exchange for FBI drug-buy money.

GORDON and the government stipulate for the purposes of sentencing that GORDON was responsible for conspiring to distribute and possess with intent to distribute at least one (1) kilogram but less than three (3) kilograms of heroin, through GORDON's own conduct and the reasonably foreseeable conduct of his co-conspirators.

GORDON's involvement in the conspiracy charged in Count One of the Superseding Indictment is not limited to the facts contained in this stipulated factual basis. These facts are merely a summary of GORDON's involvement in this conspiracy and are presented in this document to support his plea of guilty to Count One in the Superseding Indictment.

 5/26/16  
BRANDON S. LONG (Date)  
Assistant United States Attorney

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JULIE C. TIZZARD (Date)  
Attorney for Defendant

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THOMAS GORDON (Date)  
Defendant