

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR VIOLATIONS OF
THE FEDERAL CONTROLLED SUBSTANCES ACT**

UNITED STATES OF AMERICA

CRIMINAL DOCKET NO.

v.

SECTION:

GARAN GIBSON

a/k/a "Red,"

MATTHEW COUSAN

a/k/a "Mathis Cousan,"

a/k/a "Fat"

VIOLATIONS: 21 U.S.C. § 841 (a)(1)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 846

The Grand Jury charges that:

COUNT 1

Beginning at a time unknown, but prior to 2007, and continuing to the present, in the Eastern District of Louisiana and elsewhere, the defendants, **GARAN GIBSON, a/k/a "Red,"** and **MATTHEW COUSAN, a/k/a "Mathis Cousan," a/k/a "Fat,"** did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jury, to distribute and possess with the intent to distribute a quantity of heroin, a Schedule I drug controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

COUNT 2

On or about October 26, 2010, in the Eastern District of Louisiana, **MATTHEW COUSAN, a/k/a "Mathis Cousan," a/k/a "Fat,"** did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

On or about November 8, 2010, in the Eastern District of Louisiana, **MATTHEW COUSAN, a/k/a "Mathis Cousan," a/k/a "Fat,"** did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

On or about February 15, 2011, in the Eastern District of Louisiana, **GARAN GIBSON, a/k/a "Red,"** did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

On or about March 11, 2011, in the Eastern District of Louisiana, **GARAN GIBSON, a/k/a "Red,"** did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

On or about March 18, 2011, in the Eastern District of Louisiana, **GARAN GIBSON, a/k/a “Red,”** did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1 through 6 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 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1 through 6 the defendants, **GARAN GIBSON, a/k/a “Red,”** and **MATTHEW COUSAN, a/k/a “Mathis Cousan,” a/k/a “Fat,”** 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 through 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.

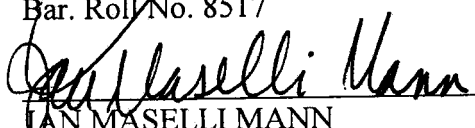
All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON



JIM LETTEN
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New Orleans, Louisiana
July 21, 2011