## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA		*	CRIMINAL NO.
v.		*	SECTION:
IURI MARTIROSIAN		*	VIOLATION: 8 U.S.C. § 1324(a)(1)(A)(iii)
	*	*	*

## FACTUAL BASIS

If this matter had proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible tangible exhibits, the following facts beyond a reasonable doubt to support the allegations in the Bill of Information now pending against the Defendant.

Defendant, **IURI MARTIROSIAN**, operates a commercial floor cleaning business in the New Orleans and Atlanta metro area. Defendant hired both Aleksandr M. Zarachyni and Larisa I. Yudina to work for him at various times for his business. Between September, 2005 until September, 2006, and between March, 2009 until July, 2009, in the Eastern District of Louisiana, the defendant, illegally harbored two aliens, namely, Aleksandr M. Zarachyni and Larisa I. Yudina. These aliens had come to the United States illegally and remained in the Unites States in violation of Federal law. **MARTIROSIAN**, knowing that these individuals were illegally present within the United States, concealed, harbored and shielded them from detection at 225 Jade Avenue, Metairie, Louisiana.

MARTIROSIAN admits that he allowed these aliens to work for him in lieu of rent at 225 Jade Avenue, Metairie, Louisiana between September 2005 until on or about September 2006, and did so having full knowledge that these aliens were not lawfully admitted nor permitted to work within the United States of America.

In addition, **MARTIROSIAN** admits that from March 2009 until on or about July 2009, both aliens lived at 225 Jade Avenue and he further admits that he did not charge these aliens rent because he owed them back wages and agreed to let them stay for no charge to settle his debt with them. **MARTIROSIAN** also admits that his deliberate actions in renting 225 Jade Avenue to these two aliens facilitated the aliens remaining in the United States of America illegally as they had a physical location to remain and evade detection by immigration authorities.

W. SCOTT LARAGY Assistant United States Attorney Louisiana Bar Roll No. 25755

IURI MARTIROSIAN Defendant Date

Date

EDDIE JORDAN, Jr. Attorney for Defendant

Date