UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	**CRIMINAL DOCKET NO.: 12-52**
v.	*	
ISAAC MEDRANO	*	**SECTION: "C" (3)**

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proven through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the Government in Count One of the indictment now pending against the defendant **ISAAC MEDRANO** (hereinafter **MEDRANO** or defendant) to wit: transmitting in interstate commerce telephonic communications containing threats to injure individuals in violation of Title 18, United States Code, Section 875(c).

The following recounts the evidence that would be adduced at trial which would show that on or about September 1, 2011, and continuing through on or about December 2, 2011, **MEDRANO** knowingly transmitted in interstate and foreign commerce

from the State of Texas to the State of Louisiana telephonic communications to K.B. containing threats to injure K.B. and members of his family, in violation of Title 18, United States Code, Section 875(c).

Around February 2011, S.B. and **MEDRANO**, who had previously attended high school together in Texas, began a romantic relationship. S.B. lived with her husband in Eastern District of Louisiana. This relationship started on Facebook and gradually escalated to physical sexual contact. In June 2011, S.B. visited **MEDRANO** at a hotel located in the Rio Grande Valley of Texas. From June 2011 to August 2011, **MEDRANO** and S.B. continued trying to establish a relationship. In September 2011, S.B. attempted to end the relationship with **MEDRANO**, but he refused. **MEDRANO** also tried to end the relationship due to his desire to remain in Texas but it continued.

Angered by the intended break up, **MEDRANO**, residing in Texas, began sending threatening text messages to S.B., about killing her husband, K.B. **MEDRANO** also threatened S.B.'s husband K.B. According to S.B., **MEDRANO** claimed to be a hit man. In or about October 2011, **MEDRANO** made these threats from a phone with Texas area code (956) XXX-XXXX, in part, to K.B.'s telephone number (985) XXX-XXXX, located in the Eastern District of Louisiana. These threats were left on K.B.'s home answering machine. S.B. identified the telephone number that made the threatening phone calls and the caller's voice as being **MEDRANO**'s. **MEDRANO** acknowledges making these phone calls. **MEDRANO** exchanged phone calls with K.B. who was angry over **MEDRANO**'s

affair with S.B. However, **MEDRANO** acknowledges that none of this justified **MEDRANO** in making these threatening phone calls. **MEDRANO** takes full responsibility for his bad conduct.

MEDRANO's threats of serious physical harm were made using vile and obscene language. **MEDRANO** identified himself by name during one of the voice mail messages left on K.B.'s answering machine.

In October 2011, **MEDRANO** sent nude pictures of S.B., which were originally taken by S.B., to her sixteen year old daughter and to K.B.'s work e-mail in Norco, Louisiana. According to the Security Manager at K.B.'s employer, their e-mail server is located in Houston, Texas. On October 27 and 28 and again on November 4, 2011, **MEDRANO** sent numerous SMS text messages to S.B.'s adult son E.G. from telephone number (504) XXX-XXXX. The messages contained specific threats of physical violence, again using vile and obscene language. He also threatened to kill K.B. and S.B.'s minor daughter.

TONY GORDON SANDERS Assistant United States Attorney Louisiana Bar Roll No. 11705	Date
GARY V. SCHWABE, JR. Counsel for the Defendant Louisiana Bar Roll No. 19780	Date
ISAAC MEDRANO Defendant	Date