

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO. 11-143

 * SECTION: "B"

 *
MARLON JENERRO GREEN

 * * *

FACTUAL BASIS

If this case was to proceed to trial, the Government would present credible testimony and reliable evidence to prove the following facts beyond a reasonable doubt:

Marlon Jenerro Green is a U.S. military veteran receiving monthly benefits from the United States Department of Veterans Affairs (VA) due to a brain injury and a hernia. At the time of the instant offense, Green resided in Kent, Washington and received care from the VA Medical Center there. However, because he previously resided in New Orleans, Green's benefits were being processed through the VA office in New Orleans. Green regularly contacted the VA's Homeless Program Office regarding his vouchers.

On May 24, 2011, Green called the VA office in New Orleans and spoke to VA employee F.S. Green was upset about his benefits and threatened to kill someone at the VA if his "paperwork was not right." Later that day, Green made a second phone call to the VA, stated

that he was en route to New Orleans, and reiterated his previous threat to kill a VA employee, specifically V.H.

Agents of the Federal Bureau of Investigation (FBI) tracked Green's travel to New Orleans, Louisiana and, on May 31, 2011, located him at the Hampton Inn in Metairie, Louisiana. Green allowed the agents to enter his hotel room and consented to an interview. At that time, the agents discovered, in plain sight, a fully loaded, Glock, .40 caliber handgun on the nightstand, which they seized as a security precaution.

Green agreed to a voluntary interview with the agents and admitted to calling the VA. During this interview, he became agitated and expressed anger toward the VA and several VA employees. Green was arrested and advised of his constitutional rights after which he consented to a search of his vehicle and a rental storage unit.

The foregoing facts will be proven by the testimony of Special Agents of the Federal Bureau of Investigation, additional testimonial evidence, and other documentary evidence.

GREGORY M. KENNEDY
Assistant United States Attorney

Date

ALVIN JOHNSON, ESQ.
Attorney for Marlon Jenerro Green

Date

MARLON JENERRO GREEN
Defendant

Date