UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 13-087
v.	*	SECTION: "J" (1)
GREGORY R. ALEXANDER	*	VIOLATION: 26 U.S.C. §5841 26 U.S.C. §5861(d)
	*	26 U.S.C. §5871

* * *

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved 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, **GREGORY R. ALEXANDER**, (hereinafter "**ALEXANDER**" or "defendant") to wit: receiving and possessing a firearm, that is, a destructive device commonly known as a gasoline bomb, that was not registered to him in the National Firearms Registration and Transfer Record in violation of Title 26, United States Code Section 5861(d).

The following recounts the evidence would be adduced at trial which would show that on

or about February 25, 2013, **ALEXANDER** assembled the parts to construct two gasoline and four other ignitable liquid bombs , and thereafter for **ALEXANDER** to receive and possess multiple firearms, that is, six destructive devices commonly known as a gasoline bomb, that were not registered to him in the National Firearms Registration and Transfer Record in violation of Title 26, United States Code Section 5861 (d). On or about February 25, 2013, **ALEXANDER** purchased and/or used a combination of gasoline and other medium petroleum distillates, improvised fuses and plastic bottles, which had affected foreign and interstate commerce in some manner in their transportation to this state. On or about February 25, 2013, in the Eastern District of Louisiana, in the bank parking lot of Whitney Bank located at 2200 Canal Street, New Orleans, LA, **ALEXANDER** poured gasoline or other medium petroleum distillates into empty bottles, with at least one having a material intended to act as a fuse and such as to anticipate that after its lighting, and the passage of time the gasoline or other medium petroleum distillate in each bottle would catch fire and/or explode. That after the completion of the gasoline and medium petroleum distillate bombs, **ALEXANDER** entered his truck, placed the bombs in various locations of the truck, and ignited at least one fuse with the intent that the resulting fire and/or explosion would destroy by fire the vehicle. That the destructive device failed to operate as intended because it/they extinguished themselves prior to igniting the gasoline or medium petroleum distillate in the bottles.

An expert with the Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives, ("ATFE"), would testify that he examined the six gasoline and petroleum distillate bombs and lifted a latent print from one of the bombs and further that each of the six devices manufactured and possessed by **ALEXANDER** on or about February 25, 2013, meets the definition of a firearm under Title 26, United States Code, Sections 5845 and 5861(d).

An ATF agent would testify, that devices such as the gasoline and medium distillate bombs manufactured and possessed by **ALEXANDER**, on or about February 25, 2013 meets the definition of destructive device defined in Title 26, United States Code, Section 5845, and as such, is required to be registered in the National Firearms Act (NFA) Records pursuant to Title 26, United States Code, Sections 5841 et. seq., identifying the device, the date of registration and the identification and address of the person entitled to possession of the firearm. That he caused such a search to be made of the NFA records to determine if any devices were registered to **ALEXANDER**, or any other individual pursuant to the NFA and that the search indicated that no devices had been registered by any person matching **ALEXANDER**, on or before February 25, 2013.

A fingerprint expert would testify that he examined the bomb and a latent print taken from the bomb and matched them to the fingerprints taken of the defendant from prior conviction records for **ALEXANDER** and positively matched them with each other.

On February 27, 2013, **ALEANDER**, contacted via telephone U.S. Agencies, subsidiary, Affirmative Insurance Company and falsely reported his vehicle stolen on February 24, 2013, and attempting to institute a claim for insurance benefits.

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TONY GORDON SANDERS — Date
Assistant United States Attorney
Louisiana Bar Roll No. 11705

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IKE SPEARS — Date
Counsel for Defendant
Louisiana Bar Roll No. _____

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GREGORY R. ALEXANDER, Defendant — Date