

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 14-288
v. * SECTION: "C"
JUAN RAMON ALVAREZ-MARTINEZ, *
a/k/a Juan Ramon-Alvarez * * *

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:

On November 24, 2014, at approximately 6:00 am, Louisiana State Police (LSP) personnel performing targeted operations on Megabus arrivals to New Orleans, Louisiana at St. Claude and Elysian Fields Avenues encountered JUAN RAMON ALVAREZ-MARTINEZ, who had just arrived from Houston, Texas. LSP Sgt. Mark Fontenot observed ALVAREZ-MARTINEZ exit the Megabus and become nervous upon noticing law enforcement personnel. ALVAREZ-MARTINEZ immediately turned away and briskly walked across Elysian Fields Avenue. This behavior has been indicative of wanted subjects and drug couriers previously encountered traveling on the Megabus. LSP Troopers Fontenot and R. Zimmerman approached ALVAREZ-MARTINEZ to speak with him and ask for identification. ALVAREZ-MARTINEZ responded in broken English that he didn't have identification and that he was from Honduras.

Border Patrol Agent (BPA) Toby Willcutt responded to the Troopers' request for assistance. When questioned by BPA Willcutt, ALVAREZ-MARTINEZ admitted that he was from Honduras and was present in the United States illegally, at which time he was arrested.

ALVAREZ-MARTINEZ's fingerprints were processed through the IDENT/IAFIS system which revealed that he had been previously removed on March 7, 2005 under the name of Juan Ramon-Alvarez. A further check revealed that ALVAREZ-MARTINEZ did not have the expressed consent of the United States Attorney General or his authorized designated successor, the Secretary of the Department of Homeland Security, to reenter the United States.

The government would also present additional evidence of guilt not contained above in the factual basis.

GREGORY M. KENNEDY
Assistant United States Attorney

Date

SAMUEL J. SCILLITANI
Attorney for Juan Ramon Alvarez-Martinez

Date

JUAN RAMON ALVAREZ-MARTINEZ
Defendant

Date