

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA : INDICTMENT  
 :  
 - v. - :  
 : 14 Cr. 344  
 JUVENCIO MARTINEZ-MARTINEZ, :  
 a/k/a "Raul," :  
 :  
 Defendant. :  
-----X

COUNT ONE

(Conspiracy to Commit Hostage Taking)

The Grand Jury charges:

1. From in or about late March 2014 through on or about May 15, 2014, in the Southern District of New York and elsewhere, JUVENCIO MARTINEZ-MARTINEZ, a/k/a "Raul," the defendant, knowingly seized and detained and threatened to kill, to injure and to continue to detain another person in order to compel a third person to do and abstain from doing an act as an explicit and implicit condition for the release of the person detained, and attempted and conspired to do so, to wit, JUVENCIO MARTINEZ-MARTINEZ and other individuals detained an individual in a residence in or about Weslaco, Texas and threatened to kill, injure and detain that individual in order to compel a person residing in or about Fallsburg, New York to send MARTINEZ-MARTINEZ money via Money Gram.

(Title 18, United States Code, Section 1203.)

COUNT TWO

(Conspiracy to Commit Alien Smuggling)

The Grand Jury further charges:

2. From in or about late March 2014 through on or about May 15, 2014, in the Southern District of New York and elsewhere, JUVENCIO MARTINEZ-MARTINEZ, a/k/a "Raul," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other, to commit an offense against the United States, to wit, a violation of Title 8, United States Code, Section 1324(a)(1)(A)(i).

3. It was a part and object of the conspiracy that JUVENCIO MARTINEZ-MARTINEZ, a/k/a "Raul," and others known and unknown, would and did knowingly bring to the United States an alien knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i).

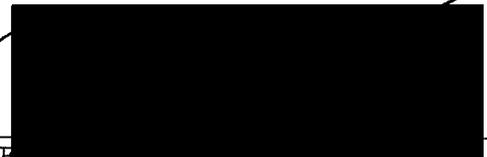
OVERT ACT

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about May 2014, JUVENCIO MARTINEZ-MARTINEZ, a/k/a "Raul," the defendant, called an individual located in or about Fallsburg, New York and demanded that the

individual pay MARTINEZ-MARTINEZ money in order to continue transport a foreign national from El Salvador who had entered the United States from Mexico.

(Title 18, United States Code, Section 371.)



PERSON

Preet Bharara  
PREET BHARARA  
United States Attorney

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**UNITED STATES OF AMERICA**

**- v. -**

**JUVENCIO MARTINEZ-MARTINEZ,  
a/k/a "Raul,"  
Defendant.**

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**INDICTMENT**

14 Cr. \_\_\_\_

(18 U.S.C. § 1203 and 8 U.S.C. § 1324(a)(1)(A)(i) )



Foreperson.

**PREET BHARARA**  
United States Attorney.

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