

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 15-200</b>
<b>v.</b>	*	<b>SECTION: "J"</b>
<b>KEVIN GONZALES</b>	*	

\*      \*      \*

**FACTUAL BASIS**

The above-named defendant, Kevin GONZALES (hereinafter, "GONZALES"), has agreed to plead guilty pursuant to a plea agreement with the Government to Count One of the Superseding Indictment. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt the following facts to support the allegations against GONZALES:

**Count One - Drug Trafficking Conspiracy**

Beginning on a date unknown, but not later than February 6, 2015, and continuing until on or about August 6, 2015, in the Eastern District of Louisiana, and elsewhere, GONZALES conspired with codefendants Thomas GORDON, Donald EALY, Martha QUINONES, Kenneth HARRIS, Reginald WASHINGTON, Wilbert CLARK, and Earl BROWN, and others, to distribute and to possess with the intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin.

During the course of the conspiracy, GONZALES and his mother, QUINONES, traveled from Houston to New Orleans on a public Megabus, while carrying quantities of heroin for distribution to GORDON and EALY. GONZALES and QUINONES communicated with GORDON regarding their heroin-dealing activities using cellular phones.

Sometime immediately prior to July 17, 2015, QUINONES traveled to New Orleans by Megabus while carrying approximately one-half kilogram of heroin, which she distributed to GORDON. On July 30, 2015, GONZALES sent a text message to GORDON, stating, "What's up it's Kevin. My mom said it is possible to get rid of the whole car by the 8th of next month." In this text, GONZALES was using coded language to confirm whether GORDON would be able to sell one kilogram of heroin before August 8, 2015. GORDON responded, "Yes They love how it drives." On July 31, 2015, GONZALES arrived in New Orleans with one-half kilogram of heroin, which he provided to GORDON. GORDON, working with EALY and others, repackaged and sold the heroin in the New Orleans area. GONZALES returned to Houston on August 4, 2015.

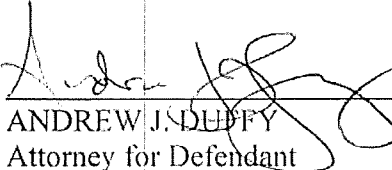
On August 5, 2015, GONZALES called GORDON to finalize logistics for QUINONES's trip to New Orleans, in which she would be transporting heroin to GORDON. On August 6, 2015, QUINONES traveled to New Orleans by public Megabus while knowingly possessing approximately one-half kilogram of heroin. Upon arrival into New Orleans, QUINONES was arrested, along with GORDON who had traveled to the bus station to pick up QUINONES. At the time of her arrest, QUINONES was in possession of approximately one-half kilogram of heroin, which she intended to distribute to GORDON.


GONZALES and the government stipulate for the purposes of sentencing that GONZALES was responsible for conspiring to distribute and possess with intent to distribute at least one (1) kilogram but less than three (3) kilograms of heroin, through GONZALES's own conduct and the reasonably foreseeable conduct of his co-conspirators.

GONZALES's involvement in the conspiracy charged in Count One of the Superseding

Indictment is not limited to the facts contained in this stipulated factual basis. These facts are merely a summary of GONZALES's involvement in this conspiracy and are presented in this document to support his plea of guilty to Count One in the Superseding Indictment.

 10/10/16  
BRANDON S. LONG (Date)  
Assistant United States Attorney

 9/13/2016  
ANDREW J. DUFFY (Date)  
Attorney for Defendant

 9-13-16  
KEVIN GONZALES (Date)  
Defendant