

JJD:JRS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

WILLIAM UMBERTO MARTINEZ  
CHAVEZ, also known as "William  
Martinez," "William Martines,"  
"Wiliam Martinez Chavez" and  
"Julio Cordero,"

Defendant.

- - - - - X

**MJ 19- 297** - ACT

COMPLAINT

(T. 8, U.S.C., §§ 1326(a) and (b)(2))

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ APR 02 2019 ★  
LONG ISLAND OFFICE

EASTERN DISTRICT OF NEW YORK, SS:

DENNIS CARROLL, being duly sworn, deposes and states that he is a  
Deportation Officer with the Department of Homeland Security, United States Immigration and  
Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

On or about April 2, 2019, within the Eastern District of New York, the  
defendant WILLIAM UMBERTO MARTINEZ CHAVEZ, also known as "William  
Martinez," "William Martines," "Wiliam Martinez Chavez" and "Julio Cordero," an alien  
who had previously been removed from the United States after a conviction for the  
commission of an aggravated felony, was found in the United States, without the Secretary of  
the United States Department of Homeland Security and the United States Attorney General  
having expressly consented to such alien's applying for admission.

(Title 8, United States Code, Sections 1326(a) and (b)(2)).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Deportation Officer with ICE and have been involved in the investigation of numerous cases involving the illegal reentry of aliens. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the ICE investigative file (including the defendant's criminal history record), and from reports of other law enforcement officers involved in the investigation.

2. The defendant WILLIAM UMBERTO MARTINEZ CHAVEZ, also known as "William Martinez," "William Martines," "Wiliam Martinez Chavez" and "Julio Cordero," is a citizen and national of El Salvador.

3. On or about May 22, 2000, outside a deli in Huntington, New York, the defendant stabbed Armando Velasquez Garcia, severing his aorta. Garcia died minutes later.

4. On or about May 1, 2002, after a trial, the defendant was convicted of Manslaughter in the First Degree under New York Penal Law § 125.20, an aggravated felony offense. The defendant was sentenced to term of incarceration of 20 years.

5. On or about May 6, 2003, the defendant was ordered removed from the United States by an Immigration Judge in Fishkill, New York subsequent to his aggravated felony conviction.

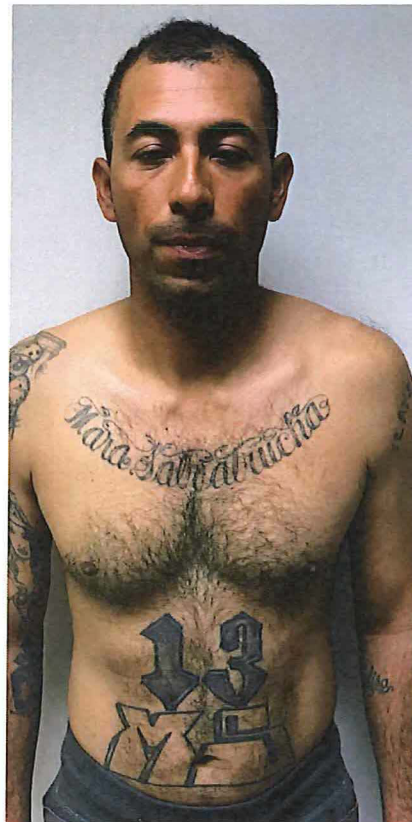
---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

6. On or about October 20, 2017, the defendant completed his manslaughter sentence and was removed from the United States to El Salvador.

7. On or about April 2, 2019, law enforcement officers identified the defendant as he exited his residence in Suffolk County and arrested him pursuant to probable cause. Asked his name, the defendant stated that it was “William Martinez Chavez.” The defendant was in possession of a Mexican driver’s license bearing his photograph and the name “Wiliam Martinez Chavez.”

8. Following the defendant’s April 2, 2019 arrest, the defendant admitted to law enforcement officers that he had been an MS-13 gang member in the past, but claimed to not be a gang member at this time. The defendant has several “MS-13” tattoos, including on his abdomen and “Mara Salvatrucha” on his chest, as shown in the below photograph.




9. Following the defendant's April 2, 2019 arrest, fingerprint impressions were taken. Law enforcement officers have compared the fingerprint impressions taken after his arrest on April 2, 2019, those taken from the defendant by the Suffolk County Police Department in 2000, and the fingerprint impression on the defendant's Warrant of Removal/Deportation taken by ICE in 2017. All of the above fingerprint impressions were made by one and the same individual.

10. A search of immigration records has revealed that there exists no request by the defendant for permission from either the United States Attorney General or the Secretary of the Department of Homeland Security to re-enter the United States after removal.

WHEREFORE, your deponent respectfully requests that the defendant WILLIAM UMBERTO MARTINEZ CHAVEZ, also known as "William Martinez," "William Martines," "Wiliam Martinez Chavez" and "Julio Cordero," be dealt with according to law.

  
DENNIS CARROLL  
Deportation Officer  
United States Immigration and Customs  
Enforcement

Sworn to before me this  
2nd day of April, 2019

  
THE HONORABLE A. KATHLEEN TOMLINSON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK