

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO.: 10-291</b>
<b>v.</b>	*	<b>SECTION: "C"</b>
<b>ALLEN A. GUILBEAU, JR.</b>	*	

\* \* \*

**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, **Allen A. Guilbeau, Jr.** The defendant has agreed to plead guilty to Count I of the Indictment charging him with making a false statement in a passport application in violation of Title 18, United States Code, Section 1542.

A Special Agent of the United States Department of State would testify that on or about December 13, 2000, in the Eastern District of Louisiana, the defendant **Allen A. Guilbeau, Jr** applied for a U. S. Passport, in his brother's name, J. P. Guilbeau. He would further testify that **Allen A. Guilbeau, Jr.** stated that he was J. P. Guilbeau, date of birth 07/23/1973, and submitted to the U.S. passport agency a fraudulent Louisiana Driver's license, # 6117844, issued on October 11, 2000 in his brother's name in order to obtain the fraudulent passport for his own use.

On or about September 25, 2008, the defendant's brother, J.P. Guilbeau applied for a U.S. Passport. On his application, he indicated that he had never been issued a U.S. Passport. The passport agency determined that a passport had been issued in J.P. Guilbeau's name in December 2000 and denied defendant's brother a passport. On or about October 8, 2008 defendant's brother, J.P. Guilbeau, went to the New Orleans passport agency and notified the agency that his brother **Allen A. Guilbeau, Jr.** had previously used his identity to apply for and fraudulently receive U.S. Passport # 089424737. Defendant's brother, J.P. Guilbeau, turned over the fraudulent passport to the passport agency.

On August 17, 2009 Special Agents of the U. S. Department of State interviewed **Allen A. Guilbeau, Jr.** **Guilbeau** was shown a copy of the DS-11 passport application that was submitted on December 13, 2000. **Guilbeau** acknowledged submitting the passport application and admitted that he applied for a U.S. passport in his brother's name. Defendant further stated that his brother was unaware that **Guilbeau** used J .P. Guilbeau's identity to fraudulently obtain a U.S. Passport.

Both the government and the defendant, **Allen A. Guilbeau, Jr.**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

---

ALLEN A. GUILBEAU, JR.      Date  
Defendant

---

JULIA K. EVANS      Date  
Assistant United States Attorney

---

ROMA KENT      Date  
Counsel for Defendant