

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 20-21
v. * SECTION: "A"
VICTOR RAMIREZ *
* * *

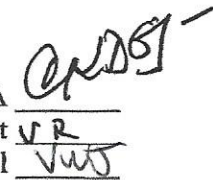
FACTUAL BASIS

The defendant, **VICTOR RAMIREZ** (hereinafter "**RAMIREZ**"), has agreed to plead guilty as charged to the one-count indictment charging him with making a false statement on a passport application in violation of Title 18, United States Code, Section 1542.

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:

Individual "A" is an individual known to the Grand Jury, who does not know defendant **VICTOR RAMIREZ**, and did not give his permission to use his personal identifying information. On or about January 27, 2020, in the Eastern District of Louisiana, defendant **RAMIREZ** willfully and knowingly made a false statement in an application with the United States Department of State for a U.S. passport with intent to induce and secure for his own use the issuance of a said passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant represented himself to be Individual "A", when, as he well knew, he was not Individual "A", as

AUSA
Defendant VR
Defense Counsel

Handwritten signature and initials in black ink, appearing to be 'CANDY' and 'VR'.

he stated to Department of State acceptance clerks in the New Orleans State Department office.

These facts would be proven by testimony of agents of the United States State Department.

Carter K. Guice Jr. 8 JUNE 2020
CARTER K. D. GUICE JR. / Date
Assistant United States Attorney

Valerie Jussein 6-8-2020
VALÉRIE JUSSEIN, ESQ. / Date
Attorney for the Defendant

Victor Ramirez
VICTOR RAMIREZ / Date
Defendant