

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

UNITED STATES OF AMERICA	*	CRIMINAL NO. 15-200
v.	*	SECTION: "J"
MARTHA QUINONES	*	
	* * *	

FACTUAL BASIS

The above-named defendant, Martha QUINONES (hereinafter, "QUINONES"), 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 QUINONES:

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, QUINONES conspired with codefendants Thomas GORDON, Donald EALY, Kevin GONZALES, 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, on multiple occasions, GORDON traveled to the Houston area to meet with QUINONES and GONZALES, residents of the Houston area, for purposes of obtaining quantities of heroin. In addition, on multiple occasions, QUINONES and GONZALES traveled from the Houston area to New Orleans in order to distribute heroin to


GORDON. For example, sometime immediately prior to July 17, 2015, QUINONES traveled to New Orleans by bus while knowingly possessing approximately one-half kilogram of heroin, which she distributed to GORDON. On July 31, 2015, GONZALES traveled to New Orleans by bus while knowingly possessing approximately one-half kilogram of heroin, which he distributed to GORDON. In the days prior to the July 31 trip, QUINONES had been in communication with GORDON over GORDON's cellular phone to help coordinate the logistics of GONZALES's trip to New Orleans for purposes of distributing heroin.

Then, on August 6, 2015, QUINONES again traveled to New Orleans by bus 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. In the days prior to the August 6 trip, GONZALES had been in communication with GORDON over GORDON's cellular phone to help coordinate the logistics of QUINONES's trip to New Orleans for purposes of distributing heroin.

GORDON, EALY, and others partnered to sell the heroin that GORDON received from QUINONES and GONZALES. During the course of the charged conspiracy, GORDON, EALY, and others used EALY's apartment building, located at 3027 Loyola Street, New Orleans, Louisiana, as the base of their drug-distribution operation. There, GORDON, EALY and others used cutting agents to dilute the quality of heroin, and used a compression jack to compress the heroin. Moreover, GORDON communicated with QUINONES, GONZALES, and others, using cellular phones in furtherance of their drug-distribution operation.

QUINONES and the government stipulate for the purposes of sentencing that QUINONES 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 QUINONES's own conduct and the reasonably foreseeable conduct of her co-conspirators.

QUINONES'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 QUINONES's involvement in this conspiracy and are presented in this document to support her plea of guilty to Count One in the Superseding Indictment.

 7/7/16
BRANDON S. LONG (Date)
Assistant United States Attorney

VALERIE WELZ JUSSSELIN (Date)
Attorney for Defendant

MARTHA QUINONES (Date)
Defendant