

**NO. 06-51489**

**IN THE  
UNITED STATES COURT OF APPEALS  
FOR THE FIFTH CIRCUIT**

**UNITED STATES OF AMERICA,  
Plaintiff-Appellee,**

**v.**

**IGNACIO RAMOS & JOSE ALONSO COMPEAN,  
Defendants-Appellants.**

**Appeal from the United States District Court  
for the Western District Of Texas, EL Paso Division**

**APPELLANT IGNACIO RAMOS' BRIEF ON APPEAL**

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**CERTIFICATE OF INTERESTED PARTIES**

NO. 06-51489, United States of America v. Ignacio Ramos & Jose Alonso Compean

The undersigned counsel of record certifies that the following listed persons have an interest in the outcome of this case. These representations are made in order that the judges of this Court may evaluate possible disqualification or recusal.

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Steven Peters & Mary Stillinger, Appellant's co-counsel at trial

David L. Botsford, Appellant's counsel on appeal only

**United States of America, Appellee**

Debra Kanoff & Jose Luis Gonzalez, Counsel at trial

Joseph Gay, Counsel on appeal only

\_\_\_\_\_  
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## **STATEMENT REGARDING ORAL ARGUMENT**

Appellant requests oral argument. This appeal raises issues of constitutional importance and some of the issues are of first impression. Counsel believes that oral argument would significantly aid the Court because of the length of the record and the complexity of many of the issues.

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## STATEMENT OF JURISDICTION

Jurisdiction below was under 18 U.S.C. §3231. This Court has jurisdiction under 28 U.S.C. §1291.

## STATEMENT OF ISSUES

**ISSUE NO. 1: RAMOS' SIXTH AMENDMENT RIGHTS TO CONFRONTATION AND TO PRESENT A COMPLETE DEFENSE WERE VIOLATED BY THE DISTRICT COURT'S RULINGS WHICH PREVENTED RAMOS FROM CROSS-EXAMINING AND ADDUCING EVIDENCE OF DAVILA'S DRUG DEALINGS.**

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**ISSUE NO. 8: THE EVIDENCE IS LEGALLY INSUFFICIENT AS TO COUNT 8.**

**ISSUE NO. 9: THE EVIDENCE IS LEGALLY INSUFFICIENT AS TO COUNT 9.**