

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

**UNITED STATES OF AMERICA**

**\* CRIMINAL DOCKET NO. 12-260**

**v.**

**\* SECTION: J**

**LUIS MISAEL MADRID-ROMERO**

**\***

**a/k/a Luis Orellana-Murillo**

**a/k/a Carlos Alberto Obellana**

**\***

**a/k/a Luis Misael Romero**

**a/k/a Luis Ismael Madrid**

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**a/k/a Luis Madrid Romero**

**\* \* \***

**FACTUAL BASIS**

Should this matter have gone to trial, the government would have proven, 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:

The Defendant, **LUIS MISAEL MADRID-ROMERO** (hereinafter “**MADRID**”) has agreed to plead guilty as charged to the one-count indictment charging him with illegal reentry of a removed alien in violation of Title 8, United States Code, Section 1326(a).

An Immigration and Customs Enforcement agent (hereinafter the “agent”) would testify that on or about September 12, 2012, Immigration and Customs Enforcement (hereinafter “ICE”) agents encountered the defendant, **MADRID**, while assisting the Jefferson Parish Sheriff’s Office in

Jefferson Parish, within the Eastern District of Louisiana. Upon determining the defendant was illegally in the United States, the defendant was detained and arrested by an ICE agent.

The ICE agent would testify that he administratively processed the defendant and conducted record checks through various U.S. Department of Homeland Security databases, which revealed that the defendant was a citizen of Honduras and illegally present in the United States.

Documentation from the records of ICE, contained in the defendant's Alien file, including a Warrant of Removal/Deportation, complete with the defendant's fingerprints, photographs and signature, would demonstrate that the defendant, **MADRID**, was removed from the United States to Honduras on or about May 2, 2011, at or near Houston, Texas. A qualified ICE Fingerprint Specialist would testify that the fingerprints of the individual documented in the Alien file containing the Warrant of Removal/Deportation and the fingerprints of the defendant are a match. Documentation from the Alien file would further show that the defendant is an alien, and not a citizen or national of the United States.

Testimony of an official from U.S. Citizenship and Immigration Services regarding record checks conducted through the Computer Linked Application Information Management System would show that the defendant, **MADRID**, did not receive consent from the U.S. Attorney General or his designated successor, the Secretary of the Department of Homeland Security, to apply for readmission or receive permission to reenter the United States since the time of the defendant's previous removal.

Further documents, court records, and other admissible evidence would show that on or about

October 29, 2002, in the Superior Court of California, Los Angeles County, California, the defendant, **MADRID**, was convicted of willful infliction of corporal injury.

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ROBERT WEIR  
Special Assistant United States Attorney

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Date

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LUIS MISAEL MADRID-ROMERO  
Defendant

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Date

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ROMA KENT  
Attorney for Defendant

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Date