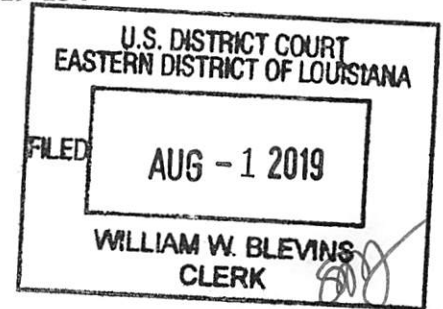


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 19-134  
v. \* SECTION: "G"  
ISAIAS MENDOZA-AILON \*  
\* \* \*



FACTUAL BASIS

The defendant, ISAIAS MENDOZA-AILON (hereinafter "MENDOZA-AILON"), has agreed to plead guilty as charged to the one-count bill of information charging him with illegal reentry of a previously removed alien in violation of Title 8, United States Code, Section 1326(a).

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 bill of information now pending against the defendant:

On June 17, 2019, a deputy with the St. Tammany Parish Sheriff's Office stopped a white Toyota Sienna minivan with Texas plates on the I-12 for a traffic violation. The van was occupied by a female (driver) and six adult males. During the stop, the officer tried to speak with the driver, but he could not communicate with her because she did not speak English. The officer then called a Border Patrol agent to assist with the interview. After arriving on the scene, the agent told the driver the reason for the stop, and asked her to explain why she was driving without a valid license. The driver told the agent that she is a citizen of Guatemala and that she entered the country without authorization. The driver admitted that she had been previously deported about five years ago.


AUSA SGL  
Defendant RS  
Defense Counsel VW

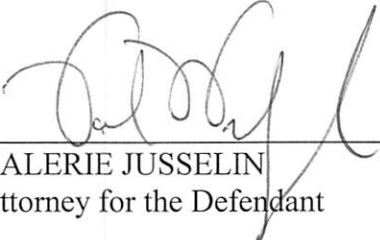
The agent then administratively arrested the driver and the other passengers, who were all determined to be in the country illegally, and transported them to his office for processing. The officer then interviewed **MENDOZA-AILON**, one of the passengers in the van, about his alienage. **MENDOZA-AILON** admitted that he was a citizen of Guatemala and that he entered the country illegally. A records check revealed that **MENDOZA-AILON** had been previously deported on October 3, 2018, and that he neither requested nor received permission from the United States Attorney General or his successor to reapply for admission to the United States. The records checks also confirmed that **MENDOZA-AILON** had no claim to United States citizenship.

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, **MENDOZA-AILON**, did not receive consent from the U.S.

AUSA SLB  
Defendant IS  
Defense Counsel WJ

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.

 8-1-19  
\_\_\_\_\_  
SPIRO G. LATSIS Date  
Assistant United States Attorney

 8-1-19  
\_\_\_\_\_  
VALERIE JUSSEIN Date  
Attorney for the Defendant

 8-1-19  
\_\_\_\_\_  
ISAIAS MENDOZA-AILON Date  
Defendant