

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

UNITED STATES OF AMERICA

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CRIMINAL NO. 14-258

v.

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SECTION: "R"

EDIN ANTONIO PLEITES-ZAMORA

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FACTUAL BASIS

The defendant, **EDIN ANTONIO PLEITES-ZAMORA** (hereinafter "**ZAMORA**"), has agreed to plead guilty as charged to the one-count indictment charging him with illegal reentry of a previously removed alien in violation of Title 8, United States Code, Section 1326(a).

Should this matter go to trial, the government would prove, 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:

On November 4, 2014, Border Patrol agents from the New Orleans, LA Border Patrol Station were conducting transportation checks at the Union Passenger Terminal in New Orleans based on information they received from the South Texas Campaign Border Intelligence Center. Early that morning, Border Patrol agents boarded a bus that had arrived from Houston and asked each passenger if they could provide proof of citizenship. One of the Border Patrol agents on the bus approached **ZAMORA** and questioned him about his citizenship. **ZAMORA** nervously stated that he was from Honduras and presented a Honduran passport with no valid visa attached.

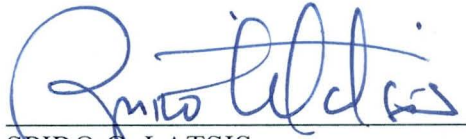
The agent then asked **ZAMORA** if he had any other form of identification or immigration documents on his person. **ZAMORA** provided the agent with a Honduran ID card. **ZAMORA** then admitted to being present in the United States illegally without any immigration documents. The agent then asked **ZAMORA** if he has ever been arrested or deported before and he said no. The agent then took **ZAMORA** into custody for processing.

After he was processed, the agent would testify that he conducted record checks through various U.S. Department of Homeland Security databases and determined that **ZAMORA** is a citizen of Honduras and illegally present in the United States.

Documentation from Border Patrol records contained in the defendant's Alien File, including a Warrant of Removal/Deportation, complete with the defendant's fingerprints, photographs and signature, would show that the defendant, **ZAMORA**, was removed from the United States to Honduras on May 25, 2012. A qualified 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, **ZAMORA**, 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.

 6-10-2015

SPIRO G. LATSI

Date

Assistant United States Attorney

EDIN ANTONIO PLEITES-ZAMORA

Date

Defendant

VALERIE WELZ JUSSELIN

Date

Attorney for Defendant