UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 15-163

v. * SECTION: "G" (2)

JAROL DAVID SOSA-PALMA

a/k/a Ronald Yovanni Chirino-Palma a/k/a Ronald Chirinos a/k/a Ronald Javani Chirinos a/k/a Ronald Jovani Chirinos a/k/a Ronald Yovanni Palma-Chirino

* * *

FACTUAL BASIS

The defendant, JAROL DAVID SOSA-PALMA, a/k/a Ronald Yovanni Chirino-Palma; a/k/a Ronald Chirinos; a/k/a Ronald Javani Chirinos; a/k/a Ronald Jovani Chirinos; a/k/a Ronald Yovanni Palma-Chirino (hereinafter "SOSA-PALMA"), 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 May 30, 2015, **SOSA-PALMA** was arrested by the New Orleans Police Department for sexual battery of a victim under the age of thirteen. ICE agents were notified of the arrest and an Immigration Detainer was issued. ICE agents conducted electronic database queries through law enforcement computer indices on **SOSA-PALMA**. The queries revealed that

SOSA-PALMA is a native and citizen of Honduras, and that he has no claim of United States citizenship or lawful immigration status.

Documentation contained in the **SOSA-PALMA's** Alien File included an Order for Removal/Deportation showing that he was removed from the United States to Honduras on June 21, 2013. 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, **SOSA-PALMA**, are a match. Documentation from the Alien File would further show that the **SOSA-PALMA** 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, **SOSA-PALMA**, 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 **SOSA-PALMA's** previous removal.

SRIRO GLATSIS

Assistant United States Attorney

JAROL DAVID SOSA-PALMA

Date

Defendant

SAMUEL JOHN SCILLITANI, JR

Date

Attorney for Defendant