

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 16-145
v.	*	SECTION: "F"
OGER FRANCISCO ISAOLA-PALMA	*	VIOLATION: 18 U.S.C. § 1546(a)
a/k/a "Jose Adan Rauda"		
a/k/a "William Figueroa-Lopez"	*	
a/k/a "Ojer Francisco Trejo-Alvarado"		
a/k/a "Ojer Francisco Murillo-Trejo"	*	

\* \* \*

FACTUAL BASIS

In support of the defendant's, **OGER FRANCISCO ISAOLA-PALMA**, a/k/a "Jose Adan Rauda," a/k/a "William Figueroa-Lopez," a/k/a "Ojer Francisco Trejo-Alvarado," a/k/a "Ojer Francisco Murillo-Trejo" (**ISAOLA-PALMA**), guilty plea to Count 1 of the Bill of Information, the Government submits that it could prove the following facts beyond a reasonable doubt, through credible testimony and the production of reliable evidence:

On February 19, 1997, **ISAOLA-PALMA** (utilizing the alias Trejo-Alvarado) was encountered by the United States Border Patrol in Raymondville, Texas having been present in the United States without admission or parole. **ISAOLA-PALMA** was ordered removed in absentia but was never removed from the United States due to his failure to appear subsequent to being ordered removed.

October 24, 1997, **ISAOLA-PALMA** (utilizing the alias Ojer Francisco Trejo-Alvarado and claiming to be a citizen and national of Honduras) was again ordered removed from the United States by an Immigration Judge in Harlingen, Texas in abstentia, but never left.

On December 28, 2001, **ISAOLA-PALMA** (utilizing the alias Jose Adan Rauda, a citizen and national of Honduras) had applied for and later received Temporary Protected Status and was issued a social security number and Employment Authorization Document to reside and work in the United States lawfully. During the application process, **ISAOLA-PALMA** identified that he was previously ordered removed by an Immigration Judge under the alias Ojer Francisco Murrillo-Trejo.

On July 30, 2014 U.S. Citizenship and Immigration Services (USCIS) notified **ISAOLA-PALMA** (under the alias Rauda) in writing of its intention to withdraw his TPS status based on a conviction for second degree assault by the state court in Frederick, MD.

On September 11, 2014, USCIS again notified **ISAOLA-PALMA** (under the alias Rauda) in writing of its intent to withdraw his TPS status. October 28, 2014, USCIS withdrew **ISAOLA-PALMA's** (under the alias Rauda) TPS status based on the aforementioned conviction.

In May of 2016, U.S. Immigration and Customs Enforcement, Homeland Security Investigations, Office of the Special Agent in Charge, New Orleans, Louisiana (HSI) and Enforcement and Removal Operations, New Orleans Field Operations (ERO) received information about possible Transportation Worker Identification Credential (TWIC) application fraud by Oger Francisco **ISAOLA-PALMA** who was utilizing the alias Jose Adan Rauda and an additional alias of William Figueroa-Lopez.

Specifically, on April 23, 2016, the Transportation and Security Administration (TSA) received information from a TWIC enrollment application for a William Figueroa-Lopez utilizing a

Puerto Rican birth certificate and Puerto Rican driver's license. The fingerprint enrollment information of Figueroa-Lopez matched the biometrics of a TWIC previously issued to a Jose Adan Rauda (TWIC 03532443 Expires April 21, 2019.) Rauda was identified as a national and citizen of El Salvador who was the previous recipient of Temporary Protected Status (TPS) and permitted to remain and be employed in the United States. Jose Adan Rauda was later identified as Oger Francisco **ISAOLA-PALMA**, a citizen and national of Honduras who was previously ordered removed under the alias Ojer Francisco Trejo-Murillo.

On June 6, 2016, **ISAOLA-PALMA**, a resident of Metairie, Louisiana, was encountered by U.S. Customs and Border Protection Office of Field Operations and Saint Charles Sheriff's Office at **ISAOLA-PALMA**'s place of employment in Gonzales, Louisiana. HSI and ERO transported **ISAOLA-PALMA** to the office of ERO New Orleans for processing and interview. **ISAOLA-PALMA** was provided a statement of rights and agreed to speak with agents and officers without the presence of an attorney. **ISAOLA-PALMA** stated he purchased and received a Puerto Rican birth certificate and Puerto Rican Driver's license under the name William Figueroa-Lopez from persons known and unknown. **ISAOLA-PALMA** stated he applied for a TWIC under the alias Figueroa-Lopez because he no longer maintained TPS, immigration and employment benefits.

During the interview by HSI and ERO, **ISAOLA-PALMA** initially stated his true and correct name was Jose Adan Rauda and he was born in El Salvador but later stated his true and correct name was Oger Francisco **ISAOLA-PALMA** and he was born in Honduras. **ISAOLA-PALMA** stated he purchased the documentation to obtain immigration and employment benefits under the name Rauda from persons known. Persons known sold **ISAOLA-PALMA** a birth certificate under the name Jose Adan Rauda in exchange for U.S. monetary instruments. **ISAOLA-**

**PALMA** stated persons known later demanded more money and threatened to contact law enforcement if **ISAOLA-PALMA** did not pay more for continued use of the provided documents.

For a 14 year period during the overall span of the defendant's illegal presence in the United States, the defendant possessed several documents obtained through false pretenses under the assumed identity of "Rauda." These documents included a social security card in the name of "Jose Adan Rauda," ending in "4989," multiple U.S. Department of Homeland Security Employment Authorization cards, multiple TWIC cards, a Texas driver's license, bank ATM cards, credit cards and employee identity cards. **ISAOLA-PALMA** also maintained a vehicle registered under the alias Rauda.

All of these documents that the defendant accepted, possessed, used, and attempted to use, and more specifically the above-described social security card, when considered both separately and together, helped the defendant establish evidence of authorized stay or employment in the United States. The defendant's success in using these unlawfully obtained documents to prove his authorization to stay and work in this country is evidenced by his employment by several companies during the period of his unauthorized presence in the United States.

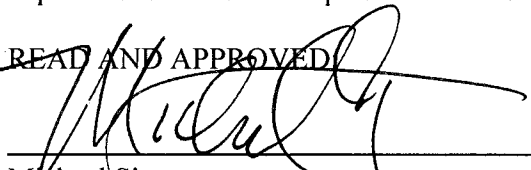
By pleading guilty to Count 1 of the Bill of Information, **ISAOLA-PALMA** freely and voluntarily admits that he knowingly used, attempted to use, possessed, and obtained documents through unlawful means, prescribed by statute or regulation as evidence of authorized stay or employment in the United States, more particularly, a social security card in the name of "Jose Adan Rauda," ending in "4989."

**Limited Nature of Factual Basis**

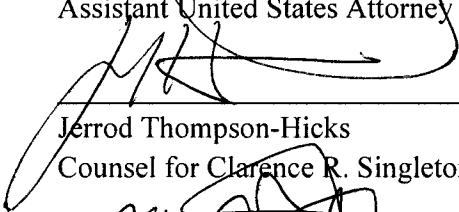
This proffer of evidence is not intended to constitute a complete statement of all facts known by **ISAOLA-PALMA** and the Government and described by **ISAOLA-PALMA** to the

Government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **ISAOLA-PALMA's** plea of guilty to the charged crimes and to inform the court of some of the relevant conduct in this case and, unless noted otherwise, to stipulate that all acts took place within the Eastern District of Louisiana.

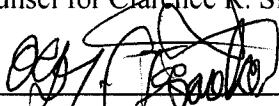
~~READ AND APPROVED~~

  
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Michael Simpson  
Assistant United States Attorney

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Jerrod Thompson-Hicks  
Counsel for Clarence R. Singleton

9/20/2016  
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Oger Francisco Isaola-Palma  
Defendant

9/20/2016  
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DATE