

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED JUL 19 2018
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 18-87
v.	*	SECTION: "L"
JOEL MADRIGAL-SANCHEZ	*	VIOLATION: 8 USC § 1326(a)

*

* * *


FACTUAL BASIS

Were this matter brought to trial, the United States would prove, through competent evidence, the following beyond a reasonable doubt.

On or about March 8, 2018, Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) agents encountered the defendant **JOEL MADRIGAL-SANCHEZ** in connection with a traffic stop conducted by St. Tammany Sheriff's officers near Lacombe, Louisiana. **JOEL MADRIGAL-SANCHEZ** was a passenger in the vehicle. He admitted to the agents that he was a citizen of Mexico and had unlawfully entered the United States.

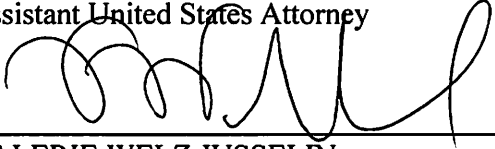
Law enforcement records confirmed that **JOEL MADRIGAL-SANCHEZ** had been previously deported and thereafter removed from the United States on or about December 8, 2015. Notwithstanding, on an unknown date but since his last removal, **JOEL MADRIGAL-SANCHEZ** unlawfully reentered the United States without the requisite consent from the United States Attorney General or her designated successor, the Secretary of the Department of Homeland

Security, to apply for readmission or receive permission to reenter the United States.



IRENE GONZÁLEZ
Assistant United States Attorney

7/19/18
Date



VALERIE WELZ JUSSSELIN
Attorney for Defendant

7-19-18
Date



JOEL MADRIGAL-SANCHEZ
Defendant

7-19-18
Date