

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 20-14
v. * SECTION: "B"
NAZARIO CRUZ-MUNOZ *

* * *

FACTUAL BASIS

The defendant, **NAZARIO CRUZ-MUNOZ** (hereinafter "**CRUZ**"), 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 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 indictment now pending against the defendant:

On January 27, 2020, agents assigned to patrol the Interstate 12 (I-12) corridor near Covington,

La., received a radio call from the St. Tammany Sheriff's Office requesting assistance with a vehicle stop. A vehicle was stopped for speeding near Milepost 60 on I-12. One of the subjects


was identified as **NAZARIO CRUZ-MUNOZ**. The Acting Supervisory Border Patrol Agent questioned **CRUZ** as to his citizenship. **CRUZ** stated that he was a citizen of Mexico and had no documentation to enter or to remain in the United States legally. The agent then checked various immigration databases and determined that **CRUZ** was indeed a citizen of Mexico, and that he

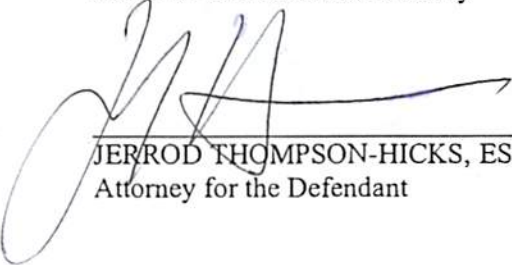
had no claim to United States citizenship. The record checks also confirmed that **CRUZ** had


been removed from the United States on July 23, 2015 in Laredo, Texas. Testimony of an

AUSA
Defendant
Defense Counsel

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, **CRUZ**, 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. These facts would be proven by testimony of officers of the St. Tammany Parish Sheriff's Office and agents of the United States Border Patrol.


CARTER K. D. GUICE JR. 6-7-20
Assistant United States Attorney Date


JERROD THOMPSON-HICKS, ESQ. 06/07/20
Attorney for the Defendant Date


NAZARIO CRUZ-MUNOZ 06/07/2020
Defendant Date