

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

UNITED STATES OF AMERICA

*

CRIMINAL NO.:

v.

*

SECTION:

ARNULFO FERRERA-ARRAZOLA

*

**VIOLATIONS: 8 USC § 1326(a)
8 USC § 1326(b)(2)**

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FACTUAL BASIS

The defendant, **ARNULFO FERRERA-ARRAZOLA** ("**FERRERA-ARRAZOLA**") has agreed to plead guilty as charged to the one count Indictment charging him with illegal re-entry of a deported alien previously convicted of an aggravated felony in violation of Title 8 United States Code, Section 1326(a) and (b)(2).

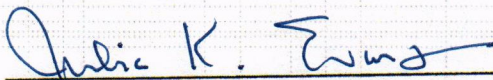
Should this matter have gone to trial, the United States would have proven, through introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant.

On or before February 13, 2020, Department of Homeland Security Investigations (HSI), Border Enforcement Security Task Force (BEST) received information that **FERRERA-ARRAZOLA**, a previously removed alien, was residing in Lafourche Parish, Louisiana. On February 13, 2020, agents assigned to BEST conducted a traffic stop on a Honda Civic, Louisiana License Plate XXX CYB, which law enforcement suspected was operated by **FERRERA-ARRAZOLA**, a citizen of Honduras. **FERRERA-ARRAZOLA** did not have a driver's license, but did have an employee badge bearing an alias with his photo attached to it. **FERRERA-ARRAZOLA** was turned over to ICE, Enforcement Removal Operations, for administrative processing.

An ICE agent would testify that record checks were run through various U.S. Department of Homeland Security databases in order to verify the defendant's citizenship and status. Law enforcement records revealed that **FERRERA-ARRAZOLA** is, in fact, a citizen of Honduras, illegally present in the United States. He had been deported and removed from the United States on several occasions. The record checks confirmed that **FERRERA-ARRAZOLA** had been removed most recently on April 29, 2009.

Notwithstanding, on an unknown date, but since his last removal, **FERRERA-ARRAZOLA** unlawfully reentered the United States without the requisite consent from the United States Attorney General or his designated successor, the Secretary of Homeland Security, to apply for readmission or receive permission to reenter the United States.

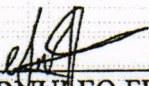
In addition, on or about December 27, 2007, in the Third District Court for the County of Salt Lake, Utah, **FERRERA-ARRAZOLA** was convicted of three counts of unlawful distribution, offering, agreeing, consenting or arranging to distribute a controlled substance, to wit: cocaine, in violation of Title 58, Chapter 37, Section 8(1)(a)(ii) Utah Code Annotated, 1953 and sentenced to not less than one year nor more than 15 years in the Utah State Prison, to be suspended so defendant may be released early to ICE.


 JULIA K. EVANS
 Assistant United States Attorney

12-7-2020
 Date


 ANNA L. FRIEDBERG
 THOMAS HARANG, JR. #36135
 Attorneys for Defendant

12.4.2020
 Date


 ARNULFO FERRERA-ARRAZOLA

12/4/20
 Date