

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

UNITED STATES OF AMERICA	* CRIMINAL DOCKET NO. 12-153
v.	* SECTION: E
WILLIAM JESUS BRANDEL-MENA	*
a/k/a Wilfredo Lopez Mejia	*
a/k/a William Bonilla	*
a/k/a William Rodriguez	*
a/k/a William Jesus Brandel	*

* * *

FACTUAL BASIS

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:

The Defendant, **WILLIAM JESUS BRANDEL-MENA** (hereinafter “**BRANDEL**”) has agreed to plead guilty as charged to the one-count indictment charging him with illegal reentry of a removed alien in violation of Title 8, United States Code, Section 1326(a).

An Immigration and Customs Enforcement agent (hereinafter the “agent”) would testify that on or about March 26, 2012, Immigration and Customs Enforcement (hereinafter “ICE”) agents encountered the defendant, **BRANDEL**, while assisting the Kenner Police Department in Jefferson

Parish, within the Eastern District of Louisiana. Upon determining the defendant was illegally in the United States, the defendant was detained and arrested by an ICE agent.

The agent would testify that, upon questioning **BRANDEL** under oath after being read his *Miranda* rights, the defendant stated that he was a citizen of Honduras and had previously been removed from the United States. The agent confirmed the defendant's illegal status by performing biographical record and fingerprint checks through various United States Department of Homeland Security databases.

Documentation from the records of ICE, contained in the defendant's Alien file, including a Warrant of Removal/Deportation, complete with the defendant's fingerprints, photographs and signature, would demonstrate that the defendant, **BRANDEL**, was removed from the United States to Honduras on or about April 1, 2011, at or near Alexandria, Louisiana. A qualified ICE 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 are a match. Documentation from the Alien file would further show that the defendant 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, **BRANDEL**, 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.

ROBERT WEIR
Special Assistant United States Attorney

Date

WILLIAM JESUS BRANDEL-MENA
Defendant

Date

VALERIE JUSSELIN
Attorney for Defendant

Date