

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 09-30072-WDS
)	
DEANNA COSTELLO,)	
)	
Defendant.)	

STIPULATION OF FACTS

The parties hereby stipulate that the following facts are true beyond a reasonable doubt:

1. The defendant knew that Rogelio Salaices-Arenales, her boyfriend, was an alien who had entered and remained in the United States in violation of the law, on two occasions.
2. Salaices-Arenales had lived with the defendant at 816 LaSalle St. in Cahokia, Illinois, for approximately a year before his arrest in July of 2003 on a federal drug charge. Salaices-Arenales disclosed his cohabitation with the defendant at this address to federal authorities during a proffer on October 31, 2003. The defendant knew that Salaices-Arenales pled guilty in his federal case and was deported to his home country of Mexico after serving several years in a federal prison.
3. In March 2006, the defendant picked Salaices-Arenales up from a Greyhound Bus Station in St. Louis, Missouri, and transported him to her home at 816 LaSalle St. in Cahokia, Illinois, within the Southern District of Illinois, where she permitted him to reside for the majority of the time that he remained in the United States illegally until his arrest on October 10, 2006.
4. On several occasions, Salaices-Arenales moved out of the defendant's home due to domestic disputes. During these periods, which never lasted longer than two weeks, Salaices-Arenales stayed with his uncle, Pancho Salaices, in Fairmount City, Illinois, or with his brother, Ruben Salaices, in Collinsville, Illinois.


5. On October 10, 2006, the Drug Enforcement Administration, attempted to stop a vehicle occupied by Salaices-Arenales and his brother Ruben Salaices. The vehicle fled from agents but eventually was in an accident in East St. Louis. Ruben Salaices fled from the scene of the accident, but Salaices-Arenales was taken into custody without further incident. The defendant was contacted by Salaices-Arenales while the vehicle he was in was trying to evade police. Their conversation was recorded. A copy of the transcript of that conversation is attached hereto as Exhibit 1.


6. The defendant arrived in the area a short time after the accident.

SO STIPULATED:

A. COURTNEY COX
United States Attorney


DEANNA COSTELLO
Defendant


RANLEY KILLIAN
Assistant United States Attorney


TODD SCHULTZ
Attorney for Defendant

Date: 10-21-09

Date: 10/21/09