

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 03-_____
	:	
v.	:	DATE FILED: _____
	:	
ROMULO BACUILIMA VELICELA	:	VIOLATION: 8 U.S.C. §1326(a)
a/k/a "Julio Tenecora,"	:	(Reentry after deportation -
	:	1 Count)
	:	Notice of Prior Conviction

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about July 17, 2003, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

ROMULO BACUILIMA VELICELA,
a/k/a "Julio Tenecora,"

an alien and a subject of Ecuador, who had previously been deported from the United States on or about February 11, 1997, was found in the United States, having knowingly and unlawfully re-entered the United States without first applying to the Attorney General of the United States or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a), (b)(2).

NOTICE OF PRIOR CONVICTION

THE GRAND JURY FURTHER CHARGES THAT:

Defendant Romulo Bacuilima Velicela, a/k/a “Julio Tenecora,” committed the offense charged in Count One of this Indictment after having been convicted in the Superior Court of New Jersey on November 27, 1995, at Accusation Number 95-11-0297, of a prior aggravated felony offense, specifically Manslaughter in the Second Degree, in violation of New Jersey Statutes Annotated, Section 2C:11-4.

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney