

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MAY 05 2011

JAMES N. HATTEY, Clerk
By *[Signature]* Deputy Clerk

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL ACTION
 :
 JOHN DENNIS TAN ONG : NO. 1:10-CR-352
 :

STIPULATED REQUEST FOR A JUDICIAL ORDER OF REMOVAL

Defendant, JOHN DENNIS TAN ONG, by and through his counsel, John A. Garland, and the United States of America, by and through its counsel, Sally Quillian Yates, United States Attorney for the Northern District of Georgia, Tracia M. King, Assistant United States Attorney, and James McHenry, Special Assistant United States Attorney, hereby agree and stipulate pursuant to Title 8, United States Code, Section 1228(c)(5), to the following:

1. Defendant waives the right to notice and a hearing prior to removal from the United States.
2. The Court should enter a judicial order that defendant be removed from the United States.
3. The facts in support of this request are as follows:
 - a. Defendant is not a citizen or national of the United States.
 - b. Defendant is a native of the Philippines and a citizen of Canada.

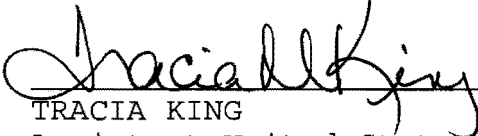
- c. Defendant was admitted to the United States on or about September 17, 2010, as a nonimmigrant visitor for pleasure.
- d. Between July 1, 2009, and February 14, 2010, Defendant conspired to violate and evade the Arms Export Control Act (22 U.S.C. § 2778 *et seq.*), a law regulating the export of defense articles and prohibiting the export of such articles without a license or authorization, by conspiring to export from the United States to the Philippines certain United States defense articles, including items designated on the United States Munitions List, without having first obtained from the Department of State's Directorate of Defense Trade Controls a license for such exports or written authorization for such exports.
- e. Defendant is entering into this stipulation as a condition of his plea agreement in which he agrees with the United States to plead guilty to conspiracy, in violation of Title 18, United States Code, Section 371.
- f. Based upon the Defendant's conspiracy, he is currently removable and deportable from the United States pursuant to 8 U.S.C. § 1227(a)(4)(A)(i) as an

alien who has engaged in any activity to violate or evade any law prohibiting the export from the United States of goods, technology, or sensitive information.

g. Defendant has agreed with the United States as a condition of his plea agreement to the entry of a judicial order of removal.

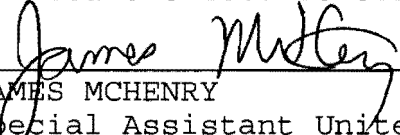
4. Accordingly, Defendant and the United States jointly request that the Court, after imposing sentence, order that Defendant be removed from the United States so that promptly upon his release from confinement United States Immigration and Customs Enforcement may execute the order of removal according to the applicable laws and regulations.

SO STIPULATED, this 5th day of May, 2011.



TRACIA KING
Assistant United States Attorney

May 5, 2011
Date

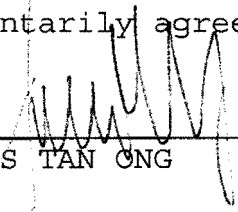


JAMES MCHENRY
Special Assistant United States Attorney

May 5, 2011
Date

This stipulation has been read to me in English, the language I understand best, and I have carefully discussed every part of it

with my attorney. I understand the terms of this stipulation,
and I voluntarily agree to those terms.

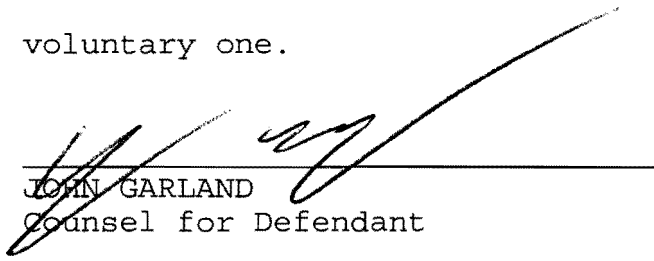


JOHN DENNIS TAN ONG
Defendant

5-5-2011

Date

I am JOHN DENNIS TAN ONG'S attorney. I have carefully discussed
this stipulation with my client. To my knowledge, my client's
decision to enter into this agreement is an informed and
voluntary one.



JOHN GARLAND
Counsel for Defendant

5-5-11

Date