

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ENKHCHIMEG ULZIIBAYAR EDWARDS,
also known as “Eni Edwards”

Violation: Title 18, United States
Code, Section 1512(b)(3)

INDICTMENT

COUNT ONE

The SPECIAL FEBRUARY 2014 GRAND JURY charges:

1. At all times material to this Indictment:
 - a. In approximately July 2001, Individual A, a Mongolian citizen, applied for and received a student exchange visa to the United States. As a condition for receiving and continuing to receive the benefit of the visa, Individual A was required to live with a host family in New England. In approximately 2002, Individual A absconded from Individual A’s exchange host family and was arrested in or about May 2002. EDWARDS and her husband posted a \$4,000 bond so that Individual A could remain free pending immigration proceedings against Individual A. EDWARDS represented that Individual A would live with EDWARDS and her husband at the EDWARDS’ residence in the Northern District of Illinois.
 - b. In approximately July 2003, EDWARDS arranged for Individual A to marry a friend of hers, Individual B, who was a United States citizen. EDWARDS arranged the marriage so that Individual A could apply for and obtain United States citizenship through marrying Individual B.

c. In approximately July 2003, Individual A and Individual B were married in Las Vegas, Nevada. Shortly after their marriage, in approximately August 2003, Individual A and Individual B applied, via a petition, for Individual A to be naturalized as a United States citizen. After the petition was received by the United States Customs and Immigration Service, USCIS requested additional information in support of the petition. Individual B failed to provide the requested information and ceased pursuing the petition with USCIS. After immigration authorities rejected the naturalization petition, Individual A and Individual B finalized their divorce in or about May 2004.

d. It was a federal crime to assist a person to knowingly and unlawfully enter into a marriage for the purpose of evading a provision of the immigration laws of the United States.

e. By no later than January 2013, federal criminal law-enforcement authorities were investigating the role that EDWARDS played in the marriage of Individual A and Individual B.

2. On or about January 8, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ENKHCHIMEG ULZIIBAYAR EDWARDS,
also known as “Eni Edwards,”

defendant herein, knowingly attempted to corruptly persuade Individual B, with intent to hinder, delay and prevent the communication to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense;

In violation of Title 18, United States Code, Section 1512(b)(3).

COUNT TWO

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. The allegations contained in paragraph 1 of this Indictment are incorporated here.
2. On or about January 9, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ENKHCHIMEG ULZIIBAYAR EDWARDS,
also known as “Eni Edwards,”

defendant herein, knowingly attempted to corruptly persuade Individual B, with intent to hinder, delay and prevent the communication to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense;

In violation of Title 18, United States Code, Section 1512(b)(3).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY