

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No. 13-
MANAMADURAI SOMALINGAM : 18 U.S.C. § 371;
8 U.S.C. § 1324(a)(1)(A)(v)(I)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE

1. From in or about March 2011 through in or about May 2012, in Hudson and Middlesex Counties, in the District of New Jersey, and elsewhere, defendant

MANAMADURAI SOMALINGAM

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, that is, to utter, use, possess, obtain, accept, and receive nonimmigrant visas, namely student visas, for entry into and as evidence of authorized stay in the United States, knowing that the student visas had been procured by means of false claims and statements and otherwise procured by fraud and unlawfully obtained, contrary to Title 18, United States Code, Section 1546(a).

2. In furtherance of the conspiracy, defendant MANAMADURAI SOMALINGAM and his co-conspirators committed and caused the commission of the following overt acts in the District of New Jersey and elsewhere:

a. In or about June 2011, defendant MANAMADURAI SOMALINGAM falsely certified that an individual with the initials "U.P." was eligible to be a nonimmigrant F-1 student.

b. On or about June 27, 2011, defendant MANAMADURAI SOMALINGAM issued a certificate of eligibility for nonimmigrant student status, also known as a Form I-20, to U.P., knowing that U.P. would be working without authorization in the United States instead of attending classes.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

From in or about March 2011 through in or about May 2012, in Hudson and Middlesex Counties, in the District of New Jersey, and elsewhere, defendant

MANAMADURAI SOMALINGAM

did knowingly and intentionally conspire and agree with others to conceal, harbor, and shield from detection aliens in any place, including any building, knowing and in reckless disregard of the fact that such aliens had come to, entered, and remained in the United States in violation of law, and for the purpose of commercial advantage and private financial gain, contrary to Title 8, United State Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

In violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).



PAUL J. FISHMAN
UNITED STATES ATTORNEY

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INFORMATION
CHARGING VIOLATIONS OF

18 U.S.C. § 371;
8 U.S.C. § 1324(a)(1)(A)(v)(I)

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