

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
ANTHONY TIJO, : **VIOLATION: 18 U.S.C. § 1001**
a/k/a “Tony” : **(false statements - 1 count)**
: **18 U.S.C. § 2(b) (aiding and abetting)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

Between on or about June 3, 2003 and on or about February 19, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANTHONY TIJO,
a/k/a “Tony,”

in a matter within the jurisdiction of the United States Immigration and Customs Enforcement (“ICE”) (formerly known as the United States Immigration and Naturalization Service (“INS”)), an agency of the executive branch of the United States, knowingly and willfully made and caused to be made materially false, fictitious, and fraudulent statements and representations in that defendant ANTHONY TIJO caused to be made a claim for political asylum on behalf of S.R. on the basis that S.R. had a well-founded fear of persecution in her home country of Indonesia on account of her religion in an Application for Asylum and for Withholding of Removal and in proceedings before ICE, when, as the defendant knew, such statement was not true and the defendant had counseled and instructed S.R. to falsely state that she feared persecution in her home country of Indonesia on account of her religion in return for the payment of \$1,120 by S.R.

to the defendant.

In violation of Title 18, United States Code, Sections 1001 and 2(b).

PATRICK L. MEEHAN
United States Attorney