

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>09-</u>
v.	:	DATE FILED: <u>May 14, 2009</u>
ABDUL RAHMAN HOSSEINI,	:	VIOLATIONS:
a/k/a "M.A."	:	8 U.S.C. §1001(a)(1) and (2) (making a
	:	false statement - 1 count)
	:	8 U.S.C. §1325(a)(3) (improper entry of
	:	alien - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 26, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ABDUL RAHMAN HOSSEINI,
a/k/a "M.A.,"

in a matter within the jurisdiction of the United States Department of Homeland Security, an agency of the executive branch of the United States, knowingly and willfully concealed a material fact and made a materially false, fictitious, and fraudulent statement and representation in that defendant HOSSEINI asserted that his name was M.A., that he was 15 years old and that he lived in Afghanistan his entire life when, as the defendant knew, his name was Abdul Rahman Hosseini, he was 20 years old and he was residing in, and a citizen of, the Netherlands.

In violation of Title 18, United States Code, Sections 1001(a)(1) and (2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 26, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**ABDUL RAHMAN HOSSEINI,
a/k/a “M.A.,”**

attempted to enter the United States by a willfully false and misleading misrepresentation and the willful concealment of a material fact in that defendant HOSSEINI affirmed, under oath, to officers of the United States Department of Homeland Security that his name was M.A., that he was 15 years old, that he lived in Afghanistan his entire life, and that he feared returning to Afghanistan because of the Taliban when, as defendant HOSSEINI knew, his name was Abdul Rahman Hosseini, he was 20 years old, he was living in the Netherlands and was not being targeted by the Taliban.

In violation of Title 8, United States Code, Section 1325(a)(3).

A TRUE BILL:

**_____
GRAND JURY FOREPERSON**

**_____
LAURIE MAGID
United States Attorney**