

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 26-
	:	
ANTONIA-BEATRICE MIRCEA	:	18 U.S.C. § 371
	:	
	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States charges:

1. At all times relevant to this Information:
 - a. The Immigration and Nationality Act (INA) governs the immigration laws of the United States.
 - b. Pursuant to the INA, an alien (a person not a citizen or national of the United States) is not permitted to permanently reside in the United States unless they are a lawful permanent resident.
 - c. Under the INA, an alien who is married to a United States citizen can obtain lawful permanent resident status in the United States if the marriage was entered into, in good faith; and the United States citizen did not enter into the marriage in exchange for something of value, such as money; and the United States citizen did not enter into the marriage for the purpose of enabling the alien to obtain legal permanent resident status in the United States.
 - d. The United States Citizenship and Immigration Services (USCIS) is an agency of the United States Department of Homeland Security and is

charged with processing applications for immigration benefits such as lawful permanent residence.

e. An alien who is seeking to become a lawful permanent resident of the United States, on the basis of marriage to a United States citizen, is required to complete and submit to the USCIS an Application to Register Permanent Residence or Adjust Status (Form I-485). The alien is required to sign the Form I-485 certifying, under penalty of perjury, that the information provided by the alien, including information about the alien's spouse, is true and correct and that the alien is admissible to the United States pursuant to the INA.

f. In order for an alien to obtain permanent resident status on the basis of marriage to a United States citizen, the United States citizen spouse is required to file a Petition for Alien Relative (Form I-130) on behalf of the alien. In the Form I-130, the spouse is required to certify that he or she is in fact a United States citizen, to provide certain background information about the marriage (such as the location of the marital residence) and to certify that the marriage was not entered into for purposes of evading immigration laws. Additionally, certain supporting documentation is also required to be submitted contemporaneously with the Form I-130, to include, but not limited to, a copy of the marriage certificate, and Biographic Information (Form G-325).

g. Upon receipt of the Form I-485 and the Form I-130, the USCIS begins an official proceeding to determine whether to grant the petition. A Report of Medical Examination and Vaccination Record (Form I-693) and an Affidavit of Support (Form I-864) on behalf of the alien are also required to be filed with the

USCIS to ensure that the alien has no communicable diseases, and will not become a public charge in the United States.

h. As part of the official proceeding, the USCIS conducts interviews with the alien and the United States citizen spouse in order to determine the validity of the claimed marriage.

i. If an alien's application is approved by the USCIS, the alien is accorded “conditional” lawful permanent resident status for a period of two years. Generally, within 90 days of the two-year anniversary of the issuance of conditional lawful permanent residence, the alien and United States citizen file a Petition to Remove Conditions on Residence (Form I-751) with the USCIS to remove the conditional status of the alien. The alien and the United States citizen must establish that the marriage was entered into in good faith. A marital interview is conducted at USCIS’s discretion.

j. If and when the Form I-751 is approved, the conditions of alien’s residence are removed, resulting in unconditional lawful permanent residence status. This status authorizes the alien to permanently reside and lawfully work in the United States.

k. Aliens who have been lawful permanent residents for at least three years and who are married to, and living with, the same United States citizen spouse are eligible to apply for United States citizenship through the naturalization process by completing and filing an Application for Naturalization (Form N-400) with USCIS. Aliens who are not still married with the same United States citizen spouse must wait five years to be eligible to apply for United States Citizenship.

1. All forms submitted to USCIS are signed under the penalty of perjury.

2. Beginning no later than in or around September 2024 and continuing through in or about December 2025, in Burlington and Atlantic Counties, in the District of New Jersey, the defendant,

ANOTNIA-BEATRICE MIRCEA,

did knowingly and willfully conspire, combine, confederate, and agree with Victor Purilla, who is charged elsewhere, and other persons known and unknown, to commit an offense against the United States, specifically engaging in marriage fraud in violation of 8 U.S.C. § 1325(c).

Object of the Conspiracy:

2. It was the object of the conspiracy that Victor Purilla and defendant ANTONIA-BEATRICE MIRCEA entered into a marriage for the purpose of fraudulently obtaining citizenship for defendant MIRCEA.

Overt Acts

3. In furtherance of the conspiracy and to effect the object, the following overt acts were committed in the District of New Jersey and elsewhere:

a. Victor Purilla is a United States citizen. Antonia-Beatrice Mircea is a national of Romania and therefore an alien in the United States.

b. In 2014, Purilla married a Bulgarian national who later obtained U.S. citizenship based on the marriage. They divorced in 2019.

c. In or about September 2024, defendant ANTONIA-BEATRICE MIRCEA and Purilla were married in Atlantic City, New Jersey.

d. In or about June 2025, defendant ANTONIA-BEATRICE MIRCEA and Purilla entered into a lease for an apartment on Boardwalk in Atlantic City.

e. In or about August 2025, Purilla submitted a Form I-130 seeking to obtain citizenship for defendant ANTONIA-BEATRICE MIRCEA based on their marriage. On the Form I-130, Purilla falsely stated, among other things, that Purilla and defendant ANTONIA-BEATRICE MIRCEA lived together at the apartment at Boardwalk, Atlantic City, New Jersey.

f. In connection with Purilla's Form I-130, defendant ANTONIA-BEATRICE MIRCEA submitted a Form I-485. On the Form I-485, Mircea falsely stated, among other things, that Purilla and defendant MIRCEA lived together at the apartment at Boardwalk, Atlantic City, New Jersey.

g. In or about December 2025, a USCIS officer conducted interviews of both defendant ANTONIA-BEATRICE MIRCEA and Purilla in

connection with Mircea's application for citizenship. During the interview with the USCIS officer, which was under oath, defendant MIRCEA and Purilla falsely confirmed that they lived together in the apartment at Boardwalk.

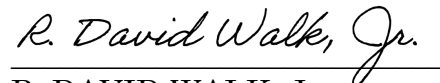
In violation of Title 18, United States Code, Section 371.

ROBERT FRAZER
United States Attorney



JOSEPH MCFARLANE
Assistant United States Attorney

Approved:



R. DAVID WALK, Jr.
Deputy United States Attorney

CASE NUMBER: _____

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INFORMATION FOR

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