7/3/07 12:00 p.m.

2005R00146/ADK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 07-560(DMC)
v.	:	18 U.S.C. §§ 1546(a), 1425(a) & 2
ALAA EL SAADAWI	:	INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting in Newark, charges:

COUNT ONE

1. On or about August 8, 2001, defendant ALAA EL SAADAWI filed an Application for Naturalization form, Form N-400 ("the Form") with the Immigration and Naturalization Service ("INS") for the purpose of obtaining United States citizenship.

2. The Form asked whether defendant ALAA EL SAADAWI had ever knowingly committed any crime for which he had not been arrested. In response, defendant ALAA EL SAADAWI checked off the "No" box on the Form.

3. The Form also asked defendant ALAA EL SAADAWI to list his then present and past membership in, or affiliation with, every organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place. In response, defendant ALAA EL SAADAWI wrote "N/A."

4. The Form further asked defendant ALAA EL SAADAWI to sign the Form both prior to its submission and after an interview with an INS official. On the part of the Form that requested a signature prior to the Form's submission, the Form stated in relevant part that "I swear or affirm, under penalty of perjury under the laws of the United States of America that this application, and the evidence submitted with it, is all true and correct." Defendant ALAA EL

SAADAWI signed and dated that Form on or about August 6, 2001.

5. On or about July 10, 2002, in furtherance of his naturalization process, defendant ALAA EL SAADAWI appeared in Newark, New Jersey, before a District Adjudications Officer ("DAO") with the INS. On that date, the DAO placed defendant ALAA EL SAADAWI under oath.

6. The DAO asked, in substance and in part, whether defendant ALAA EL SAADAWI had ever knowingly committed any crime for which he had not been arrested. Defendant ALAA EL SAADAWI responded "no."

7. The DAO also asked, in substance and in part, whether defendant ALAA EL SAADAWI then had, or had in the past had, any affiliation or membership with any organization, association, fund, or foundation. Defendant ALAA EL SAADAWI responded "no."

8. On or about July 10, 2002, defendant ALAA El SAADAWI again signed the Form, which as stated above he had previously signed on a different part of the Form on or about August 6, 2001, and affirmed under penalty of perjury that the statements made therein were true to the best of his knowledge and belief.

9. Based upon, among other things, defendant ALAA EL SAADAWI's statements in the Form and defendant ALAA EL SAADAWI's statements and actions before the DAO on or about July 10, 2002, defendant ALAA EL SAADAWI was naturalized in Newark, New Jersey, and became a citizen of the United States.

10. Contrary to his representations, however, prior to August 2001, defendant ALAA EL SAADAWI was affiliated with an organization known as the Global Relief Foundation

("GRF"). In or about December 2001, pursuant to an Executive Order, the United States Department of Treasury, Office of Foreign Assets Control, froze GRF's assets pending an investigation into GRF's possible ties to terrorism.

11. Further contrary to his representations, in or about April 2002, defendant ALAA EL SAADAWI committed a crime in that he and others agreed to and tried to smuggle approximately $659,000 out of the United States. Indeed, on or about July 26, 2002, a short time after his appearance before the DAO, defendant ALAA EL SAADAWI was charged with committing these crimes. On or about July 23, 2003, defendant ALAA EL SAADAWI was convicted of committing these crimes.

12. On or about July 10, 2002, in the District of New Jersey and elsewhere, defendant

ALAA EL SAADAWI

did knowingly and willfully make under oath a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, in that defendant ALAA EL SAADAWI, while under oath, denied to an INS officer that he had knowingly committed a crime for which he had not been arrested.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT TWO

1. The allegations contained in Paragraphs 1 through 11 of Count One of this Indictment are repeated and realleged as if fully set forth herein.

2. On or about July 10, 2002, in the District of New Jersey and elsewhere, defendant

ALAA EL SAADAWI

did knowingly and willfully make under oath a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, in that defendant ALAA EL SAADAWI, while under oath, denied to an INS officer that he had been a member of, or affiliated with, an organization, association, fund, foundation, party, club, society, and similar group in the United States or in any other place.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT THREE

1. The allegations contained in Paragraphs 1 through 11 of Count One of this Indictment are repeated and realleged as if fully set forth herein.

2. On or about July 10, 2002, in the District of New Jersey and elsewhere, defendant

ALAA EL SAADAWI

did knowingly and willfully subscribe as true, as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, in that defendant ALAA EL SAADAWI signed the Form N-400 falsely denying that: (1) he had knowingly committed a crime for which he had not been arrested; and (2) he had been a member of, or affiliated with, an organization, association, fund, foundation, party, club, society, and similar group in the United States or in any other place.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT FOUR

1. The allegations contained in Paragraphs 1 through 11 of Count One of this Indictment are repeated and realleged as if fully set forth herein.

2. On or about July 10, 2002, in the District of New Jersey and elsewhere, defendant

ALAA EL SAADAWI

did knowingly and willfully procure and attempt to procure, contrary to law, the naturalization of a person, namely himself, in that defendant ALAA EL SAADAWI: (1) while under oath denied to an INS officer that he had knowingly committed a crime for which he had not been arrested; (2) while under oath denied to an INS officer that he had been a member of, or affiliated with, an organization, association, fund, foundation, party, club, society, and similar group in the United States or in any other place; and (3) subscribed as true on the Form N-400 the false statements described in Paragraphs 2 and 3 of Count One of this Indictment.

In violation of Title 18, United States Code, Sections 1425(a) and 2.

A TRUE BILL

FOREPERSON

Christopher J. Christie

CHRISTOPHER J. CHRISTIE
United States Attorney

CASE NUMBER: 07-560(DMC)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

ALAA EL SAADAWI

INDICTMENT FOR

18 U.S.C. §§ 1546, 1425 & 2

A True Bill,

CHRISTOPHER J. CHRISTIE
U.S. ATTORNEY
NEWARK, NEW JERSEY

ANDREW KOGAN
ASSISTANT U.S. ATTORNEY
(973) 645-2754

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(Ed. 1/97)