

2025R00564/MJM

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

DEC 22 2025

SB

UNITED STATES OF AMERICA	:	Hon. Georgette Castner	AT 8:30 <u>3:55 P.M.</u>
	:		CLERK, U.S. DISTRICT COURT - DNJ
v.	:	Crim. No. 25-816	
	:		
MUHAMMAD SHAKEEL	:	18 U.S.C. §§ 611, 1015(a), and	
	:	1425(a)	

INDICTMENT

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

COUNT 1
(Voting by an Alien in a Federal Election)

1. At all times relevant to Count 1 of this Indictment:
 - a. A United States citizen was a native of the United States; a person naturalized in the United States; or a person who derived U.S. citizenship (from one or both parents); and who owed allegiance to the United States and was entitled to its full rights, privileges, and protection.
 - b. An alien was any person not a citizen or national of the United States. This included immigrants (e.g. lawful permanent residents) and non-immigrants (e.g. individuals who were admitted to the United States for a temporary duration, such as a student, a visitor or a temporary worker).
 - c. A lawful permanent resident ("LPR") is an alien who had been conferred permanent resident status in the United States (colloquially known as a "Green Card" holder). An Alien Registration Receipt Card

(also known as a “Green Card”) was issued to lawful permanent residents as evidence of their status. Upon meeting the statutory prerequisites for naturalization, an LPR could apply to become a naturalized United States citizen.

d. In order to register to vote in the State of New Jersey, an applicant was required to certify and attest that they met certain eligibility requirements, including the requirement that he/she was a United States citizen.

e. Upon successfully registering to vote in New Jersey, an applicant was authorized to vote in New Jersey State and local elections, as well as in federal elections.

f. Defendant MUHAMMAD SHAKEEL (“SHAKEEL”) was a Lawful Permanent Resident living in Bergen County, New Jersey having entered the United States via an F42 visa in approximately August of 2017.

2. On or about February 21, 2018,, SHAKEEL registered to vote in New Jersey while applying for a New Jersey non-driver identification. In doing so, SHAKEEL certified and attested that he was a United States citizen.

3. Based on the information that SHAKEEL provided in his application, including his false statement that he was a United States citizen, SHAKEEL’s application to register to vote was accepted, and he was successfully registered to vote in the State of New Jersey.

4. After having successfully registered to vote, SHAKEEL voted in the general election held on November 3, 2020 via a mail-in ballot that he signed

before casting. The 2020 general election included the election for the offices of President and Vice President of the United States.

5. In or about November 2020, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

MUHAMMAD SHAKEEL,

an alien, knowing that he was not a United States citizen, voted in an election held solely or in part for the purpose of electing a candidate for the office of the President, Vice President, Presidential elector, Member of the Senate or Member of the House of Representatives.

In violation of Title 18, United States Code, Section 611.

COUNT 2

(False Statements in Relation to Naturalization)

1. The allegations set forth in paragraphs 1 through 4 of Count 1 of this Indictment are realleged here.

2. On or about September 9, 2022, SHAKEEL submitted an Application for Naturalization ("N-400") to the U.S. Citizenship and Immigration Services ("USCIS"). An N-400 is a United States government form that is submitted by LPRs to apply to become U.S. citizens through the naturalization process. The N-400 consists of a detailed questionnaire that requires the applicant to provide personal information, including but not limited to, biographical information, marital history, criminal records, and information concerning whether the applicant has ever registered to vote and/or voted in any federal, state, or local election. The questions on the N-400 are designed to allow USCIS to determine whether applicants meet requirements like good moral character, English proficiency, and knowledge of U.S. history/government, before they are approved for United States citizenship. If it is determined that an applicant has voted in a federal election his/her application for citizenship will be denied.

3. As part of that application, the N-400 requires applicants to swear/affirm and certify under penalty of perjury under the laws of the United States that the information they report in the N-400 is complete, true, and correct.

4. After the N-400 is submitted by the applicant, he/she is scheduled for an interview with an official ("Immigration Services Officer") from USCIS. At the time that an applicant is interviewed by an Immigration Services Officer, the Applicant is placed under oath. Thereafter, the Immigration Services Officer goes over with the applicant the answers that the applicant provided in the N-400 that the applicant filled out and submitted to USCIS. At the end of the interview, the Immigration Services Officer determines whether to: (i) approve the applicant's request to become a citizen; (ii) deny the request for citizenship; or (iii) request that the applicant provide additional information and come in for a subsequent interview. If the Immigration Services Officer approves an applicant's Form N-400, the applicant is scheduled to take the Oath of Allegiance at a naturalization ceremony. The naturalization ceremony is the culmination of the naturalization process.

5. In the N-400 that SHAKEEL signed on or about September 3, 2022 and submitted on about September 9, 2022, SHAKEEL checked the "No" box in response to the question "[h]ave you EVER registered to vote in any Federal, state, or local election in the United States?" Also, as part of that N-400 application, SHAKEEL checked the "No" box in response to the question "[h]ave you EVER voted in any Federal, state, or local election in the United States?"

6. On or about March 1, 2023, the Superintendent of Elections for Bergen County sent SHAKEEL a letter informing him that he had in fact voted in a previous federal election.

7. On or about May 9, 2023, SHAKEEL was interviewed by an Immigration Services Officer regarding his application for naturalization and the answers which he had provided on the N-400 form that he had previously submitted to USCIS. At the start of the interview SHAKEEL was placed under oath. When he was thereafter questioned, SHAKEEL reaffirmed the false statements he made in his N-400, namely that he had never voted in any Federal, state or local election.

8. On or about May 9, 2023, in Essex County, in the District of New Jersey and elsewhere, the defendant,

MUHAMMAD SHAKEEL,

did knowingly make a false statement under oath, in any case, proceeding, or matter relating to, or under, or by virtue of any law of the United States relating to naturalization, citizenship, or registry of aliens, namely during an interview with an official of the United States Citizenship and Immigration Services in connection with the defendant's Application for Naturalization (Form N-400).

In violation of Title 18, United States Code, Section 1015(a).

COUNT 3

(False Statements in Relation to Naturalization)

1. The allegations set forth in paragraphs 1 through 4 of Count 1, and paragraphs 2 through 7 of Count 2 of this Indictment are realleged here.

2. In or about September 2002, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

MUHAMMAD SHAKEEL,

knowingly procured and attempted to procure, contrary to law, the naturalization of a person, namely, himself, by way of false statements, in that he knowingly made materially false statements in an Application for Naturalization (Form N-400) signed under penalty of perjury on or about September 3, 2022, wherein defendant falsely represented that he had never voted in any Federal, state or local election in the United States.

In violation of Title 18, United States Code, Section 1425(a).

A TRUE BILL


FOREPERSON

TODD BLANCHE
U.S. Deputy Attorney General

PHILIP LAMPARELLO
Senior Counsel

/s/ Mark J. McCarren
Mark J. McCarren
Assistant U.S. Attorney

Approved:

/s/ Ronnell L. Wilson
Ronnell L. Wilson
Chief, Special Prosecutions Division

CASE NUMBER: 25-816 (GC)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

MUHAMMAD SHAKEEL

INDICTMENT FOR
18 U.S.C. §§ 611, 1015(a), and 1425(a)


TODD BLANCHE
UNITED STATES DEPUTY ATTORNEY GENERAL

PHILIP LAMPARELLO
SENIOR COUNSEL
NEWARK, NEW JERSEY

MARK J. MCCARREN
ASSISTANT U.S. ATTORNEY
(973) 645-2700
