

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 20-

v. :

AMITKUMAR KANUBHAI PATEL : 18 U.S.C. § 1204  
18 U.S.C. § 2

**INDICTMENT**

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

1. At all times relevant to this Indictment:

a. Defendant AMITKUMAR KANUBHAI PATEL was born in India and became a naturalized citizen of the United States on May 29, 2013.

b. In November 2016, minor “AAP” was born at JFK Medical Center in Edison Township, New Jersey. AAP is a United States citizen. AAP’s biological mother was Individual 1 and his biological father was defendant AMITKUMAR KANUBHAI PATEL.

c. The term “child” means a person who has not attained the age of 16 years pursuant to Title 18, United States Code, Section 1204(b)(1).

d. The term “parental rights,” with respect to a child, means the right to physical custody of the child - (A) whether joint or sole (and includes visiting rights); and, (B) whether arising by operation of law, court order, or legally binding agreement of the parties, as defined by Title 18, United States Code, Section 1204(b)(2).

2. On or about July 26, 2017, defendant AMITKUMAR KANUBHAI PATEL and AAP boarded Qatar Airways Flight #702 from John F. Kennedy International airport in New York to Doha International airport in Doha, Qatar.

3. On or about October 16, 2018, the New Jersey Superior Court Chancery Division Family Part ordered defendant AMITKUMAR KANUBHAI PATEL to return AAP to the United States immediately.

4. From at least as early as October 19, 2018 to the date of this Indictment, in the District of New Jersey and elsewhere, defendant

AMITKUMAR KANUBHAI PATEL

did knowingly remove a child, namely AAP, from the United States and retained a child, AAP, who had been in the United States, outside the United States with intent to obstruct the lawful exercise of the parental rights of AAP's mother, Individual 1.

In violation of Title 18, United States Code, Section 1204(a) and Title 18, United States Code, Section 2.

A TRUE BILL,

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 20-

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

AMITKUMAR KANUBHAI PATEL

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INDICTMENT FOR

18 U.S.C. § 1204(a)  
18 U.S.C. § 2

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A True Bill,

\_\_\_\_\_  
Foreperson

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CRAIG CARPENITO  
U.S. ATTORNEY, NEWARK, NEW JERSEY

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JASON M. RICHARDSON  
ASSISTANT U.S. ATTORNEY  
CAMDEN, NEW JERSEY  
(856) 757-5026

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