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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FEB 09 2022

AT 8:30 2:22pm M
WILLIAM T. WALSH
CLERK

UNITED STATES OF AMERICA : Criminal No. 22-103 (LMB)
:
v. :
: 18 U.S.C. §§ 1028A(a)(1),
LUC FIKIRI MATTHEWS : 1546(a), & 2

INDICTMENT

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

COUNTS ONE THROUGH SIX
(FALSE IMMIGRATION DOCUMENTS)

THE DEFENDANT AND OTHER INDIVIDUALS, ENTITIES, AND
ORGANIZATIONS

1. At all times relevant to this Indictment:

a. Defendant LUC FIKIRI MATTHEWS was a resident of Philadelphia, Pennsylvania who owned and operated the African Hispanic Immigration Organization ("AHIO") in Pennsauken, New Jersey. Defendant MATTHEWS represented himself as a licensed and qualified immigration attorney when, in fact, he was not licensed to practice law in the State of New Jersey or the Commonwealth of Pennsylvania.

b. AHIO was an organization incorporated, owned, operated, and controlled by Defendant LUC FIKIRI MATTHEWS. Among other things, AHIO advertised itself as a nonprofit organization assisting individuals and their families with immigration-related legal work, including filing official U.S.

government forms and paperwork to obtain immigration benefits in the United States. AHIO had offices at 4821 Westfield Avenue, Pennsauken, New Jersey and at 5 Central Avenue in Newark, New Jersey.

d. Individual 1, a native and citizen of El Salvador, resided at a location in New Jersey and did not have legal permanent resident status in the United States.

e. Individual 2, a native and citizen of Honduras, resided at a location in New Jersey and did not have legal permanent resident status in the United States.

f. Individual 3, a native and citizen of Honduras, resided at a location in New Jersey and did not have legal permanent resident status in the United States.

g. Individual 4, a native and citizen of Honduras, resided at a location in New Jersey and did not have legal permanent resident status in the United States.

h. Individual 5, a native and citizen of Greece, resided at a location in New Jersey and did not have legal permanent resident status in the United States.

i. Individual 6, a native and citizen of Honduras, resided at a location in New York and did not have legal permanent resident status in the United States.

j. United States Citizenship and Immigration Services ("USCIS"), formerly the United States Bureau of Citizenship and Immigration

Services, was an agency within the United States Department of Homeland Security responsible for receiving and adjudicating immigrant and non-immigrant applications and immigration forms submitted by or on behalf of aliens. An alien is any person not a citizen or national of the United States. Both USCIS and the United States Department of Homeland Security are departments or agencies of the United States Government.

THE U-VISA PROGRAM: BACKGROUND

2. The Victims of Trafficking and Violence Prevention Act ("VTVPA") of 2000 strengthens the ability of law enforcement agencies to investigate and prosecute certain qualifying crimes, while also helping law enforcement agencies to better serve victims of crimes. The VTVPA also offers legal protections to the victims of these crimes, including noncitizen (alien) victims who do not have legal permanent resident status in the United States and may be subject to immigration removal proceedings. The VTVPA's protections include protections from the immediate risk of being removed from the United States.

3. Under the VTVPA, victims of certain qualifying crimes that occur in the United States may be eligible to petition USCIS for U nonimmigrant status and obtain a U Visa.

4. In order to be eligible for a U Visa, the applicant must meet several requirements, including that the applicant is a noncitizen victim of a qualifying criminal activity in the United States; the applicant suffered substantial physical or mental abuse as a result of having been the victim of the criminal

activity; the applicant has information about the criminal activity; and the applicant is, or is likely to be, helpful to law enforcement, prosecutors, judges, or other officials in the detection, investigation, prosecution, conviction, or sentencing of the criminal activity.

5. If a crime victim's U Visa application is granted, the U Visa allows the victim to legally remain and work in the United States for a certain period of time, on a temporary basis, in U nonimmigrant status. While in U nonimmigrant status, the crime victim has an ongoing duty to cooperate with law enforcement and cannot unreasonably refuse to assist with the investigation or prosecution of the criminal activity. If certain conditions are met, a crime victim with a U Visa may apply for adjustment to lawful permanent resident status in the United States (i.e., seek a green card) after a certain period of time has passed.

6. USCIS determines which criminal activities qualify for U Visa consideration. At all times relevant to this indictment, the qualifying crimes included the following: Abduction; Abusive Sexual Contact; Blackmail; Domestic Violence; Extortion; False Imprisonment; Felonious Assault; Female Genital Mutilation; Fraud in Foreign Labor Contracting; Hostage; Incest; Involuntary Servitude; Kidnapping; Manslaughter; Murder; Obstruction of Justice; Peonage; Perjury; Prostitution; Rape; Sexual Assault; Sexual Exploitation; Slave Trade; Stalking; Torture; Trafficking; Witness Tampering; Unlawful Criminal Restraint; and certain related criminal activities.

APPLYING FOR A U VISA: FORMS I-918 AND I-918B

7. In order to obtain a U Visa, an applicant must file both a Form I-918, Petition for U Nonimmigrant Status ("I-918" or "Form I-918"), as well as a Form I-918, Supplement B, U Nonimmigrant Status Certification ("I-918B" or "Form I-918B"), with USCIS.

8. The I-918 requests the visa applicant's biographical information, including the visa applicant's alien number, which is a unique seven-, eight- or nine-digit number assigned to a noncitizen by the United States Department of Homeland Security. The applicant, the applicant's attorney, or the applicant's advocate completes the I-918. The applicant is required to personally sign the I-918 and declare under penalty of perjury that the information provided is complete, true, and correct.

9. The I-918B requests further information about the nature of the criminal activity at issue, as well as information about the victim, including any injuries to the victim and how the victim assisted and/or cooperated with law enforcement. The I-918B explains the role the victim had, has, or will have, in being helpful to the investigation or prosecution of the case. The I-918B is a required piece of evidence to help demonstrate that a qualifying criminal activity has occurred; that the victim has information about the criminal activity; and that the victim was helpful, is being helpful, or is likely to be helpful, in the detection, investigation, prosecution, conviction, or sentencing of criminal activity.

10. In contrast to the I-918, the I-918B is completed by a federal, state, local, tribal, or territorial law enforcement agency, prosecutor, judge, or another qualifying agency or official ("certifying official"). It is not completed by the victim, or by the victim's advocate or attorney.

11. A current investigation, the filing of charges, a prosecution, or a conviction is not required for a certifying official to sign an I-918B. According to USCIS rules, the head of a certifying agency has the authority to sign I-918Bs or to delegate that authority to other agency officials in supervisory roles within the certifying agency.

12. A certifying official's decision to sign an I-918B is discretionary and made under the authority of that agency or official. Neither the Department of Homeland Security nor any other federal agency has the authority to require an agency or certifying official to sign an I-918B. The I-918B requires the certifying official to affirm that it was submitted under penalty of perjury.

13. If a certifying official decides to sign and certify an I-918B, the official returns the executed certification to the victim (or the victim's attorney or advocate). The victim is then required to send the original, signed I-918B, along with his or her completed I-918, to USCIS.

CONDUCT OF THE DEFENDANT: AN OVERVIEW

14. At various times relevant to this indictment, Defendant LUC FIKIRI MATTHEWS engaged in a fraudulent scheme and artifice pursuant to which he, using AHIO, knowingly and intentionally promised clients that he would assist them in gaining legal resident status in the United States for a fee.

Defendant MATTHEWS then made false and fraudulent statements on immigration documents, including by forging or causing the forgery of government agency approvals from certifying officials, in an effort to cause USCIS to improperly issue U Visas to various noncitizens of the United States.

15. To execute this scheme, Defendant LUC FIKIRI MATTHEWS held meetings in New Jersey with various individuals who were noncitizens of the United States; falsely held himself out as an immigration attorney; falsely represented that certain noncitizens were eligible for legalization or other benefits and programs from USCIS, when these individuals were not, in fact, eligible for such legalization, benefits and programs; falsely assured various noncitizens that that he, Defendant MATTHEWS, would be successful in obtaining legalization or other benefits and programs from USCIS on their behalf; charged money in exchange for his immigration services; agreed to prepare U Visa applications for noncitizens individuals, while knowing that the individuals were not eligible to apply for U Visas; completed or caused the completion of U Visa applications and made false statements on these applications, such as, for example, falsely representing on the visa applications that the noncitizens had been the victims of certain qualifying crimes that had taken place within the United States; created or caused the creation of false correspondence and documents from local government agencies and officials; forged or caused the forgery of signatures of various local government officials and other individuals whose signatures were helpful or required for USCIS's consideration of U Visa applications; and mailed or caused the mailing of

completed, false and fraudulent U Visa application packages to the USCIS office in Vermont with the intent that these applications would be processed by USCIS and then USCIS would issue the U Visas.

16. The noncitizens, as described herein, never actually received the U Visas for which Defendant LUC FIKIRI MATTHEWS had applied on their behalf, and for which Defendant MATTHEWS knew they were unqualified and ineligible.

PREPARING AND PRESENTING FALSE DOCUMENTS

Individual 1

17. On or about various occasions in early 2017, Defendant LUC FIKIRI MATTHEWS held meetings at the AHIO office in Pennsauken, New Jersey and elsewhere in New Jersey with Individual 1 and his spouse.

18. During those meetings, Defendant LUC FIKIRI MATTHEWS discussed Defendant MATTHEWS's filing of visa applications with USCIS on behalf of Individual 1, his spouse, and his minor child.

19. Individual 1 and his spouse informed Defendant LUC FIKIRI MATTHEWS, in substance and in part, that Individual 1's minor child previously had been assaulted in El Salvador. Defendant MATTHEWS stated that this prior assault would qualify Individual 1, his spouse, and his minor child to be eligible for U Visas. Individual 1 expressed concern about this U Visa eligibility because the minor child's prior assault had taken place in El Salvador, rather than in the United States, but Defendant MATTHEWS

dismissed the concern and told Individual 1, in substance and in part, not to worry.

20. Defendant LUC FIKIRI MATTHEWS instructed Individual 1 and his spouse to sign immigration paperwork, including an I-918 form. The paperwork was completed in English by Defendant MATTHEWS or at his direction.

21. In or about February to March 2017, on behalf of Individual 1, Defendant LUC FIKIRI MATTHEWS knowingly prepared or caused to be prepared a visa application package containing a false and fraudulent I-918B form, as well as supporting documents. The visa application package contained information that Defendant MATTHEWS knew to be false, and that Defendant MATTHEWS specifically included in an effort to cause USCIS to issue a U Visa to Individual 1.

22. The visa application package that was prepared or caused to be prepared by Defendant LUC FIKIRI MATTHEWS contained the following false and fraudulent statements, among others:

a. The Form I-918B falsely stated that Individual 1's minor child had been assaulted in Camden, New Jersey, rather than in El Salvador. Also, the form's factual description of the assault on the minor child was false.

b. The Form I-918B falsely reflected that it had been signed by a particular individual at the Camden County Prosecutor's Office ("CCPO"), who in turn was falsely identified as the "Certifying Official" for I-918B forms ("CCPO Purported Certifying Official 1"). In reality, CCPO Purported Certifying

Official 1 did not sign the Form I-918B for Individual 1. The signature was forged.

c. The visa application package contained correspondence that purportedly was drafted and signed by CCPO Purported Certifying Official 1, regarding the alleged prior assault on Individual 1's minor child. In reality, CCPO Purported Certifying Official 1 neither drafted nor signed this correspondence. The correspondence and signature were forged.

23. On or about March 3, 2017, Defendant LUC FIKIRI MATTHEWS mailed or caused to be mailed the envelope containing Individual 1's visa application package, including the false and fraudulent I-918B form, to USCIS from a United States Postal Service facility in Philadelphia, Pennsylvania. The envelope was received by USCIS in Vermont on or about March 7, 2017.

24. Individual 1 and his spouse paid Defendant LUC FIKIRI MATTHEWS at least approximately \$5,000 for his immigration services.

Individual 2

25. On or about various occasions in 2018, Defendant LUC FIKIRI MATTHEWS held meetings at the AHIO office in Pennsauken, New Jersey and elsewhere in New Jersey with Individual 2 and her spouse.

26. During those meetings, Defendant LUC FIKIRI MATTHEWS discussed Defendant MATTHEWS's filing of visa applications with USCIS on behalf of Individual 2 and her spouse.

27. Individual 2 and her spouse informed Defendant LUC FIKIRI MATTHEWS, in substance and in part, that Individual 2 previously had been

the victim of a crime in New Jersey in 2011, which had resulted in a Temporary Restraining Order issued by the Municipal Court of Riverside Township ("TRO"), and that Individual 2's spouse had been a witness to this crime. Defendant MATTHEWS stated that this prior crime would make Individual 2 and her spouse eligible for U Visas.

28. In or about April to May 2018, on behalf of Individual 2, Defendant LUC FIKIRI MATTHEWS knowingly prepared or caused to be prepared a visa application package containing a false and fraudulent I-918B form, as well as supporting documents. The visa application package contained information that Defendant MATTHEWS knew to be false, and that Defendant MATTHEWS specifically included in an effort to cause USCIS to issue a U Visa to Individual 2.

29. The visa application package that was prepared or caused to be prepared by Defendant LUC FIKIRI MATTHEWS contained the following false and fraudulent statements, among others:

a. Form I-918 purported to include Individual 2's signature. In reality, Individual 2 never signed this form.

b. Form I-918B falsely stated that Individual 2 had been the victim of a crime in 2017, rather than in 2011. Also, the form's factual description of the crime against Individual 2 was false. For example, the form falsely described the crime as including a rape and sexual assault.

c. Form I-918B falsely reflected that it had been signed by a particular individual at the Burlington Township Police Department

("Burlington Township"), who in turn was falsely identified as the relevant "Certifying Official" for I-918B forms ("Burlington Township Purported Certifying Official 1"). In reality, Burlington Township Purported Certifying Official 1 neither completed nor signed the Form I-918B. The signature was forged.

d. The visa application package contained a document that purported to be a copy of a Temporary Restraining Order issued in 2017 regarding the alleged assault and rape that were described in the I-918B. In reality, this 2017 Temporary Restraining Order was never issued; rather, it is a forged and fraudulently-altered version of the original Temporary Restraining Order that had been issued in 2011.

30. On or about April 30, 2018, Defendant LUC FIKIRI MATTHEWS mailed or caused to be mailed the envelope containing Individual 2's visa application package, including the false and fraudulent I-918B form, to USCIS from a United States Postal Service facility in Philadelphia, Pennsylvania. The envelope was received by USCIS in Vermont on or about May 4, 2018.

31. Individual 2 and her spouse paid Defendant LUC FIKIRI MATTHEWS approximately at least \$5,000 for his immigration services.

Individual 3

32. On or about various occasions in 2016 or early 2017, Defendant LUC FIKIRI MATTHEWS held meetings at the AHIO office in Pennsauken, New Jersey and elsewhere in New Jersey with Individual 3.

33. During those meetings, Defendant LUC FIKIRI MATTHEWS discussed Defendant MATTHEWS's filing of an application for a visa with USCIS on behalf of Individual 3 and his child, as well as the filing of an application for a work authorization on behalf of Individual 3.

34. Defendant LUC FIKIRI MATTHEWS instructed Individual 3 to sign paperwork, including a I-918 form. The paperwork was otherwise completed in English by Defendant MATTHEWS or at his direction.

35. In or about January 2017 to March 2017, on behalf of Individual 3, Defendant LUC FIKIRI MATTHEWS knowingly prepared or caused to be prepared a visa application package containing a false and fraudulent I-918B form. The visa application package contained information that Defendant MATTHEWS knew to be false, and that Defendant MATTHEWS specifically included in an effort to cause USCIS to issue a U Visa to Individual 3.

36. The visa application package that was prepared or caused to be prepared by Defendant LUC FIKIRI MATTHEWS contained the following false and fraudulent statements, among others:

a. Form I-918B falsely stated that Individual 3 had been the victim of an assault in Atlantic City, New Jersey in 2013. This alleged crime did not occur.

b. Form I-918B falsely reflected that it had been signed by a particular individual at the "City of Atlantic City Department of Police" ("ACPD"), who in turn was falsely identified as the relevant "Certifying Official" for I-918B forms ("Atlantic City Purported Certifying Official 1"). In reality,

Atlantic City Purported Certifying Official 1 did not sign the Form I-918B.

Atlantic City Purported Certifying Official 1 is a fictitious individual.

c. Form I-918B reflected that the assault crime against Individual 3 was documented in a particular ACPD report case number. In reality, the ACPD report case number that was listed on the Form I-918B did not correspond to any alleged crimes against Individual 3.

37. On or about March 17, 2017, Defendant LUC FIKIRI MATTHEWS mailed or caused to be mailed the envelope containing Individual 3's visa application package, including the false and fraudulent 918B form, to USCIS from a United States Postal Service facility in Philadelphia, Pennsylvania. The envelope was received by USCIS in Vermont on or about March 23, 2017.

38. Individual 3 paid Defendant LUC FIKIRI MATTHEWS approximately at least \$3,000 for his immigration services.

Individual 4

39. On or about various occasions in the spring and summer of 2017, Defendant LUC FIKIRI MATTHEWS held meetings at the AHIO office in Pennsauken, New Jersey and elsewhere in New Jersey with Individual 4 and his spouse.

40. During those meetings, Defendant LUC FIKIRI MATTHEWS discussed Defendant MATTHEWS's filing of an application for a visa with USCIS on behalf of Individual 4 and his spouse.

41. In or about March 2017 to June 2017, on behalf of Individual 4, Defendant LUC FIKIRI MATTHEWS knowingly prepared or caused to be

prepared a visa application package containing a false and fraudulent I-918B form. The visa application package contained information that Defendant MATTHEWS knew to be false, and that Defendant MATTHEWS specifically included in an effort to cause USCIS to issue a U Visa to Individual 4.

42. The visa application package that was prepared or caused to be prepared by Defendant LUC FIKIRI MATTHEWS contained the following false and fraudulent statements, among others:

a. Form I-918 purported to include Individual 4's signature. In reality, Individual 4 never signed this form.

b. Form I-918B falsely stated that Individual 4 had been the victim of false imprisonment and unlawful criminal restraint by an unidentified police officer in July 2014 in Edgewater Park, New Jersey. This alleged crime did not occur.

c. Form I-918B falsely reflected that it had been signed by a particular individual at the Burlington County Prosecutor's Office ("BCPO"), who in turn was falsely identified as the relevant "Certifying Official" for I-918B forms ("BCPO Purported Certifying Official 1"). In reality, BCPO Purported Certifying Official 1 did not sign the Form I-918B.

43. On or about June 1, 2017, Defendant LUC FIKIRI MATTHEWS mailed or caused to be mailed the envelope containing Individual 4's visa application package, including the false and fraudulent 918B form, to USCIS from a United States Postal Service facility in Philadelphia, Pennsylvania. The envelope was received by USCIS in Vermont on or about June 6, 2017.

44. Individual 4 and his spouse paid Defendant LUC FIKIRI MATTHEWS approximately at least \$5,785 for his immigration services.

Individual 5

45. In or about January 2017 to February 2017, on behalf of Individual 5, Defendant LUC FIKIRI MATTHEWS knowingly prepared or caused to be prepared a visa application package containing a false and fraudulent I-918B form. The visa application package contained information that Defendant MATTHEWS knew to be false, and that Defendant MATTHEWS specifically included in an effort to cause USCIS to issue a U Visa to Individual 5.

46. The visa application package that was prepared or caused to be prepared by Defendant LUC FIKIRI MATTHEWS contained the following false and fraudulent statements, among others:

a. Form I-918B falsely stated that Individual 5 had been the victim of felonious assault and blackmail on or about August 14, 2016 in Brooklawn, New Jersey. This alleged crime did not occur.

b. Form I-918B falsely reflected that it had been signed by a particular individual at the Brooklawn Police Department ("Brooklawn PD"), who in turn was falsely identified as the relevant "Certifying Official" for I-918B forms ("Brooklawn PD Purported Certifying Official 1"). In reality, Brooklawn Purported Certifying Official 1 did not sign the Form I-918B. Brooklawn PD Purported Certifying Official 1 is a fictitious individual.

47. On or about February 17, 2017, Defendant LUC FIKIRI MATTHEWS mailed or caused to be mailed the envelope containing Individual 5's visa application package, including the false and fraudulent I-918B form, to USCIS from a United States Postal Service facility in Philadelphia, Pennsylvania. The envelope was received by USCIS in Vermont on or about February 22, 2017.

Individual 6

48. In or about March to April 2018, on behalf of Individual 6, Defendant LUC FIKIRI MATTHEWS knowingly prepared or caused to be prepared a visa application package containing a false and fraudulent I-918B form, as well as supporting documents. The visa application package contained information that Defendant MATTHEWS knew to be false, and that Defendant MATTHEWS specifically included in an effort to cause USCIS to issue a U Visa to Individual 6.

49. The visa application package that was prepared or caused to be prepared by Defendant LUC FIKIRI MATTHEWS contained the following false and fraudulent statements, among others:

a. Form I-918B falsely stated that Individual 6 had been the victim of felonious assault, blackmail, extortion, stalking, and unlawful criminal restraint on or about May 28, 2017 in Vineland, New Jersey. This alleged crime did not occur.

b. Form I-918B falsely reflected that it had been signed by a particular individual at the Vineland New Jersey Police Department ("Vineland

PD”), who in turn was identified as the relevant “Certifying Official” for I-918B forms (“Vineland PD Purported Certifying Official 1”). In reality, Vineland PD Purported Certifying Official 1 did not sign the Form I-918B. The signature was forged.

c. The visa application package contained correspondence that purportedly was drafted and signed by a high-ranking officer in the Vineland PD, regarding the alleged crimes inflicted on Individual 6. In reality, the high-ranking officer in the Vineland PD neither drafted nor signed this correspondence. The correspondence and signature were forged.

50. On or about April 13, 2018, Defendant LUC FIKIRI MATTHEWS mailed or caused to be mailed the envelope containing Individual 6’s visa application package, including the false and fraudulent 918B form, to USCIS from a United States Postal Service facility in Philadelphia, Pennsylvania. The envelope was received by USCIS in Vermont on or about April 19, 2018.

The Charges

51. On or about the dates set forth below, in the District of New Jersey, and elsewhere, defendant

LUC FIKIRI MATTHEWS

knowingly and willfully caused to be made under oath, and under penalty of perjury under Section 1746 of Title 28, United States Code, to be subscribed as true, false statements with respect to material facts in the following immigration forms and supplementing documents that were required by immigration laws and regulations prescribed thereunder, and knowingly and

willfully presented to the United States Citizenship and Immigration Service such forms and supplementing documents that contained such false statements and failed to contain any reasonable basis in law or fact, knowing that the forms and supplementing documents were false, and aided and abetted the same:

COUNT	ON BEHALF OF INDIVIDUAL	APPROXIMATE DATE	SUBJECT MATTER
1	1	March 3, 2017	A false and fraudulent Form I-918B and supporting documents
2	2	April 30, 2018	A false and fraudulent Form I-918B and supporting documents
3	3	March 17, 2017	A false and fraudulent Form I-918B
4	4	June 1, 2017	A false and fraudulent Form I-918B
5	5	February 17, 2017	A false and fraudulent Form I-918B
6	6	April 13, 2018	A false and fraudulent Form I-918B and supporting documents

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

COUNTS 7 THROUGH 12
(AGGRAVATED IDENTITY THEFT)

1. Paragraphs 1 through 50 of Counts 1 through 6 of this Indictment are hereby incorporated and realleged as if fully set forth herein.

2. On or about the dates listed below, in the District of New Jersey and elsewhere, defendant

LUC FIKIRI MATTHEWS

did knowingly transfer, possess, and use without lawful authority, and aided and abetted others in the transfer, possession, and use of, without lawful authority, a means of identification of the victims listed below, during and in relation to the felony offenses of false immigration documents, in violation of Title 18, United States Code, Section 1546(a), as charged elsewhere in this Indictment, knowing that the means of identification belonged to an actual person:

COUNT	ON BEHALF OF	APPROXIMATE DATE	OFFENSES AND MEANS OF IDENTIFICATION
7	CCPO Purported Certifying Official 1	March 3, 2017	Name and signature of CCPO Purported Certifying Official 1 on Form I-918B submitted on behalf of Individual 1, together with correspondence purportedly written and signed by CCPO Purported Certifying Official 1
8	Individual 1	March 3, 2017	Name, date of birth, alien number, and signature of Individual 1 on the Form I-918 submitted on behalf of Individual 1

9	Burlington Township Purported Certifying Official 1	April 30, 2018	Name and signature of Burlington Township Purported Certifying Official 1 on Form I-918B submitted on behalf of Individual 2
10	Individual 2	April 30, 2018	Name, date of birth, alien number, and signature of Individual 2 on the Form I- 918 submitted on behalf of Individual 2
11	BCPO Purported Certifying Official 1	June 1, 2017	Name and signature of BCPO Purported Certifying Official 1 on Form I-918B submitted on behalf of Individual 4
12	Individual 4	June 1, 2017	Name, date of birth, alien number, and signature of Individual 4 on the Form I- 918 submitted on behalf of Individual 4

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATIONS AS TO COUNTS ONE THROUGH SIX

1. As a result of committing the offenses charged in Counts One through Six of this Indictment, defendant MATTHEWS shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(6)(A)(ii) any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offenses charged in Counts One through Six, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Counts One through Six of this Indictment.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

1. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

(CONTINUED ON NEXT PAGE)

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p) (as incorporated by 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(b)), to forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

A TRUE BILL

FOREPERSON

Philip R. Sellinger b7A2

PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 22-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

LUC FIKIRI MATTHEWS

INDICTMENT FOR

18 U.S.C. §§ 1028A(a)(1),
1546(a) & 2

A True Bill.

Foreperson

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