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8	UNITED STATES DISTRICT COURT
9	FOR THE CENTRAL DISTRICT OF CALIFORNIA
10	June 2011 Grand Jury
11	UNITED STATES OF AMERICA,
12	Plaintiff, <u>INDICTMENT</u>
13	v.) [18 U.S.C. § 1001(a)(2):
14	OYTUN AYSE MIHALIK,
15	aka "Ayse Oytun Akin,") aka "Ayse Mihalik,") aka "Cindy Palmer,")
16	Defendant.
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19	The Grand Jury charges:
20	[18 U.S.C. § $1001(a)(2)$]
21	On or about August 8, 2011, in Los Angeles County, within the
22	Central District of California, in a matter within the
23	jurisdiction of the Federal Bureau of Investigation ("FBI") and
24	the Department of Homeland Security, Homeland Security
25	Investigations ("HSI"), namely, an interview with Special Agents
26	of the FBI and HSI at Los Angeles International Airport ("LAX"),
27	defendant OYTUN AYSE MIHALIK also known as ("aka") "Ayse Oytun
28	Akin," "Ayse Mihalik," and "Cindy Palmer" ("defendant MIHALIK"),

knowingly and willfully made material false, fictitious, and
fraudulent statements and representations in a matter involving
international terrorism as defined in 18 U.S.C. § 2331.

4 Specifically, defendant MIHALIK stated in the interview that: 5 (1) she had never used a name other than "Oytun Mihalik" or a 6 similar name when using Western Union to send money to a person 7 who was overseas; (2) she had sent money only once via Western 8 Union to a person who was overseas; and (3) she believed that the 9 recipient of the money she sent overseas via Western Union was a 10 woman.

These statements and representations were false, fictitious, 11 and fraudulent because, as defendant MIHALIK well knew when she 12 made the statements during the interview at LAX, in fact the 13 (1) defendant MIHALIK had used the alias following was true: 14 "Cindy Palmer" when sending money via Western Union to a person 15 who was overseas; (2) defendant MIHALIK had sent money more than 16 once via Western Union to a person who was overseas; and (3) 17 18 defendant MIHALIK believed that the recipient of the money she sent overseas via Western Union was a man. 19

These false, fictitious, and fraudulent statements and 20 representations were made in a matter involving international 21 terrorism, as defined in Title 18, United States Code, Section 22 2331, namely, a matter involving acts that: (1) are violent and 23 dangerous to human life; (2) would be violations of the criminal 24 laws of the United States or of any State if the acts occurred 25 within the jurisdiction of the United States or of any State; (3) 26 are intended to intimidate and coerce a civilian population, 27 28 influence the policy of a government by intimidation and coercion,

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1	and affect the conduct of a government by mass destruction,
2	assassination, and kidnapping; and (4) occur primarily outside the
3	territorial jurisdiction of the United States.
4	A TRUE BILL
5	1.1
6	Foreperson
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8	ANDRÉ BIROTTE JR. United States Attorney
9	N. g. Dropaon
10	ROBERT E. DUGDALE
11	Assistant United States Attorney Chief, Criminal Division
12	PATRICK R. FITZGERALD
13	Assistant United States Attorney Chief, National Security Section
14 15	JUDITH A. HEINZ Assistant United States Attorney
16	Deputy Chief, National Security Section
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