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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

August 2001 Grand Jury

**01 CR 3240 W**

UNITED STATES OF AMERICA,	)	Criminal Case No. _____
	)	
Plaintiff,	)	<u>I N D I C T M E N T</u>
	)	
v.	)	Title 18, U.S.C., Sec. 1546(a) -
	)	False Statement in Immigration
MOHDAR MOHAMED ABDOULAH,	)	Application; Title 18, U.S.C.,
aka Mihdar Mohammad	)	Sec. 1001 - False Statement
Al-Mihdar Zeid,	)	
	)	
Defendant.	)	
	)	

The grand jury charges:

Count 1

On or about May 5, 2000, in the Southern District of California, defendant MOHDAR MOHAMED ABDOULAH, aka Mihdar Mohammad Al-Mihdar Zeid, did knowingly present to Immigration and Naturalization Service an application required under the immigration laws, and regulations prescribed thereunder, to wit, an application for asylum an withholding of removal [Form I-589], which contained a statement, to wit, that he last entered the United States without inspection on December 7, 1998, through New York, New York; which the defendant then and there knew was false, in that in truth and in fact he entered the United States on December 10, 1998, from Canada, on a Yemen passport

MGW:nlv(bt) :San Diego  
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1 with a valid United States B-2 visitor's visa; in violation of  
2 Title 18, United States Code, Section 1546(a).

3 Count 2

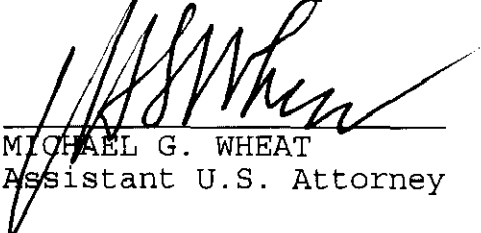
4 On or about July 24, 2001, in the Southern District of  
5 California, in a matter within the jurisdiction of Immigration and  
6 Naturalization Service, an agency of the United States, defendant,  
7 MOHDAR MOHAMED ABDOULAH, aka Mihdar Mohammad Al-Mihdar Zeid, knowingly  
8 and willfully made and caused to be made a false, fictitious, and  
9 fraudulent material statement and representation, to wit, that he last  
10 entered the United States without inspection on December 7, 1998,  
11 through New York, New York, on an Italian passport; which the  
12 defendant then and there knew was false, in that in truth and in fact  
13 he entered the United States on December 10, 1998, from Canada, on a  
14 Yemen passport with a valid United States B-2 visitor's visa; in  
15 violation of Title 18, United States Code, Section 1001.

16 DATED: November 2, 2001.

17 A TRUE BILL:

18  
19   
20 Foreperson

21 PATRICK K. O'TOOLE  
22 United States Attorney

23 By:   
24 MICHAEL G. WHEAT  
25 Assistant U.S. Attorney