

AO 91 (Rev. 11/11) Criminal Complaint

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

UNITED STATES DISTRICT COURT

JUN 28 2019

for the
Eastern District of Arkansas

JAMES W. MCCORMACK, CLERK
By: 
DEP CLERK

United States of America)
v.)
Bilal Al-Rayanni)
)
)
)
)
)
)

Case No. 4:19-MJ-00168 PSH

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 13, 2019 in the county of Phillips in the Eastern District of Arkansas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 1542	False Statement in Passport Application

This criminal complaint is based on these facts:

See Attached Affidavit.

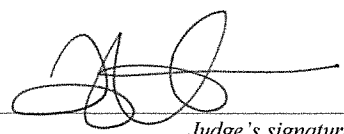
Continued on the attached sheet.


Complainant's signature

Thomas Johnson, DSS, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 06/28/2019


Judge's signature

City and state: Little Rock, AR

Patricia Harris, United States Magistrate Judge
Printed name and title

#1

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Thomas Johnson, a Special Agent with the United States Department of State, Diplomatic Security Service (DSS), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the United States Department of State, Diplomatic Security Service (DSS), Hot Springs, Arkansas. I have been employed by DSS since January of 2013 and have been a federal agent and officer working for the Department of Justice and the Department of Homeland Security prior to that since June of 1998.

2. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search/arrest warrants.

3. That as a result of my training, general knowledge, and experience as a Special Agent for DSS, I am familiar with violations of federal law including false statements in violation of Title 18, United States Code, Section 1542 (passport fraud).

4. Through my training and experience, I have participated in many investigations where individuals have made false statements, used different identities to commit passport fraud and other federal violations.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

6. I make this affidavit in support of a criminal complaint charging Bilal Al-Rayanni (hereinafter “AL-RAYANNI”), aka Bilal Kassim Alawdi (“Alawdi”), with a violation of Title

18, United States Code, Section 1542. The information contained in this affidavit is based on my training, experience, participation in other investigations, and information provided to me by other sources. The current investigation has involved discussions between law enforcement officers, review of digital media and records, and communications with others who have personal knowledge of the events and circumstances described herein.

7. Based on facts set forth in this affidavit, I submit there is probable cause to arrest AL-RAYANNI for the crime of making false statements in a passport application, in violation of Title 18, United States Code, Section 1542.

STATUTORY AUTHORITY

8. This investigation concerns the alleged violations of 18 U.S.C. § 1542, for making false statements in an application for U.S. Passport. Under that statute it is a federal crime to knowingly and willfully make any false statement in an application for passport with intent to induce or secure the issuance of a passport under the authority of the United States. Venue is appropriate in the Eastern District of Arkansas because AL-RAYANNI mailed the DS-82 application from a Post Office in West Helena, AR, where he also purchased the money order to pay for the passport application fee.

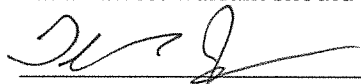
FACTS ESTABLISHING PROBABLE CAUSE

9. On or about May 13, 2019, an individual who self-identified as “Bilal Kassim Alawdi,” date of birth July 30, 1991, place of birth Yemen, submitted a DS-82 (#298575916), U.S. Passport Renewal Application, by mail and provided his return mailing address as 527 North Fourth Street, West Helena, AR. As part of the passport renewal application, “Alawdi” provided U.S. passport #450194528, which was issued on November 25, 2008, as proof of identity and citizenship.


10. On June 27, 2019, "Alawdi" was interviewed by special agents from DSS and the Federal Bureau of Investigation. "Alawdi" appeared to be the same person depicted in the photograph submitted with "Alawdi's" passport application, and he admitted he was the person who submitted the passport application. During the interview, "Alawdi" admitted that his true name is Bilal AL-RAYANNI. He explained that his father's true name is Abdo Mohammed Al-Rayanni and that his father (unlawfully) purchased a United States visa from a man in Yemen identified as Kassem Alawdi. AL-RAYANNI's father then used that documentation to (fraudulently) obtain a U.S. passport for AL-RAYANNI under the assumed name of Bilal Kassim Alawdi in 1992. AL-RAYANNI stated that he learned his true name was "Bilal Al-Rayanni" when he was approximately 10-12 years old. He has, however, continued to use the name "Bilal Kassim Alawdi" to obtain or renew United States passports in 2002, 2008, and now 2019.

CONCLUSION

11. Upon consideration of all the information recounted herein, I respectfully submit that there is probable cause to believe that on or about May 13, 2019, Bilal Al-Rayanni aka Bilal Kassim Alawdi committed the offense of making false statements in a passport application, in violation of Title 18, United States Code, Section 1542, and that an arrest warrant should be issued.


THOMAS JOHNSON, Special Agent
Diplomatic Security Service

SWORN TO AND SUBSCRIBED BEFORE ME ON THIS 28 DAY OF JUNE, 2019.


PATRICIA HARRIS
United States Magistrate Judge