

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3:18CR165
)	
Plaintiff,)	JUDGE JEFFREY J. HELMICK
)	
v.)	
)	
IBRAHIM ZUBAIR MOHAMMAD,)	
)	
Defendant.)	
)	

**FACTUAL ALLEGATIONS IN SUPPORT OF
JUDICIAL ORDER OF REMOVAL**

The United States of America hereby moves for the entry of an Order of Judicial Removal and Notice is hereby given to Defendant, IBRAHIM ZUBAIR MOHAMMAD (the defendant) and to his attorney of record David Lee Klucas, that the United States of America alleges the following facts in support of the Notice of Intent to Request Judicial Removal:

1. The defendant is not a citizen or national of the United States.
2. The defendant is a native of India and a citizen of India.
3. The defendant was admitted to the United States as an F-1 nonimmigrant on or about August 5, 2001
4. The defendant adjusted his status to that of conditional permanent resident on March 21, 2008 with the conditions being removed on April 5, 2011.
5. At the time of sentencing in the instant criminal proceeding, the defendant will have been convicted in the United States District Court, Northern District of Ohio, of Concealment of Financing of Terrorism, in violation of Title 18, United States Code,

Section 2339C(c)(2)(B).

6. The maximum term of imprisonment for a violation of Title 18, United States Code, Section 2339C(c)(2)(B) is 10 years.

6. The defendant is, and at sentencing will be, subject to removal from the United States pursuant to Section 237(a)(4)(B) of the Immigration and Nationality Act of 1952 (INA), as amended, 8 U.S.C. § 1227(a)(4)(B), as an alien who has engaged in terrorist activity.

WHEREFORE, pursuant to Section 238(c) of the INA, 8 U.S.C. § 1228(c), the United States of America requests that the Court, at the time of sentencing, order that the defendant be removed from the United States to India.

Respectfully submitted,

JUSTIN E. HERDMAN
UNITED STATES ATTORNEY

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