



FILED
U.S. DISTRICT COURT
DISTRICT OF COLORADO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

10/11/03 AM 11:03
JAMES R. HANSPEAKER
CLERK

Criminal Case No. 03-CR-127 B

BY _____ DEP. CLK

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ABDUL QAYYUM,
2. CHRIS MARIE WARREN,
a/k/a Christie Warren,
3. HAROON RASHID,
4. SAIMA SAIMA,
5. IRFAN KAMRAN, and
6. SAJJAD NASSER,
a/k/a Sajjad Naseer,

Defendants.

SUPERSEDING INDICTMENT

18 U.S.C. § 371

18 U.S.C. § 1001

8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i)

The Grand Jury charges that:

COUNT ONE

1. From on or about March 4, 1996, to on or about March 21, 2003, in the District of Colorado, and elsewhere, the defendants, **ABDUL QAYYUM, CHRIS MARIE WARREN, a/k/a "Christie Warren," HAROON RASHID, SAIMA SAIMA, IRFAN KAMRAN and SAJJAD**

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NASSER, a/k/a "Sajjad Naseer," did knowingly and willfully combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to defraud the United States by obstructing, interfering, impairing, impeding and defeating, through fraudulent and dishonest means, the legitimate functioning of the government, that is, the regulation and control of immigration of aliens into the United States.

THE PURPOSE AND OBJECT OF THE CONSPIRACY

2. It was the purpose and object of the conspiracy that the defendants would arrange for and assist in an otherwise inadmissible alien's fraudulent entry into and unlawful presence in the United States.

THE MANNER AND MEANS OF THE CONSPIRACY

3. The manner and means by which the defendants sought to accomplish the conspiracy included, among others, the following:

a. At various time between on or about March 4, 1996, and on or about August 19, 1997, through fraudulent and deceptive means, including but not limited to the filing of false immigration documents, one or more of the defendants arranged for the entry of an illegal alien into the United States.

b. At various times between on or about August 19, 1997, and on or about March 21, 2003, one or more of the defendants provided the illegal alien with housing and other forms of support in order to continue the alien's unlawful presence in the United States.

c. At various times between on or about August 19, 1997, and on or about March 21, 2003, one or more of the defendants concealed from and/or falsely represented the alien's true status in the United States in order to continue the alien's unlawful presence in the United States.



OVERT ACTS

4. In furtherance of the conspiracy and to achieve the objects thereof, the defendants committed and caused to be committed in the District of Colorado, and elsewhere, at least one of the following overt acts, among others:

a. On or about March 4, 1996, the defendant, **ABDUL QAYYUM**, filed an immigrant visa petition (also known as an "INS Form I-130") in Denver, Colorado, concerning Imran Khan, and falsely represented therein that Imran Khan was his biological son, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not his biological son

b. On or about March 4, 1996, the defendant, **CHRIS MARIE WARREN**, a/k/a "**Christie Warren**," filed an affidavit of support (also known as an "INS Form I-134") concerning Imran Khan, and falsely represented therein that Imran Khan was her stepson, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not her stepson.

c. On or about December 17, 2002, the defendant, **ABDUL QAYYUM**, falsely stated to a federal agent that Imran Khan was his biological son, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not his biological son.

d. On or about February 10, 2003, the defendant, **SAIMA SAIMA**, falsely stated to a federal agent that Imran Khan was the biological son of Abdul Qayyum, her father, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum.

e. On or about February 11, 2003, the defendant, **IRFAN KAMRAN**, falsely stated to a federal agent that Imran Khan was the biological son of Abdul Qayyum, his father, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum.



f. On or about February 15, 2003, the defendant, **CHRIS MARIE WARREN**, a/k/a "**Christie Warren**," falsely stated to a federal agent that Imran Khan was the biological son of Abdul Qayyum, her husband, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum,

g. On or about March 11, 2003, the defendant, **HAROON RASHID**, falsely stated to a federal agent that Imran Khan was the biological son of Abdul Qayyum when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum.

h. On or about March 11, 2003, in the District of Colorado, the defendant, **SAJJAD NASSER**, a/k/a "**Sajjad Naseer**," falsely stated to a federal agent that Imran Khan was the biological son of Abdul Qayyum, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

On or about December 17, 2002, in the District of Colorado, in a matter within the jurisdiction of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, an agency of the United States, the defendant, **ABDUL QAYYUM**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation, that is, did state to a federal agent that Imran Khan was his biological son, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not his biological son, in violation of Title 18, United State Code, Section 1001.



COUNT THREE


On or about February 15, 2003, in the District of Colorado, in a matter within the jurisdiction of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, an agency of the United States, the defendant, **CHRIS MARIE WARREN**, a/k/a "**Christie Warren**," did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation, that is, did state to a federal agent that Imran Khan was the biological son of Abdul Qayyum, her husband, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum, in violation of Title 18, United State Code, Section 1001.

COUNT FOUR

On or about March 11, 2003, in the District of Colorado, in a matter within the jurisdiction of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, an agency of the United States, the defendant, **HAROON RASHID**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation, that is, did state to a federal agent that Imran Khan was the biological son of Abdul Qayyum when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum, in violation of Title 18, United State Code, Section 1001.

COUNT FIVE

On or about February 10, 2003, in the District of Colorado, in a matter within the jurisdiction of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, an agency of the United States, the defendant, **SAIMA SAIMA**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation, that is, did state to a federal agent that Imran Khan was the biological son of Abdul Qayyum, her father, when in truth and in fact,



as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum, in violation of Title 18, United State Code, Section 1001.

COUNT SIX

On or about February 11, 2003, in the District of Colorado, in a matter within the jurisdiction of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, an agency of the United States, the defendant, **IRFAN KAMRAN**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation, that is, did state to a federal agent that Imran Khan was the biological son of Abdul Qayyum, his father, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum, in violation of Title 18, United State Code, Section 1001.

COUNT SEVEN

On or about March 11, 2003, in the District of Colorado, in a matter within the jurisdiction of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, an agency of the United States, the defendant, **SAJJAD NASSER, a/k/a "Sajjad Naseer,"** did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation, that is, did state to a federal agent that Imran Khan was the biological son of Abdul Qayyum, when in truth and in fact, as the defendant then and there well knew, Imran Khan was not the biological son of Abdul Qayyum, in violation of Title 18, United State Code, Section 1001.

COUNT EIGHT

From on or about March 4, 1996, to on or about March 21, 2003, in the District of Colorado, and elsewhere, the defendants; **ABDUL QAYYUM, CHRIS MARIE WARREN, a/k/a Christie Warren, HAROON RASHID, SAIMA SAIMA, IRFAN KAMRAN, and SAJJAD NASSER, a/k/a Sajjad Naseer,** and others known and unknown to the grand jury, did knowingly combine,



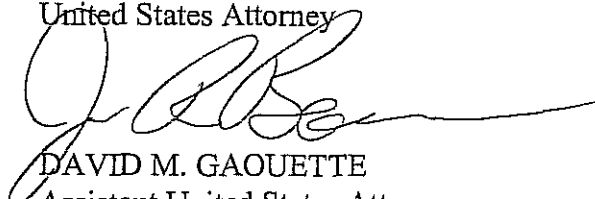
conspire, confederate and agree, to conceal, harbor and shield from detection, an alien, knowing and in reckless disregard of the fact that said alien had come to, entered and remained in the United States in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) & (a)(1)(B)(i).

A TRUE BILL


FOREPERSON

JOHN W. SUTHERS
United States Attorney



DAVID M. GAOUCETTE
Assistant United States Attorney
1225 17th Street, Suite 700
Denver, Colorado 80202
303-454-0100



DATE: May 22, 2003

DEFENDANT: ABDUL QAYYUM

DOB: February 15, 1943

ADDRESS: 2750 South Monroe Street
Denver, Colorado

OFFENSE: **COUNT ONE:**
18 U.S.C. § 371
Knowingly and willfully combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to defraud the United States.

COUNT TWO:
18 U.S.C. § 1001
Knowingly and willfully make a false, fraudulent, and fictitious material statement and representation.

COUNT EIGHT:
8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i)
Conspiracy to Conceal, Harbor, or Shield From Detection an Alien

LOCATION OF OFFENSE: Denver Metropolitan Area

PENALTY: **COUNTS ONE AND TWO:**
NMT Five (5) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment
COUNT EIGHT:
NMT Ten (10) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

AGENT: Ross E. Godwin, Senior Special Agent
Immigration and Naturalization Service
U.S. Department of Justice



AUTHORIZED BY: Steven A. Tyrrell
U.S. Department of Justice, Criminal Division

David M. Gaouette
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less

over five days

other

THE GOVERNMENT

will seek detention in this case

will not seek detention in this case

The statutory presumption of detention is not applicable to this defendant.

OCDETF CASE: Yes No



DATE: May 22, 2003

DEFENDANT: CHRIS MARIE WARREN,
a/k/a Christie Warren

DOB: Unknown

ADDRESS: 2750 South Monroe Street
Denver, Colorado

OFFENSE: **COUNT ONE:**
18 U.S.C. § 371
Knowingly and willfully combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to defraud the United States.

COUNT THREE:
18 U.S.C. § 1001
Knowingly and willfully make a false, fraudulent, and fictitious material statement and representation.

COUNT EIGHT:
8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i)
Conspiracy to Conceal, Harbor, or Shield From Detection an Alien

LOCATION
OF OFFENSE: Denver Metropolitan Area

PENALTY: **COUNTS ONE AND THREE:**
NMT Five (5) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

COUNT EIGHT:
NMT Ten (10) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

AGENT: Ross E. Godwin, Senior Special Agent
Immigration and Naturalization Service
U.S. Department of Justice



AUTHORIZED BY: Steven A. Tyrrell
U.S. Department of Justice, Criminal Division

David M. Gaouette
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less

over five days

other

THE GOVERNMENT

will seek detention in this case

will not seek detention in this case

The statutory presumption of detention is not applicable to this defendant.

OCDETF CASE: Yes No



DATE: May 22, 2003

DEFENDANT: HAROON RASHID,

DOB: 3/3/71

ADDRESS: 500 Jay Street,
Lakewood, Colorado

OFFENSE: **COUNT ONE:**
18 U.S.C. § 371
Knowingly and willfully combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to defraud the United States.

COUNT FOUR:
18 U.S.C. § 1001
Knowingly and willfully make a false, fraudulent, and fictitious material statement and representation.

COUNT EIGHT:
8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i)
Conspiracy to Conceal, Harbor, or Shield From Detection an Alien

LOCATION
OF OFFENSE: Denver Metropolitan Area

PENALTY: **COUNTS ONE AND FOUR:**
NMT Five (5) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment
COUNT EIGHT:
NMT Ten (10) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

AGENT: Ross E. Godwin, Senior Special Agent
Immigration and Naturalization Service
U.S. Department of Justice



AUTHORIZED BY: Steven A. Tyrrell
U.S. Department of Justice, Criminal Division

David M. Gaouette
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less

over five days

other

THE GOVERNMENT

will seek detention in this case

will not seek detention in this case

The statutory presumption of detention is not applicable to this defendant.

OCDETF CASE: Yes No



DATE: May 22, 2003

DEFENDANT: SAIMA SAIMA,

DOB: unknown date 1970

ADDRESS: 500 Jay Street,
Lakewood, Colorado

OFFENSE: **COUNT ONE:**
18 U.S.C. § 371
Knowingly and willfully combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to defraud the United States.

COUNT FIVE:
18 U.S.C. § 1001
Knowingly and willfully make a false, fraudulent, and fictitious material statement and representation.

COUNT EIGHT:
8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i)
Conspiracy to Conceal, Harbor, or Shield From Detection an Alien

LOCATION OF OFFENSE: Denver Metropolitan Area

PENALTY: **COUNTS ONE AND FIVE:**
NMT Five (5) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment
COUNT EIGHT:
NMT Ten (10) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

AGENT: Ross E. Godwin, Senior Special Agent
Immigration and Naturalization Service
U.S. Department of Justice



AUTHORIZED BY: Steven A. Tyrrell
U.S. Department of Justice, Criminal Division

David M. Gaouette
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less

over five days

other

THE GOVERNMENT

will seek detention in this case

will not seek detention in this case

The statutory presumption of detention is not applicable to this defendant.

OCDETF CASE: Yes No



DATE: May 22, 2003

DEFENDANT: IRFAN KAMRAN

DOB: 4/12/70

ADDRESS: 8400 East Yale Avenue, Building 3-101
Denver, Colorado

OFFENSE: **COUNT ONE:**
18 U.S.C. § 371
Knowingly and willfully combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to defraud the United States.

COUNT SIX:
18 U.S.C. § 1001
Knowingly and willfully make a false, fraudulent, and fictitious material statement and representation.

COUNT EIGHT: 8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i)
Conspiracy to Conceal, Harbor, or Shield From Detection an Alien.

LOCATION OF OFFENSE: Denver Metropolitan Area

PENALTY: **COUNTS ONE AND SIX:**
NMT Five (5) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

COUNT EIGHT:
NMT Ten (10) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

AGENT: Ross E. Godwin, Senior Special Agent
Immigration and Naturalization Service
U.S. Department of Justice



AUTHORIZED BY: Steven A. Tyrrell
U.S. Department of Justice, Criminal Division

David M. Gaouette
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less

over five days

other

THE GOVERNMENT

will seek detention in this case

will not seek detention in this case

The statutory presumption of detention is not applicable to this defendant.

OCDETF CASE: . Yes No



DATE: May 22, 2003

DEFENDANT: SAJJAD NASSER,
a/k/a Sajjad Naseer,

DOB: Unknown date

ADDRESS: 8350 East Yale Avenue, Building E-203
Denver, Colorado

OFFENSE: **COUNT ONE:**
18 U.S.C. § 371
Knowingly and willfully combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to defraud the United States.

COUNT SEVEN:
18 U.S.C. § 1001
Knowingly and willfully make a false, fraudulent, and fictitious material statement and representation.

COUNT EIGHT:
8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i)
Conspiracy to Conceal, Harbor, or Shield From Detection an Alien

LOCATION
OF OFFENSE: Denver Metropolitan Area

PENALTY: **COUNTS ONE AND SEVEN:**
NMT Five (5) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment
COUNT EIGHT:
NMT Ten (10) years imprisonment;
NMT a \$250,000 fine, or both;
NMT Three (3) years supervised release;
\$100.00 Special Assessment

AGENT: Ross E. Godwin, Senior Special Agent
Immigration and Naturalization Service
U.S. Department of Justice



AUTHORIZED BY: Steven A. Tyrrell
U.S. Department of Justice, Criminal Division

David M. Gaouette
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ESTIMATED TIME OF TRIAL:

five days or less

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THE GOVERNMENT

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The statutory presumption of detention is not applicable to this defendant.

OCDETF CASE: Yes No