

SEALED FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MAY 15 PM 3:24
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

V.

WISSAM ALLOUCHE,

Defendant.

CRIMINAL JUSTICE CLERK
SA 13 CR 0420 OG
INDICTMENT

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[Vio: Counts 1&2-18 U.S.C. § 1425
Procurement of Citizenship
or Naturalization Unlawfully;
Count 3-18 U.S.C. § 1001, Making
False Statements.]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 1425(b)]

On or about January 12, 2009, within the Western District of Texas, the Defendant,

WISSAM ALLOUCHE,

for himself, a person not entitled to naturalization and citizenship, knowingly procured and obtained, and attempted to procure and obtain naturalization and citizenship by falsely stating regarding his Form-400 Application for Naturalization, Part 10, Question 9.c, "No" in response to the question "Have you ever been a member of or in any way associated (either directly or indirectly) with a terrorist organization?" when in truth and fact the Defendant was a fighter in the Amal militia in Lebanon during the early to mid-1980s and after his release as an Israeli prisoner of war, the Defendant was made a commander in the Amal militia; as an Amal commander, the Hizballah fighters in his sector had to notify the Defendant of their operations. Hizballah is classified by the United States government as a Designated Foreign Terrorist Organization.

In violation of Title 18, United States Code, Section 1425(b).

COUNT TWO

[18 U.S.C. § 1425(b)]

On or about January 12, 2009, within the Western District of Texas, the Defendant,

WISSAM ALLOUCHE,

for himself, a person not entitled to naturalization and citizenship, knowingly procured and obtained, and attempted to procure and obtain naturalization and citizenship by falsely stating regarding his Form-400 Application for Naturalization, Part 2, Question B, Defendant claimed that he and his wife were married and living together for the last three years, when in truth and actuality, the Defendant and his wife they had not lived together since May 2007 and filed for divorce in Bexar County on December 7, 2007.

In violation of Title 18, United States Code, Section 1425(b).

COUNT THREE

[18 U.S.C. § 1001]

On or about October 14, 2009, within the Western District of Texas, the Defendant,

WISSAM ALLOUCHE,

knowingly and willfully made a materially false, fictitious, and fraudulent statement in any matter within the jurisdiction of the executive branch, to wit: in order to gain a security clearance from the United States Department of Defense, on his Form SF-86, Questionnaire for National Security Position, Section 29, Question g, "Have you EVER participated in militias (not including official state government militias) or paramilitary groups?", the Defendant answered "No" when in truth and fact, the Defendant was a fighter and commander of the Amal militia in Lebanon during the early

to mid-1980's.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL.



FOREPERSON OF THE GRAND JURY

ROBERT PITMAN
UNITED STATES ATTORNEY

BY: 

MARK T. ROOMBERG
Assistant United States Attorney