UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

Criminal No. 17-46 (RBW)

v.

KASSIM TAJIDEEN,

Defendant.

NOTICE OF INTENT TO REQUEST JUDICIAL REMOVAL

NOTICE IS HEREBY GIVEN TO KASSIM TAJIDEEN ("defendant") and to his attorneys of record, including Chibli Mallat, Paul G. Cassell, William J. Murphy, William W. Taylor III, Erick R. Delinsky, and Steven N. Herman, that upon conviction of the defendant for a violation of Title 18 United States Code, Section 1956(h), the United States of America shall request that the Court issue a Judicial Order of Removal against the defendant pursuant to Section 238(c) of the Immigration and Nationality Act of 1952, as amended, 8 U.S.C. § 1228(c).

Respectfully submitted,

JESSIE K. LIU **United States Attorney** DC Bar No. 472845

By:

Thomas A. Gillice, DC Bar #452336 Luke Jones, VA Bar #75053 Karen Seifert, NY Bar #4742342 **Assistant United States Attorneys** Jacqueline L. Barkett, NY Bar #5424916 Special Assistant United States Attorney National Security Section United States Attorney's Office 555 4th Street NW. 11th Floor Washington, D.C. 20530

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And

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By: ____/S

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: Criminal No. 17-46 (RBW)

V.

:

KASSIM TAJIDEEN,

:

Defendant. :

FACTUAL ALLEGATIONS IN SUPPORT OF JUDICIAL REMOVAL

NOTICE IS HEREBY GIVEN TO KASSIM TAJIDEEN ("the defendant") and to his attorneys of record, including Chibli Mallat, Paul G. Cassell, William J. Murphy, William W. Taylor III, Erick R. Delinsky, and Steven N. Herman, 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 Lebanon and a citizen of Belgium and Lebanon.
- 3. The defendant was paroled into the United States for the purpose of criminal prosecution on or about March 23, 2017.
- 4. At the time of sentencing in the instant criminal proceeding, the defendant will have been convicted in the United States District Court for the District of Columbia of Count Eleven of the Superseding Indictment, charging Conspiracy to Launder Monetary Instruments, in violation of Title 18 United States Code, Section 1956(h).
- 5. The maximum term of imprisonment for a conviction of Count Eleven, a violation of Title 18 United States Code, Section 1956(h), is twenty (20) years' imprisonment.
- 6. The defendant is, and at sentencing will be, subject to removal from the United States pursuant to Section 212(a)(2)(I) INA, 8 U.S.C. § 1182(a)(2)(I), as an alien who a consular

officer or the Attorney General knows, or has reason to believe, has engaged in an offense which is described in section 1956 of Title 18, United States Code (relating to laundering of monetary instruments).

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 Lebanon, or in the alternative, Belgium.

Respectfully submitted,

JESSIE K. LIU United States Attorney DC Bar No. 472845

By: ____/S/_

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Karen Seifert, NY Bar #4742342
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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

: **Criminal No. 17-46 (RBW)**

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:

KASSIM TAJIDEEN,

:

Defendant. :

ORDER OF JUDICIAL REMOVAL

In consideration of the application of the United States of America, the Factual Allegations in Support of Judicial Removal, the consent of KASSIM TAJIDEEN ("the defendant") and all prior proceedings and submissions in this matter set forth herein, the Court finds:

- 1. The defendant is not a citizen or national of the United States.
- 2. The defendant is a native of Lebanon and a citizen of Lebanon and Belgium.
- 3. The defendant was paroled into the United States for the purpose of criminal prosecution on or about March 23, 2017.
- 4. At the time of sentencing in the instant criminal proceeding, the defendant will be convicted in the United States District Court for the District of Columbia, of the following count charged in the Superseding Indictment: Count Eleven, charging Conspiracy to Launder Monetary Instruments, in violation of Title 18 United States Code, Section 1956(h).
- 5. The maximum term of imprisonment for a conviction of Count Eleven, Conspiracy to Launder Monetary Instruments, in violation of Title 18 United States Code, Section 1956(h), is twenty (20) years' imprisonment.
- 6. The defendant is, and at sentencing will be, subject to removal from the United States pursuant to Section 212(a)(2)(I) INA, 8 U.S.C. § 1182(a)(2)(I), as an alien who a consular

officer or the Attorney General knows, or has reason to believe, has engaged in an offense which is described in Section 1956 of Title 18, United States Code (relating to laundering of monetary instruments).

- 7. The defendant has waived his right to notice and a hearing under Section 238(c) of the INA, 8 U.S.C. § 1228(c).
- 8. The defendant has waived the opportunity to pursue any and all forms of relief and protection from removal.

WHEREFORE, IT IS HEREBY ORDERED, pursuant to Section 238(c) of the INA, 8 U.S.C. § 1228(c), that the defendant is ordered removed from the United States to Lebanon, or in the alternative, Belgium, upon his sentencing, which removal is to be effected upon completion of his term of incarceration or upon the defendant's transfer to Belgium.

DATE	THE HONORABLE REGGIE B. WALTON
	UNITED STATES DISTRICT JUDGE