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CENTRAL DISTRICT COURT
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

VALLMOE SHQAIRE,
aka "Mohamad Shqaire,"
aka "Mahmad Hadr Mahmad
Shakir,"

Defendant.

CR No. **CR 18-00656-JFW**

I N D I C T M E N T

[18 U.S.C. § 1425(a): Unlawful
Procurement of United States
Citizenship]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1425(a)]

On October 7, 2008, in Los Angeles County, within the Central District of California, defendant VALLMOE SHQAIRE ("SHQAIRE"), also known as ("aka") "Mohamad Shqaire" and "Mahmad Hadr Mahmad Shakir," knowingly procured naturalization as a United States citizen, to which he was not entitled, by making, in connection with his naturalization application, the following material false statements, that he knew to be false when made, each of which individually and in

1 combination with each other resulted in SHQAIRE procuring
2 naturalization contrary to law and in violation of 18 U.S.C.
3 § 1425(a):

4 False Statement 1: Defendant SHQAIRE falsely stated that he had
5 never been arrested for or convicted of a crime or served time in
6 jail or prison, when, in fact, SHQAIRE had been arrested and
7 convicted of crimes and was sentenced to a seven-year prison term and
8 served approximately four years in Israeli custody.

9 False Statement 2: Defendant SHQAIRE falsely stated that he had
10 never been a member of or associated with any organization,
11 association, fund, foundation, party, club, society or similar group
12 in the United States or in any other place, when, in fact, SHQAIRE
13 was a member of the Palestinian Liberation Organization's "Shabeda"
14 cell in Israel.

15 False Statement 3: Defendant SHQAIRE falsely stated that he had
16 never given false or misleading information to any U.S. government
17 official while applying for any immigration benefit or to prevent
18 deportation, exclusion, or removal, when, in fact, SHQAIRE had
19 attested under oath and penalty of perjury in connection with his
20 June 5, 2002 application to become a Lawful Permanent Resident that
21 he had never been arrested, cited, indicted, fined or imprisoned for
22 breaking or violating any law or ordinance, when in fact, SHQAIRE had
23 been arrested and convicted of crimes and was sentenced to a seven-
24 year prison term and served approximately four years in Israeli
25 custody.

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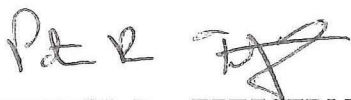
Revocation of Citizenship

Notice is hereby given that upon conviction of Count One above, defendant SHQAIRE's naturalization shall, by Court order, be revoked, set aside, and declared void, and defendant SHQAIRE's certificate of naturalization shall, by the same order, be cancelled, pursuant to Title 8, United States Code, Section 1451(e).

A TRUE BILL

15/
Foreperson

NICOLA T. HANNA
United States Attorney


PATRICK R. FITZGERALD
Assistant United States Attorney
Chief, National Security Division

CHRISTOPHER D. GRIGG
Assistant United States Attorney
Chief, Terrorism and Export
Crimes Section

ANNAMARTINE SALICK
Assistant United States Attorney
Terrorism and Export Crimes
Section