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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America

Plaintiff,

v.

Lotfi Raissi, (Counts 1-11)
aka Vincent Fabrice Algier,
aka Fabrice Vincent Algier,

Redouane Dahmani, (Counts 1-2, 9, 11)
aka Abdel Halim Lalami
aka Halim Abdel Lalami

Defendants.

INDICTMENT

VIO: 18 U.S.C. § 371
(Conspiracy)
Count 1

18 U.S.C. § 1001
(False Statements)
Counts 2-8

18 U.S.C. § 1546
(False Oath in Asylum
Application)
Count 9

18 U.S.C. § 1546
(False Visa Application)
Count 10

18 U.S.C. § 1621
(False Affidavit)
Count 11

THE GRAND JURY CHARGES:

COUNT ONE

1. From an exact date unknown, but no later than on or about January 20, 2000, through on or about March 22, 2000, in the District of Arizona and elsewhere, defendants REDOUANE DAHMANI and LOTFI RAISSI, did knowingly and willfully conspire and agree together, to commit the following offenses against the United States of America:

a. Title 18, United States Code, Section 1001 (False Statement);

1 e. On or about March 14, 2000, defendant DAHMANI executed a "Record of
2 Applicant's Oath During an Interview."

3 In violation of Title 18, United States Code, Sections 371 and 2.

4 **COUNT TWO**

5 4. From an exact date unknown, but no later than on or about January 20, 2000 through
6 March 22, 2000, in the District of Arizona and elsewhere, defendants REDOUANE
7 DAHMANI and LOTFI RAISSI, in a matter within the jurisdiction of the Immigration and
8 Naturalization Service (INS), a governmental agency of the United States of America, did
9 knowingly and willfully make a materially false, fictitious, and fraudulent statement and
10 representation, by submitting a false and fraudulent Application for Asylum and supporting
11 Affidavit to the INS. The Application for Asylum and supporting Affidavit were materially
12 false and fraudulent because defendants lied about defendant DAHMANI's purported
13 persecution and whereabouts (i.e., Algeria) in August, 1999.

14 In violation of Title 18, United States Code, Sections 1001 and 2.

15 **COUNT THREE**

16 5. On or about May 3, 2001, in the District of Arizona and elsewhere (i.e., United States
17 Embassy in London, England), defendant LOTFI RAISSI, in a matter within the jurisdiction
18 of the United States Department of State, a governmental agency of the United States of
19 America, did knowingly and willfully make a materially false, fictitious and fraudulent
20 statement and representation, by not disclosing on his Nonimmigrant Visa Application (M1
21 Visa), that defendant had a 1993 criminal conviction for theft, which carried a maximum
22 penalty of ten (10) years, from the Uxbridge Magistrate's Court in England. The failure to
23 disclose the information was material as the defendant was convicted under a false identity
24 (Vincent Fabrice Algier) and the theft occurred at a London airport. The proper disclosure of
25 the information would have led to a follow-up investigation by the Department of State.

26 In violation of Title 18, United States Code, Section 1001.

COUNT FOUR

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2 6. On or about April 5, 2000, in the District of Arizona and elsewhere, defendant LOTFI
3 RAISSI, in a matter within the jurisdiction of the Federal Aviation Administration (FAA), a
4 governmental agency of the United States of America, did knowingly and willfully make a
5 materially false, fictitious and fraudulent statement and representation, by not disclosing that
6 defendant had a 1993 criminal conviction for theft, which carried a maximum penalty of ten
7 (10) years, from the Uxbridge Magistrate's Court in England. The failure to disclose the
8 information was material as the defendant was convicted under a false identity (Vincent
9 Fabrice Algier) and the theft occurred at a London airport. The proper disclosure of the
10 information would have led to a follow up investigation by the FAA.

11 In violation of Title 18, United States Code, Section 1001.

COUNT FIVE

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13 7. On or about April 21, 1999, in the District of Arizona and elsewhere, defendant LOTFI
14 RAISSI, in a matter within the jurisdiction of the Federal Aviation Administration (FAA), a
15 governmental agency of the United States of America, did knowingly and willfully make a
16 materially false, fictitious and fraudulent statement and representation, by not disclosing that
17 defendant had a 1993 criminal conviction for theft, which carried a maximum penalty of ten
18 (10) years, from the Uxbridge Magistrate's Court in England. The failure to disclose the
19 information was material as the defendant was convicted under a false identity (Vincent
20 Fabrice Algier) and the theft occurred at a London airport. The proper disclosure of the
21 information would have led to a follow up investigation by the FAA.

22 In violation of Title 18, United States Code, Section 1001.

COUNT SIX

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24 8. On or about July 14, 1998, in the District of Arizona and elsewhere, defendant LOTFI
25 RAISSI, in a matter within the jurisdiction of the Federal Aviation Administration (FAA), a
26 governmental agency of the United States of America, did knowingly and willfully make a
27 materially false, fictitious and fraudulent statement and representation, by not disclosing that

1 defendant had a 1993 criminal conviction for theft, which carried a maximum penalty of ten
2 (10) years, from the Uxbridge Magistrate's Court in England. The failure to disclose the
3 information was material as the defendant was convicted under a false identity (Vincent
4 Fabrice Algier) and the theft occurred at a London airport. The proper disclosure of the
5 information would have led to a follow up investigation by the FAA.

6 In violation of Title 18, United States Code, Section 1001.

7 **COUNT SEVEN**

8 9. On or about July 15, 1997, in the District of Arizona and elsewhere, defendant LOTFI
9 RAISSI, in a matter within the jurisdiction of the Federal Aviation Administration (FAA), a
10 governmental agency of the United States of America, did knowingly and willfully make a
11 materially false, fictitious and fraudulent statement and representation, by not disclosing that
12 defendant had a 1993 criminal conviction for theft, which carried a maximum penalty of ten
13 (10) years, from the Uxbridge Magistrate's Court in England. The failure to disclose the
14 information was material as the defendant was convicted under a false identity (Vincent
15 Fabrice Algier) and the theft occurred at a London airport. The proper disclosure of the
16 information would have led to a follow up investigation by the FAA.

17 In violation of Title 18, United States Code, Section 1001.

18 **COUNT EIGHT**

19 10. On or about November 21, 1996, in the District of Arizona and elsewhere, defendant
20 LOTFI RAISSI, in a matter within the jurisdiction of the Federal Aviation Administration
21 (FAA), a governmental agency of the United States of America, did knowingly and willfully
22 make a materially false, fictitious and fraudulent statement and representation, by not
23 disclosing that defendant had a 1993 criminal conviction for theft, which carried a maximum
24 penalty of ten (10) years, from the Uxbridge Magistrate's Court in England. The failure to
25 disclose the information was material as the defendant was convicted under a false identity
26 (Vincent Fabrice Algier) and the theft occurred at a London airport. The proper disclosure of
27 the information would have led to a follow up investigation by the FAA.

1 In violation of Title 18, United States Code, Section 1001.

2 **COUNT NINE**

3 11. On or about January 20, 2000, in the District of Arizona and elsewhere, defendants
4 REDOUANE DAHMANI and LOTFI RAISSI, in a matter within the jurisdiction of the
5 Immigration and Naturalization Service (INS), a governmental agency of the United States of
6 America, did knowingly make under oath, or as permitted under penalty of perjury under Section
7 1746 of Title 28, United States Code, and did knowingly subscribe and present as true, various
8 false statements regarding alleged persecution in Algeria, in an Affidavit in support of
9 defendant DAHMANI's INS Application for Asylum.

10 In violation of Title 18, United States Code, Sections 1546 and 2, and Title 28, United States
11 Code, Section 1746.

12 **COUNT TEN**

13 12. On or about May 3, 2001, in the District of Arizona and elsewhere, defendant LOTFI
14 RAISSI, knowingly obtained, possessed, accepted, used and attempted to use, a M1 Visa
15 obtained from the United States Embassy in London, England, knowing it to have been falsely
16 made and procured by means of false claims or statements, and to have been otherwise procured
17 by fraud and unlawfully obtained, in that defendant RAISSI did not disclose he had a 1993
18 criminal conviction for theft, which carried a maximum penalty of ten (10) years, from the
19 Uxbridge Magistrate's Court in England. The failure to disclose the information was material
20 as the defendant was convicted under a false identity (Vincent Fabrice Algier) and the theft
21 occurred at a London airport. The proper disclosure of the information would have led to a
22 follow-up investigation by the Department of State.

23 In violation of Title 18, United States Code, Section 1546.

24 **COUNT ELEVEN**

25 13. On or about January 20, 2000, in the District of Arizona and elsewhere, defendants
26 REDOUANE DAHMANI and LOTFI RAISSI, in a matter within the jurisdiction of the
27 Immigration and Naturalization Service (INS), a governmental agency of the United States of
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1 America, did knowingly and willfully submit a false and fraudulent Affidavit in support of
2 defendant DAHMANI's Application for Asylum, which was subscribed as true even though the
3 defendants knew the Affidavit was not true.

4 In violation of Title 18, United States Code, Sections 1621(2) and 2, and Title 28, United
5 States Code, Section 1746.

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A TRUE BILL

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FOREPERSON OF THE GRAND JURY
Date: November 27, 2001

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PAUL K. CHARLTON
United States Attorney
District of Arizona

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JOSEPH C. WELTY
PETER SEXTON
Assistant U.S. Attorneys

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