

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS
(KANSAS CITY DOCKET)

RTW
6/26/03

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

) No. 03-200 -01-13-

CRYSTAL PORTER JAMAL,)
MOHAMMAD KAHN,)
SHABBER ALI a/k/a ALI SHABBER,)
TARIQ MAHMOOD,)
a/k/a MAHMOOD TARIQ,)
FAIZ RASOOL,)
ZAHEER UL ISLAM,)
GHAZALI MAHMOOD ANSIR)
a/k/a ANSIR M. GHAZALI,)
MOHAMMAD NAWAZ,)
MUNAWAR HUSSAIN,)
AHMED BILAL ISLAM a/k/a BILLY,)
KHALID MEHMOOD CHOUDRY,)
MUHAMMED WAHEED, and)
HABIB-UR REHMAN,)

Defendants.)

INDICTMENT

COUNT 1

At all times relevant to the indictment:

The Conspiracy

1. Beginning shortly before April 26, 2001, and continuing until on or about February 8, 2003, in the District of Kansas and elsewhere, defendants

**CRYSTAL PORTER JAMAL,
MOHAMMAD KAHN,
SHABBER ALI a/k/a ALI SHABBER, and
TARIQ MAHMOOD a/k/a Mahmood Tariq**

knowingly, and willfully combined, conspired, and agreed together and with each other and with others known and unknown to the grand jury to commit certain offenses against the United States, that is:

- (1) to arrange sham marriages between Pakistani citizens with citizens of the United States in order for the Pakistani citizen to evade a provision of the United States immigration laws, in violation of Title 8, United States Code, Section 1325(c); and
- (2) to submit fraudulent Forms I-130 (Petition for Alien Relative) to the Immigration and Naturalization Service based upon the sham marriages of the Pakistani citizens and the United States Citizens. Said Form I-130 were false because the underlying marriage was a sham.

The Manner and Means of the Conspiracy

2. It was part of the conspiracy that the defendants would recruit United States citizen females to marry Pakistani citizen males who were present in the United States.

3. It was part of the conspiracy that defendants would at times be a witness for the sham marriages.

4. It was part of the conspiracy that periodic payments would be made to the United States citizens females involved in the sham marriages up to at least the time the Pakistani citizen involved in the sham marriage had submitted the proper paper work to the Immigration and Naturalization Service to adjust his status, his status had been adjusted, and he had received a green card (Form I-551) from the Immigration and Naturalization Service.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, and in order to effect the objects thereof, the

defendants and their co-conspirators committed and caused to be committed, in the District of Kansas and elsewhere, the following overt acts among others:

1. On or about April 26, 2001, Faiz Rasool married Tamatha LaShawn Stubblefield in Johnson County, Kansas. Crystal Porter-Jamal recruited Stubblefield for the marriage. Crystal Porter-Jamal was a witness at the marriage.

2. On or about June 15, 2001, Zaheer Ul Islam married Angelle Charlene Herbert in Wyandotte County, Kansas. Crystal Porter-Jamal recruited Herbert for the marriage. Crystal Porter-Jamal and Shabber Ali a/k/a Ali Shabber were witnesses at the marriage.

3. On or about June 29, 2001, Angelle Charlene Herbert filed an INS Form I-130 (Petition for Alien Relative) with the Immigration and Naturalization Service on behalf of her husband Zaheer U. Islam.

4. On or about August 20, 2001, Tamatha LaShawn Stubblefield filed an INS Form I-130 (Petition for Alien Relative) with the Immigration and Naturalization Service on behalf of her husband Faiz Rasool.

5. On or about September 5, 2001, Ghazali Mahmood Ansir married Sarah Ann Bigelow in Wyandotte County, Kansas. Crystal Porter-Jamal recruited Bigelow for the marriage. Crystal Porter-Jamal was a witness at the wedding.

6. On or about September 12, 2001, Mohammad Nawab married Latashia Evette Williams in Wyandotte County, Kansas. Crystal Porter-Jamal recruited Williams for the marriage. Crystal Porter-Jamal was a witness at the wedding.

7. On or about December 10, 2001, Latashia Evette Williams filed an INS Form I-130 (Petition for Alien Relative) with the Immigration and Naturalization Service on behalf of her husband Mohammad Nawaz.

8. On or about January 28, 2002, Munawar Hussain married Waukesha S. Brooks in Wyandotte County, Kansas. Crystal Porter-Jamal recruited Brooks for the wedding. Crystal Porter-Jamal was a witness at the marriage.

9. On or about February 28, 2002, Ahmed Bilal Islam married Christina Marie Rodriguez in Shawnee County, Kansas. Crystal Porter-Jamal recruited Rodriguez for the marriage.

10. On May 9, 2002, Khalid Mehmood Choudhry married Arelia Nina Mattison in Wyandotte County, Kansas. Crystal Porter-Jamal recruited Mattison for the wedding. Crystal Porter-Jamal was a witness at the wedding.

11. On or about August 20, 2002, Arelia Nina Mattison filed an INS Form I-130 (Petition for Alien Relative) with the Immigration and Naturalization Services on behalf of her husband Khalid Mehmood Choudhry.

12. On or about February 8, 2003, in Kansas City, Missouri, Shabber Ali a/k/a Ali Shabber paid Tamatha LaShawn Stubblefield \$60.00 in United States currency. The payment was her monthly payment for marrying Faiz Rasool.

13. This was all in violation of Title 18, United States Code, Section 371.

COUNT 2

On or about April 26, 2001, in the District of Kansas, .

FAIZ RASOOL

did knowingly enter into a marriage with Tamatha LaShawn Stubblefield for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 3

On or about June 15, 2001, in the District of Kansas,

ZAHEER UL ISLAM

did knowingly enter into a marriage with Angella Charlene Herbert for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 4

On or about September 5, 2001, in the District of Kansas,

**GHAZALI MAHMOOD ANSIR
a/k/a ANSIR M. GHAZALI**

did knowingly enter a marriage with Sarah Ann Bigelow for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 5

On or about September 12, 2001, in the District of Kansas,

MOHAMMAD NAWAZ,

did knowingly enter into a marriage with Latashia Evette Williams for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 6

On or about January 28, 2002, in the District of Kansas,

MUNAWAR HUSSAIN,

did knowingly enter into a marriage with Waukeesha S. Brooks for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 7

On or about February 28, 2002, in the District of Kansas,

AHMED BILAL ISLAM a/k/a BILLY,

did knowingly enter into a marriage with Christina Marie Rodriguez for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 8

On or about May 9, 2002, in the District of Kansas,

KHALID MEHMOOD CHOUDRY,

did knowingly enter into a marriage with Arelia Nina Mattison for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 9

On or about June 7, 2002, in the District of Kansas,

MUHAMMED WAHEED,

did knowingly enter into a marriage with Onita Ravonne Norwood for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

COUNT 10

On or about October 18, 2002, in the District of Kansas,

HABIB-UR REHMAN,

did knowingly enter into a marriage with Anntya R. Hullaby for the purpose of evading a provision of the immigration laws, in violation of Title 8, United States Code, Section

1325(c).

A TRUE BILL.

Dated: _____

FOREPERSON

ERIC F. MELGREN
United States Attorney
District of Kansas
1200 Epic Center
301 North Main
Wichita, Kansas 67202
Ks. S. Ct. No. 12430

(It is requested that trial be held in Kansas City, Kansas.)

The Court acknowledges the return of this indictment in open court.

UNITED STATES DISTRICT JUDGE
District of Kansas

PENALTY:

Count 1

Conspiracy - 18 USC 371

- ◆ Not more than 5 years
- ◆ \$250,000 Fine
- ◆ Not more than 3 years SR
- ◆ \$100 Special Crime Victims Fund Assessment

Counts 2-10:

Marriage Fraud - 8 USC 1325(c)

- ◆ Not more than 5 years in prison
- ◆ Not more than a \$250,000 fine; or both
- ◆ Not more than 3 years supervised release
- ◆ \$100 Special Crime Victims Fund Assessment