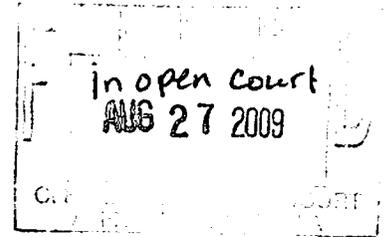


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. 1:09CR285
	)	
v.	)	Count 1 18 U.S.C. §1425(a)
	)	
AHMAD ALHAJ MOHAMMAD TONJI	)	Unlawful Procurement of
	)	Naturalization

INDICTMENT

AUGUST 2009 TERM -- AT ALEXANDRIA

Unlawful Procurement of Naturalization

THE GRAND JURY CHARGES THAT:

Between on or about October 1, 1999 and on or about July 20, 2000 in Arlington County, in the Eastern District of Virginia, AHMAD ALHAJ MOHAMMAD TONJI did knowingly procure his own naturalization contrary to law. Specifically:

1. On or about October 1, 1999, AHMAD ALHAJ MOHAMMAD TONJI caused to be submitted to the Immigration and Naturalization Service an INS Form N-400, Application for Naturalization, in which he certified under penalty of perjury that the contents of the application were true and correct. As TONJI well knew, the contents of the application concealed material facts and were false in the following particulars:

A. At Part 9 (Memberships and Organizations) of the Application for Naturalization, in response to the direction to list his present and past membership in or affiliation with every

organization, association, fund, foundation, party, club, society, or similar group in the United States or any other place, he failed to disclose his affiliations with the following organizations:

1. Anchor Yeast (Pvt) Limited, a Zimbabwe corporation, of which he had been a director since about 1990;
2. Censor, S.A., a Liberian corporation that, in 1995, disbursed funds at his direction;
3. An Institute in Mecca, Saudi Arabia, which in 1994, provided financial support in the Jihad's areas, and of which he was a director;
4. The Islamic African Relief Agency, a Sudanese agency, of which he had been a member of the board since about 1987;
5. The Islamic Call Society, a Libyan organization, of which he was a founding member in or about 1972;
6. Jucosa Concentrados S.A. a Chilean corporation, of which he was a director since in or about 1978;
7. Key Overseas, Inc., a Panamanian corporation, of which he was an officer and director since about 1995;
8. The Makkah Mukarramah Charity Trust, a Virginia corporation of which he had been an officer and director between 1990 and 1997;
9. Manazamat al Dawa Al Islamiyah, a Sudanese agency of which he had been a member of the board since in or about 1985; and
10. The Societe Agro Industrielle Mamini, an Ivory Coast entity of which he was an initial director in about 1989.

B. At Part 7 (Additional Eligibility Factors), in response to Question 12(g), "Have you ever given false testimony for the purpose of obtaining any immigration benefit," he falsely answered "no" even though, in violation of Title 18, United States Code, Section 1015, he had falsely testified to the truth of his application for an immigrant visa and alien registration on June

8, 1985. In specific, on or about June 8, 1985, TOTONJI submitted to the United States Department of State an Application for Immigrant Visa and Alien Registration, Form OF-230, and falsely swore before a consular officer of the United States in Jeddah, Saudi Arabia, that all of his statements which appeared in that application were true and complete to the best of his knowledge and belief. Yet, in response to Question 29 on the application, which directed him to "List all organizations you are now or have been a member of or affiliated with since your 16<sup>th</sup> birthday (include professional, vocational, social, and political organizations)," TOTONJI failed to list various organizations with which he well knew that he was then or had been affiliated or of which he was then or had been a member, including the following organizations:

1. The International Islamic Federation of Student Organizations, of which he was a founding member in 1969 and Secretary General between 1969 and 1973;
2. The Islamic Call Society, a Libyan organization, of which he was a founding member in or about 1972;
3. The Muslim Students Association of the U.K. and Eire, of which he was a founding member in or about 1960;
4. The Muslim Students Association of the United States and Canada, USA, of which he was a founding member in 1963 and president in 1965;
5. The United Muslim Organizations of Europe, Germany, of which he was a founding member in about 1961; and
6. The World Assembly of Muslim Youth, a Saudi Arabian organization, of which he was a founding member in 1972 and Assistant Secretary General between 1972 and 1982.

C. At Part 7 (Additional Eligibility Factors), in response to Question 15(a), he asserted that he had never knowingly committed any crime for which he had not been arrested, when in fact as he then well knew, on or about June 8, 1985, he made a false statement under oath in a proceeding or matter relating to registry of aliens, in violation of Title 18, United States Code, Section 1015, and that on or about June 19, 1985, he obtained an immigrant visa and alien registration knowing them to have been unlawfully obtained and procured by means of false claims, false statements, and by fraud, in violation of Title 18, United States Code, Section 1546, as more particularly described in Subparagraph B, above, but he was not arrested for those crimes.

All in violation of Title 18, United States Code, Section 1001.

2. On or about March 15, 2000, AHMAD ALHAJ MOHAMMAD appeared before an officer of the INS and swore that the contents of his application for naturalization were true to the best of his knowledge and belief, when as he well knew, he had omitted from his response to the direction to list his present and past membership in or affiliation with every organization, association, fund, foundation, party, club, society, or similar group in the United States or any other place various affiliations and memberships as specified in Paragraph 1(A) above; given false testimony for the purpose of obtaining any immigration benefit as specified in Paragraph 1(B) above; and committed

crimes for which he had not been arrested, as specified in Paragraph 1(C) above; all in violation of Title 18, United States Code, Section 1015.

(In violation of Title 18, United States Code §1425(a).)

A TRUE BILL:

*Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.*

\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

Dana Boente  
United States Attorney

By:

  
\_\_\_\_\_  
Gordon D. Kromberg  
Assistant United States Attorney