



IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Cr. No. _____
)	
vs.)	18 U.S.C. § 1546
)	18 U.S.C. § 1001
BASSAM Z. DARWISHAHMAD,)	18 U.S.C. § 2
)	
Defendant.)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

On or about March 4, 2002, in the Western District of Tennessee, the defendant

-----**Bassam Z. Darwishahmad**-----

did knowingly present, and cause to be presented, to the Immigration and Naturalization Service of the United States Department of Justice (now Citizenship and Immigration Services) an Application, specifically an I-485, Application to Register Permanent Residence or Adjust Status, which contained the statement "None" in response to Question C of Part 3 which asked, "List your present and past membership in or affiliation with every political organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place since your sixteenth birthday. Include any foreign military service in this part. If none, write "none". Include name(s) of organization(s), location(s), dates of membership from and to, and the nature of organization(s). If additional space is needed, use a separate



piece of paper." The defendant then and there knew the answer "none" in response to that question was false, in that the answer did not disclose his foreign military service, did not disclose that he had been a member of, and affiliated with, the Palestinian Authority as an intelligence officer and did not disclose that he had been affiliated with Fatah, and the Palestine Liberation Organization, in violation of Title 18 United States Code Section 1546 and 2.



COUNT TWO

On or about March 4, 2002 in the Western District of Tennessee the defendant

-----**Bassam Z. Darwishahmad**-----

did knowingly present, and cause to be presented, to the Immigration and Naturalization Service of the United States Department of Justice (now Citizenship and Immigration Services) an application, specifically an I-485, Application to Register Permanent Residence or Adjust Status, which contained the statement, "no" in response to Part 3, Question 4, which asked as follows: "Have you ever engaged in, conspired to engage in, or do you intend to engage in, or have you ever solicited membership or funds for, or have you through any other means ever assisted or provided any type of material support to, any person or organization that has ever engaged in or conspired to engage, in sabotage, kidnaping, political assassination, highjacking or any other form of terrorist activity?" The defendant then and there knew the answer "no" in response to that question was false in that he had thrown gas bombs (Molotov cocktails) at Israeli soldiers, in violation of Title 18 United States Code Section 1546 and 2.



COUNT THREE


On or about September 18, 2002 in the Western District of Tennessee, in a matter within the jurisdiction of the Immigration and Naturalization Service of the United States Department of Justice, an agency and Department of the United States, the defendant

-----**Bassam Z. Darwishahmad**-----

did knowingly and willfully falsify, conceal and cover up a material fact by trick, scheme and device, that is, while being questioned regarding whether or not he had ever been arrested, cited, charged, indicted, fined or imprisoned for breaking or violating any law or ordinance, excluding traffic violations, the defendant stated that he had been arrested for throwing stones by Israeli police in Nablus, Palestine in 1990, when in truth in fact he had been arrested and convicted of illegal carrying of a weapon, ammunition or explosive device; membership in an illegal association and setting up a blockade, all in violation of Title 18 United States Code Section 1001.

A TRUE BILL

S/GRAND JURY FOREMAN

DATE: Feb. 22, 2007

UNITED STATES ATTORNEY