

COPY

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS  
PEORIA DIVISION

UNITED STATES of AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
ALI SALEH KAHLAH AL-MARRI, )  
A/K/A "ABDULAKAREEM A. ALMUSLAM" )  
)  
Defendant. )

NO. 03-\_\_\_\_\_  
VIO: Title 18 U.S.C. §1028(a)(7)  
Title 18 U.S.C. §1014  
Title 18 U.S.C. §1001(a)(1) and (2)  
Title 18 U.S.C. §1029(a)(3)

INDICTMENT

Count One

The GRAND JURY charges:

1. From in or about July 2000 to in or about August 2000, ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," used false identification information to open bank accounts so that he could deposit and withdraw funds under an assumed name.
2. From in or about July 2000 to in or about August 2000, ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," rented a room at the Time Out Motel in Macomb, Illinois, in the name "Abdulakareem A. Almuslam" so he would have a local address that he could use to receive documents related to the bank accounts he intended to open.
3. In or about July 2000 and August 2000, ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," created a fictional business entity called "AAA Carpets" and used the address of the Time Out Motel in Macomb, Illinois as the address of "AAA Carpet."
4. From in or about July 2000, up to and including in or about August 2000, at Macomb,

Illinois, in the Central District of Illinois,

**ALI SALEH KAHLAH AL-MARRI,  
a/k/a "Abdullakareem A. Almuslam,"**

the defendant, knowingly used, without lawful authority, in and affecting interstate and foreign commerce, a means of identification of another person with the intent to commit an unlawful activity that constituted a violation of Federal law, in that the defendant made unauthorized use of a Social Security number that was not issued in his name to file false account opening applications with three banks in Macomb, Illinois, in violation of Title 18, United States Code, Section 1014.

In violation of Title 18, United States Code, Section 1028(a)(7).

**Count Two**

The GRAND JURY further charges:

1. Paragraphs 1 through 3 of Count One are realleged and incorporated herein by reference.
2. On or about July 21, 2000, at Macomb, Illinois, in the Central District of Illinois,

**ALI SALEH KAHLAH AL-MARRI,  
a/k/a "Abdulakareem A. Almuslam,"**

the defendant, unlawfully and knowingly made a false statement and report, for the purpose of influencing the action of an institution the accounts of which were then insured by the Federal Deposit Insurance Corporation, upon an application, in that the defendant provided a false name and Social Security number in connection with an account opening application at Citizen's National Bank in Macomb, Illinois.

In violation of Title 18, United States Code, Section 1014.

**Count Three**

The GRAND JURY further charges:

1. Paragraphs 1 through 3 of Count One are realleged and incorporated herein by reference.
2. On or about August 3, 2000, at Macomb, Illinois, in the Central District of Illinois,

**ALI SALEH KAHLAH AL-MARRI,  
a/k/a "Abdulakareem A. Ahmuslam,"**

the defendant, unlawfully and knowingly made a false statement and report, for the purpose of influencing the action of an institution the accounts of which were then insured by the Federal Deposit Insurance Corporation, upon an application, in that the defendant provided a false name and Social Security number in connection with an account opening application at the First Federal Bank in Macomb, Illinois.

In violation of Title 18, United States Code, Section 1014.

**Count Four**

The GRAND JURY further charges:

1. Paragraphs 1 through 3 of Count One are realleged and incorporated herein by reference.
2. On or about August 3, 2000, at Macomb, Illinois, in the Central District of Illinois,

**ALI SALEH KAHLAH AL-MARRI,  
a/k/a "Abdulakareem A. Almuslam,"**

the defendant, unlawfully and knowingly made a false statement and report, for the purpose of influencing the action of an institution the accounts of which were then insured by the Federal Deposit Insurance Corporation, upon an application, to wit, the defendant provided a false name and Social Security number in connection with an account opening application at Mid-America National Bank in Macomb, Illinois.

In violation of Title 18, United States Code, Section 1014.

**Count Five**

The GRAND JURY further charges:

1. At all times material to this indictment, the Federal Bureau of Investigation ("FBI") was an agency of the Department of Justice which was part of the executive branch of the Government of the United States.

2. From Tuesday, September 11, 2001, and continuously thereafter until at least the return of this Indictment, the investigation of a series of coordinated attacks on the World Trade Center ("WTC") in lower Manhattan in New York City and the Pentagon in Arlington, Virginia ("the September 11 Attacks") was a matter within the jurisdiction of the FBI.

3. On or about October 2, 2001, in connection with the investigation into the September 11 Attacks, FBI agents interviewed ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," at his apartment in West Peoria, Illinois.

4. During the interview, ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," admitted, among other things, that he had arrived in the United States on September 10, 2001, one day before the September 11 Attacks.

5. During the interview, ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," was asked when he had previously traveled to the United States.

6. On or about October 2, 2001, at West Peoria, Illinois, in the Central District of Illinois,

**ALI SALEH KAHLAH AL-MARRI,  
a/k/a "Abdulakareem A. Almuslam,"**

the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, unlawfully, willfully, and knowingly falsified, concealed, and covered up by trick, scheme, and device a material fact, and made a materially false, fictitious, and fraudulent statement and

representation, in that the defendant falsely informed agents of the FBI that, prior to September 10, 2001, the defendant had last been in the United States in 1991, when, in fact, the defendant had been in the United States in the summer of 2000.

In violation of Title 18, United States Code, Section 1001(a)(1) and (2).

**Count Six**

The GRAND JURY further charges:

1. Paragraphs 1 and 2 of Count Five are realleged and incorporated herein by reference.
2. At all times relevant to this indictment, a telephone number in the United Arab Emirates ("the UAE Telephone Number") and a person named Mustafa Ahmed al-Hawsawi, a/k/a "Mustafa Ahmed" ("al-Hawsawi"), who was believed to be associated with that number, were material to the FBI's investigation of the September 11 Attacks.
3. On or about December 11, 2001, FBI agents interviewed ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," at the FBI office in Peoria, Illinois.
4. During the interview, ALI SALEH KAHLAH AL-MARRI, a/k/a "Abdulakareem A. Almuslam," was asked whether he had ever called the UAE Telephone Number.
5. On or about December 11, 2001, at Peoria, Illinois, in the Central District of Illinois,

**ALI SALEH KAHLAH AL-MARRI,  
a/k/a "Abdulakareem A. Almuslam,"**

the defendant unlawfully, willfully, and knowingly falsified, concealed, and covered up by trick, scheme, and device a material fact, and made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, in that the defendant falsely informed FBI agents that the defendant had not called the UAE Telephone Number, when, in fact, the defendant had called the UAE Telephone Number several times.

In violation of Title 18, United States Code, Section 1001(a)(1) and (2).

**Count Seven**

The GRAND JURY further charges:

1. On or about December 11, 2001, at West Peoria, Illinois, in the Central District of Illinois and elsewhere,

**ALI SALEH KAHLAH AL-MARRI,  
a/k/a "Abdulakareem A. Almuslam,"**

the defendant, unlawfully, knowingly, and with intent to defraud, possessed 15 and more unauthorized and counterfeit access devices, and thereby affected interstate and foreign commerce, to wit, the defendant possessed in excess of 15 unauthorized and counterfeit credit card numbers on a piece of paper in his computer carrying case and in computer files in his laptop computer.

In violation of Title 18, United States Code, Section 1029(a)(3).

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
JAN PAUL MILLER  
UNITED STATES ATTORNEY

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