

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No.
)	Violation: Title 18, United
SAMI KHOSHABA LATCHIN)	State Code, Section 1425(a)
)	

COUNT ONE

The SPECIAL MARCH 2004 GRAND JURY charges:

1. At times material to this indictment:

(a) The Baath Party was a political party in the Middle East, including Iraq.

(b) The Iraqi Intelligence Service (hereafter "IIS"), known in Arabic as the *Da'irat al-Mukhabbarat al-'Ammā*, or the *Mukhabbarat*, was the foreign intelligence arm of the government of Iraq.

(c) Defendant SAMI KHOSHABA LATCHIN was born in Dohuk, Iraq and was a citizen of Iraq.

(d) Defendant SAMI KHOSHABA LATCHIN was a resident of Des Plaines, Illinois.

2. On or about August 5, 1998, defendant SAMI KHOSHABA LATCHIN caused to be prepared and submitted INS Form N-400 ("Application for Naturalization") to the Immigration and Naturalization Service, United States Department of Justice, and certified that each and every answer on that form was true and correct.

3. On or about July 22, 1999, defendant SAMI KHOSHABA LATCHIN appeared before an Immigration and Naturalization Service examiner and was interviewed concerning his answers placed on the above-described Application for Naturalization. On that application, defendant SAMI KHOSHABA LATCHIN signed his name, Sami Latchin, below the statement “I swear that the contents of this application, and supplemental pages 1 through 0, that the corrections, numbered 1 through 5, were made at my request, and that this amended application, is true to the best of my knowledge and belief.”

4. On or about July 22, 1999, at Chicago, in the Northern District of Illinois, Eastern Division,

SAMI KHOSHABA LATCHIN,

defendant herein, knowingly procured and attempted to procure, contrary to law, naturalization as a United States citizen for himself, by knowingly and willfully making under oath, material false statements in connection with his application for naturalization, in violation of 18 United States Code § 1001, during an interview with an official of the United States Immigration and Naturalization Service, United States Department of Justice, and on INS Form N-400, in that:

a) In response to the direction “List your present and past membership in or affiliation with every organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place. Include any military service in this part. If none, write ‘none’. Include the name of organization, location, dates of membership

and the nature of the organization. If additional space is needed, use separate paper”, defendant SAMI KHOSHABA LATCHIN stated ‘None’, when in fact, as defendant well knew,

- i) he had been a member of and was affiliated with the Baath Party, and
- ii) he had been a member of and affiliated with the IIS;

b) In response to the direction “List your employers during the last (5) years. List your present and most recent employer first. If none, write ‘None’. If you need more space, continue on a separate piece of paper.”, defendant SAMI KHOSHABA LATCHIN claimed that Service Service, Inc. and Huntleigh USA were his only employers, when in fact, as the defendant well knew, he was employed by the IIS during the five years prior to July 22, 1999;

c) In response to the direction to explain “Reason for trip” for absences from the United States since becoming a permanent resident, defendant SAMI KHOSHABA LATCHIN claimed that:

- i) he traveled for “vacation” between January 16, 1994 and January 30, 1994, when in fact, he traveled overseas to meet his IIS handler and to receive payment for his services;

- ii) he traveled for “vacation” between May 26, 1996 and June 4, 1996, when in fact, he traveled overseas to meet his IIS handler and to receive payment for his services; and

iii) he traveled for “vacation” between May 25, 1997 and June 30, 1997, when in fact, he traveled overseas to meet his IIS handler;

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY