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**MAY 27 2010**

**CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,	)	
	)	Criminal No. 4:10-CR-059
Plaintiff,	)	
	)	
v.	)	<b><u>INDICTMENT</u></b>
	)	
IBRAHIM ABDELRAHMAN DREMALI, and	)	
SAFAA RASHAD EISSA,	)	T. 18 U.S.C. § 371
	)	T. 18 U.S.C. § 1425(a)
Defendants.	)	T. 18 U.S.C. § 2
	)	

**THE GRAND JURY CHARGES:**

**COUNT ONE  
(Conspiracy)**

**A. INTRODUCTION**

At all times material to this Indictment:

1. On or about May 23, 1987, the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, were married to each other in Egypt.
2. On or about October 19, 1988, Abdelrahman Ibrahim Dremali, the first-born son of the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, was born in Gaza, Israel.
3. On or about June 7, 1993, Rashad El-Dien Dremali, the second-born son of the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, was born in Broward County, Florida.

4. At all times material to this Indictment, the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, resided in Florida, Urbandale, Iowa and Texas.

5. The former Immigration and Naturalization Service (INS) and United States Citizenship and Immigration Services (USCIS) were agencies of the United States government, with the responsibility of receiving and adjudicating applications for lawful permanent residence and citizenship.

6. The Social Security Administration (SSA) was an agency of the United States government, and was responsible for the issuance of Social Security account numbers.

#### **B. THE CONSPIRACY**

From in or about May 1989 and continuing through in or about December 9, 2009, in the Southern District of Iowa, and elsewhere, the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, did knowingly combine, conspire, confederate and agree with others known and unknown to the grand jury to commit the following offense against the United States: to knowingly procure, or attempt to procure, contrary to law, the naturalization of any person, in violation of 18 U.S.C. Section 1425(a).

#### **C. MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that:

1. The defendant, IBRAHIM ABDELRAHMAN DREMALI, married a United States citizen in order to obtain citizenship as the spouse of a United States citizen.

2. The defendant, SAFAA RASHAD EISSA, married a United States citizen in order to obtain citizenship as the spouse of a United States citizen.

3. The defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, did cause to be submitted documents to the USCIS which concealed the birth of their second child, Rashad El-Dien Dremali, who was born while the defendant, IBRAHIM ABDELRAHMAN DREMALI, was married to another person.

4. The defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, did cause to be submitted to INS and USCIS, additional false documents, including Form N-400, falsely representing that they had never given false or misleading information to any United States government official while applying for any immigration benefit.

#### **D. OVERT ACTS**

In furtherance of the conspiracy, and to effect the objects thereof, the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, committed and caused to be committed the following overt acts, among others, on or about the following dates in the Southern District of Iowa and elsewhere:

1. On or about May 15, 1989, the defendant, IBRAHIM ABDELRAHMAN DREMALI, married L. H., a United States citizen in Broward County, Florida.

2. On or about June 7, 1989, the defendant, IBRAHIM ABDELRAHMAN DREMALI, signed a Form G-325A, Biographic Information, in which he indicated no marriages prior to his current marriage to L. H.

3. On or about June 15, 1989, L. H. completed a Form 1-130, Petition for Alien Relative, on behalf of the defendant, IBRAHIM ABDELRAHMAN DREMALI, in which no prior wives of the defendant are identified.

4. On or about July 31, 1989, the defendant, IBRAHIM ABDELRAHMAN DREMALI, submitted a Form I-485, Application for Permanent Residence, in which he marks “NO” to the question “have you ever been married before.”

5. On or about June 18, 1990, the INS granted the defendant, IBRAHIM ABDELRAHMAN DREMALI, conditional resident status based upon his marriage to L. H., a United States citizen.

6. On or about February 24, 1991, the defendant, SAFAA RASHAD EISSA, entered the United States with Abdelrahman Ibrahim Dremali, the first-born son of the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA.

7. On or about January 28, 1992, the defendant, IBRAHIM ABDELRAHMAN DREMALI, submitted a Form SS-5 to the Social Security Administration on behalf of Abdelrahman Ibrahim Dremali.

a. The Form SS-5 listed L. H. as the maiden name of Abdelrahman Ibrahim Dremali’s mother.

8. On or about November 3, 1992, the INS removed the conditions on the residency of the defendant, IBRAHIM ABDELRAHMAN DREMALI, by approving Form I-751, Petition to Remove the Conditions on Residence, which was jointly filed by the defendant, IBRAHIM ABDELRAHMAN DREMALI, and L. H. on or about May 27, 1992.

9. On or about March 18, 1993, the defendant, SAFAA RASHAD EISSA, submitted a Form SS-5 to the Social Security Administration on behalf of Abdelrahman Dremali.

a. The Form SS-5 listed “Safaa Eissa” as the maiden name of Abdelrahman Dremali’s mother, with the last name of L. H. added, but scratched out.

10. On or about June 7, 1993, a Social Security Number, SSN 592-33-xxxx, was enumerated at the birth of Rashad El-Dien Dremali, listing "Safaa Eissa" as the mother and "Ibrahim Dremali" as the father.

11. On or about June 15, 1993, the defendant, IBRAHIM ABDELRAHMAN DREMALI, submitted Form N-400 to the former Immigration and Naturalization Services, wherein the defendant answered the following questions with the following answers:

Within Part 5 (Information about your marital history):

Question: "Number of times married"; Answer: "One"

Question: "Name"; Answer: L. H.

Within Part 6 (Information about your children):

Question: "Children"; Answer: "One"

Question: "Full name of child"; Answer: "Abd el rhman Dremali"

Question: "Date of birth"; Answer: "10/19/88"

Question: "A-number"; Answer: "A-29-979-158"

Question: "Country of birth"; Answer: "Israel"

Within Part 7 (Additional eligibility factors)

Question: "Have you ever given false testimony for the purpose of obtaining any immigration benefit?"; Answer: "No"

12. On or about February 10, 1994, the defendant, IBRAHIM ABDELRAHMAN DREMALI, was interviewed regarding the Form N-400 submitted to INS by the defendant, IBRAHIM ABDELRAHMAN DREMALI, and during the interview the defendant, IBRAHIM ABDELRAHMAN DREMALI, stated: "I have one child" and claimed no other marriages.

13. On or about March 28, 1994, the defendant, IBRAHIM ABDELRAHMAN DREMALI, was granted United States citizenship based upon his marriage to L. H., a United States citizen.

14. On or about June 23, 1994, the defendant, IBRAHIM ABDELRAHMAN DREMALI, filed a Petition to dissolve his marriage to L. H. in Broward County, Florida.

15. On or about September 15, 1994, the defendant, IBRAHIM ABDELRAHMAN DREMALI, was divorced from L. H. in Broward County, Florida.

16. On or about November 28, 1994, the defendant, SAFAA RASHAD EISSA, married Z. E. in Fort Lauderdale, Florida.

17. On or about March 3, 1997, the defendant, SAFAA RASHAD EISSA, filed a Petition to dissolve her marriage to Z. E. in Broward County, Florida.

18. On or about March 25, 1997, the defendant, IBRAHIM ABDELRAHMAN DREMALI, signed a Form G-325A, Biographic Information, in which he represented only one marriage, to LH, prior to his current marriage to the defendant, SAFAA RASHAD EISSA.

19. On or about March 25, 1997, the defendant, IBRAHIM ABDELRAHMAN DREMALI, executed a Form I-130 (Petition for Alien Relative) on behalf of the defendant, SAFAA RASHAD EISSA.

- a. The Form I-130 listed LH as the only prior wife of the defendant, IBRAHIM ABDELRAHMAN DREMALI.
- b. The Form I-130 listed Z. E. as the only prior husband of the defendant, SAFAA RASHAD EISSA.

c. The Form I-130 listed “Abdelrahman Dremali” as the only child of the defendant, SAFAA RASHAD EISSA.

20. On or about March 26, 1997, the defendant, SAFAA RASHAD EISSA, was divorced from Zaki M. Erbash in Broward County, Florida.

21. On or about April 1, 1997, the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, obtained a marriage license in Broward County, Florida.

a. Both defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, indicated this to be their second marriage.

22. On or about April 8, 1997, the defendant, SAFAA RASHAD EISSA, signed a Form G-325A, Biographic Information, in which she represented only one marriage, to Z. E., prior to her current marriage to the defendant, IBRAHIM ABDELRAHMAN DREMALI.

23. On or about April 10, 1997, the defendant, SAFAA RASHAD EISSA, filed a Form I-485, Application to Register Permanent Residence or Adjust Status, based upon her marriage to the defendant, IBRAHIM ABDELRAHMAN DREMALI, a United States citizen spouse.

a. On Part 3B of the Form I-485, the defendant, SAFAA RASHAD EISSA, listed “Abdelrahman Dremali” as her only child.

b. On Part 3C of the Form I-485, the defendant, SAFAA RASHAD EISSA, marked “No” in response to Question 10: “. . . have you, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the United States, or any

other immigration benefit?”

24. On or about January 29, 1998, the INS granted the defendant, SAFAA RASHAD EISSA, conditional resident status based upon her marriage to the defendant, IBRAHIM ABDELRAHMAN DREMALI, a United States citizen.

25. On or about February 1, 2000, the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, submitted a Form I-751, Application to Remove the Conditions on Residence, to INS.

- a. On Part 5 of the Form I-751, the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, listed “Abdelrahman Dremali” and “Azza Dremali” as their only children.

26. On or about March 8, 2000, the INS removed the conditions on the residency of the defendant, SAFAA RASHAD EISSA, by approving Form I-751, Petition to Remove the Conditions on Residence, which was jointly submitted by the defendants, IBRAHIM ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, on or about February 1, 2000.

27. On or about March 20, 2007, the defendant, SAFAA RASHAD EISSA, submitted a Form N-400, Application for Naturalization, to USCIS which represented that:

- a. That SAFAA RASHAD EISSA’S only prior marriage was to Z. E. on July 3, 1994; and
- b. That IBRAHIM ABDELRAHMAN DREMALI’S only prior marriage was to L. H. on May 15, 1998; and



- c. On Part 10 of the Form N-400, the defendant, SAFAA RASHAD EISSA, marked “No” in response to Question 23: “Have you ever given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?”
- d. On Part 10 of the Form N-400, the defendant, SAFAA RASHAD EISSA, marked “No” in response to Question 24: “Have you ever lied to any U.S. government official to gain entry or admission into the U.S.?”

28. On or about December 9, 2009, the defendant, SAFAA RASHAD EISSA, was interviewed by USCIS in San Antonio, Texas, and answered the following questions with the following answers:

- a. Question: “When and where did you marry the petitioner of your I-551, Mr. Ibrahim Dremali, for the first time?”; Answer: Fort Lauderdale, Florida, April 1, 1997.
- b. Question: “Did you live with your current husband, Mr. Dremali, as husband and wife, prior to your marriage in 1997 and if so where and when?”; Answer: “No. We started living together 2 days before our marriage.”
- c. Question: “What is the name of your first husband?”; Answer: “Zaki Mohammed Erbash.”
- d. Question: “When did you marry and divorce your first husband”; Answer: “Married on July 3, 1994 and divorced on March 26, 1997.”

- e. Question: "Other than the two marriages to Mr. Erbash in November 28, 1994 and to Mr. Dremali on April 1, 1997 have you been married before in the United States or anywhere in the world?"; Answer: "No."
- f. Question: "Other than your divorce from Mr. Erbash, have you been divorced before, here in the United States or anywhere in the world?"; Answer: "No."
- g. Question: "Have you ever given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion or removal?"; Answer: "No, sir."
- h. Question: "Have you ever lied to any U.S. government official to gain entry or admission into the United States."; Answer: "No, sir."

This is a violation of Title 18, United States Code, Section 371.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT TWO  
(Fraud in Naturalization Process)**

On or about March 20, 2007, in the Southern District of Iowa and elsewhere, the defendant, SAFAA RASHAD EISSA, aided and abetted by the defendant, IBRAHIM ABDELRAHMAN DREMALI, while residing in Urbandale, Iowa, did knowingly apply for and attempt to procure and obtain naturalization and citizenship for the defendant, SAFAA RASHAD EISSA, contrary to law, to wit: the defendant, SAFAA RASHAD EISSA, falsely represented to USCIS that the defendant, SAFAA RASHAD EISSA, gave true answers in an "Application for Naturalization" (Form N-400) when the defendant, SAFAA RASHAD EISSA, represented that:

- a. That SAFAA RASHAD EISSA'S only prior marriage was to Z. E. on July 3, 1994;  
and
- b. That IBRAHIM ABDELRAHMAN DREMALI'S only prior marriage was to L. H. on  
May 15, 1998; and
- c. On Part 10 of the Form N-400, SAFAA RASHAD EISSA marked "No" in response  
to Question 23: "Have you ever given false or misleading information to any U.S.  
government official while applying for any immigration benefit or to prevent  
deportation, exclusion, or removal?"
- d. On Part 10 of the Form N-400, SAFAA RASHAD EISSA marked "No" in response  
to Question 24: "Have you ever lied to any U.S. government official to gain entry or  
admission into the U.S.?"

when in fact the defendant, SAFAA RASHAD EISSA, knew that the defendants, IBRAHIM  
ABDELRAHMAN DREMALI and SAFAA RASHAD EISSA, had submitted false information  
to United States Citizenship and Immigration Service when they previously concealed their prior  
marriage and the birth and existence of their son, Rashad.

This is a violation of Title 18, United States Code, Section 1425(a) and 2.

**A TRUE BILL.**

/s/  
FOREPERSON

Nicholas A. Klinefeldt  
United States Attorney

By: /s/ Jason T. Griess  
Jason T. Griess  
Assistant United States Attorney