

9

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO.02-80756

v.

HONORABLE JULIAN ABELE COOK, JR

D-1 WALID SALAH, Ph.D.,
a/k/a Al Kailane Walid, Walid Kailane,

VIOLATIONS: 18 U.S.C. § 371
18 U.S.C. § 1425
18 U.S.C. § 1546

D-2 CHILAKAMARRI RAMESH, M.D.,
a/k/a Ramesh Chilakamarri

D-6 SAMIR AL-KILAINE,

Defendants.

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 371 – *Conspiracy to Commit Naturalization Fraud*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

That beginning on or about September 19, 1998 and continuing until on or about August 1, 2002, in the Eastern District of Michigan and elsewhere, defendants, WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, and SAMIR AL-KILAINE did conspire and agree with each other, and with other persons, to defraud the United States by submitting falsified documents and making fraudulent representations to the Immigration and Naturalization Service, an agency of the United States, for the purpose of evading provisions of the immigration laws regarding citizenship in the United States,

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in violation of Title 18, United States Code, Sections 1425 and 1546.

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed by CHILAKAMARRI RAMESH, M.D. in the Eastern District of Michigan and elsewhere. In total, between September 1998 and August 2002, CHILAKAMARRI RAMESH, M.D. knowingly signed approximately 953 false and fraudulent N-648s on behalf of approximately 492 citizenship applicants located in or near Dearborn, Cleveland, St. Louis, and Chicago.. These N-648s falsely claimed that CHILAKAMARRI RAMESH, M.D. performed mental evaluations on these applicants and falsely certified that these applicants had mental defects – primarily mental retardation, post-traumatic stress disorder, learning disabilities, and/or dementia – rendering them exempt from the English-language requirement for naturalization. Among these N-648s, without limitation, were the following:

1. On December 18, 1999, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri signed INS form N-648, Certification for Disability Exceptions for B.Y.;
2. On May 11, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri signed INS form N-648, Certification for Disability Exceptions for S.A.M.;
3. On May 11, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri signed INS form N-648, Certification for Disability Exceptions for M.Q.;
4. On July 1, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri signed INS form N-648, Certification for Disability Exceptions for A.A.G.;
5. On September 14, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri signed INS form N-648, Certification for Disability Exceptions for

N.Z.;

6. On September 21, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri signed INS form N-648, Certification for Disability Exceptions for R.A.J.;
7. On September 1, 2001, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri signed INS form N-648, Certification for Disability Exceptions for A.A.W.;

In furtherance of the conspiracy and to effect the objects of the conspiracy SAMIR AL-KILAINE acted as interpreter for CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri at 4A's Hope, 10334 West Warren, Dearborn, Michigan during meetings with the applicants knowing that CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri was executing false N-648s on behalf of the applicants. SAMIR AL-KILAINE further accompanied these applicants to the INS office in Detroit for citizenship interviews knowing that the applicants had submitted false and fraudulent N-648s with their citizenship applications.

In furtherance of the conspiracy and to effect the objects of the conspiracy, WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane solicited and received sums of money – generally ranging from \$500 to \$2,300 – from citizenship applicants at 4A's Hope, 10334 West Warren, Dearborn, Michigan, and shared such sums with co-defendants CHILAKAMARRI RAMESH, M.D. and SAMIR AL-KILAINE knowing that false and fraudulent N-648s would be submitted to the INS on behalf of the citizenship applicants.

All in violation of Title 18, United States Code, Sections 371, 1425, and 1546.

COUNT TWO

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

On or about July 1, 2000 and September 16, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINE, did sign or allow to be signed on his behalf false and untrue INS forms N-648, Certification for Disability Exceptions for A.A.G., knowing that such N-648s would be used to attempt to procure, contrary to law, the naturalization of A.A.G., all in violation of Title 18, United States Code, Sections 2 and 1425.

COUNT THREE

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

On or about December 18, 1999, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINE, did sign or allow to be signed on his behalf a false and untrue INS form N-648, Certification for Disability Exceptions for B.Y., knowing that such N-648 would be used to attempt to procure, contrary to law, the naturalization of B.Y., all in violation of Title 18, United States Code, Sections 2 and 1425.

COUNT FOUR

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

On or about March 20, 1999 and on or about May 11, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINE, did sign or allow to be signed on his behalf false and untrue INS forms N-648, Certification for Disability Exceptions for S.A.M., knowing that such N-648s would be used to attempt to procure, contrary to law, the naturalization of S.A.M., all in violation of Title 18, United States Code, Sections 2 and 1425.

COUNT FIVE

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

On or about March 4, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINE, did sign or allow to be signed on his behalf a false and untrue INS form N-648, Certification for Disability Exceptions for N.I., knowing that such N-648 would be used to attempt to procure, contrary to law, the naturalization of N.I., all in violation of Title 18, United States Code, Sections 2 and 1425.

COUNT SIX

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

On or about August 25, 2000 and September 1, 2001, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINE, did sign or allow to be signed on his behalf false and untrue INS forms N-648, Certification for Disability Exceptions for A.A.W., knowing that such N-648s would be used to attempt to procure, contrary to law, the naturalization of A.A.W., all in violation of Title 18, United States Code, Sections 2 and 1425.

COUNT SEVEN

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

On or about July 1, 2000 and September 21, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINE, did sign or allow to be signed on his behalf false and untrue INS forms N-648, Certification for Disability Exceptions for R.A.J., knowing that such N-648s would be used to attempt to procure, contrary to law, the naturalization of R.A.J., all in violation of Title 18, United States Code, Sections 2 and 1425.

COUNT EIGHT

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINE

On or about May 11, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINE, did sign or allow to be signed on his behalf a false and untrue INS form N-648, Certification for Disability Exceptions for M.Q., knowing that such N-648 would be used to attempt to procure, contrary to law, the naturalization of M.Q., all in violation of Title 18, United States Code, Sections 2 and 1425.

COUNT NINE

(18 U.S.C. §§ 2 and 1425 – *Naturalization Fraud; Aiding and Abetting*)

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri
D-6 SAMIR AL-KILAINÉ

On or about September 14, 2000, CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri, aided and abetted by WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane, and SAMIR AL-KILAINÉ, did sign or allow to be signed on his behalf a false and untrue INS form N-648, Certification for Disability Exceptions for N.Z., knowing that such N-648 would be used to attempt to procure, contrary to law, the naturalization of N.Z., all in violation of Title 18, United States Code, Sections 2 and 1425.

THIS IS A TRUE BILL

/s _____ Grand Jury Foreperson
GRAND JURY FOREPERSON

STEPHEN J. MURPHY
United States Attorney

/s Jonathan Tukel _____
JONATHAN TUKEL
Assistant United States Attorney
Chief, National Security Unit

/s Leonid Feller _____
LEONID FELLER
Assistant United States Attorney

Date: October 14, 2008

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
Yes X <input type="checkbox"/> No	AUSA's Initials: LF

D-1 WALID SALAH, Ph.D., a/k/a Al Kailane Walid, Walid Kailane
Case Title: D-2 CHILAKAMARRI RAMESH, M.D., a/k/a Ramesh Chilakamarri; D-6 SAMIR AL-KILAINE

County where offense occurred : WAYNE

Check One: X ☐ Felony ☐ Misdemeanor ☐ Petty

___ Indictment/___ Information --- no prior complaint.
 ___ Indictment/___ Information --- based upon prior complaint [Case number: _____]
 ___ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information:

Superseding to Case No: 02-80756

Judge: JULIAN ABELE COOK, JR.


- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants and charges below:

Defendant name

Charges

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 14, 2008
 Date


 JONATHAN TUKEL
 LEONID FELLER
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9524
 Fax: (313) 226-2372
 E-Mail address: leonid.feller@usdoj.gov

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.