

**SEALED**

U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

2015 FEB 19 PM 2:35

DEPUTY CLERK SUD

UNITED STATES OF AMERICA

v.

SHERIN THAWER

**3-15CR-0063B**

CRIMINAL NO.

**UNDER SEAL**

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Commit Fraud in Connection with Immigration Documents  
[Violation of 18 U.S.C. §§ 371 and 1546]

Introduction

At all times material to this indictment:

1. In the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Sherin Thawer**, was an attorney who represented aliens, that is persons who are not United States citizens, before the U.S. Department of Homeland Security, United States Citizenship and Immigration Service (USCIS). Among other things, **Sherin Thawer**, represented aliens before USCIS when they were applying for various types of visas to enter or remain in the United States to include through a U Nonimmigrant Status or U-Visa.

2. To be eligible for a U-Visa, the alien must have (1) been a victim of a certain crime; (2) suffered mental or physical abuse as a result of the crime; and (3) helped law

enforcement officials in the investigation and/or prosecution of the crime. In addition to the U-Visa application (I-918, Petition for U Nonimmigrant Status), applicants are asked to submit a Form I-918 Supplement B, U Nonimmigrant Status Certification form, also known as a Law Enforcement Certification form. The Law Enforcement Certification form is to be completed and signed by the certifying official for the law enforcement agency that investigated and/or prosecuted the crime of which the alien was a victim.

3. U-Visa applications and materials must be sent via mail or courier to the USCIS Vermont Service Center (Vermont Service Center) located in Saint Albans, Vermont.

#### The Conspiracy and Its Object

4. Beginning on or about March 2012 and continuing until on or about September 2014, in the Dallas Division of the Northern District of Texas, the defendant, **Sherin Thawer**, did intentionally and willfully combine, conspire, confederate, and agree with others both known and unknown to the Grand Jury, to obtain a nonimmigrant visa, border crossing card, alien registration receipt or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, knowing it to be forged, counterfeited, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained, in violation of 18 U.S.C. § 1546(a).

#### Manner and Means of the Conspiracy

5. During and in connection with **Sherin Thawer's** representation of aliens seeking a U-Visa, Law Enforcement Certification forms purporting to be completed and signed by

police officers were submitted to USCIS along with the U-Visa applications. These Law Enforcement Certification forms, containing the names and badge numbers of police officers, were completed without the knowledge or authorization of the police officers named on each form. The signatures purporting to be those of the named officers on the Law Enforcement Certification forms were forged.

6. The fraudulently completed and forged Law Enforcement Certification forms were then sent to USCIS along with the other application materials via FedEx®, a private and commercial interstate carrier.

7. **Sherin Thawer** submitted the fraudulently completed and forged Law Enforcement Certification forms for the purpose of obtaining U-Visas for the aliens she represented.

#### Overt Acts

8. On or about March 21, 2012, a U-Visa application filed for B.A., an alien represented by **Sherin Thawer**, was sent via FedEx® by or at the direction of **Sherin Thawer** to the Vermont Service Center from Irving, Texas. The Law Enforcement Certification form submitted with the application was completed by or at the direction of **Sherin Thawer**. At the time it was sent, **Sherin Thawer** knew the form had not been completed by Officer A.C. (who is a member of the Fort Worth Police Department) and that his signature on the Law Enforcement Certification form was forged.

9. On or about April 12, 2012, a U-Visa application filed for V.P., an alien represented by **Sherin Thawer**, was sent via FedEx® by or at the direction of **Sherin**

**Thawer** to the Vermont Service Center from Irving, Texas. The Law Enforcement Certification form submitted with the application was completed by or at the direction of **Sherin Thawer**. At the time it was sent, **Sherin Thawer** knew the form had not been completed by Officer R.T. (who is a member of the Desoto Police Department) and that his signature on the Law Enforcement Certification form was forged.

10. On or about September 21, 2012, a U-Visa application filed for G.K., an alien represented by **Sherin Thawer**, was sent via FedEx® by or at the direction of **Sherin Thawer** to the Vermont Service Center from Irving, Texas. The Law Enforcement Certification form submitted with the application was completed by or at the direction of **Sherin Thawer**. At the time it was sent, **Sherin Thawer** knew the form had not been completed by Officer J.W. (who is a member of the Irving Police Department) and that his signature on the Law Enforcement Certification form was forged.

11. On or about February 14, 2013, a U-Visa application filed for A.K., an alien represented by **Sherin Thawer**, was sent via FedEx® by or at the direction of **Sherin Thawer** to the Vermont Service Center from Irving, Texas. The Law Enforcement Certification form submitted with the application was completed by or at the direction of **Sherin Thawer**. At the time it was sent, **Sherin Thawer** knew the form had not been completed by Officer D.K. (who is a member of the Fort Worth Police Department) and that his signature on the Law Enforcement Certification form was forged.

In violation of 18 U.S.C. §§ 371 and 1546.

Count Two  
Mail Fraud  
[Violation of 18 U.S.C. § 1341]

Beginning on or about March 2012 and continuing until on or about September 2014, in the Dallas Division of the Northern District of Texas, the defendant, **Sherin Thawer**, did knowingly devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, by depositing and causing to be deposited any matter or thing for delivery through the United States Postal Service and private and commercial interstate carriers, for the purpose of executing and attempting to execute a scheme and artifice to defraud.

In violation of 18 U.S.C. § 1341.

Count Three

Transfer or Use of the Means of Identification of Another Person  
[Violation of 18 U.S.C. § 1028(a)(7)]

On or about March 2012 and continuing until on or about February 2013, in the Dallas Division of the Northern District of Texas, the defendant, **Sherin Thawer**, did knowingly transfer, possess, or use, without lawful authority the means of identification of another person, to wit, the names and badge numbers of police officers A.C., R.T., J.W., and D.K., with the intent to commit, or in connection with, unlawful activity constituting a violation of Federal law or a felony under applicable state law.

In violation of 18 U.S.C. § 1028(a)(7).

Count Four  
Aggravated Identity Theft  
[Violation of 18 U.S.C. § 1028A(a)(1)]

On or about March 21, 2012, in the Dallas Division of the Northern District of Texas, the defendant, **Sherin Thawer**, did knowingly transfer, possess, or use, without lawful authority the means of identification of another person, to wit, the name and badge number of Officer A.C., with the intent to commit, or in connection with, unlawful activity constituting a violation of Federal law.

In violation of 18 U.S.C. § 1028A(a)(1).

Count Five  
Aggravated Identity Theft  
[Violation of 18 U.S.C. § 1028A(a)(1)]

On or about April 12, 2012, in the Dallas Division of the Northern District of Texas, the defendant, **Sherin Thawer**, did knowingly transfer, possess, or use, without lawful authority the means of identification of another person, to wit, the name and badge number of Officer R.T., with the intent to commit, or in connection with, unlawful activity constituting a violation of Federal law.

In violation of 18 U.S.C. § 1028A(a)(1).

Count Six  
Aggravated Identity Theft  
[Violation of 18 U.S.C. § 1028A(a)(1)]

On or about September 21, 2012, in the Dallas Division of the Northern District of Texas, the defendant, **Sherin Thawer**, did knowingly transfer, possess, or use, without lawful authority the means of identification of another person, to wit, the name and badge number of Officer J.W., with the intent to commit, or in connection with, unlawful activity constituting a violation of Federal law.

In violation of 18 U.S.C. § 1028A(a)(1).

Count Seven  
Aggravated Identity Theft  
[Violation of 18 U.S.C. § 1028A(a)(1)]

On or about February 14, 2013, in the Dallas Division of the Northern District of Texas, the defendant, **Sherin Thawer**, did knowingly transfer, possess, or use, without lawful authority the means of identification of another person, to wit, the name and badge number of Officer D.K., with the intent to commit, or in connection with, unlawful activity constituting a violation of Federal law.

In violation of 18 U.S.C. § 1028A(a)(1).

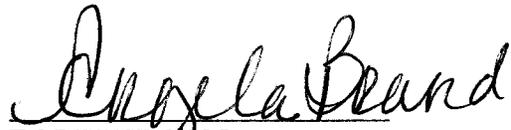
Forfeiture Notice

[18 U.S.C. § 982(a)(2)(B); 18 U.S.C. § 1028(b)(5); 21 U.S.C. § 853(p)]

Upon conviction of any of the offenses alleged in Counts One through Seven, and pursuant to 18 U.S.C. § 982(a)(2)(B) and 18 U.S.C. § 1028(b)(5), defendant, **Sherin Thawer**, shall forfeit to the United States any property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as the result of the offense and any personal property used or intended to be used to commit the offense.

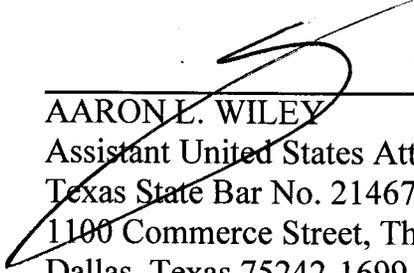
If any of the property described above, as a result of any act or omission of the defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(a)(2)(B), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL

  
FOREPERSON

JOHN R. PARKER  
ACTING UNITED STATES ATTORNEY

  
\_\_\_\_\_  
DAN GIVIDEN  
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\_\_\_\_\_  
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THE UNITED STATES OF AMERICA

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18 U.S.C. §§ 371 and 1546  
Conspiracy to Commit Fraud in  
Connection with Immigration Documents

18 U.S.C. § 1341  
Mail Fraud

18 U.S.C. § 1028(a)(7)  
Transfer or Use of the Means of  
Identification of Another Person

18 U.S.C. § 1028A(a)(1)  
Aggravated Identity Theft

18 U.S.C. § 982(a)(2)(B); 18 U.S.C. § 1028(b)(5); 21 U.S.C. § 853(p)  
Forfeiture Notice

7 Count(s)

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A true bill rendered

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DALLAS

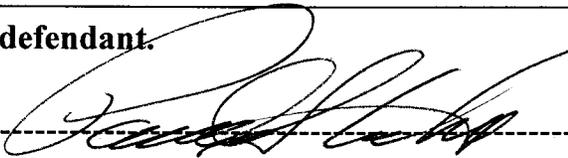
*Anola Brand*

FOREPERSON

Filed in open court this 19 day of February 2015.

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Clerk

**Warrant to issue for defendant.**



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UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Criminal matter pending