

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_  
:   
v. : DATE FILED: \_\_\_\_\_  
:   
FRANCKLIN RAMIREZ-ACOSTA : VIOLATIONS:  
a/k/a "Franklin Ramirez," : 18 U.S.C. § 1001(a)(2)  
"Edwin Burgos," : (Making false statement – 1 Count)  
"Edwin Burgos-Burgos" : 18 U.S.C. § 911  
: (False claim of United States citizenship – 1  
: Count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 5, 2001, in Berks County, Pennsylvania, in the Eastern District of Pennsylvania, the defendant,

FRANCKLIN RAMIREZ-ACOSTA  
a/k/a "Franklin Ramirez," "Edwin Burgos," "Edwin Burgos-Burgos,"

in a matter within the jurisdiction of the executive branch of the government of the United States, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation to an agent of the Immigration and Naturalization Service, namely by stating and representing that he is a citizen of the United States when, as the defendant then and there well knew, he was not a citizen of the United States.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 5, 2001, in Berks County, Pennsylvania, in the Eastern District of Pennsylvania, the defendant,

FRANCKLIN RAMIREZ-ACOSTA  
a/k/a "Franklin Ramirez," "Edwin Burgos," "Edwin Burgos-Burgos,"

an alien and native of the Dominican Republic, did falsely and willfully represent himself to be a citizen of the United States to an agent of the Immigration and Naturalization Service.

In violation of Title 18, United States Code, Section 911.

A TRUE BILL:

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FOREPERSON

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PATRICK L. MEEHAN  
United States Attorney