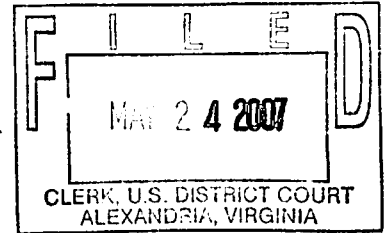


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA)	Criminal No. 1:07CR190
)	
v.)	Count 1: 8 U.S.C. §1324(a)(1)(A)(iii) and
)	(a)(1)(B)(ii) (Conceal, Harbor or
LLOYD W. MINER,)	Shield From Detection an Illegal
also known as Rico)	Alien)
)	
)	Count 2: 8 U.S.C. §1324(a)(1)(A)(iv) and
TSOMORLIG BATJARGAL,)	(a)(1)(B)(ii) (Encouraging
also known as Somoun)	Illegal Alien to Enter and
)	Reside in the United States)
)	
)	Count 3: 18 U.S.C. § 1028(a)(1), (f)
Defendants)	(Conspiracy to Commit Fraud
)	With Identification Documents)
)	
)	
)	

INDICTMENT

May Term - At Alexandria

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times material to this indictment:

1. The defendant, LLOYD W. MINER, was a federal employee with the title of Deputy Assistant Chief of Internal Affairs, Eastern Region, Office of Security and Investigations, United States Citizenship and Immigration Services (USCIS) within the Department of Homeland Security (DHS). He is responsible for ensuring compliance with the rules and laws among USCIS employees within the Eastern Region.

2. The defendant, TSOMORLIG BATJARGAL, also known as Somoun, is a Mongolian National, who is in the United States illegally. Her F-1 student visa was terminated on November 3, 2004, when she failed to enroll for a session at LADO International College in Arlington, Virginia. As a result of her failure to enroll in a school approved by the Student & Exchange Visitor Information System and her failure to comply with USCIS regulations, the defendant, TSOMORLIG BATJARGAL, also known as Somoun, has no immigration status, is illegally present in the United States and is subject to arrest and deportation.

3. The defendants are boyfriend and girlfriend. They are not married. They reside at 14718 Calvary Place, Centreville, Virginia, within the Eastern District of Virginia.

4. The defendant, TSOMORLIG BATJARGAL, also known as Somoun, operates a black, convertible Volkswagen (VW) with personalized Fraternal Order of Police (FOP) Virginia License plates "SOMON." This vehicle is owned by defendant LLOYD W. MINER. The insurance policy on the vehicle is issued in LLOYD W. MINER's name and has no other insured person on the policy

5. The defendant, LLOYD W. MINER, owns and operates a white Hummer with personalized FOP Virginia License plates "RICOX."

6. Both vehicles are regularly parked outside of 14718 Calvary Place, Centreville, Virginia and were used to transport the illegal alien, defendant TSOMORLIG BATJARGAL, also known as Somoun.

7. The defendants, TSOMORLIG BATJARGAL, also known as Somoun, and LLOYD W. MINER operated an internet-based travel business, known as "Your Travel

Biz.” Defendant MINER enrolled defendant BATJARGAL under his own account for this business on February 2, 2006. The address for this business was listed by the defendants as 14718 Calvary Place, Centreville, Virginia.

8. The defendant, TSOMORLIG BATJARGAL, also known as Somoun, registered as a sole proprietorship commercial cleaning business in Fairfax County, Virginia, a company called Intercissors, LLC. Mail for this business was received at 14718 Calvary Place, Centreville, Virginia.

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in and around February 2, 2006 continuing through on or about May 22, 2007, in Fairfax County, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, LLOYD W. MINER, knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did unlawfully conceal, harbor, and shield from detection, such alien.

The Grand Jury realleges and incorporates by reference the GENERAL ALLEGATIONS of this Indictment.

(In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), and (a)(1)(B)(ii)).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in and around February 2, 2006 continuing through on or about May 22, 2007, in Fairfax County, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, LLOYD W. MINER, did unlawfully and knowingly encourage and induce an alien to reside in the United States, knowing and in reckless disregard of the fact that such residence was or would be in violation of law.

The Grand Jury realleges and incorporates by reference the GENERAL ALLEGATIONS of this Indictment.

(In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), and (a)(1)(B)(ii)).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

The Grand Jury realleges and incorporates by reference the GENERAL ALLEGATIONS of this Indictment.

On or about March 7, 2006, the defendants LLOYD W. MINER, also known as Rico and TSOMORLIG BATJARGAL, also known as Somoun, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together and with other persons known to the grand jury, to commit the following offense against the United States: to unlawfully, knowingly and without lawful authority produce an identification document, namely a driver's license, for TSOMORLIG BATJARGAL from Washington state, when such production was in and affecting interstate commerce. (In violation of Title 18, United States Code, Sections 1028(a)(1),(b)(1)(A)(ii), and (f).)

MANNER AND MEANS OF THE CONSPIRACY

The purpose of the conspiracy was to obtain a driver's license from Washington state to permit defendant TSOMORLIG BATJARGAL, also known as Somoun, to continue to operate the vehicle financed and provided for her by defendant LLOYD W. MINER, and to replace her Virginia driver's license, obtained while she was still legally attending school in the United States. Defendant TSOMORLIG BATJARGOL surrendered her Virginia driver's license, which expired on March 19, 2006, when she obtained the Washington state driver's license.

OVERT ACTS

In furtherance of the said conspiracy and to effect the objects thereof, the

defendants committed the following overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

1. In or about January 2006, defendant TSOMORLIG BATJARGAL, also known as Somoun, transferred her bank account's mailing address from 1111 Arlington Boulevard, Apartment 409, Arlington, Virginia, to a friend's residence in Washington state in order to create a document to fraudulently claim residence in Washington.

2. On February 28, 2006, the defendant LLOYD W. MINER purchased a plane ticket for defendant TSOMORLIG BATJARGAL, also known as Somoun, to fly from Dulles International Airport in the Eastern District of Virginia, to Washington state to stay for four days while she obtained a Washington state driver's license.

3. On March 7, 2006, the defendant TSOMORLIG BATJARGAL, also known as Somoun, personally applied for a driver's license from Washington state.

4. On or before April 25, 2006, the defendant TSOMORLIG BATJARGAL transferred her bank account's mailing address to 14718 Calvary Place, Centreville, Virginia.

(In violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(ii) and (f)).

Forfeiture Notice

Pursuant to Rule 32.2(a), the defendant, LLOYD W. MINER, is hereby notified that, if convicted of the offenses alleged in Count One, Count Two or Count Three above he shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461 and 18 U.S.C. § 982(a)(6)(A), all right, title, and interest in any and all property, real or personal, which constitutes or is derived from proceeds traceable to the offense of concealing, harboring or shielding from detection an illegal alien (8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(1)); encouraging an illegal alien to reside (8 U.S.C. § 1324(a)(1)(A)(iv) and (a)(1)(B)(1)); or fraud and related activity in connection with obtaining a driver's license (18 U.S.C. §§ 1028(a)1), (b)(1)(A)(ii) and 2) including, but not limited to the following property:

- (a) real property located at 14718 Calvary Place, Centreville, Virginia 20121
- (b) LLOYD W. MINER's 2004 black Volkswagen (VW) convertible bearing Vehicle Identification Number *****0461 with Fraternal Order of Police (FOP) Virginia personalized plates: "SOMON"
LLOYD W. MINER's 2004 white Hummer bearing Vehicle Identification Number *****5422 with FOP Virginia personalized plates: "RICOX"

(In accordance with Title 18, United States Code, Section 981(a)(1)(C); Title 28, United States Code, Section 2461(c); and Title 18, United States Code, Section 982(a)(6)(A) and Rule 32.2(a), Federal Rules of Criminal Procedure.)

A TRUE BILL:
Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON

Chuck Rosenberg
United States Attorney

By: _____

Ronald L. Walutes, Jr.
Assistant United States Attorney