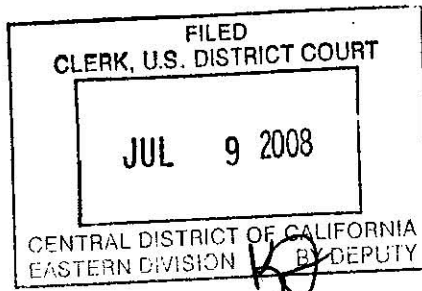


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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
November 2007 Grand Jury

12 UNITED STATES OF AMERICA,)
13 Plaintiff,)
14 v.))
15 CONSTANTINE PETER KALLAS,)
16 and))
17 MARIA GABRIELA KALLAS,))
18 Defendants.)

ED CR 08- 128-SGL

I N D I C T M E N T

[18 U.S.C. § 201(b)(2):
Acceptance of Bribe by Public
Official; 18 U.S.C. § 2(a):
Aiding and Abetting]

19 The Grand Jury charges:

20 [18 U.S.C. §§ 201(b)(2), 2(a)]

21 On or about June 26, 2008, in San Bernardino County, within the
22 Central District of California, defendant CONSTANTINE PETER KALLAS, a
23 public official, namely an Assistant Chief Counsel within Immigration
24 and Customs Enforcement, a branch within the United States Department
25 of Homeland Security, directly and indirectly did corruptly demand,
26 seek, receive, accept, and agree to receive and accept something of
27 value personally, in return for (1) being influenced in the
28 performance of an official act, (2) being influenced to commit and

ROA:roa

1 aid in committing, and to collude in, and allow, and to make
2 opportunity for the commission of a fraud on the United States, and
3 (3) being induced to do an act and omit to do an act in violation of
4 his official duty. In doing so, defendant CONSTANTINE PETER KALLAS
5 accepted payment of \$20,000 from M.S., an undocumented alien residing
6 in the United States, in exchange for promising to obtain work
7 authorization and legal permanent residency status for M.S.


8 At the above time and place, defendant MARIA GABRIELA KALLAS
9 aided, abetted, counseled, commanded, induced and procured the
10 commission of the offense alleged above.

11
12
13 A TRUE BILL

14 
15 _____
16 Foreperson

17
18 THOMAS P. O'BRIEN
United States Attorney

19 CHRISTINE C. EWELL
Assistant United States Attorney
20 Chief, Criminal Division

21 
22 SHERI PYM
Assistant United States Attorney
23 Chief, Riverside Office

24 RAYMOND O. AGHAIAN
Assistant United States Attorney
25
26
27
28

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