

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>25-_____</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>MD NURUL HASAN</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>MD MUNSUR ALI</b>		<b>18 U.S.C. § 371 (conspiracy – 1 count)</b>
<b>a/k/a “Mithu,”</b>	<b>:</b>	<b>52 U.S.C. § 10307(c) (false information in</b>
<b>MD RAFIKUL ISLAM</b>		<b>registering – 16 counts)</b>
<b>a/k/a “Mohammed Rafikul Islam,”</b>	<b>:</b>	<b>52 U.S.C. § 20511(2)(A) (fraudulent voter</b>
<b>a/k/a “Jibon”</b>		<b>registration – 16 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**  
**(Conspiracy)**

**THE GRAND JURY CHARGES THAT:**

**BACKGROUND**

At all times relevant to the indictment:

**Millbourne Borough, Pennsylvania**

1. Millbourne Borough (“Millbourne”) was a municipality located in Delaware County, in the Eastern District of Pennsylvania, with an area of approximately 0.1 square miles and a population of slightly more than 1,200.
2. Millbourne had a municipal government consisting of a mayor, five borough councilmembers, a tax collector, a police chief, and some administrative personnel. The borough council had a president and vice president. The mayor, councilmembers, and tax collector were all elected officials who served four-year terms.

3. Millbourne's elections were held in odd-numbered years and were staggered so that in one year, voters would choose the mayor, three borough councilmembers, and the tax collector, and two years later, voters would elect the other two councilmembers.

4. Nearly all of Millbourne's registered voters were members of one political party, so if a candidate for office won that party's primary, that candidate was extremely likely to win the general election.

### **The Defendants**

5. Defendant MD NURUL HASAN was a resident of Millbourne and the vice president of the Millbourne Borough Council. Defendant HASAN operated a computer training business out of offices located in Upper Darby, in the Eastern District of Pennsylvania.

6. Defendant MD MUNSUR ALI, a/k/a "Mithu," was a resident of Millbourne and a member of the Millbourne Borough Council.

7. Defendant MD RAFIKUL ISLAM, a/k/a "Mohammed Rafikul Islam," a/k/a "Jibon," was a resident of Millbourne. Defendant ISLAM was a member of the Millbourne Borough Council until he lost his bid for re-election in 2021.

8. All of the defendants knew that it was a crime to register to vote and to vote in a location where the voter does not reside, and to attempt and conspire to register another person to vote in a location where the voter does not reside.

### **The 2021 Millbourne Elections**

9. In 2021, Millbourne held elections for mayor, three seats on the borough council, and tax collector.

10. Defendant MD NURUL HASAN entered the majority party's primary election for mayor.

11. The primary election was held on May 20, 2021.

12. Defendant MD NURUL HASAN was defeated in the primary election by an approximate vote count of approximately 138 to 120.

13. In the same election, defendant MD MUNSUR ALI was one of three majority party candidates for borough council to advance to the general election, while defendant MD RAFIKUL ISLAM lost his bid for re-election to the council.

14. After the primary, defendant MD NURUL HASAN decided that he would run as a write-in candidate for mayor in the general election, which was scheduled for November 2, 2021. Defendants MD MUNSUR ALI and MD RAFIKUL ISLAM agreed to support defendant HASAN in his write-in campaign for mayor.

**Pennsylvania's Online Voter Registration Website**

15. Registering to vote in the Commonwealth of Pennsylvania permitted a registrant to vote in all upcoming elections for both federal as well as non-federal candidates for as long as the registration was valid.

16. The Office of Pennsylvania's Secretary of State ("SOS") oversaw elections in the Commonwealth and operated a statewide database of all registered voters, which was accessible to election officials in all of Pennsylvania's 67 counties.

17. The SOS's Office also operated an online voter registration website, which was accessible to the public (the "PAOVR" website).

18. Any person who accessed the PAOVR website could either submit a new voter registration application or edit an existing voter's registration information as long as the person knew certain personal identification information about the voter. A person who provided

such information about a voter on the PAOVR website could change the voter's name, address, and/or party affiliation, and/or request a mail-in or absentee ballot.

19. If the person accessing the PAOVR website requested a mail-in or absentee ballot for the voter, such a person could ask for the ballot to be mailed to any address in the world.

20. Anyone accessing the PAOVR website to register to vote, change an existing registration, or request a mail-in ballot had the option of leaving an email address as a point of contact, in case the person wanted to be alerted about the status of his or her application.

**The Increase in Millbourne's Voter Registrations Before the General Election**

21. According to the Delaware County Board of Elections, there were approximately 549 registered voters in Millbourne at the time of the primary election on May 18, 2021.

22. By the time the general election was held on November 2, 2021, there were approximately 578 registered voters in Millbourne.

23. Most of the additional registered voters were people who did not live in Millbourne and had previously been registered to vote in locations outside of Millbourne, but whose voter registration addresses had been changed to Millbourne addresses by someone accessing the PAOVR website.

24. Among the registered Pennsylvania voters whose voter registration addresses were changed to locations in Millbourne in October 2021 by someone accessing the PAOVR website were the following:

a. Person A, a resident of Upper Darby, Pennsylvania, known to the grand jury;

- b. Person B, a resident of Drexel Hill, Pennsylvania, known to the grand jury;
- c. Person C, a resident of Philadelphia, Pennsylvania, known to the grand jury;
- d. Person D, the wife of Person C, a resident of Philadelphia, Pennsylvania, known to the grand jury;
- e. Person E, a daughter of Person C and Person D, a resident of Philadelphia, Pennsylvania, known to the grand jury;
- f. Person F, another daughter of Person C and Person D, a resident of Philadelphia, Pennsylvania, known to the grand jury;
- g. Person G, a resident of Upper Darby, Pennsylvania, known to the grand jury;
- h. Person H, a resident of Upper Darby, Pennsylvania, known to the grand jury;
- i. Person I, the wife of Person H, a resident of Upper Darby, Pennsylvania, known to the grand jury;
- j. Person J, a resident of Upper Darby, Pennsylvania, known to the grand jury;
- k. Person K, the son of Person J, a resident of Upper Darby, Pennsylvania, known to the grand jury;
- l. Person L, a resident of Havertown, Pennsylvania, known to the grand jury;

m. Person M, a resident of Upper Darby, Pennsylvania, known to the grand jury;

n. Person N, the son of Person M, a resident of Upper Darby, Pennsylvania, known to the grand jury;

o. Person O, a resident of Upper Darby, Pennsylvania, known to the grand jury; and

p. Person P, the wife of Person O, a resident of Upper Darby, Pennsylvania, known to the grand jury.

### **THE CONSPIRACY**

25. From at least in or about May 2021 until the present, in the Eastern District of Pennsylvania and elsewhere, defendants

**MD NURUL HASAN,  
MD MUNSUR ALI,  
a/k/a "Mithu,"  
and  
MD RAFIKUL ISLAM,  
a/k/a "Mohammed Rafikul Islam,"  
a/k/a Jibon,"**

conspired and agreed together and with other persons known and unknown to the grand jury to:

(a) knowingly and willfully give false information as to the name and address of voters to establish their eligibility to register and vote in primary and general elections held in part for the purpose of selecting and electing candidates for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives, in violation of Title 52, United States Code, Section 10307(c), and (b) knowingly and willfully deprive and defraud the residents of the Commonwealth of Pennsylvania of a fair and impartially conducted election process by the procurement and

submission of voter registration applications that were known by the defendants to be materially false, fictitious, and fraudulent under the laws of Pennsylvania, in violation of Title 52, United States Code, Section 20511(2)(A).

### **MANNER AND MEANS**

It was part of the conspiracy that:

26. In or about 2021, defendants MD NURUL HASAN, MD MUNSUR ALI, and MD RAFIKUL ISLAM conspired and agreed with one another and with persons known and unknown to the grand jury to steal the 2021 general election for Mayor of Millbourne for defendant HASAN through a multi-step process, which included: (a) obtaining personal identification information of non-Millbourne residents, such as their names, addresses, dates of birth, and driver's license numbers; (b) using the personal identifying information to access the PAOVR website and change the voter registration addresses for those non-Millbourne residents to locations within Millbourne; (c) using the PAOVR website to request that mail-in or absentee ballots for those non-Millbourne residents be sent to addresses accessible by one or more of the defendants; (d) retrieving the ballots from the Millbourne mailboxes; (e) impersonating the voters and fraudulently casting write-in votes for defendant HASAN to be mayor; (f) enclosing the fraudulently completed ballots in envelopes and forging the voters' signatures on the envelopes; and (g) submitting the ballots in their envelopes to the Delaware County Board of Elections.

27. To further this conspiracy, defendants MD NURUL HASAN and MD MUNSUR ALI contacted friends and acquaintances whom defendants HASAN and ALI knew did not live in Millbourne; told these non-Millbourne residents that defendant HASAN was

running for mayor in Millbourne; asked if they could register the non-Millbourne residents to vote in Millbourne and then cast mail-in ballots for defendant HASAN to be mayor.

28. Defendants MD NURUL HASAN and MD MUNSUR ALI persuaded many of their non-Milbourne friends and acquaintances to show them their driver's licenses or other documents containing their names, addresses, dates of birth, and other personal identification information, so that defendants HASAN and ALI could register them to vote in Millbourne. During many of these conversations, defendants HASAN and ALI told their non-Milbourne friends and acquaintances that they would not get in trouble as long as they did not vote in another election in November 2021.

29. Defendants MD NURUL HASAN and MD MUNSUR ALI also conspired and agreed to use personal identifying information for other non-Millbourne residents that defendants HASAN and ALI had obtained from other sources, such as defendant HASAN's business, to register those nonresidents as Millbourne voters without the knowledge of those non-residents.

30. On multiple occasions in or about October 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration addresses for people whom defendant HASAN knew did not live in Millbourne to addresses located in Millbourne,

31. For example, on the following dates, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration addresses for the following people to locations within Millbourne:

<b>Date</b>	<b>Voter</b>	<b>False Millbourne Address</b>
October 5, 2011	Person A	X6 Marian Ct.
October 11, 2021	Person B	X2 Erna Court
October 12, 2021	Person C	X7 Burd Ave.
October 12, 2021	Person D	X7 Burd Ave.



October 12, 2021	Person E	X7 Burd Ave.
October 13, 2021	Person F	X7 Burd Ave.
October 15, 2021	Person G	X1 Burd Ave.
October 15, 2021	Person H	X5 Hurley Ct.
October 15, 2021	Person I	X5 Hurley Ct.
October 16, 2021	Person J	X7 Hurley Ct.
October 16, 2021	Person K	X7 Hurley Ct.
October 16, 2021	Person L	X0 Marian Ct.
October 17, 2021	Person M	X6 Hurley Ct.
October 17, 2021	Person N	X6 Hurley Ct.
October 18, 2021	Person O	X2 Sellers Ave.
October 18, 2021	Person P	X2 Sellers Ave.

32. Every time that defendant MD NURUL HASAN provided false information to change a non-Millbourne resident's address to a Millbourne location, he provided an email address for the voter. Many times, defendant HASAN provided one of four email addresses that he used and accessed. To divert suspicion from himself, however, defendant HASAN sometimes provided email addresses belonging to other people, including defendant MD RAFIKUL ISLAM, who knowingly and willfully permitted defendant HASAN to use their email addresses to cover up defendant HASAN's actions.

33. Once defendant MD NURUL HASAN had successfully registered non-Millbourne residents as Millbourne voters, he used the PAOVR website to request that mail-in ballots be sent to locations in Millbourne that he and his co-conspirators could access, including to his residence, a second property he owned in Millbourne, and the Millbourne residences of defendants MD MUNSUR ALI and MD RAFIKUL ISLAM.

34. In some cases, defendant MD NURUL HASAN requested the mail-in ballots at the same time that he changed the voter registration addresses for the non-Millbourne residents, but in some instances, defendant HASAN did not request the ballots until weeks after he had changed the voter registration addresses.

35. Sometimes when defendant MD NURUL HASAN accessed the PAOVR website to request mail-in ballots, he asked for them to be sent to different locations than the addresses where he had falsely registered the non-Millbourne residents to vote. Additionally, in some cases, defendant HASAN provided different email addresses for the voters when he requested mail-in ballots than the ones he had provided when he had changed the voter registration addresses. To divert attention from himself, defendant HASAN sometimes provided email addresses controlled by defendant MD MUNSUR ALI in order to cover up the fact that defendant HASAN was requesting mail-in ballots for dozens of different people.

36. After the Delaware County Board of Elections mailed ballots to the locations requested by defendant MD NURUL HASAN, defendant HASAN and his co-conspirators collected the ballots, opened them, wrote in defendant HASAN's name for mayor, enclosed the ballots in special envelopes, and forged the voters' signatures on the envelopes before returning them to the Board of Elections.

37. On some occasions, defendant MD NURUL HASAN presented the sealed envelope containing a fraudulent ballot to the non-Millbourne resident to whom the ballot had been addressed, and the non-resident signed the envelope.

38. In total, defendants MD NURUL HASAN, MD MUNSUR ALI, and MD RAFIKUL ISLAM falsely registered nearly three dozen non-Millbourne residents as Millbourne voters and cast ballots for those non-Millbourne residents in the 2021 general election for mayor of Millbourne.

39. The defendants' efforts to steal the election for defendant MD NURUL HASAN were ultimately unsuccessful, as defendant HASAN still lost the general election by a vote of approximately 165 to 138.

### OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants MD NURUL HASAN, MD MUNSUR ALI, a/k/a “Mithu,” and MD RAFIKUL ISLAM, a/k/a “Mohammed Rafikul Islam,” a/k/a “Jibon,” and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere.

1. On or about October 5, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person A to an address in Millbourne, even though defendant HASAN knew that Person A did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

2. On or about October 11, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person B to an address in Millbourne, even though defendant HASAN knew that Person B did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

3. On or shortly before October 12, 2021, defendants MD NURUL HASAN and MD MUNSUR ALI went to the Philadelphia house of Person C and his family, and persuaded Person C to provide the defendants with photos of the driver’s licenses for Person C, Person D, Person E, and Person F, so that the defendants could illegally register them as Millbourne voters and cast votes from them for defendant HASAN in the race for mayor.

4. On or about October 12, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person C, Person D, and

Person E to an address in Millbourne, even though defendant HASAN knew that Person C, Person D, and Person E did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

5. On or about October 13, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person F to an address in Millbourne, even though defendant HASAN knew that Person F did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

6. On or shortly before October 15, 2021, defendant MD MUNSUR ALI persuaded Person G to provide him and defendant MD NURUL HASAN with personal identification information so that the defendants could illegally register Person G as a Millbourne voter and cast a vote from him for defendant HASAN in the race for mayor.

7. On or about October 15, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person G to an address in Millbourne, even though defendant HASAN knew that Person G did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

8. On or shortly before October 15, 2021, defendant MD NURUL HASAN persuaded Person H to provide him with images of Person H and Person I's driver's licenses so that defendant HASAN could illegally register Person H and Person I as Millbourne voters and cast votes for defendant HASAN in the race for mayor.

9. On or about October 15, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person H and Person I to an

address in Millbourne, even though defendant HASAN knew that Person H and Person I did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne. When defendant HASAN changed the voting addresses for Person H and Person I, he provided an email address controlled by defendant MD RAFIKUL ISLAM with the consent of defendant ISLAM, in order to divert suspicion from defendant HASAN.

10. On or shortly before October 16, 2021, defendants MD NURUL HASAN and MD MUNSUR ALI went to the Upper Darby house of Person J, her husband, and her son, Person K, and persuaded them to provide the defendants with photos of the driver's licenses for Person J and Person K, so that the defendants could illegally register them as Millbourne voters and cast votes from them for defendant HASAN in the race for mayor.

11. On or about October 16, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person J and Person K, to an address in Millbourne, even though defendant HASAN knew that Person J and Person K did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

12. On or before October 16, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person L to an address in Millbourne, even though defendant HASAN knew that Person L did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne. When defendant HASAN changed the voting addresses for Person L, he provided an email address for defendant MD RAFIKUL ISLAM with the consent of defendant ISLAM, in order to divert suspicion from defendant HASAN.

13. On or shortly before October 17, 2021, defendants MD NURUL HASAN and MD MUNSUR ALI went to the Upper Darby house of Person M, her husband, and her son, Person N, and persuaded them to provide the defendants with photos of the driver's licenses for Person M and Person N, so that the defendants could illegally register them as Millbourne voters and cast votes from them for defendant HASAN in the race for Millbourne mayor.

14. On or about October 17, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person M and Person N, to an address in Millbourne, even though defendant HASAN knew that Person M and Person N did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

15. On or shortly before October 18, 2021, defendant MD NURUL HASAN met with Person O and persuaded him to provide him with driver's license numbers for himself and his wife, Person P, so that defendant HASAN could illegally register them as Millbourne voters and cast votes from them for defendant HASAN in the race for mayor.

16. On or about October 18, 2021, defendant MD NURUL HASAN accessed the PAOVR website and changed the voter registration address for Person O and Person P, to an address in Millbourne, even though defendant HASAN knew that Person O and Person P did not reside in Millbourne, Pennsylvania, and that it was illegal for a person who did not live in Millbourne to register or to vote in Millbourne.

All in violation of Title 18, United States Code, Section 371.

**COUNTS TWO THROUGH SEVENTEEN****THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1-24 and 26-39 of Count One of this indictment are re-alleged here.

2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, the defendants listed below knowingly and willfully gave and caused others to give false information as to a voter's name and address in the voting district for the purpose of establishing one's eligibility to register and to vote in primary and general elections held in part for the purpose of electing any candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives, by accessing the PAOVR website and changing the voting addresses for the persons listed below, whom the defendants knew did not live in Millbourne, to locations in Millbourne with each false voter constituting a separate count:

<b>COUNT</b>	<b>Defendant(s) Charged</b>	<b>Date of Offense</b>	<b>Voter in Whose Name False Information was Given</b>
2	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 5, 2011	Person A
3	<b>MD NURUL HASAN</b>	October 11, 2021	Person B
4	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 12, 2021	Person C
5	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 12, 2021	Person D
6	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 12, 2021	Person E
7	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 13, 2021	Person F

8	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 15, 2021	Person G
9	<b>MD NURUL HASAN and MD RAFIKUL ISLAM, a/k/a "Mohammed Rafikul Islam," a/k/a "Jibon"</b>	October 15, 2021	Person H
10	<b>MD NURUL HASAN and MD RAFIKUL ISLAM, a/k/a "Mohammed Rafikul Islam," a/k/a "Jibon"</b>	October 15, 2021	Person I
11	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 16, 2021	Person J
12	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 16, 2021	Person K
13	<b>MD NURUL HASAN and MD RAFIKUL ISLAM, a/k/a "Mohammed Rafikul Islam," a/k/a "Jibon"</b>	October 16, 2021	Person L
14	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 17, 2021	Person M
15	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 17, 2021	Person N
16	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 18, 2021	Person O
17	<b>MD NURUL HASAN and MD MUNSUR ALI, a/k/a "Mithu"</b>	October 18, 2021	Person P

All in violation of Title 52, United States Code, Section 10307(c), and 18 U.S.C.

§ 2.



**COUNTS EIGHTEEN THROUGH THIRTY-THREE****THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1-24 and 26-39 of Count One of this indictment are re-alleged here.

2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, the defendants listed below knowingly and willfully deprived, defrauded, and attempted to deprive and defraud the residents of the Commonwealth of Pennsylvania of a fair and impartially conducted election process by the procurement and submission of voter registration applications that were known by the defendants to be materially false, fictitious, and fraudulent under the laws of Pennsylvania, by accessing the PAOVR website and changing the voting addresses for the persons listed below, whom the defendants knew did not live in Millbourne, to locations in Millbourne, with each false voter constituting a separate count:

<b>COUNT</b>	<b>Defendant(s) Charged</b>	<b>Date of False Registration</b>	<b>Voter Fraudulently Registered at a Millbourne Address</b>
18	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a "Mithu"</b>	October 5, 2011	Person A
19	<b>MD NURUL HASAN</b>	October 11, 2021	Person B
20	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a "Mithu"</b>	October 12, 2021	Person C
21	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a "Mithu"</b>	October 12, 2021	Person D
22	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a "Mithu"</b>	October 12, 2021	Person E
23	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a "Mithu"</b>	October 13, 2021	Person F
24	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a "Mithu"</b>	October 15, 2021	Person G

<b>COUNT</b>	<b>Defendant(s) Charged</b>	<b>Date of False Registration</b>	<b>Voter Fraudulently Registered at a Millbourne Address</b>
25	<b>MD NURUL HASAN, MD RAFIKUL ISLAM, a/k/a “Mohammed Rafikul Islam,” a/k/a “Jibon”</b>	October 15, 2021	Person H
26	<b>MD NURUL HASAN, MD RAFIKUL ISLAM, a/k/a “Mohammed Rafikul Islam,” a/k/a “Jibon”</b>	October 15, 2021	Person I
27	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a “Mithu”</b>	October 16, 2021	Person J
28	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a “Mithu”</b>	October 16, 2021	Person K
29	<b>MD NURUL HASAN, MD RAFIKUL ISLAM, a/k/a “Mohammed Rafikul Islam,” a/k/a “Jibon”</b>	October 16, 2021	Person L
30	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a “Mithu”</b>	October 17, 2021	Person M
31	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a “Mithu”</b>	October 17, 2021	Person N
32	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a “Mithu”</b>	October 18, 2021	Person O
33	<b>MD NURUL HASAN, MD MUNSUR ALI, a/k/a “Mithu”</b>	October 18, 2021	Person P

All in violation of Title 52, United States Code, Section 20511(2)(A), and 18  
U.S.C. § 2.

**A TRUE BILL:**



Handwritten signature of Nelson S.T. Thayer, appearing to read "NST/for".

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**NELSON S.T. THAYER**  
**ACTING UNITED STATES ATTORNEY**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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THE UNITED STATES OF AMERICA

v.

MD NURUL HASAN

MD MUNSUR ALI

a/k/a "Mithu,"

MD RAFIKUL ISLAM

a/k/a "Mohammed Rafikul Islam,"

a/k/a "Jibon"

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INDICTMENT

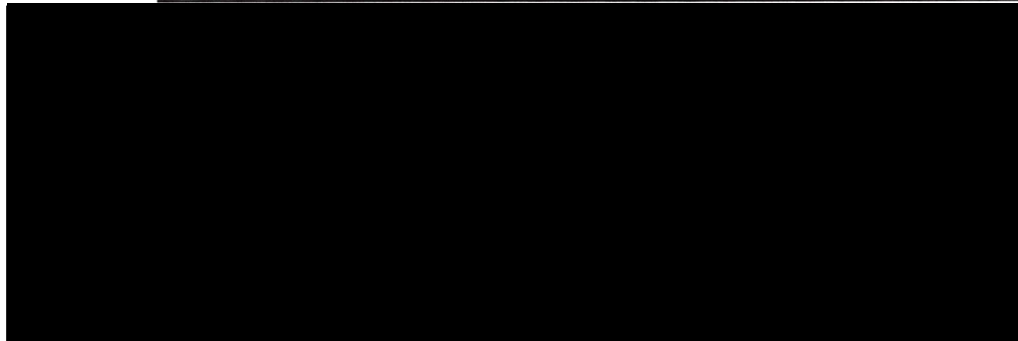
18 U.S.C. § 371 (conspiracy – 1 count)

52 U.S.C. § 10307(c) (false information in registering – 16 counts)

52 U.S.C. § 20511(2)(A) (fraudulent voter registration – 16 counts)

18 U.S.C. § 2 (aiding and abetting)

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

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia County: Philadelphia

City and State of Defendants: See reverse

County: See reverse Register number: N/A

Place of accident, incident, or transaction: Eastern District of Pennsylvania

Post Office: Upper Darby County: Delaware

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: No

Case Number: N/A Judge: N/A

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

- 1.  Antitrust
- 2.  Income Tax and other Tax Prosecutions
- 3.  Commercial Mail Fraud
- 4.  Controlled Substances
- 5.  Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
- 6.  General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES 18 U.S.C. § 371 (conspiracy – 1 count); 52 U.S.C. § 10307(c) (false information in registering – 16 counts); 52 U.S.C. § 20511(2)(A) (fraudulent voter registration – 16 counts) 18 U.S.C. § 2 (aiding and abetting))

DATE: 2/18/25

/s/ MARK B. DUBNOFF  
Mark B. Dubnoff  
Assistant United States Attorney

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