

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	)	No. 23-cr- 17-LM-01
	)	
v.	)	Count 1: False Statement in Passport Application
	)	(18 U.S.C. § 1542)
ANDREW MAHN,	)	Count 2: False Statements
	)	(18 U.S.C. § 1001(a)(2))
Defendant	)	Count 3: Aggravated Identity Theft
	)	(18 U.S.C. § 1028A)
_____	)	

INDICTMENT

**The Grand Jury Charges:**

**COUNT ONE**

[18 U.S.C. § 1542 – False Statement in Passport Application]

1. On or about November 15, 2022, in the District of New Hampshire and elsewhere, the defendant,

ANDREW MAHN,

knowingly and willfully made a false statement in an application for a passport with intent to induce and secure for his own use or the use of another the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated claimed his name was A.M. and provided an incorrect date of birth, which statements he knew to be false.

All in violation of Title 18, United States Code, Section 1542.

**COUNT TWO**

[18 U.S.C. § 1001(a)(2) – False Statements]

2. On or about November 15, 2022, in the District of New Hampshire and elsewhere, the defendant,

ANDREW MAHN,

in a matter within the jurisdiction of the United States Department of State, an agency of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in connection with a United States Passport Application. Specifically, to induce and secure the issuance of a United States Passport, MAHN falsely stated on the application a name and date of birth that were not his own. MAHN knew that these statements and representations were false when made.

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

**COUNT THREE**

[18 U.S.C. § 1028A – Aggravated Identity Theft]

3. Paragraph 1 is re-alleged.

4. On or about November 15, 2022, in the District of New Hampshire and elsewhere, the defendant,

ANDREW MAHN,

did knowingly use, without lawful authority, a means of identification of another person, namely, the name and date of birth of another person, A.M., during and in relation to a felony violation of Title 18, United States Code, Section 1542, as alleged in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 1028A.

**ADDITIONAL SENTENCING ENHANCEMENT**

[18 U.S.C. § 3147 – Penalty for an Offense Committed While on Pretrial Release]

5. At the time of the offenses charged in Counts One, Two and Three, defendant ANDREW MAHN was on pretrial release under Title 18, United States Code, Chapter 207, in the case of

United States v. Andrew Mahn, Case No. 21-cr-00177 in the United States District Court for the Northern District of Illinois, pursuant to an order dated March 18, 2021, from the United States District Court for the District of Massachusetts, which order notified said defendant of the potential effect for committing an offense while on pretrial release.

A TRUE BILL

Dated: February 15, 2023

/s/ FOREPERSON  
FOREPERSON

JANE E. YOUNG  
UNITED STATES ATTORNEY

By: /s/ Alexander S. Chen  
Alexander S. Chen  
John J. Kennedy  
Assistant U.S. Attorneys