IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 1:25cv23616

UNITED STATES OF AMERICA, Plaintiff, vs. MARIEVA BRICENO, a/k/a Marieva Briceno de Sanchez, a/k/a Marieva Briceno Betancourt, a/k/a Marieva Briceno de Hernandez, Defendant.	**COMPLAINT TO REVOKE NATURALIZATION**

I. PRELIMINARY STATEMENT

The United States of America brings this civil action against Defendant Marieva Briceno, a/k/a Marieva Briceno de Sanchez, a/k/a Marieva Briceno Betancourt, a/k/a Marieva Briceno de Hernandez ("Defendant"), to revoke her naturalized U.S. citizenship. This action under 8 U.S.C. § 1451(a) is based on Defendant's criminal conduct prior to naturalizing, for which she was charged and convicted after naturalizing. Specifically, before she became a citizen of the United States, Defendant engaged in criminal activity that she concealed throughout the naturalization process and that disqualified her from U.S. citizenship

Beginning in approximately May 2007, Defendant conspired to fraudulently bill Medicare for more than $5.4 million in false medical claims. When Defendant filed her naturalization application in December 2009 and was interviewed in March 2010, she stated that she had never committed a crime for which she had not been arrested. On March 14, 2012, however, she pleaded guilty to – and was ultimately convicted of – engaging in a conspiracy to commit health care fraud beginning in approximately May 2007, in violation of 18 U.S.C.

§§ 1347 and 1349. In light of Defendant's fraudulent scheme, which she misrepresented and concealed throughout her naturalization proceedings, she was ineligible for naturalization and thus procured her citizenship unlawfully. Additionally, because she withheld her prior crimes from the government throughout her naturalization proceedings, she also procured her citizenship by concealment of a material fact or by willful misrepresentation. Accordingly, as shown below, Defendant unlawfully naturalized, and this Court must order the denaturalization of Defendant.

II. PARTIES, JURISDICTION, AND VENUE

1. This is an action filed under 8 U.S.C. § 1451(a) to revoke and set aside the decision admitting Defendant to U.S. citizenship and to cancel Defendant's Certificate of Naturalization No. [redacted]

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1345 for this cause of action under 8 U.S.C. § 1451(a).

3. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391, because Defendant can be found in and resides in this District.

4. Plaintiff is the United States of America, suing on behalf of itself.

5. Defendant is a native of Venezuela and obtained her U.S. citizenship through naturalization.

6. Defendant's last known address of residence is in Miami-Dade County, Florida.

III. FACTUAL BACKGROUND

7. The affidavit of Ralph Reichard, a Deportation Officer with U.S. Immigration and Customs Enforcement, an agency within the U.S. Department of Homeland Security, showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached hereto as Exhibit A.

A. Defendant's Fraud Scheme & Federal Conviction

8. Beginning in approximately May 2007, Defendant, together with others, began operating three purported medical clinics in the Detroit, Michigan area: Bless MC, LLC, which later changed its name to Blessed MC, LLC ("Blessed"), Alpha & Omega MC, LLC ("A&O"), and Manuel MC, LLC ("Manuel," and with Blessed and A&O, the "Clinics").

9. From the outset of her operation of the Clinics, Defendant operated them as purported medical clinics to defraud Medicare by billing Medicare for expensive and medically unnecessary tests.

10. Defendant knew from the outset of her operation of the Clinics that their purpose was not to treat sick patients but to make money by defrauding Medicare.

11. Patients were not referred to the Clinics by primary-care physicians.

12. Rather, Defendant and her co-conspirators paid the patients cash kickbacks to endure medically unnecessary diagnostic testing.

13. To recruit Medicare patients, Defendant established a scheme in which she and her co-conspirators hired a patient recruiter who paid cash kickbacks to patients on Medicare.

14. In exchange for their kickbacks, those individuals would visit the Clinics, endure medically unnecessary test or procedures, and then sign documents indicating that they had received medically necessary services that Defendant or her co-conspirators then billed to Medicare.

15. Defendant directed her daughter and co-conspirator, Karina Hernandez ("Ms. Hernandez"), to oversee the daily operations of the Clinics.

16. Defendant regularly provided guidance to Ms. Hernandez on how to run the Clinics.

17. Additionally, Defendant traveled to Detroit to oversee the operations of the Clinics when Ms. Hernandez was unavailable.

18. Between approximately May 2007 and January 2010, Defendant and her co-conspirators caused the submission of approximately $5,460,323 in false and fraudulent claims to the Medicare program for medically unnecessary services at the Clinics.

19. Ultimately, Medicare paid $2,998,321.94 on false and fraudulent claims submitted from the Clinics.

20. Defendant personally received approximately $513,200 from the submission of false and fraudulent claims from the Clinics.

21. On September 12, 2011, Defendant was charged by a Second Superseding Indictment with, among other charges, Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. §§ 1347 and 1349. *See* Second Superseding Indictment, *United States v. Karina Hernandez, et al.*, No. 11-cr-20076 (E.D. Mich. Sept. 12, 2011), ECF No. 113 (attached hereto as Exhibit B).

22. On March 14, 2012, Defendant and her attorney signed a Rule 11 Plea Agreement that was filed in her criminal case. *See* Rule 11 Plea Agreement, *United States v. Briceno*, No. 11-cr-20076 (E.D. Mich. Mar. 14, 2012), ECF No. 218 ("Plea Agreement") (attached hereto as Exhibit C).

23. The Plea Agreement states that it provides a "sufficient and accurate" factual basis for her guilty plea. *See* Plea Agreement at 2.

24. The Plea Agreement contains Defendant's admission to the facts alleged in the preceding paragraphs 8-20.

25. The facts alleged in the preceding paragraphs 8-20 summarize Defendant's participation in the crime of Conspiracy to Commit Health Care Fraud.

26. On March 14, 2012, Defendant appeared before the U.S. District Court for the Eastern District of Michigan and pleaded guilty to one count of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. §§ 1347 and 1349. *See* Transcript of Arraignment and Guilty Plea Hearing at 23:25-24:14, *United States v. Briceno*, No. 11-cr-20076-02 (E.D. Mich. Apr. 20, 2012), ECF No. 243 (attached hereto as Exhibit D).

27. During her appearance before the Court on March 14, 2012, Defendant testified under oath that the following statements accurately described her role in the conspiracy to commit health care fraud to which she was pleading guilty:

a. "From the outset, the Defendant opened purported medical clinics in Michigan to defraud Medicare by billing Medicare for expensive and medically unnecessary tests." *See id.* at 2:20-23, 14:10-24.

b. "Patients were not referred to Blessed, A&O and Manuel by a primary care physician." *See id.* at 2:20-23, 14:25-15:14.

c. "The Defendant directed her daughter and co-conspirator Karina Hernandez, who oversaw the operations of Blessed, Alpha & Omega and Manuel." *See id.* at 2:20-23, 15:15-21.

d. "The Defendant established the scheme in which Medicare patients were recruited through the payment of cash kickbacks to attend the clinics." *See id.* at 2:20-23, 15:22-16:16:1.

e. "Additionally, Defendant traveled to Detroit to oversee the operations of the fraudulent clinics while her daughter and co-conspirator was unavailable." *See id.* at 2:20-23, 16:2-9.

f. "Defendant received personally approximately $513,200.65." *See id.* at 2:20-23, 16:10-13.

g. "Defendant and her co-conspirators caused the submission of approximately $5.4 million in false and fraudulent claims to the Medicare program for medically unnecessary services at Blessed, Alpha & Omega and Manuel." *See id.* at 2:20-23, 16:14-19.

28. Following the entry of her guilty plea, the U.S. District Court for the Eastern District of Michigan convicted Defendant of one count of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. § 1347. *See* Judgment in a Criminal Case at 1, *United States v. Briceno*, No. 11-cr-20076-02 (E.D. Mich. July 6, 2012), ECF No. 276 ("Judgment") (attached hereto as Exhibit E).

29. As a result of her conviction for the crime of Conspiracy to Commit Health Care Fraud, the U.S. District Court for the Eastern District of Michigan sentenced Defendant to 60 months in prison followed by 24 months of supervised release, ordered her to pay $2,998,321.94 in restitution to the Medicare Trust Fund, and ordered her to forfeit $513,200.65.

B. Defendant's Naturalization Application and Oath Ceremony

30. On or about December 21, 2009, Defendant applied to naturalize and become a U.S. citizen by filing a Form N-400, Application for Naturalization ("Naturalization Application") with U.S. Citizenship and Immigration Services ("USCIS"). *See* Form N-400, Application for Naturalization (attached hereto as Exhibit F).

31. On her Naturalization Application, Defendant checked "No" in response to Part 10, Question 15, which asked: "Have you **ever** committed a crime or offense for which you were **not** arrested?".

32. On her Naturalization Application, Defendant checked "No" in response to Part 10, Question 23, which asked: "Have you **ever** given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?"

33. On or about November 9, 2009, Defendant signed the Naturalization Application under penalty of perjury, thereby certifying that her answers to the questions therein were true and correct.

34. On March 11, 2010, Ruben Teurbe-Tolon, an officer with USCIS, orally interviewed Defendant regarding her Naturalization Application to determine her eligibility for naturalization.

35. At the beginning of the interview, Officer Teurbe-Tolon placed Defendant under oath.

36. During the interview, Officer Teurbe-Tolon asked Defendant, consistent with Part 10, Question 15 of Defendant's Naturalization Application, whether she had ever committed a crime or offense for which she was not arrested.

37. Defendant verbally confirmed her written response to Part 10, Question 15 of her Naturalization Application, testifying under oath that she had never committed a crime or offense for which she was not arrested.

38. Defendant's testimony regarding her commission of a crime or offense was false.

39. At her naturalization interview, Defendant did not disclose her involvement in the crime of Conspiracy to Commit Health Care Fraud.

40. During the interview, Officer Teurbe-Tolon asked Defendant, consistent with Part 10, Question 23 of Defendant's Naturalization Application, whether she had ever given false or misleading information to any U.S. Government official while applying for any immigration benefit.

41. Defendant verbally confirmed her written response to Part 10, Question 23 of her Naturalization Application, testifying under oath that she had never given false or misleading information to any U.S. Government official while applying for any immigration benefit.

42. Defendant's testimony regarding the submission of false or misleading information to a U.S. Government official while applying for any immigration benefit was false.

43. At her naturalization interview, Defendant did not disclose that she had provided false or misleading information to USCIS while applying for naturalization when she falsely checked "No" to Part 10, Question 15 of her N-400, which asked if Defendant had ever committed a crime or offense for which she was not arrested.

44. Defendant's answer of "No" to Part 10, Question 15 of her N-400 was false or misleading because she had engaged in a criminal conspiracy to commit health care fraud between May 2007 until at least on or about October 2009, to which she later admitted and for which she was later convicted.

45. In fact, at no point during the naturalization process did Defendant disclose to USCIS that she had engaged in a conspiracy to commit health care fraud.

46. At the end of the interview, Defendant again signed the Naturalization Application under penalty of perjury in the presence of Officer Teurbe-Tolon and swore that the

contents of her application, including nine numbered changes and one page of additional evidence, were true and correct to the best of her knowledge.

47. Based upon the information Defendant supplied on her Naturalization Application and on the sworn answers she gave during her March 11, 2010 naturalization interview, USCIS approved the application.

48. On March 19, 2010, Defendant took the Oath of Allegiance to become a U.S. citizen. She was issued Certificate of Naturalization No. [redacted] *See* Form N-550, Certificate of Naturalization (attached as Exhibit G).

IV. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of U.S. Citizenship.

49. No individual has a right to naturalization "unless all statutory requirements are complied with." *United States v. Ginsberg*, 243 U.S. 472, 474-75 (1917). Indeed, the Supreme Court has underscored that "[t]here must be strict compliance with all the congressionally imposed prerequisites to the acquisition of citizenship." *Fedorenko v. United States*, 449 U.S. 490, 506 (1981); *see also id.* (an individual "who seeks political rights as a member of the Nation can rightfully obtain them only upon the terms and conditions specified by Congress." (quoting *Ginsberg*, 243 U.S. at 474)).

50. Among other requirements, Congress has mandated that an individual may not naturalize unless that person "during all periods referred to in this subsection has been and still is a person of good moral character . . . ." *See* 8 U.S.C. § 1427(a)(3). The required statutory period for good moral character begins five years before the date the applicant files the application for naturalization, and it continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *Id.*; 8 C.F.R. § 316.10(a).

51. Although Congress has not specifically defined what constitutes good moral character for naturalization purposes, the Immigration and Nationality Act lists certain classes of applicants who cannot be found to have the requisite good moral character. 8 U.S.C. § 1101(f).

52. As a matter of law, an applicant necessarily lacks good moral character if he or she commits a crime involving moral turpitude ("CIMT") during the statutory period and later either is convicted of the crime or admits his or her commission of the criminal activity. 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(A)); 8 C.F.R. § 316.10(b)(2)(i) (providing that applicants "shall be found to lack good moral character" if, for example, they committed and were convicted of one or more crimes involving moral turpitude).

53. Congress has also explicitly precluded individuals who give false testimony for the purpose of obtaining immigration benefits from being able to establish the good moral character necessary to naturalize. 8 U.S.C. § 1101(f)(6).

54. Further, Congress created a "catch-all" provision, which states, "[t]he fact that any person is not within any of the foregoing classes shall not preclude a finding that for other reasons such person is or was not of good moral character." 8 U.S.C. § 1101(f) (flush language).

55. Individuals who commit unlawful acts adversely reflecting upon their moral character cannot meet the good moral character requirement, unless they prove that extenuating circumstances existed. *See* 8 C.F.R § 316.10(b)(3)(iii); 8 U.S.C. § 1101(f) (flush language).

56. Thus, an individual unlawfully procured naturalization if he or she committed unlawful acts during the statutory period, even if he or she was convicted of those crimes after being granted citizenship. *See United States v. Jean-Baptiste*, 395 F.3d 1190, 1193-94 (11th Cir. 2005), *cert. denied*, 546 U.S. 852 (2005).

B. The denaturalization statute

57. Recognizing that there are situations where an individual has naturalized despite failing to comply with all congressionally imposed prerequisites to the acquisition of citizenship or by concealing or misrepresenting facts that are material to the decision on whether to grant his or her naturalization application, Congress enacted 8 U.S.C. § 1451.

58. Under 8 U.S.C. § 1451(a), this Court must revoke an order of naturalization and cancel the individual's Certificate of Naturalization if his or her naturalization was *either*:

i. illegally procured, *or*

ii. procured by concealment of a material fact or by willful misrepresentation.

59. Failure to comply with any of the congressionally imposed prerequisites to the acquisition of citizenship renders the citizenship "illegally procured." *Fedorenko*, 449 U.S. at 506.

60. Naturalization was procured by concealment of a material fact or by willful misrepresentation, where: (1) the naturalized citizen misrepresented or concealed some fact during the naturalization process; (2) the misrepresentation or concealment was willful; (3) the fact was material; and (4) the naturalized citizen procured citizenship as a result of the misrepresentation or concealment. *See Kungys v. United States*, 485 U.S. 759, 767 (1988).

61. Where the government establishes that the defendant's citizenship was procured illegally or by willful misrepresentation or concealment of material facts, "district courts lack equitable discretion to refrain from entering a judgment of denaturalization." *Fedorenko*, 449 U.S. at 517.

V. CAUSES OF ACTION

COUNT I
ILLEGAL PROCUREMENT OF NATURALIZATION
LACK OF GOOD MORAL CHARACTER
(CRIME INVOLVING MORAL TURPITUDE)

62. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections II through IV of this Complaint.

63. To be eligible for naturalization, Defendant was required to establish that she was a person of good moral character from December 21, 2004, until the date she became a U.S. citizen, on March 19, 2010.

64. Defendant was statutorily precluded from establishing the good moral character necessary to naturalize because she committed a CIMT during the statutory period. 8 U.S.C. § 1101(f)(3); 8 C.F.R. § 316.10(b)(2)(i).

65. As set forth above at paragraphs 8 through 20, Defendant conspired with others to open and operate medical clinics to generate more than $5.4 million in false medical claims that Defendant and her co-conspirators fraudulently billed to Medicare, resulting in Defendant and her co-conspirators receiving $2.9 million in Medicare payments, with Defendant personally receiving $513,200 as a result of her participation in the criminal conspiracy.

66. On March 14, 2012, Defendant pleaded guilty to the crime of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. §§ 1347 and 1349.

67. Defendant committed that crime and underlying fraud during the statutory period.

68. Defendant's conviction under 18 U.S.C. § 1347 is for a fraud related offense, and constitutes a CIMT. *See, e.g.*, *Jordan v. De George*, 341 U.S. 223, 229 (1951) ("American courts have, without exception, included [fraud] crimes within the scope of moral turpitude."); *Itani v.*

Ashcroft, 298 F.3d 1213, 1215 (11th Cir. 2002) ("Generally, a crime involving dishonesty or false statement is considered to be one involving moral turpitude." (citations omitted)).

69. Because Defendant committed a CIMT during the statutory period, to which she later admitted and for which she was convicted, Defendant was barred under 8 U.S.C. § 1101(f)(3) from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

70. Because Defendant was not a person of good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

71. Because she was ineligible to naturalize, Defendant illegally procured her citizenship, and this Court must revoke her citizenship, as provided for by 8 U.S.C. § 1451(a).

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (UNLAWFUL ACTS)

72. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections II through IV of this Complaint.

73. To be eligible for naturalization, Defendant was required to establish that she was a person of good moral character from December 21, 2004, until March 19, 2010, which was the date she became a U.S. citizen.

74. Defendant could not establish the requisite good moral character for naturalization because she committed unlawful acts during the statutory period that reflected adversely on her moral character, and there were no extenuating circumstances that would lessen her guilt. 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

75. Specifically, as set forth above at paragraphs 8 through 20, from approximately May 2007 to or about October 2009, Defendant conspired with others to open and operate medical clinics to generate more than $5.4 million in false medical claims that Defendant and her co-conspirators fraudulently billed to Medicare, resulting in Defendant and her co-conspirators receiving $2.9 in Medicare payments and Defendant personally receiving $513,200.

76. On March 14, 2012, Defendant appeared before the U.S. District Court for the Eastern District of Michigan and pleaded guilty to one count of Conspiracy to Commit Health Care Fraud.

77. Defendant committed the crime of Conspiracy to Commit Health Care Fraud and the underlying fraud within the statutory period.

78. The crime of Conspiracy to Commit Health Care Fraud and the underlying fraud are crimes that adversely reflected upon Defendant's moral character.

79. Defendant cannot establish extenuating circumstances with regard to the conspiratorial conduct and fraudulent acts underlying her guilty plea pursuant to 18 U.S.C. § 1347 that would render her conduct less reprehensible than it otherwise would be or that tend to palliate or mitigate her guilt. She therefore cannot avoid the regulatory bar on establishing good moral character found in 8 C.F.R. § 316.10(b)(3)(iii).

80. The regulatory "unlawful acts" bar on establishing good moral character found in 8 C.F.R. § 316.10(b)(3)(iii) applies to Defendant regardless of whether the statutory CIMT bar (set forth in Count I) also applies.

81. Defendant's unlawful conduct precluded her under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

82. Because Defendant was not a person of good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

83. Because Defendant was ineligible to naturalize, she illegally procured her naturalization, and this Court must revoke her citizenship, as provided for by 8 U.S.C. § 1451(a).

COUNT III

ILLEGAL PROCUREMENT OF NATURALIZATION
LACK OF GOOD MORAL CHARACTER
(FALSE TESTIMONY)

84. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections II through IV of this Complaint.

85. To be eligible for naturalization, Defendant was required to establish that she was a person of good moral character from December 21, 2004, until the date she became a U.S. citizen, on March 19, 2010.

86. Defendant was statutorily precluded from showing that she was a person of good moral character because she gave false testimony, under oath, during the statutory period, for the purpose of obtaining an immigration benefit, specifically naturalization. 8 U.S.C. § 1101(f)(6); 8 C.F.R. § 316.10(b)(2)(vi).

87. During the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when she swore, under oath, during her March 11, 2010 naturalization interview, that she had never committed a crime or offense for which she had not been arrested.

88. During the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when she swore, under oath, during her March 11, 2010 naturalization interview, that she had never given false or misleading information to any U.S. Government official while applying for any immigration benefit.

89. During the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when she swore, under oath, during her March 11, 2010 naturalization interview, that she had not been employed anywhere in preceding five years other than at the businesses that she had listed in response to Part 6 Question B of her N-400, a list that did not include Manuel, one of the clinics that she operated and oversaw from May 2007 to January 2010.

90. Defendant's testimony on each of the foregoing issues was knowingly false and for the purpose of obtaining an immigration benefit, namely naturalization.

91. Because Defendant provided false testimony under oath for the purpose of obtaining her naturalization, she was barred under 8 U.S.C. § 1101(f)(6) from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

92. Because Defendant was not a person of good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

93. Because she was ineligible to naturalize, Defendant illegally procured her citizenship, and this Court must revoke her citizenship, as provided for by 8 U.S.C. § 1451(a).

COUNT IV

PROCUREMENT OF U.S. CITIZENSHIP BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION

94. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections II through IV of this Complaint.

95. Under 8 U.S.C. § 1451(a), this Court must revoke Defendant's citizenship and cancel her Certificate of Naturalization because she procured her naturalization by concealment of a material fact and by willful misrepresentation.

96. As set forth above, throughout the naturalization process, Defendant willfully misrepresented and concealed her involvement in a criminal conspiracy to commit health care fraud between approximately May 2007 until or about October 2009, for which she later pleaded guilty in the U.S. District Court for the Eastern District of Michigan to one count of Conspiracy to Commit Health Care Fraud.

97. Specifically, Defendant represented on her Naturalization Application and during her naturalization interview that she had never knowingly committed any crime or offense for which she had not been arrested, despite knowing that such representations were false and misleading.

98. Defendant also represented during her naturalization interview that she had never given false or misleading information to any U.S. Government official while applying for any immigration benefit, despite knowing that her representation was false and misleading.

99. Defendant knew the representations that she had never knowingly committed any crime or offense for which she had not been arrested were false because starting in approximately May 2007, she had been member of a conspiracy to commit health care fraud that she had joined with knowledge of its unlawful purpose, as she later admitted to in her Plea Agreement and for which she was later convicted.

100. Defendant knew the representation that she had never given false or misleading information to any U.S. Government official while applying for any immigration benefit was false because she had signed her Form N-400 and submitted it to USCIS on December 21, 2009, after stating on her Form N-400 that she had never committed any crime for which she was not arrested, even though starting in approximately May 2007, she had been member of a conspiracy

to commit health care fraud that she had joined with knowledge of its unlawful purpose, as she later admitted to in her Plea Agreement and for which she was later convicted.

101. Defendant's misrepresentations were material to her naturalization because the disclosure of her fraudulent scheme would have had a natural tendency to influence USCIS's decision whether to approve Defendant's Naturalization Application as they related to statutory eligibility criteria for such benefit.

102. Had Defendant disclosed the truth about her criminal conduct, USCIS would have discovered her statutory ineligibility for naturalization and could not have approved her application or administered the oath of allegiance.

103. Defendant thus procured her naturalization by willful misrepresentation and concealment of material facts, and this Court must revoke her citizenship pursuant to the requirements of 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the United States of America, requests:

1. A declaration that Defendant illegally procured her citizenship;

2. A declaration that Defendant procured her citizenship by concealment and willful misrepresentation of material facts;

3. Judgment revoking and setting aside Defendant's naturalization and canceling Certificate of Naturalization No. [redacted] effective as of the original date of the order and certificate, March 19, 2010;

4. Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship that he obtained as a result of her March 19, 2010, naturalization;

5. Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against her, her Certificate of Naturalization and any copies thereof in her possession – and to make good faith efforts to recover and immediately surrender any copies thereof that she knows are in the possession of others – to the Attorney General or his representative, including undersigned counsel;

6. Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against her, any other indicia of U.S. citizenship (including, but not limited to, U.S. passports, passport cards, and Enhanced Drivers Licenses, whether valid or expired), and any copies thereof in her possession – and to make good faith efforts to recover and then surrender any copies thereof that she knows are in the possession of others – to the Attorney General or his representative, including undersigned counsel; and

7. Judgment granting the United States such other relief as may be lawful and proper in this case.

Dated: August 12, 2025

Respectfully submitted,

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