UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,	)
	) **Civil Action No. 25-cv-1850**
Plaintiff,	)
	)
v.	) **JOINT MOTION FOR**
	) **CONSENT JUDGMENT**
GURDEV SINGH SOHAL, a.k.a. DEV SINGH, a.k.a. BOOTA SINGH SUNDU,	) **REVOKING NATURALIZATION**
	)
	)
Defendant.	)
	)

The United States of America ("Plaintiff") and Gurdev Singh Sohal, a.k.a. Dev Singh, a.k.a. Boota Singh Sundu ("Defendant," and with Plaintiff, the "Parties") move this Court to enter the attached proposed Consent Judgment Revoking Naturalization. This joint motion is supported by Plaintiff's Complaint, ECF No. 1, and by Defendant's admission to, and acknowledgment of the truth of, the specific facts identified below.

The Parties agree that this Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331 and 1345 for this cause of action under 8 U.S.C. § 1451 and that venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant resides in Ferndale, Washington, within the jurisdiction and venue of this Court. *See* 8 U.S.C. § 1451(a).

I. FACTUAL BACKGROUND

On May 25, 1994, an immigration judge denied an application Defendant filed for an immigration benefit and ordered Defendant, under the identity Dev Singh, to be excluded and deported from the United States. ECF No.1 ¶¶ 17-18. On June 10, 1994, Defendant filed a Notice of Appeal to the Board of Immigration Appeals ("BIA"), and on February 7, 1995, the BIA dismissed Defendant's appeal. *Id.* at ¶¶ 20-21. On January 3, 1995, Defendant, using a different name, Gurdev

Singh Sohal, filed a second application for an immigration benefit ("second application") with the INS, without listing any previous names used. *Id.* at ¶¶ 25-29.

On May 26, 1998, Defendant, using the Gurdev Singh Sohal name, filed with the former Immigration and Naturalization Service ("INS")[1] a Form I-485, Application to Register Permanent Residence or Adjust Status (I-485), representing that he was not in exclusion or deportation proceedings and that he had never sought to procure any immigration benefit by fraud or willful misrepresentation of a material fact. ECF No. 1 at ¶ 32-33. On August 9, 2004, Defendant, using the name Gurdev Singh Sohal, filed a Form N-400, Application for Naturalization (naturalization application), with USCIS, based, inter alia, on having been a lawful permanent resident for at least five years. *Id.* at ¶ 41. In his naturalization application, in response to Question C in Part 1, Defendant left blank the question asking about other names used, and he represented a false date of birth. *Id.* at ¶¶ 44-45. In his naturalization application, Defendant answered "no" to a question asking, "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?" (emphasis in original); Defendant answered "no" to a question asking, "Have you EVER lied to any U.S. Government official to gain entry or admission into the United States?" (emphasis in original); Defendant answered "no" to a question asking, "Have you EVER been ordered to be removed, excluded, or deported from the United States?" (emphasis in original); and Defendant answered "no" to a question asking, "Have you EVER applied for any kind of relief from removal, exclusion, or deportation?" *Id.* at ¶¶ 48-51.

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[1] On March 1, 2003, the INS ceased to exist as an independent agency within the Department of Justice, and most of its functions were transferred to the newly formed Department of Homeland Security. *See* Homeland Security Act of 2002, Pub. L. No. 107-296, §§ 441, 451, 471, 116 Stat. 2135 (Nov. 25, 2002). The INS was divided into three separate agencies, Immigration and Customs Enforcement, Customs and Border Protection, and Citizenship and Immigration Services ("USCIS"). USCIS assumed the INS's authority to adjudicate visa petitions, adjustment and naturalization applications, and other requests for immigration benefits. *Id.* at § 451.

On February 24, 2005, a USCIS Immigration Services Officer ("ISO") placed Defendant under oath and orally interviewed Defendant regarding his naturalization application to determine his eligibility for naturalization. ECF No. 1 at ¶¶ 54-55. During the interview, Defendant testified to the contents of his Form N-400 and, consistent with his written answers, that his legal name was Gurdev Singh Sohal; that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal; that he had never lied to any U.S. government official to gain entry or admission into the United States; that he had never been ordered to be removed, excluded, or deported from the United States; and that he had never applied for any kind of relief from removal, exclusion, or deportation. *Id.* at ¶ 56.

II. STATUTORY BACKGROUND

The Parties acknowledge the relevant law set forth as follows. 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 . . . ." 8 U.S.C. § 1427(a)(3). The required statutory period for good moral character, prescribed in 8 U.S.C. § 1427(a)(3), begins five years before the date the applicant files the application for naturalization and continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1). Congress has mandated that an individual who fails to maintain good moral character during the statutory period is ineligible for naturalization under 8 U.S.C. §§ 1427(a)(1) and 1429. The Immigration and Nationality Act provides for the revocation of an individual's naturalized U.S. citizenship if the naturalization was illegally procured. 8 U.S.C. § 1451(a). Although "courts necessarily and properly exercise discretion in characterizing certain facts while determining whether an applicant for citizenship meets some of the requirements for naturalization ... that limited discretion does not include the authority to excuse illegal ... procurement of citizenship." *Fedorenko v. United States*, 449 U.S. 490, 517 (1981).

Procurement of citizenship while a person lacked good moral character constitutes illegal procurement. *United States v. Teng Jiao Zhou*, 815 F.3d 639, 643 (9th Cir. 2016).

III. ANALYSIS

Based on the agreed facts and law, Defendant admits that he illegally procured his naturalization and his citizenship because he lacked the requisite good moral character to naturalize due to his failure to reveal full and accurate information regarding his identity during the naturalization process, which constitutes unlawful acts that adversely reflected on his moral character during the statutory period, for which there are no extenuating circumstances that ameliorate his guilt, as alleged in Count II of the Complaint. ECF No. 1 ¶¶ 87-98. Specifically, during the statutory period during which he was required to maintain good moral character, Defendants failed to reveal that he had used a different identity to apply for an immigration benefit and that he been ordered excluded and deported under that identity. Accordingly, Defendant concedes that this Court must enter an order of denaturalization under 8 U.S.C. § 1451 based solely on his failure to maintain good moral character.

IV. CONCLUSION

In light of the facts and the law above, which Defendant admits are true and applicable, and having fully discussed the case with his counsel, Defendant agrees with the United States that denaturalization is proper and, to avoid delay, uncertainty, inconvenience, and the expense of further litigation, does not wish to contest denaturalization, including challenging jurisdiction, venue, or raising any other affirmative defense. Accordingly, the United States and Defendant jointly move this Court for an order providing the relief requested in the attached proposed Consent Judgment Revoking Naturalization. The parties also jointly request that the Court set a hearing for approximately 10 days from the effective date of the Judgment, at which Defendant must demonstrate that he has complied with the Judgment, unless the United States provides notice that

Date: April 13, 2026

Respectfully submitted,

GURDEV SINGH SOHAL
Defendant

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CERTIFICATE OF SERVICE

I, J. Max Weintraub, hereby certify that on this day I electronically filed the foregoing using the ECF system which will send notification to all counsel of record.

Dated: April 13, 2026

/s/ J. Max Weintraub
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