UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 1:26-cv-21744

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEC NASREDDINE KASSIR,
a/k/a Alec Kassir,
a/k/a Ali Nasreddine Kassir,

Defendant.
_____________________________________/

COMPLAINT TO REVOKE NATURALIZATION

PRELIMINARY STATEMENT OF THE CASE

The United States of America brings this civil action against Defendant Alec Nasreddine Kassir, a/k/a Alec Kassir, a/k/a Ali Nasreddine Kassir, to revoke his naturalization under 8 U.S.C. § 1451(a).

Defendant illegally procured his naturalization and procured his naturalization by willful misrepresentation and concealment of material facts. During the naturalization process, Defendant represented that he had been living in a marital union with his U.S. citizen spouse during the three years immediately preceding the filing of his Naturalization Application. This was not true. On November 14, 2018, Defendant pleaded guilty to Passport Fraud, in violation of 18 U.S.C. § 1542. In the factual proffer supporting the guilty plea, Defendant admitted that he obtained his U.S. passport through the fraudulent procurement of his U.S. citizenship by means of materially false statements in naturalization proceedings. Specifically, Defendant admitted that, despite his statements to the contrary in naturalization proceedings, he was not living in martial union with his U.S. citizen spouse—or even in the same state—when he applied for naturalization.

Had Defendant been truthful during his naturalization proceedings, U.S. Citizenship and Immigration Services ("USCIS") would have concluded that, as a matter of law, Defendant was ineligible to naturalize and would have denied his naturalization application. Under 8 U.S.C. § 1430, applicants such as Defendant, who are married to U.S. citizens and apply for citizenship three years after they become permanent residents must live in marital union with their U.S. citizen spouse for the three years before they apply.

Defendant therefore illegally procured his naturalization and, independently, procured his naturalization by willfully misrepresenting and concealing material facts during his naturalization proceedings. As a result, the Court must revoke the order admitting Defendant to U.S. citizenship and cancel his certificate of naturalization pursuant to 8 U.S.C. § 1451(a).

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff is the United States of America.

2. Defendant is a native of Lebanon and a naturalized U.S. citizen.

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

4. The court has subject-matter jurisdiction under 28 U.S.C. §§ 1331 and 1345 for a cause of action under 8 U.S.C. § 1451(a).

5. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant resides in Miami, Florida, which is within the jurisdiction and venue of this Court.

6. The affidavit of [redacted], Special Agent with the U.S. Homeland Security Investigations, a component of Immigration and Customs Enforcement, an agency with 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.

FACTUAL ALLEGATIONS

7. Defendant is a native of Lebanon.

8. Defendant was admitted to the United States on August 7, 2004, on an F-1 non-immigrant student visa.

9. On December 7, 2006, Defendant married U.S. citizen Alicia Jean Rattray.

10. On June 4, 2007, Defendant became a conditional permanent resident of the United States based on his marriage to Ms. Rattray.

11. On May 18, 2009, the conditions on Defendant's permanent resident status were removed, which resulted in him becoming a permanent resident as of June 4, 2007.

I. Defendant's Naturalization

12. On or about March 24, 2010, the Defendant filed a Form N-400, Application for Naturalization ("Naturalization Application"). Naturalization Application, attached as Ex. B.

13. Part 2 of the Naturalization Application asked the applicant to provide "Information About Your Eligibility" by checking a box next to one of four possible answers that were labeled A through D.

14. Defendant checked Box B to provide the following answer to Part 2 of his Naturalization Application about the basis of his eligibility to naturalize: "I have been a lawful permanent resident of the United States for at least three years, and I have been married to and living with the same U.S. citizen for the last three years, and my spouse has been a U.S. citizen for the last three years."

15. Part 4, Section A of the Naturalization Application asked the applicant to provide his home address.

16. In response to Part 4, Section A of his Naturalization Application, Defendant stated that he lived on [redacted] in Dearborn Heights, Wayne County, Michigan.

17. Part 6, Section A of the Naturalization Application asked the applicant "Where have you lived during the last five years?"

18. In response to Part 6, Section A of his Naturalization Application, Defendant stated that, from "10-20-08" (October 20, 2008) to present, he lived at the "Current Home Address," that he had listed in response to Part 4, Section A of his Naturalization Application.

19. Part 8, Section B, Questions 1 and 5 of the Naturalization Application asked Defendant to provide his spouse's full name and home address.

20. In response to Part 8, Section B, Questions 1 and 5 of his Naturalization Application, Defendant listed his spouse's full name as Alicia Jean Rattray and answered that his spouse lived on [redacted] in Dearborn Heights, Michigan.

21. Defendant was not living on [redacted] in Dearborn Heights, Michigan, when he completed his Naturalization Application.

22. Defendant was not living on [redacted] in Dearborn Heights, Michigan, when he filed his Naturalization Application.

23. Defendant was not living in Michigan when he completed his Naturalization Application.

24. Defendant was not living in Michigan when he filed his Naturalization Application.

25. Defendant was not living with his spouse, Ms. Rattray, when he completed his Naturalization Application.

26. Defendant was not living with his spouse, Ms. Rattray, when he filed his Naturalization Application.

27. Part 10, Section D, Question 23 of the Naturalization Application asked the applicant "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 the original).

28. Defendant checked the box "No" to answer Part 10, Section D, Question 23 of his Naturalization Application.

29. On or about March 18, 2009, Defendant signed his Naturalization Application under penalty of perjury, certifying that the application and evidence submitted with it were all true and correct.

30. On July 9, 2010, Defendant appeared for an interview regarding his eligibility for naturalization at the USCIS Detroit Field Office, where a USCIS officer interviewed Defendant about his eligibility for naturalization.

31. At the beginning of the interview, the USCIS officer placed Defendant under oath.

32. During the interview and review of the application, the USCIS officer asked Defendant about his eligibility for naturalization, and, confirming his answer to Part 2 of his Naturalization Application, Defendant orally answered under oath that he was a lawful permanent resident of the United States for at least three years before he applied and that for the last three years, he was married to and living with the same U.S. citizen spouse.

33. When the USCIS officer asked Defendant to confirm his home address, Defendant orally answered under oath that he lived on [redacted] Dearborn Heights, Michigan, thereby confirming his written answer to Part 4, Section A of his Naturalization Application.

34. The USCIS interviewing officer asked Defendant Part 10, Section A, Question 23, "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 the original).

35. Defendant answered "No" when asked by the USCIS interviewing officer if he had 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, thereby confirming his answer to Part 10, Section A, Question 23 of his Naturalization Application.

36. At the conclusion of the interview, Defendant signed the Naturalization Application, again attesting under penalty of perjury that the contents of the application, including the ten corrections made during the interview, were true and correct.

37. Defendant was no longer living in Michigan when a USCIS officer interviewed him about his Naturalization Application.

38. At no point during the naturalization process did Defendant disclose that he no longer lived on [redacted], Dearborn Heights, Michigan.

39. At no point during the naturalization process did Defendant disclose that he no longer lived in marital union with his U.S. citizen spouse, Ms. Rattray.

40. On July 9, 2010, based on his written application and the oral testimony that he provided at his naturalization interview, USCIS approved Defendant's Naturalization Application.

41. On July 15, 2010, Defendant appeared at the U.S. Federal Courthouse in Detroit, Michigan, for a naturalization oath ceremony.

42. On July 15, 2010, Defendant answered the questions on and signed a Form N-445, Notice of Naturalization Oath Ceremony ("Form N-445"). Form N-445, attached as Ex. C.

43. Question 1 on the Form N-445 asked the Defendant, "AFTER the date you were first interviewed on your Application for Naturalization, Form N-400: Have you married or been widowed, separated or divorced?

44. Defendant checked the box "No" to answer Question 1 on his Form N-445.

45. On July 15, 2010, Defendant took the Oath of Allegiance to the United States and was admitted as a U.S. citizen.

46. On July 15, 2010, USCIS issued Certificate of Naturalization No. [redacted] to Defendant in the name of Alec Nasreddine Kassir ("Certificate of Naturalization"). Certificate of Naturalization, attached as Ex. D.

II. <u>Defendant's Conviction of Passport Fraud</u>

47. On January 19, 2018, the United States filed a Criminal Complaint in the Southern District of Florida charging Defendant with unlawfully procuring naturalization, in violation of 18 U.S.C. § 1425(a), and trafficking in counterfeit goods, in violation of 18 U.S.C. § 2320. Criminal Complaint, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Jan. 19, 2018), ECF No. 3, attached as Ex. E.

48. On April 19, 2018, in a Superseding Indictment, a grand jury in the Southern District of Florida charged Defendant with unlawful procurement of naturalization, in violation of 18 U.S.C. § 1425(b); four counts of using and attempting to use a passport obtained by a false statement, in violation of 18 U.S.C. § 1542; conspiring to traffic in counterfeit goods, in violation of 18 U.S.C. § 2320; five counts of attempting to traffic in counterfeit goods, in violation of 18 U.S.C. § 2320(a)(1), and conspiring to commit money laundering, in violation of 18 U.S.C. § 1956(h). Superseding Indictment, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Apr. 19, 2018), ECF No. 31, attached as Ex. F.

49. The United States alleged in the Superseding Indictment that Defendant, on four separate occasions in 2016 and 2017, "did willfully and knowingly use and attempt to use a passport, the issue of which was secured by reason of a false statement, in that the defendant submitted as proof of his United States citizenship a Certificate of Naturalization, when in truth and in fact and as the defendant then and there well knew, the Certificate of Naturalization submitted as proof of United States citizenship was obtained by a false statement." *Id.* at 2.

50. On November 14, 2018, Defendant signed a Plea Agreement in which he agreed to plead guilty to one count of passport fraud and one count of conspiring to commit

money laundering. Plea Agreement, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Nov. 19, 2018), ECF No. 61, attached as Ex. G.

51. On November 14, 2018, Defendant signed a factual proffer in support of his guilty plea. Factual Proffer, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Nov. 16, 2018), ECF No. 62, attached as Ex. H.

52. In the factual proffer, Defendant admitted that, if the case had proceeded to trial, the government's evidence would have shown, beyond a reasonable doubt, that, among other things:

a. His Naturalization Application contained "several materially false statements." *Id.* at 1.

b. In Part 2 of his Naturalization Application, Defendant "falsely stated that, at the time of signature he had been 'a Lawful Permanent Resident of the United States for at least three years and he had been married to and *living with the same U.S. citizen for the last three years* and his spouse had been a U.S. citizen for the last three years.'" *Id.* at 1–2.

c. In Part 4 of his Naturalization Application, Defendant falsely stated that he lived in an apartment on [redacted] in Dearborn Heights, Michigan, "when in fact he was living in South Florida at the time." *Id.* at 2.

d. In Part 6 of his Naturalization Application, Defendant "falsely stated he had lived at the same Michigan apartment from October 20, 2008, to Present (Present defined as March 18, 2010)." *Id.* at 2.

e. In Part 8, Section B of his Naturalization Application, Defendant "falsely stated that his U.S. citizen spouse was presently living with [Defendant] at the Michigan apartment." *Id.*

f. "In fact, [Defendant] had separated from and had been living apart from his U.S. citizen spouse for almost a year prior to his initial naturalization application." *Id.*

g. Defendant's U.S. citizen former spouse "would testify that she and [Defendant] were no longer living together as of January or February 2009. Around that time, she found out that she was pregnant with another man's child." *Id.*

h. On October 5, 2009, Defendant's U.S. citizen former spouse gave birth to a child, and the child's birth certificate shows that the father was another man, not the Defendant. *Id.*

i. The Record of Divorce or Annulment for Defendant and his U.S. citizen former spouse, which was recorded in Michigan on June 7, 2011, required the couple to list the "Date Couple Last Resided in Same Household." Defendant and his former spouse answered "January 2010." *Id.*

j. Beacon Management – the company that managed the Michigan apartment that Defendant listed on his N-400 application – confirmed to law enforcement that Defendant's "Notice to Vacate" was dated December l, 2009, and his "Vacate Date" was January 31, 2010, which was three months before Defendant filed his N-400 on or about March 27, 2010. *Id.* at 2–3.

k. On or about December 18, 2009, Defendant registered a four-door BMW with License Plate [redacted] in Florida. On the car's registration and on Defendant's application for vehicle certificate of title, he listed his residence as being on [redacted]

[redacted] in Coral Springs, Florida. On or about April 26, 2010, Defendant renewed his registration on the same BMW utilizing the same Coral Springs, Florida address. *Id.* at 3.

l. On or about March 5, 2010, Defendant registered his business AN IMEX, INC and filed an Electronic Articles of Incorporation with the Florida Division of Corporations. On both the Registration and Articles of Incorporation, Defendant affirmed that his personal address as well as the principal place of business for AN IMEX, INC. was on [redacted] in Coral Springs, Florida, as of March 5, 2010. *Id.*

m. During an interview with U.S. Customs and Border Protection at Miami International Airport on or about July 23, 2017, Defendant stated he was employed at a business in Doral, Florida from approximately 2009 to 2011. *Id.*

53. On March 29, 2019, the United States District Court, being satisfied there was a factual basis for the plea, accepted Defendant's plea of guilty and found Defendant guilty of using and attempting to use a passport obtained by a false statement, in violation of 18 U.S.C. § 1542, and conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h).

54. The United States District Court sentenced Defendant to probation for three years. Amended Judgment, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Feb. 24, 2020), ECF No. 100, attached as Ex. I.

GOVERNING LAW

I. Statutory Prerequisites to the Acquisition of Citizenship through Naturalization

55. No alien has a right to naturalization "unless all statutory requirements are complied with." *United States v. Ginsberg*, 243 U.S. 472, 474–75 (1917).

56. 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) ("An alien who seeks political rights as a member of this Nation can rightfully obtain them only upon the terms and conditions specified by Congress." (quoting *Ginsberg*, 243 U.S. at 474)).

57. Congress has mandated that an individual may not naturalize unless that person "during all periods referred to in [8 U.S.C. § 1427(a)] has been and still is a person of good moral character." 8 U.S.C. § 1427(a).

58. The required statutory period for good moral character for a spouse of a U.S. citizen begins three 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); 8 U.S.C. § 1430; 8 C.F.R. § 316.10(a)(1); 8 C.F.R. § 319.1.

59. Congress has explicitly precluded individuals who give false testimony during the statutory period 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).

II. <u>The Denaturalization Statute</u>

60. 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.

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

a. illegally procured, *or*

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

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

63. 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. *Kungys v. United States*, 485 U.S. 759, 767 (1988).

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

CAUSES OF ACTION

COUNT I
ILLEGAL PROCUREMENT OF NATURALIZATION
(Failure to Reside in Marital Union with U.S. Citizen Spouse)

65. Defendant was not qualified for naturalization because he did not live in a marital union with his U.S. citizen spouse for the three years before he applied for naturalization.

66. An applicant who is married to a U.S. citizen or obtained status as lawful permanent resident by reason if his or her status as a spouse or child of a U.S. citizen, may naturalize if, *inter alia*, "if such person immediately preceding the date of filing his application for naturalization has resided continuously, after being lawfully admitted for permanent residence, within the United States for at least three years, and during the three years immediately preceding the date of filing his application has been living in marital union with the citizen spouse." 8 U.S.C. § 1430; 8 C.F.R. § 319.1.

67. As alleged in Paragraph 52, Defendant admitted in the factual proffer that he submitted with his plea agreement in his criminal proceedings that he was separated and living apart from his U.S. citizen spouse before he filed for naturalization.

68. Defendant is collaterally estopped from denying the facts that he was not living with his U.S. citizen wife as required by 8 U.S.C. § 1430(a) and 8 C.F.R. § 319.1 because his false statements in his naturalization proceedings that he was living with his spouse in marital union before he applied for naturalization were critical and necessary facts to prove the elements of his passport fraud conviction . *See United States v. Munoz*, 112 F.4th 923, 933 (11th Cir. 2024) (explaining that a denaturalization defendant is collaterally estopped from denying facts admitted in a factual proffer submitted with a plea agreement

when the facts were necessary to the conviction, which is satisfied "when the final outcome hinges on" the facts).

69. Defendant's separation from his spouse, Ms. Rattray, before he applied for naturalization, was not informal or involuntary as defined under 8 C.F.R. § 319.1(b)(2)(ii).

70. Defendant's separation from his U.S. citizen spouse was not informal as evidenced by the fact that they divorced on July 7, 2011.

71. Defendant therefore did not meet the requirements for naturalization under 8 U.S.C. § 1430(a).

72. Because Defendant was ineligible to naturalize, he illegally procured his naturalization, and this Court must revoke his naturalization under 8 U.S.C. § 1451(a).

COUNT II
ILLEGAL PROCUREMENT OF NATURALIZATION
(Lack of Good Moral Character – False Testimony)

73. Defendant was required for lawful naturalization to establish that he was a person of good moral character from March 24, 2007, three years before he filed his Naturalization Application, until the date he became a U.S. citizen on July 15, 2010 (the "statutory period"). 8 U.S.C. § 1427(a); 8 U.S.C. §1430(a); 8 C.F.R. § 316.10(a)(1); 8 C.F.R. 319.1(a).

74. Defendant was statutorily barred from showing that he was a person of good moral character during the statutory period because he gave false testimony, under oath, on two different occasions for the purpose of obtaining immigration benefits. 8 U.S.C. § 1101(f)(6).

75. As alleged in Paragraph 32, on July 9, 2010, Defendant testified falsely for the purpose of obtaining an immigration benefit when he orally testified under oath that he

was eligible for naturalization because he was a lawful permanent resident of the United States who was living in marital union with his U.S. citizen spouse for the three years before he applied for naturalization.

76. Defendant's testimony was false because, as described in Paragraph 52 and as he admitted in the factual proffer from his passport fraud conviction, he was not living in marital union with his U.S. citizen spouse for the three years before he applied for naturalization.

77. As alleged in Paragraph 33, on July 9, 2010, Defendant testified falsely for the purpose of obtaining an immigration benefit when he orally testified under oath that he resided on [redacted] in Dearborn Heights, Michigan.

78. Defendant's testimony was false because, as described in Paragraph 52 and as he admitted in the factual proffer from his passport fraud conviction, he was not living on [redacted] in Dearborn Heights, Michigan, for the three years before he applied for naturalization.

79. As alleged in Paragraph 34, on July 9, 2010, Defendant testified falsely for the purpose of obtaining an immigration benefit when he orally testified under oath that he had never given false or misleading information to any U.S. government official while applying for any immigration benefit.

80. Defendant's testimony was false because, as described in Paragraphs 13 to 20, and as he admitted in the factual proffer from his passport fraud conviction, he provided false information about living in marital union with his U.S. citizen spouse for the three years before he applied for naturalization

81. Because Defendant provided false, oral testimony under oath for the purpose of obtaining naturalization, during the statutory period when he was required to show good moral character, he was barred under 8 U.S.C. § 1101(f)(6) from establishing that he had the good moral character necessary to become a naturalized U.S. citizen.

82. Because Defendant could not establish the requisite good moral character under 8 U.S.C. § 1427(a)(3), he was ineligible for naturalization.

83. Because Defendant was ineligible to naturalize, he illegally procured his naturalization, and this Court must revoke his naturalization under 8 U.S.C. § 1451(a).

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

84. Under 8 U.S.C. § 1451(a), this Court must revoke and set aside the order admitting Defendant to citizenship and cancel his Certificate of Naturalization because he procured his naturalization by concealment of material facts or by willful misrepresentations.

85. As alleged in Paragraphs 14 through 20 and Paragraphs 32 to 33, during the naturalization process Defendant willfully misrepresented and concealed the fact that he was not living in marital union with his U.S. citizen spouse for the three years before he applied for naturalization on March 24, 2010.

86. As alleged in Paragraphs 15, 16, 17, 18, and 33, during the naturalization process Defendant willfully misrepresented and concealed that fact that he was not living on [redacted] in Dearborn Heights, Michigan.

87. As alleged in Paragraphs 42 to 44, during the naturalization process Defendant willfully misrepresented and concealed the fact that he was separated from his

U.S. citizen spouse when he answered Question 1 on the Form N-455 stating that he was not separated from his U.S. citizen spouse since he was first interviewed on his Naturalization Application.

88. As alleged in Paragraph 34 and 35, during the naturalization process Defendant willfully misrepresented and concealed the fact that he gave false and misleading information when he made false statements on his Naturalization Application.

89. Defendant made the concealments and misrepresentations voluntarily and despite knowing that such representations were false and misleading. Accordingly, Defendant made these representations willfully.

90. At no point during the naturalization process did Defendant disclose that he was not living in marital union with his U.S. citizen spouse before he applied for naturalization or that he did not live on [redacted] in Dearborn Heights, Michigan, during his naturalization proceedings.

91. Defendant's misrepresentations and concealments were material to his Naturalization Application, because each would have had a natural tendency to influence USCIS's decision whether to approve his Naturalization Application. Indeed, if USCIS had known that Defendant was not living in marital union with his U.S. citizen spouse on [redacted] in Dearborn Heights, Michigan, when he applied for naturalization, USCIS would have denied his Naturalization Application because he was not qualified to naturalize under 8 U.S.C. § 1430(a).

92. Defendant therefore procured his naturalization by concealment of material facts and willful misrepresentations, and this Court must revoke his naturalization as a U.S. citizen under 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

WHEREFORE, the United States of America respectfully requests:

(1) A declaration that Defendant illegally procured his U.S. citizenship;

(2) A declaration that Defendant procured his U.S. citizenship by concealment of material facts and by willful misrepresentation;

(3) Judgment revoking and setting aside the order admitting Defendant to citizenship and canceling Certificate of Naturalization No. [redacted], effective as of the original date of the order and certificate, July 15, 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 his July 15, 2010 naturalization;

(5) Judgment requiring the Defendant to surrender and deliver, within ten days of entry of Judgment, his Certificate of Naturalization, as well as any copies thereof in his possession or control—and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others—to the Attorney General, through her undersigned representative;

(6) Judgment requiring the Defendant to immediately surrender and deliver, within ten days of entry of Judgment, any other indicia of U.S. citizenship, including, but not limited to, U.S. passports (whether valid or expired), U.S. passport cards (whether valid or expired), and Enhanced Driver's Licenses (whether valid or expired), as well as any copies thereof in his possession or control—and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others—to the Attorney General through her undersigned representative; and

(7) Judgment granting the United States any other relief that may be lawful and proper in this case.

Dated: March 17, 2026

Respectfully submitted,

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEC NASREDDINE KASSIR,
a/k/a Alec Kassir,
a/k/a Ali Nasreddine Kassir,

Defendant.
_______________________________________/

EXHIBITS IN SUPPORT OF
COMPLAINT TO REVOKE NATURALIZATION

A. Affidavit of Good Cause of [redacted] Special Agent, U.S. Homeland Security Investigations, U.S. Immigration and Customs Enforcement, U.S. Department of Homeland Security (Sept. 1, 2020)

B. Form N-400, Application for Naturalization (Mar. 24, 2010)

C. Form N-445, Notice of Oath Ceremony (July 15, 2010)

D. Certificate of Naturalization No. [redacted] (July 15, 2010)

E. Criminal Complaint, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Jan. 19, 2018), ECF No. 3

F. Superseding Indictment, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Apr. 19, 2018), ECF No. 31

G. Plea Agreement, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Nov. 19, 2018), ECF No. 61

H. Factual Proffer, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Nov. 19, 2018), ECF No. 62

I. Amended Judgment, *United States v. Kassir*, No. 18-cr-20104-Cooke (S.D. Fla. Feb. 24, 2020), ECF No. 100