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

CASE NO. 1:26-cv-24273

UNITED STATES OF AMERICA, Plaintiff, vs. YOSMAIKEL RODRIGUEZ PEREZ, Defendant.	**COMPLAINT TO REVOKE NATURALIZATION**

I. PRELIMINARY STATEMENT

The United States of America brings this civil action against Defendant Yoskmaikel Rodriguez Perez ("Defendant"), to revoke his 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 he was charged and convicted after naturalizing. Three years before he filed his application for naturalization and became a citizen of the United States, Defendant engaged in criminal activity that he concealed throughout the naturalization process and that disqualified him from U.S. citizenship

Although Defendant was required to establish good moral character in the statutory period between 2013 and 2018, beginning in approximately March 2015, Defendant conspired to fraudulently bill Medicare for more than $800,000 in false medical claims. When Defendant filed his naturalization application in July 2018 and was interviewed in December 2018, he stated that he had never committed a crime for which he had not been arrested. Less than a year later, on November 8, 2019, he pleaded guilty to—and was ultimately convicted of—engaging in a conspiracy to commit health care fraud and wire fraud in violation of 18 U.S.C. § 1349. Because of Defendant's fraudulent conspiracy, which he misrepresented and concealed throughout his naturalization proceedings, he was ineligible for naturalization and thus procured his citizenship unlawfully. Additionally, because Defendant withheld his prior crime from the government throughout his naturalization proceedings, he also procured his citizenship by concealment of a material fact or by willful misrepresentation. Accordingly, 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], issued on December 21, 2018.

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 Cuba and obtained his 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 Eduardo Capo, 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 Entered the United States in 2004 And Became a Lawful Permanent Resident

8. Defendant was born in 1984, in Cuba.

9. On November 12, 2004, Defendant applied for admission to the United States at a port of entry.

10. Defendant was paroled into the United States.

11. The Department of Homeland Security commenced removal proceedings against the Defendant.

12. On January 3, 2006, Defendant filed a Form I-485 Application to Register Permanent Residence or Adjust Status ("Adjustment Application").

13. A true and complete copy of Defendant's Form I-485 Application to Register Permanent Residence or Adjust Status, except for redactions of personally identifying information immaterial to this action, is attached hereto as Exhibit B.

14. On December 27, 2005, Defendant signed the Adjustment Application under penalty of perjury, thereby certifying that his answers to the questions therein were true and correct.

15. On July 6, 2006, an Immigration Judge approved Defendant's Application for Adjustment of Status.

16. A true and complete copy of the Immigration Judge's Order isattached hereto as Exhibit C.

B. Defendant Applied For Naturalization And Became a Naturalized Citizen in 2018

17. On or about July 24, 2018, 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").

18. A true and complete copy of Defendant's Form N-400, except for redactions of personally identifying information immaterial to this action, is attached hereto as Exhibit D.

19. On his Naturalization Application, in response to Part 8, which asked, "[l]ist where you have worked or attended school full time or part time during the last five years," Defendant listed only "Pharmacology Research, LLC," "Pharmacology International Research, LLC.," and "Cookies and Cakes, LLC."

20. On his Naturalization Application, Defendant checked "No" in response to Part 12, Question 22, which asked: "Have you **EVER** committed a crime or offense for which you were **NOT** arrested?"

21. On his Naturalization Application, Defendant checked "No" in response to Part 12, Question 32, 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?"

22. On or about July 24, 2018, Defendant signed the Naturalization Application under penalty of perjury, thereby certifying that his answers to the questions therein were true and correct.

23. On December 13, 2018, Evelyn Galagarza Negron, an Immigration Services Officer ("ISO") with USCIS, orally interviewed Defendant regarding his Naturalization Application to determine his eligibility for naturalization. *See* Exhibit D – Certified Form N-400 at 4-47; Declaration of Raquel Smith, (attached hereto as Exhibit E).

24. At the beginning of the interview, the ISO placed Defendant under oath.

25. During the interview, the ISO asked Defendant, consistent with Part 12, Question 22 of Defendant's Naturalization Application, whether he had ever committed a crime or offense for which he was not arrested.

26. Defendant verbally confirmed his written response to Part 12, Question 22 of his Naturalization Application, testifying under oath that he had never committed a crime or offense for which he was not arrested.

27. During the interview, the ISO asked Defendant, consistent with Part 12, Question 32 of Defendant's Naturalization Application, whether he had ever given false or misleading information to any U.S. Government official while applying for any immigration benefit.

28. Defendant verbally confirmed his written response to Part 12, Question 32 of his Naturalization Application, testifying under oath that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit.

29. At no point during the naturalization process did Defendant disclose to USCIS that he had engaged in a conspiracy to commit health care and wire fraud.

30. At the end of the interview, Defendant certified under penalty of perjury that his Naturalization Application, including the testimony he provided at the interview, was complete, true, and correct.

31. On December 21, 2018, Defendant took the Oath of Allegiance to become a U.S. citizen. He was issued Certificate of Naturalization No. [redacted]

32. A true and complete copy of Defendant's Certificate of Naturalization, except for redactions of personally identifying information immaterial to this action, is attached hereto as Exhibit F.

C. Defendant Was Convicted in 2019 For His Participation in a Fraud Scheme That Took Place Between 2015 And 2016

33. On June 27, 2019, Defendant was charged in an Indictment with, among other charges, Conspiracy to Commit Health Care Fraud and Wire Fraud, in violation of 18 U.S.C. §§ 1343, 1347, 1349. *See* Indictment, *United States v. Alonso Martinez, et al.*, No. 1:19-cr-20389 (S.D. Fla. June 27, 2019), ECF No. 3, is attached hereto as Exhibit G.

34. The conduct charged in the Indictment as Conspiracy to Commit Health Care Fraud and Wire Fraud all occurred between April 2014 and August 2016.

35. Stated otherwise, all of the conduct charged in the Indictment as Conspiracy to Commit Health Care Fraud and Wire Fraud occurred before Defendant naturalized.

36. On August 27, 2019, Defendant and his attorney appeared in district court for a proceeding in the criminal action against him. *See* Calendar Call Proceedings Before the Honorable Federico A. Moreno, *United States v. Alonso Martinez, et al.*, No. 1:19-cr-20389 (S.D. Fla. Nov. 8, 2019), ECF No. 43 ("Hearing Transcript") (attached hereto as Exhibit H).

37. During the hearing, Defendant's attorney confirmed that Defendant is a naturalized citizen. Exhibit H – Hearing Transcript at 24:5-16.

38. The Court confirmed on the record that Defendant that "could lose his citizenship" as a result of the criminal charges. Exhibit H – Hearing Transcript at 24:17.

39. Defendant's attorney replied, "[a]bsolutely your honor." Exhibit H – Hearing Transcript at 24:18.

40. On November 8, 2019, Defendant and his attorney signed a Plea Agreement that was filed in his criminal case. *See* Plea Agreement, *United States v. Rodriguez Perez*, No. 1:19-cr-20389 (S.D. Fla. Nov. 12, 2019), ECF No. 53 ("Plea Agreement") (attached hereto as Exhibit I).

41. Defendant pleaded guilty to Conspiracy to Commit Health Care Fraud and Wire Fraud, in violation of 18 U.S.C. § 1349. *See* Exhibit I – Plea Agreement.

42. On November 8, 2019, Defendant also signed a Factual Basis in Support of Plea that was filed in his criminal case. *See* Factual Basis In Support of Plea, *United States v. Rodriguez Perez*, No. 1:19-cr-20389 (S.D. Fla. Nov. 12, 2019), ECF No. 54 ("Factual Basis") (attached hereto as Exhibit J).

43. The Factual Basis that Defendant signed is "a summary of the testimony were this case to proceed to trial," *see* Exhibit J – Factual Basis at 4, and it states the following:

a. Defendant and other individuals operated Mediglez Wellness Center, a Florida corporation that did business in Miami-Dade County as a medical clinic that purported to provide medical treatment to Medicare beneficiaries.

b. Between March 2015 through August 2016, Defendant and his co-conspirators submitted and caused Home Health Agencies ("HHA") and pharmacies to submit false and fraudulent claims to Medicare, using interstate wire communications, seeking payment for home health services and prescription drugs that were not medically necessary and not provided as claimed.

c. Using interstate wire communications, Defendant and his co-conspirators submitted false and fraudulent claims to Medicare seeking reimbursement for medical services that were not medically necessary and not provided as claimed.

d. Defendant and his co-conspirators solicited and received kickbacks and bribes from HHAs and pharmacies in return for referring Medicare beneficiaries so that the HHAs and pharmacies could submit fraudulent claims to Medicare in the names of the referred beneficiaries.

e. Defendant and his co-conspirators sold medically unnecessary prescriptions to HHAs, pharmacies, and patient recruiters to be used in the fraudulent billing of Medicare for services that the beneficiaries did not need or receive.

f. As a result of false and fraudulent claims between March 2015 through August 2016, Medicare made payments to Medigelz Wellness Center, and other HHAs and pharmacies in excess of $886,694.

44. On January 17, 2020, the District Court for the Southern District of Florida convicted Defendant of one count of Conspiracy to Commit Health Care Fraud and Wire Fraud, in violation of 18 U.S.C. § 1349. *See* Judgment in a Criminal Case, *United States v. Rodriguez Perez*, No. 1:19-cr-20389 (S.D. Fla. Jan. 22, 2020), ECF No. 87 ("Judgment") (attached hereto as Exhibit K).

45. Defendant was sentenced to a prison term of nineteen months as well as three years of supervised release following his imprisonment.

46. Defendant was also sentenced to pay criminal monetary penalties totaling $886,649 in restitution.

IV. GOVERNING LAW

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

47. 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).

48. Among other requirements, Congress has mandated that an individual may not naturalize unless that person "during all the 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).

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

50. 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).

51. 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).

52. 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).

53. 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).

54. 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

55. 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.

56. 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*:

a. illegally procured, *or*

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

57. 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.

58. 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).

59. Where the government establishes that a 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)

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

61. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from July 24, 2013—five years prior to the date on which he filed his naturalization application—until the date he became a U.S. citizen, December 21, 2018.

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

63. As set forth above at paragraph 43, between March 2015 and August 2016, Defendant conspired with others to operate a medical clinic to generate false and fraudulent

medical claims seeking payment for medical services including home health services and prescription drugs that were not medically necessary and not provided as claimed.

64. Based on these false and fraudulent claims, Medicare paid $886,649.

65. On November 8, 2019, Defendant pleaded guilty to the crime of Conspiracy to Commit Health Care Fraud and Wire Fraud, in violation of 18 U.S.C. § 1349.

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

67. Defendant's conviction under 18 U.S.C. § 1349 is for a fraud-related offense and constitutes a CIMT. *See Jordan v. De George*, 341 U.S. 223, 229 (1951) ("[F]raud has consistently been regarded as such a contaminating component in any crime that American courts have, without exception, included such 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); *see also Chiao Fang Ku v. Att'y Gen. United States of Am.*, 912 F.3d 133, 143 (3d Cir. 2019) (finding "no need to revisit the long-held tenet that fraud crimes—including wire fraud—are crimes involving moral turpitude under the INA"); *Arias v. Lynch*, 834 F.3d 823, 827 (7th Cir. 2016) (noting "there is a consensus that fraud is close to the core of moral turpitude"); *Barragan-Lopez v. Mukasey*, 508 F.3d 899, 903 (9th Cir. 2007) (finding that a conspiracy conviction is a CIMT if the underlying crime is a CIMT).

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

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

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

COUNT II

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

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

72. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from July 24, 2013—five years prior to the date on which he filed his naturalization application—until the date he became a U.S. citizen, December 21, 2018.

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

74. Specifically, as set forth above at paragraph 43, between March 2015 and August 2016, Defendant conspired with others to operate a medical clinic to generate false and fraudulent medical claims seeking payment for medical services including home health services and prescription drugs that were not medically necessary and not provided as claimed.

75. Based on these false and fraudulent claims, Medicare paid $886,649.

76. On November 8, 2019, Defendant pleaded guilty to the crime of Conspiracy to Commit Health Care Fraud and Wire Fraud, in violation of 18 U.S.C. § 1349.

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

78. The crime of Conspiracy to Commit Health Care Fraud and Wire Fraud is a crime that adversely reflected upon Defendant's moral character.

79. Defendant cannot establish extenuating circumstances regarding the conspiratorial conduct and fraudulent acts underlying his guilty plea pursuant to 18 U.S.C. § 1349 that would render his conduct less reprehensible than it otherwise would be or that tend to palliate or mitigate his guilt. He 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 him under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) from showing that he had the good moral character necessary to become a naturalized U.S. citizen.

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

83. Because Defendant was ineligible to naturalize, he illegally procured his naturalization, and this Court must revoke his 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 he was a person of good moral character from July 24, 2013—five years prior to the date on which he filed his naturalization application—until the date he became a U.S. citizen, December 21, 2018.

86. Defendant was statutorily precluded from showing that he was a person of good moral character because he 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 he swore, under oath, during his December 13, 2018 naturalization interview, that he had never committed a crime or offense for which he had not been arrested.

88. During the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when he swore, under oath, during his December 13, 2018 naturalization interview, that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit.

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

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

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

92. Because he was ineligible to naturalize, Defendant illegally procured his citizenship, and this Court must revoke his 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

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

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

95. As set forth above, throughout the naturalization process, Defendant willfully misrepresented and concealed his involvement in a criminal conspiracy to commit health care fraud between approximately April 2015 to August 2016, for which he later pleaded guilty in the U.S. District Court for the Southern District of Florida to one count of Conspiracy to Commit Health Care Fraud and Wire Fraud.

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

97. Defendant also represented on his Naturalization Application and during his naturalization interview that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit, despite knowing that his representation was false and misleading.

98. Defendant additionally represented on his Naturalization Application and during his naturalization interview that between July 24, 2013 and July 24, 2018, his only places of employment were "Pharmacology Research, LLC," "Pharmacology International Research, LLC.," and "Cookies and Cakes, LLC."

99. Defendant knew the representations that he had never knowingly committed any crime or offense for which he had not been arrested were false because starting in approximately April 2015, he had been member of a conspiracy to commit health care fraud that he had joined with knowledge of its unlawful purpose, as he later admitted to in his Factual Basis In Support of his Plea Agreement and for which he was later convicted.

100. Defendant knew the representations that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit were false because he had signed his Naturalization Application and submitted it to USCIS on July 24, 2018, even though starting in approximately March 2015, he had been member of a conspiracy to commit health care fraud that he had joined with knowledge of its unlawful purpose, as he later admitted to in his Factual Basis In Support of his Plea Agreement and for which he was later convicted.

101. Defendant knew the representations that his only places of employment between July 24, 2013 and July 24, 2018 were "Pharmacology Research, LLC," "Pharmacology International Research, LLC.," and "Cookies and Cakes, LLC" were false because between approximately April 2015 and August 2016, he was an operator of Mediglez Wellness Center, the business through which he conducted his Conspiracy to commit Healthcare and Wire Fraud, as he later admitted to in the Factual Basis In Support of his Plea Agreement.

102. Defendant's misrepresentations were material to his naturalization because the disclosure of his fraudulent scheme would have had a natural tendency to influence USCIS's decision whether to approve his Naturalization Application.

103. Had Defendant disclosed the truth about his criminal conduct, USCIS would have discovered his statutory ineligibility for naturalization and could not have approved his Naturalization Application or administered the oath of allegiance.

104. Defendant thus procured his naturalization by willful misrepresentation and concealment of material facts, and this Court must revoke his 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 his citizenship;

2. A declaration that Defendant procured his 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, December 21, 2018;

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 December 21, 2018, naturalization;

5. Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against him, his Certificate of Naturalization and any copies thereof in his possession—and to make good faith efforts to recover and immediately surrender any copies

thereof that he 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 him, 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 his possession—and to make good faith efforts to recover and then surrender any copies thereof that he 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: June 18, 2026

Respectfully submitted,

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