UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)Civil Case No. 3:26-CV-02784
	)
v.	)
	)
GURCHAIN SINGH, also known as GURCHETAN SINGH SANDHU,	)
	)
Defendant.	)
	)
	)

COMPLAINT TO REVOKE NATURALIZATION

The United States of America ("Plaintiff") brings this civil action against Defendant Gurchain Singh, also known as Gurchetan Singh Sandhu ("Defendant" or "Singh") to revoke his naturalized United States citizenship under 8 U.S.C. § 1451(a). Plaintiff alleges that Defendant illegally procured his naturalization and that he willfully misrepresented and concealed material facts in applying to naturalize.

PRELIMINARY STATEMENT OF THE CASE

Before becoming a naturalized United States citizen in July 2005 under the name Gurchain Singh, Defendant applied in April 1996 for an immigration benefit with the legacy former Immigration and Naturalization Service ("INS") using the

alternative name "Gurchetan Singh Sandhu." In June 1997, the INS referred his case to the immigration court and issued him a Notice to Appear charging him as removal pursuant to section 212(a)(6)(A)(i) of the Immigration and Nationality Act ("INA") for being an alien present in the United States without being admitted or paroled, or who had arrived in the United States at any time or place other than designated by the Attorney General. When Defendant failed to appear for his hearing, the immigration judge ordered him, under the same Gurchetan Singh Sandhu identity, removed *in abstentia* to India.

But Defendant failed to deport. Instead, Defendant pursued a separate application for an immigration benefit filed under the alternative identity of Gurchain Singh. In 2005, Defendant naturalized as a United States citizen using that same identity. Throughout his naturalization proceedings, however, Defendant failed to disclose his prior immigration history or his use of an alternative identity. Through these actions and conduct, Defendant procured his naturalization by concealment and willful misrepresentation, which made him statutorily ineligible for United States citizenship.

With the attached affidavit showing good cause, therefore, the United States of America brings this civil action on the grounds that Defendant illegally procured his naturalization and willfully misrepresented and concealed material facts during

the naturalization process. Under 8 U.S.C. § 1451(a), the United States requests that the Court revoke and set aside the order admitting Defendant to citizenship and cancel his certificate of naturalization.

JURISDICTION AND VENUE

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

2. The 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) because Defendant resides here. *See* Exhibit 4.

PARTIES

4. Plaintiff is the United States of America.

5. Defendant Gurchain Singh, a/k/a Gurchetan Singh Sandhu, was purportedly born in India and is a naturalized United States citizen, whose last known address is in Lebanon, Pennsylvania.

6. Gurchain Singh and Gurchetan Singh Sandhu are one and the same person.

FACTUAL ALLEGATIONS

7. The affidavit of Lauren Sitzer, an Immigration Services Officer with U.S. Citizenship and Immigration Services ("USCIS"), an agency with the U.S. Department of Homeland Security ("DHS"), showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached hereto.

I. Defendant's Immigration History Using the Gurchetan Singh Sandhu Identity

8. On April 29, 1996, Defendant, using the name Gurchetan Singh Sandhu, filed an application for immigration benefit with INS and was assigned alien registration number [redacted].

9. On September 18, 1996, INS mailed a notice scheduling an interview to take place on October 9, 1996, at the INS Office in San Francisco. The interview notice was mailed to his attorney.

10. On September 26, 1996, Defendant's attorney wrote to the INS and requested the interview be rescheduled due to a scheduling conflict.

11. On October 10, 1996, INS mailed a notice rescheduling the interview for October 30, 1996. The interview notice was mailed to Defendant's attorney.

12. On October 30, 1996, Defendant and his attorney failed to appear for interview at the INS Office in San Francisco.

13. On June 4, 1997, INS referred his case to the immigration court and issued to him a Form I-862, Notice to Appear ("NTA"), placing him in deportation proceedings. The NTA charged him as deportable pursuant to INA Section 212(a)(6)(A)(i), for being an alien present in the United States at any time or place other than designated by the Attorney General. The NTA ordered Defendant to appear before an immigration judge at 550 Kearny Street, Suite #800, San Francisco, California 94108, on September 24, 1997, at 1:00 PM. The NTA was mailed to Defendant, at his address of record, via certified mail with return receipt requested. On June 6, 1997, the NTA was returned to the INS as undeliverable with a "Returned to Sender – Attempted not Known" stamp.

14. On September 24, 1997, Defendant failed to appear at his immigration hearing and the judge ordered him deported from the United States to India *in absentia*. The order bears a certificate of service indicating that it was mailed to Defendant.

15. On October 27, 1997, the INS issued Defendant a Form I-166, Notice to Removable Alien to Surrender, to his last known address of record. The Notice was sent via certified mail, return receipt requested, and it indicated that travel arrangements had been made for his departure to India. Specifically, the Notice

ordered Defendant to report to 630 Sansome Street, San Francisco, California 94111 at 9:00 AM on December 9, 1997.

16. INS received a return receipt indicating that the Form I-166 was delivered on October 31, 1997.

17. There is no record that Defendant departed the United States pursuant to the order of deportation.

II. Defendant's Immigration History Using the Gurchain Singh Identity

18. On October 30, 1996, the same individual in question, now using the name Gurchain Singh, married U.S. citizen Corinna Alban in New York, New York.

19. On December 26, 1996, Corinna Alban-Singh filed a Form I-130, Petition for Alien Relative, on Singh's behalf. On the Form I-130, she represented that his name was Gurchain Singh, he was born in 1968, in India, and that he last entered the United States without inspection on March 15, 1995. She further represented that he had never used other names. In addition, she listed "none" in the section for names of his prior husbands or wives.

20. Concurrently, Singh filed a Form I-485, Application to Register Permanent Residence or Adjust Status, with the INS. On Form I-485, signed under penalty of perjury on December 24, 1996, he represented that his name was Gurchain

Singh, he was born in 1968, in India, and that he last entered the United States without inspection on March 15, 1995. He also represented the following:

a. He listed "none" in the section for A-number;

b. His mother was Chint and his father was Bal;

c. His wife was Corinna Alban-Singh;

d. He had no children;

e. He had never, in or outside the U.S., been arrested, cited, charged, indicted, fined, or imprisoned for breaking or violating any law or ordinance, excluding traffic violations;

f. He had never been deported from the U.S., removed from the U.S. at government expense, excluded within the past year; and he was not currently in exclusion or deportation proceedings; and

g. He had never, by fraud or willful misrepresentation of a material fact, sought to procure, or procured, a visa, other documentation, and entry into the U.S. or any other immigration benefit.

21. Defendant submitted Supplement A to his Form I-485 to apply for adjustment of status under INA § 245(i). On Supplement A, which Defendant signed under penalty of perjury on December 24, 1996, he represented that his name was Gurchain Singh, that he was born in 1968 in India, and that he last entered the United

States without inspection. In addition, in the section for A-number, Defendant listed "none."

22. In support of Form I-485, he submitted a Form G-325A, Biographic Information. On the G-325A, which he signed on December 24, 1996 under severe penalties for knowingly and willfully falsifying or concealing a material fact, he represented that his name was Gurchain Singh, and that he was born in 1968, in India. He also represented the following:

a. He listed "none" in the section for A-number;

b. He listed "none" in the section for all other names used;

c. He married Corinna Alban, born in Queens, New York, on October 30, 1996, in Queens, New York, U.S.; and

d. He listed "none" in the section for former husbands or wives.

23. The INS assigned to him A-number [redacted].

24. On July 30, 1997, Defendant appeared for an interview before Officer Dennis L. Graham at the INS office in New York, New York.

25. During the July 30, 1997 interview, he updated his address, occupation, phone number and confirmed that he had no children. In addition:

a. He affirmed his "no" response to the question asking whether he had ever, in or outside the U.S., been arrested, cited, charged, indicted,

fined, or imprisoned for breaking or violating any law or ordinance, excluding traffic violations;

b. He affirmed his "no" response to the question asking whether he had ever been deported from the U.S., removed from the U.S. at government expense, excluded within the past year; or was then in exclusion or deportation proceedings; and,

c. He affirmed his "no" response to the question asking whether he had ever, by fraud or willful misrepresentation of a material fact, sought to procure, or procured, a visa, other documentation, and entry into the U.S. or any other immigration benefit.

26. On February 13, 1998, the INS approved Form I-130 and Form I-485, adjusting Defendant's status to that of a legal permanent resident in immigrant classification code of CR6, spouse of a US citizen, in conditional status.

27. On July 12, 2000, Defendant and his spouse jointly filed a Form I-751, Petition to Remove the Conditions on Residence. On the Form I-751, which he signed under penalty of perjury on January 24, 2000, Defendant represented that his name was Gurchain Singh, he was born in 1968, in India, and that he was not in deportation or exclusion proceedings.

28. On January 16, 2001, the INS approved Form I-751 without an interview, removing conditions on his permanent resident status.

29. On July 12, 2004, Singh filed a Form N-400, Application for Naturalization, with USCIS based on having been a lawful permanent resident for at least five years. On Form N-400, signed under penalty of perjury, he represented that:

a. His name was Gurchain Singh;

b. He listed "N/A" in the section for all other names used;

c. His date of birth was XXX XX, 1968;

d. He listed "1" for the number of times he had been married;

e. He had never been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason;

f. 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;

g. He had never lied to any U.S. government official to gain entry or admission into the United States; and,

h. He had never been ordered to be removed, excluded or deported from the United States.

30. On July 15, 2005, Singh appeared for his Form N-400 interview at the USCIS office in Garden City, NY. Immigration Officer Jody Perez placed him under oath and asked him the following questions:

a. Your current legal name?

b. Have you ever used other names?

c. How many times have you been married?

d. Have you ever used different names?

e. Have you ever been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason?

f. 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?

g. Have you ever lied to any U.S. government official to gain entry to admission into the United States?

h. Have you ever been ordered to be removed, excluded or deported from the United States?

31. In response, he testified that: his name was Gurchain Singh; that he had never used other names; and that he had been married once. He orally answered "no" to the remaining questions. Singh and Officer Perez did not make any corrections to the written answers on his Form N-400. He and Officer Perez both signed the attestation on Part 13, where Singh swore (affirmed) under penalty of perjury that the contents of his Form N-400 were true and correct.

32. On July 16, 20053, USCIS approved his N-400 on the basis of his written application, oral testimony during his naturalization interview, and submitted evidence.

33. On July 29, 2005, Singh took the Oath of Allegiance and naturalized as a citizen of the United States. USCIS issued him Certificate of Naturalization No. [redacted].

III. Fingerprint Analysis

34. Gurchain Singh and Gerchetan Singh Sandhu are the same person.

35. Fingerprint evidence demonstrates by clear, convincing, and unequivocal evidence that the same individual submitted fingerprints under both the Gurchain Singh and Gerchetan Singh Sandhu identities. *See* Exhibit 3.

GOVERNING LAW

I. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

36. 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).

37. 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 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)).

38. Under the first ground for denaturalization, illegal procurement, citizenship is "illegally procured" if the applicant failed to comply with any of the congressionally imposed prerequisites to the acquisition of citizenship. *Fedorenko*, 449 U.S. at 506.

39. Among other requirements for naturalization, Congress mandated that an application for naturalization must demonstrate that he or she has been "lawfully" admitted to the United States for permanent residence. *See* 8 U.S.C. § 1427(a)(1); *see also* 8 U.S.C. § 1429.

40. The term "lawfully admitted for permanent residence" means "the status of having been lawfully accorded the privilege of residing permanently in the United States as an immigrant in accordance with the immigration laws[.]" 8 U.S.C. § 1101(a)(20). Thus, for an alien to be "lawfully admitted," his adjustment of status must be in "compliance with substantive legal requirements, not mere procedural regularity." *In re Koloamatangi*, 23 I. & N. Dec. 548, 550 (B.I.A. 2003); *see Gallimore v. Att'y Gen.*, 619 F.3d 216, 223 & n.6 (3d Cir. 2010).

41. Congress also 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." *See* 8 U.S.C. § 1427(a).

42. The required statutory period for good moral character begins five years before the date an applicant files the application for naturalization and continues until the applicant takes the oath of allegiance and becomes a United States citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(1).

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

44. Congress also created a "catch-all" provision, which states, "[t]he fact that any person is not within any of the [statutorily described] 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).

45. Thus, individuals who commit unlawful acts adversely reflecting upon their moral character cannot meet the good moral character requirement, unless they prove extenuating circumstances. 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

46. "[A] conviction during the statutory period is not necessary for a finding that an applicant lacks good moral character . . . it is enough that the offense was 'committed' during that time." *United States v. Zhou*, 815 F.3d 639, 644 (9th Cir. 2016) (quoting *United States v. Suarez*, 664 F.3d 655, 661 (7th Cir. 2011)).

II. The Denaturalization Statute

47. 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.

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

a. illegally procured, or

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

49. 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.

50. 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).

51. Where the government establishes that the 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
Not Lawfully Admitted for Permanent Residence
(Fraud or Willful Misrepresentation of Material Fact)

52. The United States re-alleges and incorporates by reference the foregoing paragraphs.

53. As discussed above, to qualify for naturalization, an applicant must have been lawfully admitted to the United States for permanent residence. *See* 8 U.S.C. § 1429.

54. The term "lawfully" requires compliance with substantive legal requirements for admission and not mere procedural regularity. *Gallimore*, 619 F.3d at 223 & n.6.

55. "An alien who, by fraud or by willfully misrepresenting a material fact, seeks to procure (or has sought to procure or has procured) a visa, other documentation, or admission into the United States or other benefit provided under" the INA, is inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

56. Defendant was inadmissible under 8 U.S.C. § 1182(a)(6)(C)(i) at the time of his adjustment to permanent resident status because he both sought to

procure, and did procure, admission into the United States or other immigration benefits by fraud or by willfully misrepresenting material facts.

57. Specifically, at the time Defendant adjusted his status to permanent resident using the name Gurchain Singh, he had previously sought to procure and had been denied an immigration benefit using the name Gurchetan Singh Sandhu. Indeed, at the time that Defendant adjusted to permanent resident status, he was the subject of an outstanding order of deportation under the name Gurchetan Singh Sandhu.

58. Because Defendant willfully misrepresented facts in immigration benefit applications, he was inadmissible.

59. Defendant's false statements regarding his name, date of birth, and immigration history were material to determining his eligibility for the immigration benefits for which he applied.

60. Defendant's false statements had the natural tendency to influence a decision to approve his applications.

61. Defendant, thus, sought to procure an immigration benefit by fraud or willfully misrepresenting material facts, rendering him inadmissible at the time his status was adjusted to that of a permanent resident.

62. Because Defendant was not lawfully admitted for permanent residence, he was and remains ineligible for naturalization under 8 U.S.C. §§ 1427(a)(1) and 1429.

63. Because he was ineligible for naturalization, Defendant illegally procured his citizenship, and this Court must revoke that naturalization as provided for in 8 U.S.C. § 1451(a).

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION
Not Lawfully Admitted for Permanent Residence
(Outstanding Final Order of Removal)

64. The United States re-alleges and incorporates by reference the foregoing paragraphs.

65. As discussed above, to qualify for naturalization, Defendant must have been "lawfully admitted" to the United States for permanent residence. *See* 8 U.S.C. § 1429.

66. Under the law in effect at the time of Defendant's adjustment of status to permanent resident, as today, the immigration court generally had exclusive jurisdiction over applications for adjustment of status filed by applicants (other than certain arriving aliens) in deportation or removal proceedings, including applicants with a final order of deportation or removal. 8 C.F.R. §§ 245.2(a)(1), 1245.2(a)(1).

67. Defendant was subject to an order of deportation under the name of Gurchetan Singh Sandhu as of September 24, 1997, at the time that he filed his application for adjustment of status. Because Defendant misrepresented certain facts in connection with his application, USCIS was not aware of the deportation proceedings and the outstanding order of deportation, which influenced the approval of his application for adjustment of status on February 13, 1998.

68. Because the immigration court had exclusive jurisdiction over Defendant's application for adjustment of status at the time it was approved by USCIS, he was not lawfully admitted for permanent residence; accordingly, he illegally procured his naturalization.

COUNT III

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

69. The United States re-alleges and incorporates by reference the foregoing paragraphs.

70. As an applicant for naturalization under section 316(a) of the INA (8 U.S.C. § 1427), Singh was required to establish that he was a person of good moral character during the period beginning five years prior to the filing of his application

for naturalization and continuing until the time of admission to citizenship. This period is generally referred to as the "statutory period."

71. Defendant filed his application for naturalization on July 12, 2004; accordingly, he was required to establish that he was a person of good moral character from July 12, 1999, until the time of his admission to citizenship on July 29, 2005.

72. Under the law then in effect, an individual who, during the statutory period, provided false testimony for the purpose of obtaining an immigration benefit could not establish good moral character. 8 U.S.C. § 1101(f)(6); 8 C.F.R. § 316.10(b)(2)(vi).

73. Based on the facts contained above, Defendant provided false testimony while under oath during his naturalization interview. Specifically, during his naturalization interview, Singh provided false testimony regarding:

a. his use of other names;

b. his number of marriages;

c. Whether he had ever been arrested, cited, or detained by any law enforcement officer (including INS and military officers) for any reason;

d. whether he had given false or misleading information to any U.S. government official while applying for an immigration benefit or to prevent deportation, exclusion or removal;

e. whether he had lied to any U.S. Government official to gain entry or admission to the United States; and

f. whether he had ever been ordered to be removed, excluded, or deported from the United States.

74. Because Defendant provided false testimony to obtain an immigration benefit during the statutory period, he was not eligible for naturalization; accordingly, he illegally procured his naturalization.

COUNT IV

ILLEGAL PROCUREMENT OF NATURALIZATION
Lack of Good Moral Character
(Unlawful Acts with No Extenuating Circumstances)

75. The United States re-alleges and incorporates by reference the foregoing paragraphs.

76. As an applicant for naturalization under section 316(a) of the INA (8 U.S.C. § 1427), Singh was required to establish that he was a person of good moral character during the period beginning five years prior to the filing of his application

for naturalization and continuing until the time of admission to citizenship. This period is generally referred to as the "statutory period."

77. Defendant filed his application for naturalization on July 12, 2004; accordingly, he was required to establish that he was a person of good moral character from July 12, 1999, until the time of his admission to citizenship on July 29, 2005.

78. Under the law then in effect, an individual who, during the statutory period, provided false testimony for the purpose of obtaining an immigration benefit could not establish good moral character. 8 U.S.C. § 1101(f)(6); 8 C.F.R. § 316.10(b)(2)(vi).

79. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) by knowingly and willfully concealing in his naturalization application—a matter within the jurisdiction of the executive branch of the Government of the United States—that he had previously used a different identity and that he had been deported under that identity.

80. Specifically, on July 12, 2004, Singh filed Form N-400, Application for Naturalization. On the N-400, which he signed under penalty of perjury—and about which he testified under oath on July 15, 2005—he represented that:

a. His name was Gurchain Singh;

b. He listed "N/A" in the section for all other names used;

c. His date of birth was [redacted];

d. He listed "1" for the number of times he had been married;

e. He had never been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason;

f. 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;

g. He had never lied to any U.S. government official to gain entry or admission into the United States; and,

h. He had never been ordered to be removed, excluded or deported from the United States

81. Based on the facts contained above, during the statutory period Defendant committed unlawful acts that adversely reflected on his moral character. Specifically, Defendant provided false information regarding his identity, immigration history and whether he ever provided false or misleading information, or lied, to a U.S. Government official while applying for an immigration benefit or to prevent deportation. Defendant could not establish extenuating circumstances;

accordingly, he was not eligible for naturalization and illegally procured his naturalization.

82. Because Defendant committed unlawful acts during the statutory period during which he was required to maintain good moral character, he was and remains ineligible for naturalization under 8 U.S.C. §§ 1101(f), 1427(a)(1), and 1429.

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

COUNT V

PROCUREMENT OF UNITED STATES CITIZENSHIP BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION

84. The United States re-alleges and incorporates by reference the foregoing paragraphs.

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

86. As discussed above, throughout the naturalization process, Defendant willfully misrepresented and concealed facts related to his use of an alternate identity and his immigration history.

87. The misrepresentations made by Defendant during the naturalization process were material to determining his eligibility for naturalization because they would have had the natural tendency to influence the decision whether to approve his naturalization application. In fact, Defendant misrepresented and concealed facts that would have shown that he was not lawfully admitted for permanent residence in accordance with all applicable provisions of the INA, and thus was ineligible for naturalization under 8 U.S.C. § 1429.

88. Defendant therefore procured his naturalization by concealment of material facts and willful misrepresentations.

89. Because Defendant procured his naturalization by concealment of material facts and willful misrepresentations, the Court must revoke his citizenship 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 citizenship;

2. A declaration that Defendant procured his 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 29, 2005.

4. Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to United States citizenship that he obtained as a result of his July 29, 2005 naturalization;

5. Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against him, his Certificate of Naturalization No. [redacted] 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 designated 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 (whether valid or expired), U.S. passport cards (whether valid or expired), and Enhanced Driver's Licenses (whether valid or expired), and other relevant documents, whether current 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; and

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

Dated: September 18, 2026

Respectfully submitted,

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