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United States Courts
Southern District of Texas
FILED

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Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. SYED FURQAN ALI, Axxx-xxx-165,[1] Defendant.	)	Civil Action No. **COMPLAINT TO REVOKE NATURALIZATION**

I. PRELIMINARY STATEMENT OF THE CASE

The United States of America ("Plaintiff") brings this civil action against Defendant Syed Furqan Ali ("Defendant"), to revoke his naturalized U.S. citizenship under 8 U.S.C. § 1451(a). Defendant procured his naturalization unlawfully and willfully misrepresented and concealed material facts in applying to naturalize. Defendant was still married to a Pakistani citizen when

[1] Pursuant to Fed. R. Civ. P. 5.2(a) and the Privacy Act, 5 U.S.C. § 552a(b), Plaintiff will redact information throughout this document and its exhibits that includes social security numbers, dates of birth, places of birth, alien numbers, passport numbers, phone numbers, and tax information, which are precluded from disclosure. *Jacobs v. Nat'l Drug Intelligence Ctr.*, 423 F.3d 512, 515 (5th Cir. 2005).

he paid a United States citizen $1,500.00 to marry him and secure his immigration benefits. He then presented an invalid Pakistani divorce decree to U.S. immigration officials to obtain permanent resident status from his U.S. citizen wife, even though their marriage was a sham and they never lived together. Because Defendant did not lawfully obtain permanent resident status, because he never lived with his U.S. citizen wife, and because he lied about his sham marriage during his naturalization proceedings, he illegally procured his naturalization and concealed and willfully misrepresented material facts during the naturalization process. Accordingly, this Court must now revoke that naturalization and cancel Defendant's certificate of naturalization.

II. JURISDICTION AND VENUE

1. Plaintiff is the United States of America ("United States").

2. Syed Furqan Ali ("Defendant"), is a naturalized United States citizen born in Pakistan.

3. The United States files this action under 8 U.S.C. § 1451(a), to revoke and set aside the order admitting Defendant to United States citizenship, and to cancel his Certificate of Naturalization, Number [redacted].

4. This Court has jurisdiction pursuant to 28 U.S.C. § 1345 and 8 U.S.C. § 1451(a).

5. Defendant's last known permanent residence is in Houston, Texas. Therefore, venue is proper in this district under 8 U.S.C. § 1451(a) and § 1931(b) and (c). *See* 28 U.S.C. §§ 1451(a), § 1931(b)-(c).

III. PARTIES

6. Plaintiff is the United States of America.

7. Defendant is a naturalized U.S. citizen and purports to be a native of Pakistan.

IV. FACTUAL ALLEGATIONS

8. A true and complete affidavit of Andrew Jansen, a Supervisory Special Agent with Immigration and Customs Enforcement ("ICE"), an agency within the United States Department of Homeland Security ("DHS"), showing good cause for this action, is attached as required by 8 U.S.C. § 1451(a).

9. A true and accurate copy of Plaintiff's Affidavit of Good Cause ("AGC"), except for redactions of immaterial personally identifying information, is attached as Exhibit A.

A. Defendant's Permanent Resident Status

10. On April 18, 1981, Defendant married Rana Rafith ("Rafith") in Pakistan.

11. On May 3, 1986, Defendant entered the United States on a B-2 visitor visa, which required him to leave the country by November 6, 1986.

12. Defendant did not leave the country as required by his visa by November 6, 1986.

13. On June 16, 1987, while still married to Rafith, Defendant married Jacquelyn Robinson ("Robinson"), a United States citizen in Houston, Texas, Defendant paid Robinson $1,500 to marry him.

14. Defendant and Robinson never lived together as husband and wife.

15. Defendant and Robinson did not marry intending to establish a life together.

16. Defendant and Robinson married to evade immigration laws.

17. Defendant and Robinson married to obtain immigration benefits for Defendant to which he was not eligible to receive lawfully.

18. After marrying and on August 17, 1987, Defendant and Robinson sought an immigrant visa for Defendant by filing a Form I-130, Petition for Alien Relative, on behalf of Defendant.

19. Defendant and Robinson sought the immigrant visa for Defendant on the basis of his purported marriage to her.

20. On or about August 17, 1987, Defendant sought to obtain permanent resident status on the basis of his marriage to Robinson by filing a Form I-485, Application to Register

permanent Residence or Adjust Status ("I-485"), with the U.S. Immigration and Nationality Service ("INS")[2].

21. A true and accurate copy of Defendant's I-485 Form, except for redactions of immaterial personally identifying information, is attached as Exhibit B.

22. In response to Question No. 20 of his I-485, which asked, "Have you ever been married before," Defendant represented that he was previously married to Rafith in Pakistan and that that the marriage ended on April 2, 1987.

23. In response to Question 26 of his I-485, which asked, "Have you procured or have you attempted to procure a visa by fraud or misrepresentation?" Defendant checked the box for "No."

24. Prior to filing his I-485, Defendant signed it on February 22, 1988, under penalty of perjury.

25. In support of his I-485 and his claim therein that his marriage to Rafith had ended, Defendant submitted a purported Divorce Deed from Pakistan ("Divorce Deed") that purported to show that he and Rafith were divorced on April 2, 1987.

26. The Divorce Deed, however, was invalid.

27. Therefore, Defendant's divorce to Rafith was invalid.

28. Importantly, Defendant remained legally married to Rafith when he married Robinson.

29. After examining the Divorce Deed, the U.S. Consulate General in Karachi, Pakistan concluded that the Divorce Deed was invalid because it was not issued by the proper authorities as required by Pakistani law.

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[2]On March 1, 2003, the INS ceased to exist as an independent agency within the U.S. Department of Justice, and many of its functions were transferred to the newly formed DHS. *See* Homeland Security Act of 2002, Pub. L. No. 107-296, §§ 441, 451, 471, 116 Stat. 2135 (Nov. 25, 2002). The INS was divided into several separate agencies, including U.S. Citizenship and Immigration Services ("USCIS"), Customs and Border Protection, and Immigration and Customs Enforcement. USCIS assumed naturalization authority from the INS. This Complaint will refer to INS where appropriate.

30. A true and accurate copy of the Consulate Generals' memorandum concluding that the Divorce Deed is invalid, except for redactions of immaterial personally identifying information, is attached as Exhibit C.

31. On February 22, 1988, INS granted the I-485 and admitted Defendant to the United States as a conditional permanent resident.

32. On February 14, 1990, Defendant and Robinson filed a joint petition to Remove the Conditional basis of Alien's Permanent Resident Status, Form I-751.

33. On June 8, 1990, INS approved Defendant's I-751 and lifted the conditions on his permanent resident status.

B. Defendant's Naturalization Proceedings

34. On April 5, 1993, Defendant filed a Form N-400, Application for Naturalization ("Form N-400") with INS.

35. A true and accurate copy of Defendant's N-400, except for redactions of immaterial personally identifying information, is attached as Exhibit D.

36. Defendant filed his Form N-400 seeking U.S. citizenship based upon his eligibility as a permanent resident for at least three years who had been continuously living in marital union with his U.S. citizen spouse for that time, pursuant to 8 U.S.C. § 1430(a).

37. In response to Question 33 of the N-400, which asked if you are or have been married, Defendant represented that he was married to Robinson on June 16, 1987.

38. In response to Question 34 of the N-400, which asked how many times you have been married/divorced, Defendant represented that he was divorced from Rafith on February 4, 1987 in Pakistan.

39. Prior to filing his N-400, he signed it swearing to the truth of the contents of his N-400 under penalty of perjury.

40. On October 5, 1993, INS Officer Yolanda Arizola ("Officer Arizola") interviewed Defendant under oath regarding his Form N-400 and the accuracy of its contents, to determine his eligibility for naturalization.

41. During the course of his naturalization interview, and to assess his eligibility for naturalization, Officer Arizola asked Defendant whether he was previously married and the Defendant responded "yes" and provided the name of Rawa Rafith as his prior wife.

42. Officer Arizola also asked Defendant if he obtained a divorce from Rawa Rafith.

43. In response to this question, Defendant falsely testified, orally and under oath, that he had obtained a divorce from Rana Rafith in Pakistan on February 4, 1987.

44. Based on the information contained in Defendant's naturalization application and the testimony he provided during his naturalization interview, INS approved Defendant's Form N-400 on October 5, 1993.

45. Based on the representations Defendant made on his Form N-400 and on his Form N-445, INS permitted Defendant to take the oath of allegiance on November 8, 1993.

46. Upon taking the oath on November 8, 1993, Defendant was admitted as a citizen of the United States and was issued Certificate of Naturalization Number [redacted]

47. On August 24, 2000, Robinson executed a sworn statement admitting that Defendant paid her $1,500 to marry him so that he could obtain his green card.

48. She further admitted that she and Defendant never resided together as husband and wife.

49. A true and accurate copy of Robinson's Sworn Statement, except for redactions of immaterial personally identifying information, is attached as Exhibit E.

50. The District Court of Harris County, Texas issued a Final Decree of Divorce between Defendant and Robinson on July 6, 1994.

51. A true and accurate copy of Defendant's Final Decree of Divorce, except for redactions of immaterial personally identifying information, is attached as Exhibit F.

V. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

52. 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). Indeed, the Supreme Court has underscored that "there 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)(holding that "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)).

53. Among other requirements, Congress has mandated that an individual may not naturalize unless that person was "lawfully admitted for permanent residence" in the United States. 8 U.S.C. §§ 1427(a)(1), 1429.

54. Congress has defined the term "lawfully admitted for permanent residence" to mean "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." *See* 8 U.S.C. § 1101(a)(20).

55. The term "lawfully" requires compliance with substantive legal requirements for admission, and not mere procedural regularity. 8 U.S.C. § 1101(a)(20). *Monet v. INS*, 791 F.2d 752, 753 (9th Cir. 1978).

56. Individuals cannot lawfully adjust to permanent resident status if they are inadmissible when they seek to adjust. 8 U.S.C. § 1255(a)(2) (providing that alien may adjust status only if admissible).

57. An individual 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 for in the Immigration and Nationality Act ("INA") is inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

58. Congress has also mandated that an individual who seeks to naturalize based on the permanent resident status he obtained through his marriage to a U.S. citizen must "during the three years immediately preceding the date of filing his application ... [be] living in marital union with the citizen spouse . . . who has been a United States citizen during all such period." 8 U.S.C. § 1430.

59. Congress has also mandated that an individual may not naturalize unless that person "during all periods referred to in this subsection has been and still is a person of good moral character..... " *See* 8 U.S.C. § 1427(a)(3).

60. For a person seeking to naturalize on the basis of permanent resident status acquired through a U.S. citizen-spouse with whom the applicant remains living, the statutory period for good moral character begins three 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 U.S.C. § 1430(a); 8 C.F.R. § 316.10(a).

61. Although Congress has not specifically defined what constitutes good moral character for naturalization purposes, the Immigration and Nationality Act lists certain classes of applicants precluded from establishing good moral character. 8 U.S.C. § 1101(f).

62. As a matter of law, an applicant necessarily lacks good moral character if he or she gives false testimony for the purpose of obtaining immigration benefits. 8 U.S.C. § 1101(f)(6).

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

64. The "catch-all" provision of 8 U.S.C. § 1101(f) (flush language) precludes individuals who commit unlawful acts adversely reflecting upon their moral character from establishing good moral character unless they prove that extenuating circumstances existed. *See* 8 U.S.C. § 1101(f) (flush language); 8 C.F.R § 316.10(b)(3)(iii).

65. Thus, an individual unlawfully procured naturalization if he or she committed unlawful acts during the statutory period, even if he or she was convicted of those crimes after being granted citizenship. *See Ibarra v. Bondi*, 136 F.4th 63, 68 n.6 (4th Cir. 2025); *United States v. Jean-Baptiste*, 395 F.3d 1190, 1193-94 (11th Cir. 2005), *cert. denied*, 546 U.S. 852 (2005); *United States v. Gariba*, No. 1:18-CV-127, 2018 WL 11514550, at *2 (M.D.N.C. Nov. 15, 2018).

B. The Denaturalization Statute

66. 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 a naturalization application, Congress enacted 8 U.S.C. § 1451.

67. Under 8 U.S.C. § 1451(a), this Court must revoke a U.S. citizen's naturalization and cancel his Certificate of Naturalization if naturalization was either:

a) illegally procured, or

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

68. 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.

69. Naturalization was procured by concealment of a material fact or by willful misrepresentation, where: (i) the naturalized citizen misrepresented or concealed some fact during the naturalization process; (ii) the misrepresentation or concealment was willful; (iii) the fact was material; and (iv) the naturalized citizen procured citizenship because of the misrepresentation or concealment. *Kungys v. United States*, 485 U.S. 759, 767 (1988).

70. 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* at 517.

VI. CAUSES OF ACTION

COUNT ONE
ILLEGAL PROCUREMENT OF NATURALIZATION
NOT LAWFULLY ADMITTED FOR PERMANENT RESIDENCE
(Immigration Fraud, 8 U.S.C. § 1182(a)(6)(C)(i)

71. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this complaint.

72. To qualify for naturalization, an applicant must have been "lawfully admitted" to the United States for permanent residence. 8 U.S.C. §§ 1427(a)(1), 1429.

73. The term "lawfully" denotes compliance with substantive legal requirements, not mere procedural regularity. 8 U.S.C. § 1101(a)(20). *Monet* at 753.

74. Among the applicable provisions in the INA at the time of Defendant's adjustment of status to permanent resident was the requirement that he be admissible to the United States. 8 U.S.C. §§ 1159(b)(5), 1255(a).

75. Under the law in effect at the time that Defendant adjusted his status, an individual who by fraud or by willfully misrepresenting a material fact was seeking to procure (or had sought to procure or had procured) a visa, other documentation, admission into the United States, using another identity, or other benefit provided under the INA, was inadmissible. 8 U.S.C. § 1182(a)(6)(C)(i).

76. Defendant was never lawfully admitted to the United States as a permanent resident and cannot satisfy the requirements of 8 U.S.C. §§ 1427(a)(1) and 1429, because he was inadmissible at the time of his adjustment to permanent resident status.

77. Defendant was inadmissible at the time of his adjustment to permanent resident status because he had sought to procure admission into the United States and other benefits provided for in the INA by fraud or willfully misrepresenting a material fact.

78. Specifically, at the time Defendant adjusted his status to permanent resident, he falsely claimed in his I-485 that his marriage to Rafith had ended.

79. Under the Texas Family Code, a marriage is void if either party was previously married and the prior marriage is not dissolved by legal action.

80. Therefore, Defendant's marriage to Jacquelyn Robinson was legally void. Tex. Fam. Code § 6.202.

81. Because Defendant was married to Rafith and did not obtain a divorce from her prior to his marriage to Robinson, his marriage to Robinson was void at the time of his adjustment of status and at the time of his naturalization.

82. At the time Defendant adjusted his status to permanent resident, he also falsely claimed in his I-485 that by claiming his marriage to Robinson was bona fide.

83. In fact, Defendant's marriage to Robinson was fraudulent and not bona fide because at the time they were married, Defendant and Defendant did not intend to establish a life together, and, instead, they married to evade immigration laws and to obtain immigration benefits for Defendant.

84. Defendant's false statements are material to determining his eligibility for the immigration benefits for which he applied.

85. Defendant's false statements had the natural tendency to influence a decision by the immigration officer(s) to approve his application(s). Defendant thus sought to procure an immigration benefit by fraud or willfully misrepresenting a material fact. 8 U.S.C. § 1182(a)(6)(C)(i).

86. Because Defendant was inadmissible at the time he adjusted to permanent resident status, he was never lawfully admitted for permanent residence in accordance with the substantive legal requirements to obtain that status. 8 U.S.C. § 1255(a).

87. Because Defendant was never lawfully admitted for permanent residence, he was and remains ineligible for naturalization under 8 U.S.C. §§ 1427(a)(1) and 1429.

88. Because he was ineligible to naturalize, Defendant illegally procured his citizenship.

89. Because Defendant illegally procured his citizenship, this Court must revoke his citizenship as provided for in 8 U.S.C. § 1451(a).

COUNT TWO
ILLEGAL PROCUREMENT OF NATURALIZATION
FAILURE TO LIVE IN MARITAL UNION WITH U.S. CITIZEN SPOUSE

90. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this Complaint.

91. Defendant sought to naturalize as the spouse of a U.S. citizen applying for naturalization three years after obtaining permanent resident status.

92. Congress has required any individual seeking to naturalize as the spouse of a U.S. citizen three years after obtaining permanent resident status to be living in marital union with

that U.S. citizen spouse during the three years immediately preceding the date of filing his application for naturalization. *See* 8 U.S.C. § 1430.

93. For all or part of the three years immediately preceding the filing of Defendant's N-400, Defendant was not living in marital union with Robinson, his putative U.S. citizen spouse, but was living separate and apart from Robinson.

94. Because Defendant was not living in marital union with his U.S. citizen spouse during the three years immediately preceding the date of filing his application for naturalization, he was ineligible for naturalization under 8 U.S.C. § 1430.

95. 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 THREE
ILLEGAL PROCUREMENT OF NATURALIZATION
LACK OF GOOD MORAL CHARACTER
(Unlawful Acts Adversely Reflecting Moral Character With No Extenuating Circumstances)

96. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this Complaint.

97. As outlined above, to be eligible for naturalization, Congress has mandated that an applicant must show that he or she has been a person of good moral character for the three-year statutory period before filing a naturalization application until the time the applicant becomes a naturalized U.S. citizen. 8 U.S.C. § 1430.

98. On April 5, 1993, Defendant filed his Form N-400, and on November 18, 1993, he naturalized.

99. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during his "statutory period" of April 5, 1990 (three years prior to April 5, 1993), and November 18, 1993.

100. A three-year statutory period is being used even though Defendant waited over five years from obtaining his permanent resident status to the date of his naturalization.

101. Defendant failed to show he was a person of good moral character during the statutory period, because he committed unlawful acts during that period that adversely reflected on his good moral character with no extenuating circumstances that would ameliorate or palliate his guilt. 8 U.S.C. § 1101(f) (flush text); 8 C.F.R. § 316.10(b)(3)(iii).

102. During the statutory period, Defendant committed the unlawful act of making false statements, in violation of 18 U.S.C. § 1001(a)(1)-(3), by knowingly and willfully misrepresenting in his Form N-400—a matter within the jurisdiction of the executive branch of the Government of the United States—that he had legally divorced Rafith and that his sham marriage with Robinson was bona fide.

103. During the statutory period, Defendant also committed the unlawful act of application fraud, in violation of 18 U.S.C. § 1546(a) and (b)(3), by knowingly and willfully presenting a fraudulent application and attesting to misrepresentations made under oath.

104. Specifically, Defendant violated 18 U.S.C. § 1546(a) and (b)(3) during the statutory period by knowingly and willfully misrepresenting in his Form N-400—a matter within the jurisdiction of the executive branch of the Government of the United States—that he had legally divorced Rafith and that his sham marriage with Robinson was bona fide.

105. Defendant's unlawful acts reflected adversely on his moral character.

106. No extenuating circumstances exist that would palliate Defendant's guilt. 8 C.F.R. § 316.10(b)(3)(iii); *see also United States v. Gallegos*, 2026 U.S. Dist. LEXIS 11586, 9-10 (S.D. Tex. 2026).

107. Because Defendant committed unlawful acts during the statutory period during which he was required to maintain good moral character, and no extenuating circumstances exist to palliate his guilt, he was and remains ineligible for naturalization under 8 U.S.C. §§ 1427(a)(1) and 1429.

108. Because he was ineligible to naturalize, Defendant illegally procured his citizenship.

109. Because Defendant illegally procured his citizenship, this Court must revoke his citizenship as provided for in 8 U.S.C. § 1451(a).

COUNT FOUR
ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER
(Procured by False Testimony - 8 U.S.C. § 1101(f)(6))

110. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this complaint.

111. As outlined above, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during his "statutory period" of April 5, 1990 (three years prior to April 5, 1993), and November 18, 1993.

112. At his naturalization interview, Defendant testified, orally and under oath, that he had never committed a crime or offense for which he had not been arrested when, in fact, he had committed a crime or offense for which he was not arrested, as described above.

113. At his naturalization interview, Defendant testified, orally and under oath, that he was divorced from Rafith, when in fact his claimed divorce from Rafith was invalid and he remained married to Rafith.

114. Defendant's testimony on the foregoing issues was knowingly false, and he gave it for the purpose of obtaining an immigration benefit, namely naturalization.

115. 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 establishing that he had the good moral character necessary to become a naturalized U.S. citizen.

116. Accordingly, Defendant was ineligible to naturalize.

117. Because he was ineligible to naturalize, Defendant illegally procured his citizenship.

118. Because Defendant illegally procured his citizenship, this Court must revoke his citizenship as provided for in 8 U.S.C. § 1451(a).

COUNT FIVE
PROCUREMENT OF NATURALIZATION BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION

119. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this Complaint.

120. Naturalization has been procured by concealment of a material fact or by willful misrepresentation, where: (i) the naturalized citizen misrepresented or concealed some fact during the naturalization process; (ii) the misrepresentation or concealment was willful; (iii) the fact was material; and (iv) the naturalized citizen procured citizenship because of the misrepresentation or concealment. *Kungys*, 485 U.S. at 767.

121. As set forth herein, throughout the naturalization process, in his Form N-400 and at his naturalization interview, Defendant willfully misrepresented and concealed, among other things: (i) his falsified divorce from wife #1, (ii) his sham marriage to Robinson, his putative second wife; and (iii) that he had given false or misleading information to a U.S. Government official while applying for immigration benefits.

122. Defendant knew his statements were false.

123. Defendant made such misrepresentations voluntarily and deliberately, despite knowing that such representations were false and misleading. Accordingly, Defendant made these misrepresentations willfully.

124. Defendant's misrepresentations and omissions were material to his naturalization because the disclosure of his invalid divorce, sham marriage, and false representations to U.S. Government officials while applying for an immigration benefit would have had a natural tendency to influence USCIS's decision whether to approve Defendant's application for naturalization. Indeed, had USCIS been aware of Defendant's misrepresentations, USCIS would have likely denied his naturalization application.

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

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, 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 fact 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 certificate, November 18, 1993;

(4) Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages under any document which evidences United States citizenship obtained as a result of his November 18, 1993, naturalization;

(5) Judgment requiring the Defendant, within ten (10) days of the entry of judgment against his, to surrender and deliver his Certificate of Naturalization No. [redacted] and 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 his designated representative, undersigned counsel;

(6) Judgment requiring the Defendant, within ten (10) days of the entry of judgment, to surrender and deliver any other indicia of U.S. citizenship (including, but not limited to, United States passports and passport cards, Enhanced Driver's License, and other relevant documents), whether current or expired, and 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 his representative, undersigned counsel; and

(7) Judgment granting the United States any other relief that may be lawful and just.

Dated: September 18, 2026

Respectfully submitted,

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