UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA, *Plaintiff,* v. JUAN JOSE EGUSQUIZA-VASQUEZ *Defendant.*	Civil Action No. 26-2091 **COMPLAINT TO REVOKE NATURALIZATION**

I. PRELIMINARY STATEMENT

1. The United States of America brings this civil action against Defendant Juan Jose Egusquiza-Vasquez ("Defendant") to revoke his naturalized United States citizenship. This action under 8 U.S.C. § 1451(a) is based on Defendant's unlawful conduct prior to naturalizing. Specifically, before he became a citizen of the United States in May 2011, Defendant engaged in criminal activity and concealed that criminal activity throughout his naturalization process. That criminal activity, had it been known to the United States Citizenship and Immigration Services ("USCIS"), would have naturally influenced the United States citizenship ("U.S. citizenship") decision.

2. In March and April 2008, Defendant committed acts constituting sexual battery in violation of Indiana Code § 35-42-4-8(a)(1)(A). In May 2011, Defendant illegally procured U.S. citizenship by knowingly concealing material facts and willfully misrepresenting his criminal conduct during his naturalization process. On or about November 12, 2013, Defendant pleaded guilty to the charge of sexual battery in violation of Indiana Code § 35-42-4-8(a)(1)(A). Specifically, Defendant pleaded guilty that on or about March 1, 2008, and April 30, 2008, with the intent to arouse or satisfy his own sexual desires or the sexual desires of another person, he

touched another person and compelled the other person to submit to the touching by force or imminent threat of force. That same day, the Marion Superior Court sentenced him to 3-years imprisonment in Cause No. 49G04-1302-FB-010767. Accordingly, as shown below, Defendant unlawfully naturalized and this Court must order the denaturalization of Defendant.

II. JURISDICTION, PARTIES, AND VENUE

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

4. 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).

5. Plaintiff is the United States of America.

6. Defendant is a naturalized U.S. citizen and a native of Peru.

7. Venue is proper in this district under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant resides in Indianapolis, Indiana, which is within the jurisdiction of this Court.

III. FACTUAL BACKGROUND

A. Defendant's Immigration History and Naturalization Application

8. The affidavit of Bradley A. Bookwalter, Special Agent of U.S. Immigration and Customs Enforcement, an agency within the Department of Homeland Security, showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached hereto as Exhibit ("Ex.") A.

9. Defendant first entered the United States on November 21, 2000, on a B2 non-immigrant visitor visa with authorization to remain until May 20, 2001. *Id.* at 2.

10. On November 7, 2006, Defendant's stepfather, Martin Tarazona, filed a Petition for Alien Relative (Form I-130) on Defendant's behalf. Defendant concurrently submitted an

Application for Permanent Residence (Form I-485). Both forms were approved and Defendant adjusted his status to lawful permanent resident. *Id.*

11. On or about October 18, 2010, Defendant filed Form N-400, Application for Naturalization ("N-400"), with the U.S. Citizenship and Immigration Services ("USCIS"). A true and complete copy of Defendant's N-400, except for redactions of personally identifying information ("PII") immaterial to this action, is attached hereto as Ex. B.

12. Defendant applied for naturalization based on his qualifying military service. *Id.* at 1. The relevant statute for applying for naturalization based on military service is 8 U.S.C. § 1440 (Section 329 of the Immigration and Nationality Act ("INA")). *See* Ex. C (Adjudicator notes from N-400 Application Interview) (indicating that Defendant met the eligibility requirements under "329").

13. Part 10.D, Question 15 of Defendant's N-400 asks, "Have you **ever** committed any crime for which you were **not** arrested?" Ex. B at 8 (emphasis in original). In response, the Defendant checked the box for "No." *Id.*

14. Part 10.D, Question 23 of Defendant's N-400 asks, "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?" *Id.* (emphasis in original). In response, the Defendant checked the box for "No." *Id.*

15. Part 11 of the N-400 requires the applicant to "certify, under penalty of perjury under the laws of the United States of America, that this application, and the evidence submitted with it, are all true and correct." *Id.* at 10. On October 18, 2010, Defendant signed Part 11 affirming that the information in the application was true and correct. *Id.*

16. On April 19, 2011, a USCIS officer placed Defendant under oath and conducted an

interview regarding his N-400 to determine his eligibility for naturalization. *Id.*

17. During Defendant's naturalization interview on April 19, 2011, Defendant indicated that his answers to Questions 15 and 23 on his naturalization application were true and correct to the best of his knowledge and belief. *Id.*

18. At the conclusion of his naturalization interview on April 19, 2011, Defendant signed Part 13 of his N-400, swearing for a second time "under penalty of perjury under the laws of the United States of America" that his answers to Questions 15 and 23 on his naturalization application were true and correct to the best of his knowledge and belief. *Id.*

19. The next day, on April 20, 2011, based on Defendant's representations in his naturalization application and his sworn declaration during his naturalization interview, USCIS approved Defendant's naturalization application. *Id.* at 1.

20. On or about May 18, 2011, Defendant prepared the final pre-naturalization paperwork by filing a form N-445, Notice of Naturalization Oath Ceremony ("N-445"), a true and complete copy of which, except for redactions of PII, is attached hereto as Ex. D.

21. On May 19, 2011, Defendant took the oath of allegiance and was admitted to U.S. citizenship. USCIS issued Defendant his Certificate of Naturalization No. [redacted], a true and correct copy of which, with redactions for PII, is attached hereto as Ex. E.

B. Defendant's Criminal History

22. On November 12, 2013, Defendant pleaded guilty to sexual battery in violation of Indiana Code § 35-42-4-8(a)(1)(A). Specifically, Defendant pleaded guilty that: on or about March 1, 2008, and April 30, 2008, he, with the intent to arouse or satisfy his own sexual desires or the sexual desires of another person, did touch another person who was a child under the age of 14 and compelled the other person to submit to the touching by force or imminent threat of force. A

true and correct copy of the amended information, Cause No. 13010767, with redactions for PII, is attached hereto as Ex. F. A true and correct copy of the Defendant's plea agreement, Cause No. 13010767, with redactions for PII, is attached hereto as Ex. G. A true and correct copy of the Sentencing Order and Judgment of Conviction, Cause No. 49G04-1302-FB-010767, with redactions for PII, is attached hereto as Ex. H.

23. That same day, on November 12, 2013, the Defendant was sentenced to three years imprisonment. *Id.*

24. The criminal acts to which Defendant pleaded guilty occurred prior to his naturalization. Ex. F at 3 (Defendant's criminal acts occurred on or about March 1, 2008, and April 30, 2008); Ex. E (Defendant was naturalized on May 19, 2011).

25. The criminal acts to which Defendant pled guilty were patently illegal.

26. Defendant willfully failed to disclose his criminal acts during his naturalization process by answering "No" to Question 15 on his N-400 and swearing twice, under penalty of perjury, that his responses were true and correct.

27. Defendant willfully failed to disclose that he had given false information concerning his criminal conduct during his naturalization process by answering "No" to Question 23 on his N-400 and swearing twice, under penalty of perjury, that his responses were true and correct.

28. Defendant knew his answer to Question 15 was false and misleading.

29. Defendant knew his answer to Question 23 was false and misleading.

30. Disclosure of Defendant's criminal conduct with a minor child would have naturally influenced USCIS's decision on Defendant's naturalization application.

31. Disclosure of Defendant having given false information concerning his criminal

conduct would have naturally influenced USCIS's decision on Defendant's naturalization application.

IV. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

32. No applicant 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 underscored that "[t]here must be strict compliance with all the congressionally imposed prerequisites to the acquisition of citizenship." *Fedorenko v. United States*, 449 U.S. 490, 506 (1981) (An 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).

33. Congress 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).

34. The required "statutory period" for good moral character for individuals applying for naturalization based on qualifying military service begins one year 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 § 1440; 8 C.F.R § 329.2(d).

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

36. Further, Congress created a "catch-all" provision, which states, "The 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) (catch-all provision).

37. Thus, an individual who, during the statutory period, commits an unlawful act adversely reflecting upon his or her moral character cannot meet the good moral character requirement unless he or she proves that extenuating circumstances existed. 8 C.F.R § 316.10(b)(3)(iii); 8 U.S.C. § 1101(f); *see United States v. Suarez*, 664 F.3d 655, 661 (7th Cir. 2011) (discussing 8 U.S.C. § 1101(f)(3) and 8 C.F.R. § 316.10(b)(3)(iii)) ("[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.").

B. The Denaturalization Statute

38. Individuals naturalized based on their qualifying military service under 8 U.S.C. § 1440, may have their citizenship revoked in accordance with 8 U.S.C. § 1451. 8 U.S.C. § 1440(c).

39. Congress enacted 8 U.S.C. § 1451 in recognition of the fact 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.

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

a. illegally procured; or,

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

41. 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.

42. Naturalization will be deemed 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).

43. Under a willful misrepresentation or concealment claim, the government can prevail by proving the fraud occurred during any part of the naturalization process, including in written form on the naturalization application. *Id.*; *see also United States v. Martinez*, 507 F. Supp. 3d 793, 805 (S.D. Tex. 2020).

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

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

45. Plaintiff re-alleges and incorporates by reference the factual and legal allegations in Paragraphs 1 - 44 of this Complaint as if set forth herein.

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

47. As set forth in paragraphs 11 through 19, throughout his naturalization process, Defendant willfully misrepresented and concealed his criminal conduct to obtain an immigration benefit, specifically naturalization.

48. At no point during the naturalization process did Defendant disclose his criminal conduct, but instead knowingly presented false information that he had not committed any criminal acts.

49. Further, at no point during the naturalization process did Defendant disclose that he had given false information concerning his criminal conduct during his naturalization interview.

50. Defendant knew his misrepresentation and concealment were false and misleading, and he acted willfully in providing such misrepresentations and concealment.

51. Defendant's misrepresentations were material in determining his eligibility for naturalization because they did not allow USCIS to make an informed decision when approving his naturalization application. In addition, Defendant's conduct related directly to a determination of whether he could establish the good moral character required under 8 U.S.C § 1440; 8 C.F.R § 329.2(d); 8 C.F.R. § 316.10(a)(1).

52. Had Defendant disclosed the truth about his criminal conduct, USCIS would have denied Defendant's naturalization and would not have allowed him to take the oath of allegiance because of his ineligibility.

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

COUNT II
ILLEGAL PROCUREMENT OF NATURALIZATION
LACK OF GOOD MORAL CHARACTER
(Unlawful Acts)

54. The United States re-alleges and incorporates by reference the factual and legal allegations set forth in Paragraphs 1 - 53 of this Complaint as if set forth herein.

55. As outlined above, Defendant was required to establish that he was a person of

good moral character from October 18, 2009, one year prior to filing his application for naturalization, until the date he became a U.S. citizen on May 19, 2011. 8 U.S.C § 1440; 8 C.F.R § 329.2(d); 8 C.F.R. § 316.10(a)(1).

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

57. As set forth in paragraphs 11 through 19, during the statutory period, Defendant committed an unlawful act when he provided false information during his naturalization process and falsely swore twice under penalty of perjury that he had never committed a crime or offense for which he was not arrested.

58. In addition, as also set forth in paragraphs 11 through 19, during the statutory period, Defendant committed an unlawful act when he provided false information during his naturalization process when he falsely swore twice under penalty of perjury that he had never given false information for the purpose of obtaining any immigration benefit, even though he had just indicated, falsely, that he had never committed a crime or offense for which he was not arrested.

59. Defendant committed unlawful acts by providing false information under penalty of perjury for the purpose of obtaining an immigration benefit, namely, naturalization.

60. There are no extenuating circumstances with regard to Defendant providing false information under penalty of perjury throughout his naturalization process that render his conduct less reprehensible than it otherwise would be or that would tend to lessen his guilt. As such, he cannot avoid the regulatory bar on establishing good moral character found at 8 C.F.R. § 316.10(b)(3)(iii).

61. Because Defendant committed unlawful acts that adversely reflected on his moral character during the statutory period, and he cannot demonstrate extenuating circumstances, he was barred 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.

62. Because Defendant could not establish that he was a person of good moral character during the statutory period, he was ineligible for naturalization under 8 U.S.C. § 1440.

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

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the United States of America, requests:

1. A finding that Defendant illegally procured his citizenship;

2. A finding that Defendant procured his naturalization by concealment of material facts and willful misrepresentation;

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, May 19, 2011;

4. Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages under any document which evidences U.S. citizenship obtained as a result of his May 19, 2011, naturalization;

5. Judgment requiring Defendant to surrender and deliver, within ten (10) days of Judgment, his Certificate of Naturalization, as well as any copies thereof in his possession or control (and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others), to the Attorney General, or his representative, including undersigned counsel;

6. Judgment requiring the Defendant to surrender and deliver, within ten (10) days of Judgment, any other indicia of U.S. citizenship, including, but not limited to, U.S. passports and passport cards, voter registration cards, and other voting documents, as well as any copies thereof in his possession or control (and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others), to the Attorney General, 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 September 28, 2026

THOMAS E. WHEELER II
United States Attorney
Southern District of Indiana

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

JORDAN C. CAMPBELL
Deputy Assistant Attorney General

HILARY K. PERKINS
Director
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/s/ Austin T. Mendes
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EXHIBIT A

UNITED STATES OF AMERICA	)	
	)	
INDIANAPOLIS, INDIANA	)	
	)	
In the Matter of the Revocation of the Naturalization of	)	AFFIDAVIT OF GOOD CAUSE
	)	
Juan Jose Egusquiza -Vasquez [redacted]	)	
	)	
	)	

I, Bradley A. Bookwalter, declare under the penalty of perjury as follows:

I. I am a Special Agent of U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), Department of Homeland Security (DHS). In this capacity, I have access to the official records of DHS, including the immigration file(s) of Juan Jose Egusquiza-Vasquez (hereinafter "Egusquiza-Vasquez"), [redacted]

II. I have examined records relating to Egusquiza-Vasquez, including but not limited to, his immigration file(s). Based upon my review of Egusquiza-Vasquez's records, I state, on information and belief, that the information set forth in this Affidavit of Good Cause is true and correct.

III. Based on the facts and law contained herein, good cause exists to institute proceedings pursuant to section 340(a) of the Immigration and Nationality Act (INA), 8 U.S.C. § 1451(a),[1] to revoke the citizenship of Egusquiza-Vasquez and to cancel his Certificate of Naturalization.

IV. Egusguiza-Vasquez's last known residence is [redacted] therefore, venue is proper in this district. 8 U.S.C. § 1451(a)

[1] While some provisions of the Immigration and Nationality Act, as contained in the United States Code, have been renumbered throughout the years, not all provisions have undergone such renumbering. Where necessary, this Affidavit of Good Cause lists the applicable year for a United States Code reference. If no year is included within the citation, it means that the United States Code citation is the same today as it was during the time in question.

BACKGROUND

V. Egusquiza-Vasquez was born in Peru on [redacted] 1989. He entered the United States on November 21, 2000, on a B2 non-immigrant visitor visa with authorization to remain until May 20, 2001. On November 7, 2006, Egusquiza-Vasquez's stepfather, Martin Tarazona, filed a Petition for Alien Relative (Form I-130) on Egusquiza-Vasquez's behalf. Egusquiza-Vasquez concurrently submitted an Application for Permanent Residence (Form I-485). The Form I-485 was approved on December 8, 2007, and Egusquiza-Vasquez adjusted status to that of a lawful permanent resident.

VI. On or about October 18, 2010, Egusquiza-Vasquez signed and dated an Application for Naturalization (Form N-400) and filed it with the United States Citizenship and Immigration Services ("USCIS"); the Form N-400 was signed as certifying under penalty of perjury under the laws of the United States of America that the application and evidence submitted with it were all true and correct. On April 19, 2011, USCIS Officer Lydia Landry interviewed Egusquiza-Vasquez concerning the information he provided on his Application for Naturalization. Based on his written application, documents submitted, and the Adjudicator's interview, Egusquiza-Vasquez's application for naturalization was approved on or about April 20, 2011.

VII. On or about April 29, 2011, Egusquiza-Vasquez received a notice which advised that he was scheduled to appear to take the oath of allegiance, and that he was required to complete and bring an included form. The form asked Egusquiza-Vasquez whether certain circumstances had occurred after his interview, and specifically whether

he knowingly committed any crime or offense for which he had not been arrested. Egusquiza-Vasquez completed his answers to the questions and signed the form on May 18, 2011, thereby certifying that his answers to the questions on the form were true and correct. Egusquiza-Vasquez specifically answered "no" to the question of whether after his interview he had knowingly committed any crime or offense for which he had not been arrested. On May 19, 2011, he was issued a Certificate of Naturalization, number [redacted].

VIII. On February 27, 2013, Egusquiza-Vasquez was charged with eight counts of Child Molesting in Marion County, Indiana. Specifically, Egusquiza-Vasquez was charged with various sexual conduct with a minor in violation of Indiana Code 35-42-4-3(a) and (b) which occurred between March 1, 2008 and July 16, 2008, including sexual intercourse with a nine year old child.

IX. On November 12, 2013, Egusquiza-Vasquez pleaded guilty to an amended charge of Sexual Battery: Compelled to Submit to Touching by Force/Imminent Threat in violation of Indiana Code Section 35-42-4-8(a)(1)(A) and was sentenced to three years' Marion County Community Corrections, Work Release Component.

ILLEGAL PROCUREMENT OF NATURALIZATION

X. Egusquiza-Vasquez illegally procured his naturalization because he could not have established that he was a person of good moral character. As an applicant for naturalization pursuant to section 329 of the Immigration and Nationality Act, 8 U.S.C. § 1440, Egusquiza-Vasquez was required to prove that he was a person of good moral character from October 18, 2009, which is 1 year prior to filing the application, up until May 19, 2011, the date on which he was naturalized as a citizen of the United States.

XI. Egusquiza-Vasquez could not have established that he was a person of good moral character because he provided false sworn declaration during his naturalization process for the purpose of obtaining naturalization.

A. On April 19, 2011, USCIS Officer Lydia Landry interviewed Egusquiza-Vasquez, and he swore under penalty of perjury that the contents of the application for naturalization were true and correct.

B. During the course of the naturalization interview, Egusquiza-Vasquez indicated he had never committed a crime for which he had not been arrested.

C. This response was false. Egusquiza-Vasquez had touched another person with the intent to arouse or satisfy his own sexual desires or the sexual desires of another person, and that person was compelled to submit to the touching by force or the imminent threat of force. On or about November 12, 2013, Egusquiza-Vasquez pleaded guilty to Sexual Battery in violation of Indiana Code 35-42-4-8(a)(1)(A) for actions on March 1, 2008 and April 30, 2008.

D. During the course of the naturalization interview, and in order to adjudicate his eligibility for naturalization, Egusquiza-Vasquez indicated that he had never given false or misleading information to a U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal.

E. This response was false. Egusquiza-Vasquez stated that he had never committed a crime for which he had not been arrested. On or about November 12, 2013, Egusquiza-Vasquez pleaded guilty to Sexual Battery in violation of Indiana Code 35-42-4-8(a)(1)(A) for actions on March 1, 2008 and April 30, 2008.

F. Egusquiza-Vasquez's false sworn declaration concealed the fact that he committed a crime. On or about November 12, 2013, Egusquiza-Vasquez pleaded guilty to Sexual Battery in violation of Indiana Code 35-42-4-8(a)(1)(A) for actions on March 1, 2008 and April 30, 2008.

G. Because Egusquiza-Vasquez provided a false sworn declaration, he could not establish that he was a person of good moral character.

PROCUREMENT BY WILLFUL MISREPRESENTATION

XII. Egusquiza-Vasquez procured his naturalization by willful misrepresentation and concealment of material facts.

A. Egusquiza-Vasquez willfully misrepresented and concealed his criminal activities.

B. In response to Part 10D of the N-400, Egusquiza-Vasquez indicated that he had not committed a crime for which he had not been arrested.

C. At his naturalization interview on April 19, 2011, Egusquiza-Vasquez swore under penalty of perjury that he had not committed a crime for which he had not been arrested. Egusquiza-Vasquez signed his N-400 indicating that the contents of his naturalization application, including his representation that he had not committed a crime for which

he had not been arrested, were true and correct to the best of his knowledge or belief.

D. In fact, Egusquiza-Vasquez's representation was false because during the statutory period, Egusquiza-Vasquez had touched another person with the intent to arouse or satisfy his own sexual desires or the sexual desires of another person, and that person was compelled to submit to the touching by force or the imminent threat of force. On or about November 12, 2013, Egusquiza-Vasquez pled guilty to Sexual Battery in violation of Indiana Code 35-42-4-8(a)(1)(A) for actions on March 1, 2008 and April 30, 2008.

E. At his naturalization interview on April 19, 2011, Egusquiza-Vasquez swore under penalty of perjury that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal. Egusquiza-Vasquez signed his N-400, indicating that the contents of his naturalization application, including his representation that he had never given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion or removal, were true and correct to the best of his knowledge or belief.

F. In fact, Egusquiza-Vasquez's representation was false because Egusquiza-Vasquez had touched another person with the intent to arouse or satisfy his own sexual desires or the sexual desires of another person, and that person

was compelled to submit to the touching by force or the imminent threat of force. On or about November 12, 2013, Egusquiza-Vasquez pled guilty to Sexual Battery in violation of Indiana Code 35-42-4-8(a)(1)(A) for actions on March 1, 2008 and April 30, 2008. The facts misrepresented by Egusquiza-Vasquez were material to determining his eligibility for naturalization because they would have had the natural tendency to affect the USCIS decision whether to approve his application.

G. Egusquiza-Vasquez procured his naturalization by misrepresenting and concealing his commission of sexual battery.

DECLARATION IN LIEU OF JURAT
(28 U.S.C. § 1746)

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 11th day of September, 2026.

Bradley A. Bookwalter, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations