GREGORY W. KEHOE
United States Attorney
Middle District of Florida

BRETT A. SHUMATE
Assistant Attorney General

JENNIFER J. KEENEY
Associate Director
Office of Immigration Litigation

JOHN J.W. INKELES
Chief
Affirmative Litigation Unit

HANS H. CHEN
Deputy Chief

ELISSA FUDIM
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
Denaturalization Unit
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 305-7000
E-mail: elissa.p.fudim@usdoj.gov

Counsel for the United States of America

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

UNITED STATES OF AMERICA, Plaintiff, v. PING LI, Defendant.	**COMPLAINT TO REVOKE NATURALIZATION** **8:26-CV-03003**

PRELIMINARY STATEMENT

The United States of America ("Plaintiff") brings this civil action against Ping Li to revoke his naturalized U.S. citizenship under 8 U.S.C. § 1451(a). This action arises from Defendant's conviction for conspiring to act as an agent of a foreign government without prior notification to the Attorney General in violation of 18 U.S.C. §§ 371 and 951(a). His affiliation with that foreign government—and specifically with the CCP, which controls, directs, and constitutes that government—constitutes *prima facie* evidence that he was not attached to the principles of the Constitution and was not well-disposed to the good order and happiness of the United States at the time of his naturalization. Accordingly, as shown below, Defendant illegally procured his naturalization, and the United States brings this civil action to revoke and set aside the order admitting Defendant to U.S. citizenship and to cancel his Certificate of Naturalization.

I. JURISDICTION AND VENUE

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

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1345 for this cause of action under 8 U.S.C. § 1451(a).

3. Venue is proper in this District pursuant to 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Mr. Li's last known residence prior to his current incarceration was in Tampa, Florida.

4. Mr. Li is currently incarcerated at the Miami Federal Correctional Institution.

II. PARTIES

5. Plaintiff is the United States of America.

6. Defendant is a naturalized U.S. citizen.

7. Defendant is a native of China.

III. FACTUAL BACKGROUND

8. The affidavit of David T. Casto, a Special Agent of the United States Homeland Security Investigations, a component of the United States Department of Homeland Security ("DHS"), showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached hereto as Exhibit A.

Defendant's Immigration History and Naturalization Proceedings

9. On March 11, 2009, Mr. Li filed his Form N-400, Application for Naturalization ("N-400") with U.S. Citizenship and Immigration Services ("USCIS").

10. Attached hereto as Exhibit B is a true and correct copy, except for redaction of immaterial personal identifying information, of Mr. Li's N-400.

11. On June 16, 2009, USCIS approved Mr. Li's N-400.

12. On July 17, 2009, Mr. Li recited the oath of allegiance, was admitted as a citizen of the United States, and was issued Certificate of Naturalization No. [redacted].

13. Attached hereto as Exhibit C is a true and correct copy, except for redaction of immaterial personal identifying information, of Mr. Li's Certificate of Naturalization.

Defendant's Illegal Acts and Conviction

14. The People's Republic of China ("PRC") is a one-party state led by the Chinese Communist Party ("CCP").

15. The PRC's National Intelligence Law requires that Chinese nationals support, assist, and cooperate with Chinese intelligence officials, even while abroad.

16. The PRC Intelligence Services ("PRCIS") encompasses both civilian and military components of the PRC intelligence programs.

17. The PRC Ministry of State Security ("MSS") handles civilian intelligence collection for the PRCIS.

18. The PRCIS and its various components are focused on identifying and influencing the foreign policy of other countries, including the United States, and obtaining sensitive and confidential information from those countries.

19. The PRCIS seeks to obtain information on foreign intelligence operations directed at the PRC, corporate and industrial information that could benefit the PRC, biographical profiles of foreign politicians and intelligence officers, and the political, economic, and security policies of other countries that might affect the PRC.

20. The PRC government routinely monitors and actively censors political speech inconsistent with CCP-approved political viewpoints, as well as speech that threatens to damage the reputation of the PRC government or the CCP.

21. The PRC, and in particular, the MSS, routinely monitor, among others, Chinese political dissidents who live in the United States and other countries outside China.

22. The MSS regularly uses cooperative contacts both inside the PRC and around the world to influence, threaten, and coerce political dissidents abroad.

23. The counterintelligence and economic espionage efforts emanating from the PRC and CCP through the PRCIS and MSS are a grave threat to the economic well-being and democratic values of the United States.

24. From at least as early as 2012, Mr. Li worked at the direction of officers of the MSS to obtain information of interest to the PRC government, including information concerning

Chinese dissidents and prodemocracy advocates, members of the Falun Gong religious movement, and U.S. based non-governmental organizations, and to report that information to the MSS.

25. Mr. Li also provided the MSS with sensitive information obtained from his employers, a major U.S. telecommunications company and an international information technology company.

26. On July 17, 2024, a federal grand jury in the Middle District of Florida delivered a two-count indictment against Mr. Li arising from his work at the direction of the MSS. See Indictment, *United States v. Li*, No. 8:24-cr-334 (M.D. Fla. July 17, 2024) ("Indictment").

27. Attached hereto as Exhibit D is a true and accurate copy of the Indictment.

28. Count one of the Indictment alleged the following:

> Beginning on an unknown date, but at least as early as in or around January 2012, and continuing until July 17, 2024, in the Middle District of Florida, the PRC, and elsewhere, Mr. Li did knowingly and willfully combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to act as an agent of a foreign government, to wit, the PRC, without prior notification to the Attorney General, as required by law, in violation of 18 U.S.C. § 951(a).

29. Mr. Li signed a plea agreement, filed August 19, 2024, in which he agreed to plead guilty to count one of the Indictment and admitted to facts underlying his crime. See Plea Agreement, *United States v. Li*, No. 8:24-cr-334 (M.D. Fla. Aug. 19, 2024) ("Plea Agreement").

30. Attached hereto as Exhibit E is a true and accurate copy of the Plea Agreement.

31. On August 19, 2024, Mr. Li entered a plea of guilty to count one of the Indictment.

32. On August 23, 2024, a U.S. Magistrate Judge recommended that Mr. Li's plea of guilty be accepted and that he be adjudged guilty. See Report and Recommendation Concerning

Plea of Guilty, *United States v. Li*, No. 8:24-cr-334 (M.D. Fla. Aug. 23, 2024) ("Report and Recommendation").

33. Attached hereto as Exhibit F is a true and accurate copy of the Report and Recommendation.

34. On October 17, 2024, the U.S. District Court for the Middle District of Florida entered an order adjudicating Mr. Li guilty of count one of the Indictment. See Acceptance of Plea of Guilty and Adjudication of Guilt, *United States v. Li*, No. 8:24-cr-334 (M.D. Fla. Oct. 17, 2024) ("Adjudication of Guilt").

35. Attached hereto as Exhibit G is a true and accurate copy of the Adjudication of Guilt.

36. On November 25, 2024, the U.S. District Court for the Middle District of Florida sentenced Mr. Li to forty-eight months of imprisonment followed by three years of supervised release and ordered Mr. Li to pay restitution in the amount of $250,000. See Judgment, *United States v. Li*, No. 8:24-cr-334 (M.D. Fla. Nov. 25, 2024) ("Judgment").

37. Attached hereto as Exhibit H is a true and correct copy of the Judgment.

IV. GOVERNING LAW

Congressionally imposed prerequisites to the acquisition of citizenship

38. No noncitizen has a right to naturalization "unless all statutory requirements are complied with." *United States v. Ginsberg*, 243 U.S. 472, 474-75 (1917). The Supreme Court has consistently held 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).

39. Congress has 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).

40. The required statutory period for good moral character, prescribed in 8 U.S.C. § 1427(a)(3), begins five years before the date the applicant files the application for naturalization and continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. See 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

41. Congress has further mandated that an individual may not naturalize unless that person, during the statutory period, "has been and still is a person of good moral character, attached to the principles of the Constitution of the United States, and well-disposed to the good order and happiness of the United States." 8 U.S.C. § 1427(a)(3).

42. Congress has mandated that becoming a member of, or affiliated with, any organization that that seeks to overthrow the United States government or that advocates violence or sabotage precludes an individual from naturalizing. See 8 U.S.C. § 1424(a)(4).

43. If, within five years of naturalizing, a person becomes a member of, or affiliated with, any organization that membership in or affiliation with at the time of naturalization would have precluded such person from naturalization under the provisions of 8 U.S.C. § 1424, then that membership or affiliation shall be considered prima facie evidence that such person was not attached to the principles of the Constitution of the United States and was not well-disposed to the good order and happiness of the United States at the time of naturalization. See 8 U.S.C. § 1451(c).

44. In the absence of countervailing evidence, evidence of such membership or affiliation requires the revocation and setting aside of the order admitting such person to

citizenship and the cancellation of the certificate of naturalization as having been obtained by concealment of a material fact or by willful misrepresentation. *Id.*; *Fedorenko v. United States*, 449 U.S. 490, 517 (1981) (holding that where the government establishes that a defendant's citizenship was procured illegally or by willful misrepresentation or concealment of material facts, "district courts lack equitable discretion to refrain from entering a judgment of denaturalization.").

V. CAUSES OF ACTION

COUNT I

PROCUREMENT OF NATURALIZATION BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION (Affiliation with the Chinese Communist Party)

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

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

47. As evidenced by his October 17, 2024, conviction for conspiring to act as an agent of a foreign government, Mr. Li conspired as a foreign agent on behalf of the PRCIS's MSS to obtain and report information of interest to the CCP and PRC, including sensitive information obtained from his employers and concerning Chinese dissidents and prodemocracy advocates, members of the Falun Gong religious movement, and U.S. based non-governmental organizations.

48. The CCP directs, controls, and governs the PRC and its agencies, including the PRCIS.

49. Through his work with the PRCIS's MSS, Mr. Li affiliated with the CCP within five years following his naturalization.

50. Mr. Li's affiliation with the CCP would have precluded an alien from naturalizing under the provisions of 8 U.S.C. § 1424(2)(E).

51. Consequently, Mr. Li's affiliation with the CCP within five years after his naturalization is, pursuant to 8 U.S.C. § 1451(c), prima facie evidence that he was not attached to the principles of the Constitution of the United States and was not well-disposed to the good order and happiness of the United States at the time of his naturalization.

52. There is no countervailing evidence establishing that Mr. Li was attached to the principles of the Constitution of the United States and was well-disposed to the good order and happiness of the United States at the time of his naturalization.

53. As a result of the above-referenced facts, good cause exists to institute civil denaturalization proceedings in accordance with INA § 340(a), 8 U.S.C. § 1451(c), and revoke Mr. Li's U.S. citizenship thereby canceling his Certificate of Naturalization No. [redacted].

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the United States of America, prays for relief as follows:

(1) A declaration that Mr. Li illegally procured his naturalization;

(2) A declaration that Mr. Li procured his naturalization by concealment of material facts and by willful misrepresentation;

(3) Judgment revoking and setting aside the order admitting Mr. Li to citizenship and canceling Certificate of Naturalization No. [redacted], effective as of the original date of the order and certificate, July 17, 2009;

(4) Judgment forever restraining and enjoining Mr. Li from claiming any rights, privileges, benefits, or advantages under any document which evidences United States citizenship obtained as a result of his July 17, 2009 naturalization;

(5) Judgment requiring Mr. Li, within ten (10) days of judgment, to surrender and deliver his Certificate of Naturalization, any U.S. passport, Enhanced Drivers License, or any other indicia of U.S. citizenship issued to him, whether valid or expired, as well as any copies thereof in his possession or control (and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others), to the Attorney General through his representative, undersigned counsel; and

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

Dated: October 1, 2026

Respectfully submitted,

GREGORY W. KEHOE
United States Attorney
Middle District of Florida

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

JENNIFER J. KEENEY
Associate Director
Office of Immigration Litigation

JOHN J.W. INKELES
Chief
Denaturalization Unit

HANS H. CHEN
Deputy Chief

/s/ Elissa Fudim
ELISSA P. FUDIM
Trial Attorney
United States Department of Justice
Civil Division
Office of Immigration Litigation
Denaturalization Unit
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 305-7000
E-mail: elissa.p.fudim@usdoj.gov

Counsel for the United States of America

UNITED STATES OF AMERICA	)	
	)	
TAMPA, FLORIDA	)	
	)	
In the Matter of the Revocation of the Naturalization of	)	**AFFIDAVIT OF GOOD CAUSE**
	)	
	)	
PING LI [redacted]	)	
	)	

I, David T. Casto, declare under penalty of perjury as follows:

1. I am a Special Agent with the Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement, Homeland Security Investigations located in Merritt Island, Florida. In this capacity, I have access to DHS's official records, including the immigration file of Mr. Ping Li, [redacted].
2. I have examined records relating to Mr. Li including, but not limited to, his immigration file and publicly available information filed in the criminal proceedings against him, *United States v. Li*, No. 8:24-cr-334-SDM-NHA (M.D. Fla. Nov. 25, 2024). Based on a review of those records, I state, on information and belief, that the information set forth in this Affidavit of Good Cause is true and correct.

THE DEFENDANT'S IMMIGRATION HISTORY

3. On March 11, 2009, Mr. Li filed his Form N-400, Application for Naturalization (N-400) with U.S. Citizenship and Immigration Services (USCIS). Mr. Li was interviewed on June 16, 2009, by an Immigration Services Officer (ISO) at the USCIS Tampa Field Office located in Tampa, Florida. During the interview, Mr. Li answered questions, under oath, related to the information provided within his N-400. On the same date, Mr. Li passed the U.S. history and government examination. Thereafter, the ISO approved Mr. Li's N-400 based on information

contained within the application and admitted during the interview. On July 17, 2009, Mr. Li filed a Form N-445, Notice of Naturalization Oath Ceremony (N-445) with USCIS and subsequently recited the oath of allegiance. On the same date, Mr. Li was admitted as a citizen of the United States. Mr. Li was issued Certificate of Naturalization No. [redacted].

THE POST-NATURALIZATION EVENTS

4. The People's Republic of China (PRC) is a one-party state led by the Chinese Communist Party (CCP).
5. The PRC and CCP seriously threaten the economic well-being, homeland security, and democratic values of the United States. Cases of Chinese espionage throughout the United States have expanded rapidly with Chinese nationals and non-Chinese individuals acting on behalf of the PRC and allegedly committing a variety of forms of espionage including, but not limited to, government, military, and economic espionage.
6. The PRC is seeking to surpass the United States as a global superpower and influence the world with a value system shaped by undemocratic, authoritarian ideals and actions. The PRC exploits every opportunity – financial, technological, educational, and diplomatic – through predatory lending and business practices, systematic theft of intellectual property, and brazen cyber intrusions.
7. The PRC's National Intelligence Law requires that Chinese nationals support, assist, and cooperate with Chinese intelligence officials, even while abroad.
8. The PRC Intelligence Services (PRCIS) encompasses both civilian and military components of the PRC intelligence programs. Civilian intelligence collection is handled by the Ministry of State Security (MSS).

9. The PRCIS and its various components are focused on identifying and influencing the foreign policy of other countries, including the United States, and obtaining sensitive and confidential information from those countries.

10. The PRCIS seeks to obtain information on foreign intelligence operations directed at the PRC, corporate and industrial information that could benefit the PRC, biographical profiles of foreign politicians and intelligence officers, and the political, economic, and security policies of other countries that might affect the PRC.

11. Additionally, the PRC regards any political dissent as a threat to its one-party system of government. Thus, the PRC's national security and law enforcement agencies regard political dissent as a national security threat. The PRC government routinely monitors and actively censors political speech inconsistent with CCP-approved political viewpoints, as well as speech that threatens to damage the reputation of the PRC government or the CCP.

12. The PRC's efforts to censor political dissent do not end at its national borders. The PRC, and in particular, the MSS, routinely monitor, among others, Chinese political dissidents who live in the United States and other countries outside China. The MSS regularly uses cooperative contacts both inside the PRC and around the world to influence, threaten, and coerce political dissidents abroad.

13. The PRCIS frequently depends on cooperative contacts outside the PRC's national borders to conduct research on topics of interest, which is used to further the PRCIS's mission and strengthen the CCP's stature in global affairs.

14. The counterintelligence and economic espionage efforts emanating from the PRC and CCP through the PRCIS and MSS are a grave threat to the economic well-being and democratic values of the United States.

15. Beginning on an unknown date, but at least as early as in or around January 2012, and continuing until July 17, 2024, Mr. Li worked at the direction of the MSS. As a foreign agent, Mr. Li obtained information of interest to the PRC, including information related to Chinese dissidents and pro-democracy advocates, members of the Falun Gong religious movement, and U.S. based non-governmental organizations. Mr. Li also provided the MSS with sensitive information obtained from his employers – a major U.S. telecommunications company and an international information technology company.

THE DEFENDANT'S INDICTMENT AND CONVICTION

16. On July 17, 2024, a grand jury in the Middle District of Florida delivered a two-count indictment against Mr. Li arising from his work at the direction of the MSS.

17. Count one of the indictment alleged the following:

    a. Beginning on an unknown date, but at least as early as in or around January 2012, and continuing until July 17, 2024, in the Middle District of Florida, the PRC, and elsewhere, Mr. Li did knowingly and willfully combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to act as an agent of a foreign government, to wit, the PRC, without prior notification to the Attorney General, as required by law, in violation of 18 U.S.C. § 951(a).

18. Count two of the indictment alleged the following:

    a. Beginning on an unknown date, but at least as early as in or around January 2012, and continuing until July 17, 2024, in the Middle District of Florida, and elsewhere, Mr. Li aided and abetted by other persons, known and unknown to the Grand Jury, did knowingly act within the United States as an agent of a foreign government, to wit, the

PRC, without prior notification to the Attorney General, as required by law, in in violation of 18 U.S.C. §§ 951(a) and 2.

19. On August 19, 2024, Mr. Li entered a plea of guilty to count one of the indictment.

20. On August 23, 2024, the U.S. Magistrate Judge recommended that Mr. Li's plea of guilty be accepted and that he be adjudged guilty.

21. On October 17, 2024, the U.S. District Court for the Middle District of Florida entered an order adjudicating Mr. Li guilty of count one of the indictment.

22. On November 25, 2024, the U.S. District Court for the Middle District of Florida sentenced Mr. Li to forty-eight months of imprisonment followed by three years of supervised release. The U.S. District Court Judge also ordered Mr. Li to pay restitution in the amount of $250,000.

THE DENATURALIZATION STATUTE

23. 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 "[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)).

24. Congress has 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 . . . ." 8 U.S.C. § 1427(a)(3).

25. The required statutory period for good moral character, prescribed in 8 U.S.C. § 1427(a)(3), begins five years before the date the applicant files the application for naturalization and

continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *See* 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

26. Congress has further mandated that an individual may not naturalize unless that person, during the statutory period, "has been and still is a person of good moral character, attached to the principles of the Constitution of the United States, and well-disposed to the good order and happiness of the United States." 8 U.S.C. § 1427(a)(3).

27. Finally, Congress has mandated that becoming a member of, or affiliated with, any organization that that seeks to overthrow the United States government or that advocates violence or sabotage precludes an individual from naturalizing. *See* 8 U.S.C. § 1424(a)(4).

28. Recognizing that there are situations in which an individual has naturalized despite failing to comply with all congressionally imposed prerequisites to the acquisition of citizenship or by concealing or willfully misrepresenting facts that are material to the decision whether to grant naturalization, Congress enacted 8 U.S.C. § 1451.

29. Under 8 U.S.C. § 1451(a), this Court must revoke an order of naturalization and cancel the individual's Certificate of Naturalization if his or her naturalization was *either*: (i) illegally procured; or (ii) procured by concealment of a material fact or willful misrepresentation.

30. If, within five years of naturalizing, a person becomes a member of, or affiliated with, any organization that membership in or affiliation with at the time of naturalization would have precluded such person from naturalization under the provisions of 8 U.S.C. § 1424, then that membership or affiliation shall be considered *prima facie* evidence that such person was not attached to the principles of the Constitution of the United States and was not well-disposed to the good order and happiness of the United States at the time of naturalization. *See* 8 U.S.C. § 1451(c).

31. In the absence of countervailing evidence, evidence of such membership or affiliation requires the revocation and setting aside of the order admitting such person to citizenship and the cancellation of the certificate of naturalization as having been obtained by concealment of a material fact or by willful misrepresentation. *Id.*; *Fedorenko v. United States*, 449 U.S. 490, 517 (1981) (holding that where the government establishes that a defendant's citizenship was procured illegally or by willful misrepresentation or concealment of material facts, "district courts lack equitable discretion to refrain from enteringa judgment of denaturalization.").

32. Mr. Li's U.S. citizenship is subject to revocation because within five years of naturalizing, he conspired as a foreign agent on behalf of the PRCIS's MSS – an organization that Mr. Li's affiliation with would have precluded him from naturalizing under the provisions of 8 U.S.C. § 1424(2)(E) because it is an affiliate of the Chinese Communist Party.

COUNT ONE
Naturalization Procured by Concealment of Material Facts and Willful Misrepresentation (Affiliation with the People's Republic of China's Intelligence Services' Ministry of State Security)

33. As evidenced by his October 17, 2024, conviction for conspiring to act as an agent of a foreign government, Mr. Li was affiliated with the PRCIS's MSS within five years following his naturalization.

34. Mr. Li's affiliation with the PRCIS's MSS would have precluded an alien from naturalizing under the provisions of 8 U.S.C. § 1424(2)(E).

35. Consequently, Mr. Li's affiliation with the PRCIS's MSS within five years after his naturalization is, pursuant to 8 U.S.C. § 1451(c), *prima facie* evidence that he was not attached to the principles of the Constitution of the United States and was not well-disposed to the good order and happiness of the United States at the time of his naturalization.

36. There is no countervailing evidence establishing that Mr. Li was attached to the principles of the Constitution of the United States and was well-disposed to the good order and happiness of the United States at the time of his naturalization.

37. As a result of the above-referenced facts, good cause exists to institute civil denaturalization proceedings in accordance with INA § 340(a), 8 U.S.C. § 1451(c), and revoke Mr. Li's U.S. citizenship thereby canceling his Certificate of Naturalization No. [redacted].

38. Mr. Li's last known address is [redacted].

39. Mr. Li is currently detained by the Federal Bureau of Prisons at the Miami Federal Correctional Institution, 15801 SW 137th Avenue, Miami, Florida 33177. Mr. Li's anticipated release date is December 5, 2027.

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 29 day of September 2026.

David T. Castro
Special Agent
Homeland Security Investigations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security