UNITED STATES DISTRICT COURT
EASETERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, Plaintiff, v. ASSAD JHON RAMIM, Defendant.	)	Civil Action No. 5:26-cv-7595 **COMPLAINT TO REVOKE NATURALIZATION**

I. PRELIMINARY STATEMENT OF THE CASE

The United States of America ("Plaintiff") brings this civil action against Defendant Assad Jhon Ramim ("Defendant") to revoke his naturalized U.S. citizenship under 8 U.S.C. § 1451(a). Defendant illegally procured his naturalization and willfully misrepresented and concealed material facts to procure his naturalization.

Defendant perpetrated identity fraud for almost thirty years. In 1986, when Defendant applied for an immigration benefit, he identified himself as Ahmad Shah Kohistany, born in Kohistan, Kapisa, Afghanistan in 1969. In 1990, Defendant applied to adjust to permanent resident status as Ahmad Shah Kohistani.[1] And in 1993, Defendant successfully applied to become a naturalized citizen as Ahmed Shah Kohistani. As part of the naturalization process, Defendant changed his name from Ahmed Shah Kohistani to Assad Jhon Ramim.

In fact, Assad Jhon Ramim was Defendant's real name all along, and it was never Ahmad Shah Kohistani. Moreover, Defendant was not born in Kohistan, Kapisa, Afghanistan, in 1969, but he was born in the Baghlan province of Afghanistan in 1968. Defendant fraudulently stole the

[1] In his various immigration benefits applications, Defendant's assumed identify is at times spelled Ahmad Shah Kohistani and at times spelled Ahmad Shah Kohistany.

identity of another Afghan national—Ahmed Shah Kohistany (Shah)—without Shah's knowledge or consent.

Defendant's actions and conduct statutorily barred him from becoming a U.S. citizen and render his naturalization illegally procured and procured by concealment of a material fact or by willful misrepresentation. Thus, with the attached affidavit showing good cause, Plaintiff brings this civil action to revoke and set aside the order admitting Defendant to citizenship and to cancel his certificate of naturalization.

II. 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 U.S. citizenship and to cancel Certificate of Naturalization No. [redacted], issued February 16, 1994.

2. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1345 for a 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 Defendant resides in Nazareth, Pennsylvania, within the jurisdiction and venue of this Court.

III. PARTIES

4. Plaintiff is the United States of America.

5. Defendant is a naturalized U.S. citizen and purports to be a native of Afghanistan.

IV. FACTUAL ALLEGATIONS

6. The affidavit of Matthew T. Gauder, a Special Agent of U.S. Immigration and Customs Enforcement (ICE), U.S . Department of Homeland Security (DHS), showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached as Exhibit A.

A. Defendant's Immigration History.

7. On February 17, 1986, Defendant, using the name Ahmad Shah Kohistany and identifying himself as a native of Afghanistan, filed a request for an immigration benefit with the former Immigration and Naturalization Service (INS).[2] According to his application, Defendant represented that:

a. He was a native and citizen of Afghanistan;

b. He was born in Kohistan, Kapisa, Afghanistan.

c. He was born in 1969;

d. His true and correct name was Ahmad Shah Kohistany;

8. Defendant signed his application, certifying under oath that its contents and his submissions were true and correct.

9. The INS assigned Defendant alien registration number [redacted].

10. On September 18, 1987, Defendant was interviewed in Pakistan in connection with his immigration benefit application.

11. The INS approved Defendant's immigration benefit application, and on December 8, 1987, Defendant, under the name Ahmad Shah Kohistani, entered the United States.

12. In documentation that Defendant submitted in support of his application to adjust status to that of permanent resident, he stated that his name was Ahmad Shah Kohistani.

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[2] On March 1, 2003, the INS ceased to exist as an independent agency within the Department of Justice, and most of its functions were transferred to the newly formed Department of Homeland Security. *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 three separate agencies, USCIS, Customs and Border Protection, and Immigration and Customs Enforcement. USCIS assumed naturalization authority from the INS. *Id.* § 1451. This Complaint will refer to INS where appropriate.

13. In documentation that Defendant submitted in support of his application to adjust status to that of permanent resident, he stated he was born in 1969.

14. In documentation that Defendant submitted in support of his application to adjust status to that of permanent resident, he stated that his father was Mohammad Kohistani and his mother was Azari Kohistani.

15. On December 4, 1990, Defendant, under the name Ahmad Shah Kohistani, adjusted his status to that of a permanent resident.

16. On May 26, 1993, Defendant, under the name Ahmad Shah Kohistani, filed an Application for Naturalization, Form N-400 (Form N-400), with the INS.

17. Attached hereto as [redacted] is a true and complete copy, except for redactions of immaterial personally identifying information, of Defendant's Form N-400.

18. In his Form N-400, in Part 1, Defendant represented that his name was Ahmad Shah Kohistani.

19. In his Form N-400, in Part 1, Defendant claimed he was born in 1969.

20. In his Form N-400, Defendant answered "no" to Question 12g in Part 7, which asked: "Have you ever given false testimony for the purpose of obtaining an immigration benefit?"

21. None of the representations set forth in paragraphs 18 through 20 was true.

22. Defendant's name was not Ahmad Shah Kohistani.

23. Defendant was not born in 1969.

24. On May 24, 1993, Defendant signed his Form N-400 under penalty of perjury pursuant to the laws of the United States, thereby certifying that the application and the evidence submitted with it were all true and correct.

25. On January 6, 1994, a USCIS Immigration Services Officer (ISO) orally interviewed Defendant regarding his naturalization application to determine his eligibility for naturalization.

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

27. During the interview, Defendant testified orally and under oath to the contents of his Form N-400 and, consistent with his written answers, that:

a. His name was Ahmad Shah Kohistani;

b. He was born in 1969.

c. He had never given false testimony for the purpose of obtaining an immigration benefit.

28. On January 6, 1994, at the conclusion of his naturalization interview, Defendant signed his Form N-400 in the presence of the ISO under penalty of perjury, thereby attesting that the information it contained was true and correct.

29. On January 6, 1994, based upon the information supplied by Defendant in his Form N-400 and on the sworn testimony he gave during his naturalization interview, INS approved Defendant's naturalization application.

30. As part of the naturalization process, Defendant petitioned to change his name from Ahmad Shah Kohistani to Assad Jhon Ramim.

31. Attached hereto as Exhibit C is a true and complete copy, except for redactions of immaterial personally identifying information, of Defendant's petition to change his name.

32. Defendant took the oath of allegiance on February 16, 1994, and on that date was admitted as a citizen of the United States under the name Assad Jhon Ramim. He was issued Certificate of Naturalization number [redacted].

33. Attached hereto as Exhibit D is a true and complete copy, except for redactions for immaterial personally identifying information, of Defendant's Certificate of Naturalization.

B. The Theft of Ahmad Shah Kohistani's Identify

34. In the late 1980s, Shah's brother, Mohammad Kabir Kohistani (Kabir), met Defendant's father, Qazi Habibullah Ramin (Habib), in Pakistan.

35. Habib, exiled from Afghanistan in Pakistan, was a representative of the Ittehad-al-Islami party under Abdul Sayyaf.

36. In or about 1986 or 1987, Kabir was in Pakistan in possession of identification documents for three of his brothers: Shah, Baba Khan Kohistani (Baba), and Mohammad Amin Kohistani (Amin).

37. Habib learned that Kabir was in possession of these documents, and demanded Kabir turn them over to Habib so that his own sons, Defendant, Shahid Ramin (Shahid), and Nasir Ramin (Nasir), could use them to seek admission to the United States.

38. After Kabir refused, Habib stole the documents from Kabir at gunpoint.

39. Defendant and his two brothers, Shahid and Nasir, used the stolen identification documents to enter the United States under these assumed identities.

40. Kabir was subsequently assassinated in Kabul.

V. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

41. 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)).

42. 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). The required statutory period for good moral character begins five years before the date the applicant files the application for naturalization, and it continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *Id.*

43. 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).

44. The term "lawfully" requires compliance with substantive legal requirements for admission, and not mere procedural regularity. *See* 8 U.S.C. § 1101(a)(20); *Koszelnik v. Sec'y of Dep't of Homeland Sec.*, 828 F.3d 175, 180 (3d Cir. 2016).

45. An individual who, by fraud or 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 is inadmissible. See 8 U.S.C. § 1182(a)(6)(C)(i).

B. The Denaturalization Statute

46. 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.

47. 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.

48. 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.

49. 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 as a result of the misrepresentation or concealment. *Kungys v. United States*, 485 U.S. 759, 767 (1988).

50. Where the government establishes that a defendant procured citizenship 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.

VI. CAUSES OF ACTION

COUNT ONE

ILLEGAL PROCUREMENT OF NATURALIZATION NOT LAWFULLY ADMITTED FOR PERMANENT RESIDENCE (Adjustment Procured by Fraud or Willful Misrepresentation)

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

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

53. The term "lawfully" denotes compliance with substantive legal requirements, not mere procedural regularity. *See* 8 U.S.C. § 1101(a)(20); *Koszelnik*, 828 F.3d at 180.

54. 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. *See* 8 U.S.C. §§ 1159(b)(5), 1255(a).

55. 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, or other benefit provided under the INA, was inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

56. 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.

57. Defendant sought to procure admission into the United States and other benefits provided for in the INA by fraud or willfully misrepresenting a material fact.

58. Specifically, when he sought to adjust status to permanent resident, Defendant represented himself to be Ahmad Shah Kohistani, but that was a stolen identity. Defendant was not, and had never been, Amhad Shah Kohistani.

59. Because Defendant sought to obtain an immigration benefit by fraud, he was inadmissible.

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

61. Defendant's false statements had the natural tendency to influence a decision by the immigration officer(s) to approve his application(s).

62. Defendant thus sought to procure an immigration benefit by fraud or willfully misrepresenting a material fact.

63. 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.

64. 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.

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

66. 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
LACK OF GOOD MORAL CHARACTER
(Unlawful Acts that Reflect Adversely on Moral Character With No Extenuating Circumstances)

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

68. 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 five-year statutory period before filing his or her naturalization application until the time the applicant becomes a naturalized U.S. citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(i).

69. Defendant filed his naturalization application on May 26, 1993, and he naturalized on February 16, 1996.

70. Thus, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during his "statutory period" from May 26, 1988 until February 16, 1996.

71. Defendant completed and filed his naturalization application during his "statutory period."

72. 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 was not Ahmad Shah Kohistani.

73. Defendant also violated 18 U.S.C. § 1001(a)(1)-(3) when he completed and filed his naturalization application by answering "no" to Question 12g in Part 7, which asked: "Have you ever given false testimony for the purpose of obtaining an immigration benefit?"

74. Violating 18 U.S.C. § 1001(a)(1)-(3) reflects adversely on Defendant's moral character.

75. No extenuating circumstances exist that would palliate Defendant's guilt for violating 18 U.S.C. § 1001(a)(1)-(3).

76. Defendant also violated 18 U.S.C. § 1546(a) and (b)(3) by knowingly and willfully presenting fraudulent applications and documents and attesting to misrepresentations made under oath.

77. Specifically, Defendant violated 18 U.S.C. § 1546(a) and (b)(3) when he completed and filed his naturalization application by stating that he was Ahmad Shah Kohistani, born in 1969, and that he had never given false testimony for the purpose of obtaining an immigration benefit.

78. No extenuating circumstances exist that would palliate Defendant's guilt for violating 18 U.S.C. § 1546(a) and (b)(3).

79. Defendant also violated 18 U.S.C. § 1621 by committing perjury on January 6, 1994, when a USCIS ISO orally interviewed Defendant regarding his naturalization application to determine his eligibility for naturalization.

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

81. During the interview, Defendant testified orally and under oath that his name was Ahmad Shah Kohistani and that he was born in 1969.

82. At the conclusion of his naturalization interview, Defendant signed his Form N-400 in the presence of the ISO under penalty of perjury, thereby attesting that the information it contained was true and correct.

83. This information was not correct because Defendant's name was not Ahmad Shah Kohistani and he was not born in 1969.

84. No extenuating circumstances exist that would palliate Defendant's guilt for violating 18 U.S.C. § 1621.

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

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

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

COUNT THREE

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (FALSE TESTIMONY)

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

89. As set forth above, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during the statutory period, from May 26, 1988 until February 16, 1996. 8 U.S.C. § 1427(a)(3); 8 C.F.R. §§ 316.10(a)(1).

90. Defendant was statutorily barred from establishing the good moral character necessary to naturalize because during the statutory period, he gave false testimony, orally and under oath, for the purpose of obtaining an immigration benefit, specifically naturalization. See 8 U.S.C. § 1101(f)(6); 8 C.F.R. § 316.10(b)(2)(vi).

91. Defendant provided false testimony for the purpose of obtaining an immigration benefit during his January 6, 1994, Naturalization Interview when Defendant, orally and under oath, testified that his name was Ahmad Shah Kohistani and that he was born in 1969.

92. That answer was false because Defendant knew that his name was not Ahmad Shah Kohistani and he was not born in 1969.

93. Defendant gave his false testimony at his Naturalization Interview with the intent of obtaining the immigration benefit of naturalization.

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

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

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

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

COUNT FOUR

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

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

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

3. As set forth herein, throughout the naturalization process, Defendant willfully misrepresented and concealed his identity, including a different name and date of birth, and that he had given false or misleading information to a U.S. Government official while applying for any immigration benefit. Defendant knew each of these statements to be false.

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

5. Defendant's misrepresentations were material to his naturalization because the disclosure of his real identity, including his name and date or birth, and the circumstances under which he fraudulently obtained admission to the United States would have had a natural tendency

to influence the Government's decision whether to approve Defendant's application for naturalization. Indeed, had the Government been aware of this information, it would have denied his naturalization application.

6. 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 No. [redacted], effective as of the original date of the certificate, February 16, 1994;

(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 February 16, 1996 naturalization;

(5) Judgment requiring the Defendant, within ten (10) days of the entry of judgment against him, 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 or to his designated representative, including 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 or to his representative, including undersigned counsel; and

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

Dated: October 2, 2026

Respectfully submitted,

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Counsel for the United States of America

UNITED STATES OF AMERICA)
CHICAGO, ILLINOIS)
)
In the Matter of the Revocation)
of the Naturalization of)
)
ASSAD JHON RAMIM) **AFFIDAVIT OF GOOD CAUSE**
also known as "Ahmad Shah Kohistani,")
Ahmad Shah Kohistany," and "Assadulah Ramin")

I, Matthew T. Gauder, declare under penalty of perjury as follows:

I. I am a Special Agent of U.S. Immigration and Customs Enforcement (ICE), U.S. Department of Homeland Security (DHS). In this capacity, I have access to the official records maintained by DHS/ICE, including the immigration file of Assad Jhon Ramim, also known as Ahmad Shah Kohistani, and Ahmad Shah Kohistany (hereafter, Mr. Ramim).

II. I have examined the records relating to Mr. Ramim's case. Based upon my review of these records, I state, on information and belief, that the information set forth in this Affidavit of Good Cause is true and correct.

III. On February 17, 1986[1], Mr. Ramim, using the name Ahmed Shah Kohistany and identifying himself as a native of Afghanistan, applied for an immigration benefit with the United States Immigration and Naturalization Service (INS).2 On September 18, 1987, Mr. Ramim was interviewed at the United States Embassy in Islamabad, Pakistan, in connection with that immigration benefit. On November 23, 1987, Mr. Ramim's immigration benefit was approved. On December 8, 1987, Mr. Ramim, under the name Ahmed Shah Kohistani, entered the United States at New York, New York, from Afghanistan.

IV. On December 4, 1990, Mr. Ramim, under the name Ahmed Shah Kohistani, adjusted his status to that of a permanent resident.

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[1] All dates are "on or about."

[2] As of March 1, 2003, the INS ceased to exist and its functions were transferred to various agencies within DHS. See Homeland Security Act of 2002, §§ 441,451,471, Pub. L. No. 107-296, 116 Sat. 213 (2002) (codified at 6 U.S.C §§ 251,271, 29).

V. On May 26, 1993, Mr. Ramim, under the name Ahmad Shah Kohistani, filed an Application for Naturalization, Form N-400, with the INS. On January 6, 1994, in Brooklyn, New York, INS Officer George M. Besdansky interviewed Mr. Ramim, under oath, concerning the information Ramim provided on his Application for Naturalization. Based on his written application and naturalization interview, Mr. Ramim's application was approved on January 6, 1994. On the same day, January 6, 1994, Mr. Ramim, as part of the naturalization process, petitioned to change his name from Ahmad Shah Kohistani to Assad Jhon Ramim. Mr. Ramim took the oath of allegiance on February 16, 1994, and on that date was admitted as a citizen of the United States. He was issued Certificate of Naturalization number [redacted].

VI. Mr. Ramim illegally procured his naturalization because (A) he was not lawfully admitted for permanent residence, and (B) he could not have established that he was a person of good moral character.

A. Mr. Ramim, who gained entry into the United States by fraud, was never lawfully admitted for permanent residence.

1. On the immigration benefit application, Mr. Ramim indicated that his name was Ahmad Shah Kohistany, that he was born in 1969, in Kohistan, Kapisa, Afghanistan.

2. In documentation that Mr. Ramim submitted in support of his adjustment of status to that of a lawful permanent resident, he stated that his name was Ahmad Shah Kohistani, born in 1969. He indicated that his father was Mohammad Kohistani and his mother was Azari Kohistani.

3. Mr. Ramim, however, was an imposter. His name was not Ahmad Shah Kohistani. He was not born in 1969, in Kohistan, Kapisa, Afghanistan, and his parents were not Mohammad and Azari Kohistani. Mr. Ramim real name was Assadulah Ramin. He was born in the Baghlan province of Afghanistan, to Habibullah and Aziza Ramin. Mr. Ramim took the identity, and story, of another so he could obtain entry into the United States.

4. Generally, an individual applying to enter the United States must be admissible as an immigrant pursuant to section 212 of the Immigration and Nationality Act (INA), 8 U.S.C. § 1182. *See* INA § 207(c)(l), 8 U.S.C. § 1182(c)(l). Moreover, an alien applying to adjust his status to that of a permanent resident must also be admissible pursuant to INA§ 212, 8 U.S.C. § 1182. *See* INA§ 209(a)(2), 8 U.S.C. § 1159(a)(2); *see also,* former 8 C.F.R. § 209.l(b).

5. Mr. Ramim should not have been admitted to the United States either initially or as permanent resident because he was inadmissible as an individual who willfully misrepresented a material fact – his identity – in order to procure entry into the United States. *See* former INA § 212(a)(l9), 8 U.S.C. § 1182(a)(19) (now codified at INA § 212(a)(6)(C)(i), 8 U.S.C. § 1182(a)(6)(C)(i)). Mr. Ramim was also inadmissible as an individual who was not in possession of a valid document for admission. *See* former INA § 212(a)(20), 8 U.S.C. § 1182(a)(20) (now codified at INA 212(a)(7)(A)(i)(I), 8 U.S.C. § (a)(7)(A)(i)(I)).

6. Because Mr. Ramim was inadmissible, he was not lawfully admitted for permanent residence to the United States. A person cannot be naturalized unless he or she has been lawfully admitted for permanent residence in accordance with all applicable provisions of the INA. *See* INA § 318, 8 U.S.C. § 1429. Thus, Mr. Ramim illegally procured his naturalization.

B. Mr. Ramim illegally procured naturalization because he was statutorily barred from showing that he was a person of good moral character during the statutory period prior to his naturalization based on his violations of 18 U.S.C. § 1546(a), 18 U.S.C. § 1001 and 18 U.S.C. § 1621. He violated these statutes when, on May 26, 1993, he represented under penalty of perjury in his Naturalization Application that he was Ahmad Shah Kohistani, and repeated that representation under oath at his naturalization interview, and when he answered "no" to Question 12g in Part 7, which asked: "Have you ever given false testimony for the purpose of obtaining an immigration benefit?

C. Mr. Ramim could not have established that he was a person of good moral character because, during his January 6, 1994, naturalization interview, he provided false

testimony while under oath for the purpose of obtaining his naturalization.

1. As an applicant for naturalization pursuant to INA § 316(a), 8 U.S.C. § 1427(a), Mr. Ramim was required to prove that he was a person of good moral character from approximately May 26, 1988, five years before he filed his application, up to the time he was admitted to United States citizenship on February 16, 1994 (the statutory period).

2. An individual who, during the statutory period, provides false testimony while under oath with the intent of obtaining any benefit under the INA, including naturalization, is precluded from establishing good moral character. *See* INA§ 101(f)(6), 8 U.S.C. § 1101(f)(6).

3. On January 6, 1994, INS Officer George M. Besdansky interviewed Mr. Ramim, under oath, regarding his application for naturalization.

4. At the beginning of the naturalization interview, Mr. Ramim took an oath or affirmed that he would answer all questions truthfully. Mr. Ramim identified himself as Ahmad S. Kohistani born in 1969.

5. During the course of the naturalization interview, in order to adjudge Mr. Ramim's eligibility for naturalization, Officer McLaren asked Mr. Ramim, among other questions, if he had ever given false testimony for the purpose of obtaining any immigration benefit.

6. In response to the questions, Mr. Ramim falsely testified that he had never given false testimony for the purpose of obtaining any immigration benefit.

7. As mentioned above, on September 18, 1987, a United States government official interviewed Mr. Ramim regarding his application for an immigration benefit in Islamabad, Pakistan. At the interview, Mr. Ramim falsely represented himself to be Ahmed Shah Kohistany – a person he was not – for the purpose of fraudulently obtaining an immigration benefit and gaining admission into the United States.

8. Because Mr. Ramim provided false testimony at his naturalization interview, for the purpose of obtaining naturalization, he could not have established that he was a person of good moral character. Therefore, he was ineligible to naturalize.

VII. Mr. Ramim procured his naturalization by willful misrepresentation and concealment of material facts.

A. Mr. Ramim willfully misrepresented and concealed his true identity and the fact that he obtained admission into the United States by fraud.

1. On his Application for Naturalization, Form N-400, in Part 1, Mr. Ramim stated that his name was Ahmad S. Kohistani (with Kohistani being his "family name") and that he was born in 1969. In Part 7, question 12g, Mr. Ramim represented that he never had given false testimony for the purpose of obtaining any immigration benefit.

2. Mr. Ramim signed and dated this Application for Naturalization on May 24, 1993, thereby certifying, under penalty of perjury, that the information in his Application for Naturalization was true and correct. Mr. Ramim filed his application with the INS on May 26, 1993.

3. During his naturalization interview on January 6, 1994, Mr. Ramim testified, under oath, in response to Part 7, question 12g, that he never had given false testimony for the purpose of obtaining any immigration benefit. At the end of his naturalization interview, Mr. Ramim again swore that the contents of his naturalization application were true.

4. Contrary to the representations he made, Mr. Ramim's real name was Assadulah Ramin; he adopted the identity, and story, of Ahmad Shah Kohistani in order to fraudulently gain entry into the United States. He misled and lied to U.S. government officials at United States Consulate in Islamabad, Pakistan, about his true identity during the adjudication of his application for an immigration benefit.

5. During naturalization, Mr. Ramim misrepresented and concealed (1) his true identity, and (2) his prior lies and misrepresentations to U.S. government officials regarding his identity, knowing his representations were false and misleading.

6. Mr. Ramim's misrepresentations and concealment of his true identity and previous false testimony to U.S. government officials were material to determining his eligibility for naturalization because they would have had the natural tendency to influence the INS's decision whether to approve his naturalization application. The INS would not have approved Mr. Ramim's naturalization application if it knew that Mr. Ramim was not Ahmad Shah Kohistani and that he had gained admission into the United States by lying about his true identity.

7. By concealing and misrepresenting material facts regarding his identity and past fraud, Mr. Ramim was able to procure his naturalization.

VIII. Based on the facts outlined in the foregoing paragraphs, good cause exists to institute proceedings pursuant to INA § 340(a), 8 U.S.C. § 1451(a), to revoke Mr. Ramim's citizenship and to cancel his certificate of naturalization.

IX. Mr. Ramim's last known residence is [redacted].

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 October 1, 2026.

MATTHEW T GAUDER Digitally signed by MATTHEW T GAUDER Date: 2026.10.01 23:24:57 -05'00'

Matthew T. Gauder
Special Agent
U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
Homeland Security Investigations