IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. _____

UNITED STATES OF AMERICA, Plaintiff, v. ROLA THANIS JEAN LOUIS, a/k/a ROLA ILFARAD, Defendant.	)	**COMPLAINT TO REVOKE NATURALIZATION**

Plaintiff, the United States of America, by and through the United States Attorney for the Southern District of Florida, alleges as follows:

I. PARTIES, JURISDICTION, AND VENUE

1. This is an action under 8 U.S.C. § 1451(a) to revoke and set aside the order admitting Defendant Rola Thanis Jean Louis, a/k/a Rola Ilfarad to U.S. citizenship, and to cancel Certificate of Naturalization No. [redacted].

2. Plaintiff is the United States of America.

3. Defendant is a naturalized U.S. citizen whose last known address of residence is in Lauderdale Lakes, Florida, which is in this District.

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

5. Venue is proper in the Southern District of Florida under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant's last known residence is in this District.

II. FACTUAL ALLEGATIONS

6. The affidavit of Warren C. Lee, Adjudication Officer, U.S. Citizenship and Immigration Services, an agency within the U.S. Department of Homeland Security, showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached. Exhibit A (Affidavit of Good Cause).

A. Defendant's Immigration History Under the Identity Rola Ilfrard

7. On May 12, 1992, Defendant arrived at Miami International Airport at Miami, Florida, from an international flight. During her inspection by an Immigration and Naturalization Service[1] officer, she attempted to procure admission into the United States by presenting a passport bearing the name Ilamise Pierre. She was not admitted but instead referred for a secondary inspection.

8. At her secondary inspection, Defendant presented the same Haitian passport bearing the name Ilamise Pierre. The passport was found to be photo-substituted with an altered visa. Defendant was interviewed by an INS officer who recorded her testimony on a Form I-263A, Record of Sworn Statement, during which she testified that her name was Rola Ilfrard, she was born in year 1974, in La Tortue, Haiti, that her purpose for visiting the United States was to

[1] 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, Immigration and Customs Enforcement, Customs and Border Protection, and Citizenship and Immigration Services ("USCIS"). USCIS assumed the INS's authority to adjudicate visa petitions, adjustment and naturalization applications, and other requests for immigration benefits. *Id.* at § 451.

reside in the United States, and that she was aware that she presented a fraudulent passport when requesting admission. Exhibit B (Form I-263A, Record of Sworn Statement).

9. During the same encounter with INS on May 12, 1992, Defendant's fingerprints were taken on a Form FD-249 fingerprint card.

10. The INS assigned Defendant an alien file number based on the encounter.

11. Also on May 12, 1992, having completed Defendant's inspection, the INS personally served Defendant with a Form I-122, Notice to Applicant for Admission Detained/Deferred for Hearing Before Immigration Judge. The Form I-122 charged Defendant with being excludable pursuant to 8 U.S.C. §§ 1182(a)(6)(C)(i) and (a)(7)(A)(i)(I), in that she was an alien who attempted to procure admission into the United States by fraud or willful misrepresentation of a material fact, and that she was an immigrant not in possession of a valid entry document. Exhibit C (Form I-122, Notice to Applicant for Admission Detained/Deferred for Hearing Before Immigration Judge).

12. On July 16, 1992, Defendant appeared *pro se* before the Immigration Court for a hearing in Miami, Florida. At the hearing an immigration judge found her excludable from the United States under 8 U.S.C. §§ 1182(a)(6)(C)(i) and (a)(7)(A)(i)(I).

13. On August 4, 1992, Defendant under penalty of perjury filed an application for an immigration benefit before the Immigration Court as a form of relief from exclusion.

14. In her immigration benefits application, Defendant stated the following:

a. Her name was Rola Ilfrard.

b. Her date of birth was in the year 1974.

c. Her place of birth was Port-De-Paix, Haiti.

d. Her complete alien file number assigned to her.

15. On or about August 4, 1992, Defendant under penalty of perjury filed a Form G-325A, Biographical Information sheet, before the Immigration Court in support of her immigration benefits application. Exhibit D (Form G-325A, Biographic Information).

16. In her Form G-325A, Defendant stated the following:

a. Her name was Rola Ilfrard.

b. Her date of birth was in the year 1974.

c. Her complete alien file number assigned to her.

d. Her place of birth was Port-De-Paix, Haiti.

17. On November 9, 1992, Defendant appeared with counsel before the Immigration Court for a hearing in Miami, Florida. An immigration judge again found Defendant excludable from the United States under 8 U.S.C. §§ 1182(a)(6)(C)(i) and (a)(7)(A)(i)(I).

18. The immigration judge denied Defendant's immigration benefits application and ordered her excluded from the United States and deported to Haiti. Exhibit E (Exclusion and Deportation Order).

19. On or about November 19, 1992, Defendant appealed the decision of the immigration judge to the Executive Office for Immigration Review's Board of Immigration Appeal (BIA).

20. On May 5, 1993, the BIA dismissed her appeal and Defendant's exclusion order became final. Exhibit F (Decision of the Board if Immigration Appeals).

21. There is no record that the exclusion order was executed.

B. Defendant's Immigration History as Rola Thanis Jean Louis

22. On August 12, 1996, Defendant's fingerprints were imprinted or taken on a Form FD-249 fingerprint card.

23. On or about September 26, 1996, the Defendant filed an immigration benefits application and the Form FD-249 before the INS.

24. In her application Defendant under penalty of perjury stated the following:

a. Her name was Rolla Thanis.[2]

b. She was born in the year 1973, in Haiti.

c. She last arrived to the United States on January 5, 1993, without inspection.

25. Page One of the application, Part A, Question 1, requested the applicant's alien registration number. The response in the application was "None."

26. Page One of the application, Part A, Question 16, asked "Other names used (include maiden name and all aliases)." The written response in the application was "None."

27. The INS assigned Defendant a new alien number based on the application filing.

28. On November 19, 1996, the INS referred Defendant's application to an immigration judge.

29. On November 19, 1996, INS personally served on Defendant a Form I-221, Order to Show Cause. The Form I-221 charged Defendant with deportability pursuant to former 8 U.S.C. § 1231(a)(1)(B) as an alien that entered the United States without inspection. Exhibit G (Order to Show Cause).

30. On December 16, 1997, an immigration judge granted Defendant's immigration benefit application. Exhibit H (Order of the Immigration Judge).

[2] During the course of Defendant' immigration lifecycle, she changed the spelling of her first name from Rolla to Rola.

31. Defendant never informed the Immigration Court that she had previously sought to procure immigration benefits under the identities Ilamise Pierre and Rola Ilfrard, or that she was ordered excluded.

32. On February 16, 1999, Defendant, using the name Rolla Thanis, filed before the INS a Form I-485, Application to Register Permanent Residence or Adjust Status (adjustment application) with INS. Exhibit I (Form I-485, Application to Register Permanent Residence or Adjust Status).

33. On her Form I-485, Defendant under penalty of perjury stated that:

a. Her name was Rolla Thanis.

b. Her date of birth was in the year 1973.

c. Her place of birth was Port-De-Paix, Haiti.

d. She last entered the United States on January 5, 1993, at Miami Florida without inspection.

e. She had never been deported from the U.S. or removed from the U.S. at government expense, excluded within the past year, nor was she then in exclusion or deportation proceedings.

f. She was not under a final order of civil penalty for violating section 274C of the INA for use of fraudulent documents, nor had she, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the U.S., or any other immigration benefit.

34. On January 15, 1999, Defendant signed her adjustment application, thereby certifying under penalty of perjury that its contents were true and correct.

35. On February 16, 1999, Defendant also filed before the INS a Form G-325A. Exhibit J (Form G-325A).

36. On her Form G-325A, Defendant under penalty of perjury stated that:

a. Her name was Rolla Thanis.

b. Her year of birth was 1973.

c. Her place of birth was Port-De-Paix, Haiti.

d. The box entitled "All other names used (including names by previously marriages)" was left blank.

37. Based on the information in Defendant's immigration benefits application about her last arrival date and manner of entry, USCIS issued her on or about May 24, 2004 a Request for Evidence informing that she was inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) for being an alien present in the United States without having been admitted or paroled. The Request asked Defendant to file a waiver of her inadmissibility under 8 U.S.C. § 1182(a)(6)(A)(i). Exhibit K (Request for Evidence).

38. On June 15 2004, Defendant filed before USCIS a waiver to overcome of inadmissibility under 8 U.S.C. § 1182(a)(6)(A)(i). Exhibit L (Waiver application).

39. On June 23, 2004, USCIS approved Defendant's waiver and adjustment application, and she was granted permanent resident status in the United States.

40. Defendant did not inform USCIS throughout the adjustment and waiver proceedings that she had previously attempted to procure admission or an immigration benefit under the identities Ilamise Pierre and Rola Ilfrard, or that she was ordered excluded.

41. On July 15, 2004, Defendant's fingerprint was imprinted or taken on a Form I-89, I-551 or I-586 Card Data Collection Form, for purposes of her adjustment application and

residency card. The Form I-89 contained the same alien file number as the number assigned to Defendant based on the immigration benefit application she filed before the INS on or about September 26, 1996.

42. On March 11, 2011, Defendant filed a Form N-400, Application for Naturalization (naturalization application), before USCIS. Exhibit M (Form N-400, Application for Naturalization). The application stated Defendant's name is Rola Thanis.

43. Form N-400, Part 1, Question C, asked "If you have ever used other names, provide them below." The written response in the N-400 was "N/A."

44. Form N-400, Part 10, Question 16 asked "Have you EVER been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason?" (emphasis in original). The response for "No" was checked or marked.

45. Form N-400, Part 10, Question 23 asked "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?" (emphasis in original). The response for "No" was checked or marked.

46. Form N-400, Part 10, Question 24 asked "Have you **ever** lied to any U.S. government official to gain entry or admission into the United States?" (emphasis in original). The response for "No" was checked or marked.

47. Form N-400, Part 10, Question 27 asked "Have you **ever** been ordered to be removed, excluded, or deported from the United States?" (emphasis in original). The response for "No" was checked or marked.

48. Form N-400, Part 10, Question 28 asked the applicant if she had "Have you **ever** applied for any kind of relief from removal, exclusion, or deportation?" (emphasis in original). The response for "No" was checked or marked.

49. On or about March 8, 2011, Defendant signed her naturalization application under penalty of perjury certifying that the application and evidence submitted with it were all true and correct.

50. On April 11, 2011, Defendant's fingerprints were imprinted or taken at a USCIS facility for the purpose of her naturalization application.

51. On July 20, 2011, Defendant appeared at a USCIS office for an interview to determine her eligibility for naturalization.

52. Defendant was placed under oath before she was questioned at the interview by an Immigration Services Officer.

53. Defendant was asked whether she had ever used any other names. Based on Defendant's testimonial response, the Officer wrote in red ink on the N-400 "claims none."

54. Defendant was asked whether she had ever been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason. Defendant orally answered under oath "No" in response.

55. Defendant was asked whether she had 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. Defendant orally answered under oath "No" in response.

56. Defendant was asked whether she had ever lied to any U.S. government official to gain entry or admission into the United States. Defendant orally answered under oath "No" in response.

57. Defendant was asked whether she had ever been ordered to be removed, excluded, or deported from the United States. Defendant orally answered "No" in response.

58. Defendant was asked whether she had ever applied for any kind of relief from removal, exclusion, or deportation. Defendant orally answered under oath "No" in response.

59. At the conclusion of the interview, Defendant signed the naturalization application attesting under penalty of perjury that the contents of the application, including the six corrections made during the interview, were true and correct.

60. At no point during the naturalization process did Defendant inform USCIS that she used the names Ilamise Pierre or Rola Ilfrard, or that she was ordered excluded.

61. At no point during the naturalization process did Defendant inform USCIS that she gave false and misleading information to U.S. government officials while applying for adjustment of status and naturalization.

62. At no point during the naturalization process did Defendant inform USCIS that she lied to U.S. government officials to gain entry or admission into the United States.

63. At no point during the naturalization process did Defendant inform USCIS that an immigration judge ordered her excluded and deported on November 19, 1992, under the identity of Rola Ilfrard, or that the BIA dismissed her appeal on May 5, 1993.

64. On July 20, 2011, based on her written application and on the oral testimony that she provided at the naturalization interview, USCIS approved Defendant's naturalization application.

65. On August 10, 2011, Defendant took the Oath of Allegiance to the United States and was admitted as a citizen of the United States using the name Rola Thanis Jean Louis.

66. On August 10, 2011, USCIS issued Certificate of Naturalization No. [redacted] to Defendant in the name of Rola Thanis Jean Louis. Exhibit N (Naturalization Certificate).

C. Defendant's Fingerprints

67. On June 15, 2026, the Homeland Security Investigations Forensics Laboratory concluded that the fingerprint impressions described in Paragraphs 9, 22, 41 and 50 were from the same person.

III. CAUSES OF ACTION

COUNT I

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

68. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I and II of this Complaint.

69. To qualify for naturalization, an applicant must have been lawfully admitted for permanent residence in accordance with all provisions of the Immigration and Nationality Act. 8 U.S.C. §§ 1427(a)(1), 1429.

70. An alien may adjust to permanent resident status if the alien is not inadmissible under 8 U.S.C. § 1182(a)(6)(C)(i), among other requirements.

71. Under 8 U.S.C. § 1182(a)(6)(C)(i), which was the law in effect at the time Defendant adjusted her status, an alien 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 Immigration and Nationality Act, was inadmissible.

72. 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 she was inadmissible under 8 U.S.C. § 1182(a)(6)(C)(i) at the time of her adjustment to permanent resident status.

73. Defendant was inadmissible because on May 12, 1992, she sought to procure admission into the United States by willfully presenting a photo-switched passport and altered visa to an immigration official that contained the alias name Ilamise Pierre and year of birth 1974.

74. Defendant was inadmissible because an immigration judge found her excludable under 8 U.S.C. § 1182(a)(6)(C)(i) and a final order of exclusion was entered against her.

75. Defendant was inadmissible because she sought to procure an immigration benefit by filing an immigration benefits application before the Immigration Court on August 4, 1992, in which she willfully stated the following false information:

a. Her name was Rola Ilfrard.

b. Her year of birth was 1974.

76. Defendant was inadmissible because she procured an immigration benefit by filing an immigration benefits application before the INS on September 26, 1996, and renewing that application before the Immigration Court, in which she was asked "Other names used (include maiden names and all alias)" and Defendant willfully stated the following false information:

a. "None."

77. Defendant was inadmissible because she procured an immigration benefit by filing an immigration benefits application before the INS on September 26, 1996, and renewing

that application before the Immigration Court, in which she was asked for her alien registration number and Defendant willfully stated the following false information:

a. "None."

78. Defendant was inadmissible because she procured adjustment of status by filing a Form I-485 in which she willfully stated the following false information:

a. Her last entry date was on January 5, 1993.

b. Her last manner of entry was without inspection.

79. Defendant was inadmissible because she willfully and falsely marked or checked "No" in her Form I-485 to Part 3, Question 10, which asked "... have you, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the U.S., or any other immigration benefit?".

80. Because Defendant was inadmissible at adjustment under 8 U.S.C. § 1182(a)(6)(C)(i), she was not lawfully admitted for permanent residence.

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

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

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (Unlawful Acts with No Extenuating Circumstances)

83. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I and II of this Complaint.

84. To be eligible for naturalization, there is a statutory requirement that an applicant must show that she has been a person of good moral character for the five-year period before

filing their naturalization application until the applicant becomes a naturalized U.S. citizen. *See* 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(i). This period is generally referred to as the "statutory period."

85. Under the law then in effect, an individual could not establish good moral character if, during the statutory period, she committed unlawful acts that adversely reflected on her moral character, unless she could establish extenuating circumstances. 8 U.S.C. §1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

86. Defendant filed her application for naturalization on March 11, 2011, and she naturalized on August 10, 2011. Thus, to be eligible for naturalization, Defendant was required to establish that she was a person of good moral character during her "statutory period" from March 11, 2006, until August 10, 2011.

87. Defendant completed and filed her naturalization application during her "statutory period."

88. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory period because in matter within the jurisdiction of the executive branch of the Government of the United States, she knowingly and willfully— (1) falsified, concealed, or covered up by any trick, scheme, or device a material fact; (2) made a materially false, fictitious, or fraudulent statement or representation; or (3) made or used any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

89. Defendant violated 18 U.S.C. § 1621(1) during the statutory period because she took an oath before a competent officer or person, in any case in which a law of the United States authorized an oath to be administered, that she would testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by her subscribed, is true, and

she willfully and contrary to such oath said or subscribed any material matter which she did not believe to be true.

90. Defendant violated 18 U.S.C. § 1621(2) during the statutory period because she, in any declaration, certificate, verification, or statement under penalty of perjury as permitted under 28 U.S.C. § 1746, willfully subscribed as true any material matter which she did not believe to be true.

91. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) and 18 U.S.C. § 1621(1)-(2) when under penalty of perjury she completed her naturalization application by willfully and knowingly answering in writing, and testifying under oath, "No" to Question 16 in Part 10, which asked: "Have you EVER been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason?" (emphasis in original).

92. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) and 18 U.S.C. § 1621(1)-(2) when under penalty of perjury she completed her naturalization application by willfully and knowingly answering in writing, and testifying under oath, "No" to Question 23 in Part 10, which asked: "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?" (emphasis in original).

93. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) and 18 U.S.C. § 1621(1)-(2) when under penalty of perjury she completed her naturalization application by willfully and knowingly answering in writing, and testifying under oath, "No" to Question 24 in Part 10, which asked: "Have you EVER lied to any U.S. Government official to gain entry or admission into the United States? (emphasis in original).

94. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) and 18 U.S.C. § 1621(1)-(2) when

under penalty of perjury she completed her naturalization application by willfully and knowingly answering in writing, and testifying under oath, "No" to Question 27 in Part 10, which asked: "Have you EVER been ordered to be removed, excluded, or deported from the United States?" (emphasis in original).

95. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) and 18 U.S.C. § 1621(1)-(2) when under penalty of perjury she completed her naturalization application by willfully and knowingly answering in writing, and testifying under oath, "No" to Question 28 in Part 10, which asked: "Have you EVER applied for any kind of relief from removal, exclusion, or deportation?" (emphasis in original).

96. The above answers were willfully and knowingly false because on May 12, 1992, Defendant arrived at the United States at Miami, Florida, upon which she sought to procure admission into the United States as a nonimmigrant by presenting to an immigration officer a photo-switched passport and altered visa bearing the name Llamis Pierre.

97. The above answers were willfully and knowingly false because Defendant was arrested and taken into custody by the INS on May 12, 1992.

98. The above answers were willfully and knowingly false because Defendant filed an immigration benefits application before the Immigration Court on August 4, 1992, as a form of relief from exclusion.

99. The above answers were willfully and knowingly false because Defendant was ordered excluded by an Immigration Judge on November 9, 1992, and such order became final as of May 5, 1993.

100. The above answers were willfully and knowingly false because Defendant stated her name was Rola Ilfrard and year of birth was 1974 in the immigration benefits application she

filed before the Immigration Court on August 4, 1992, and subsequently stated her name was Rolla Thanis and year of birth was 1973 in the immigration benefits application she filed before the Immigration Court on September 26, 1996.

101. The above answers were willfully and knowingly false because Defendant stated her name was Rola Ilfrard and year of birth as 1974 in the immigration benefits application she filed before the Immigration Court on August 4, 1992, and subsequently stated her name was Rola Thanis and year of birth was 1973 in her Form N-400.

102. The above answers were willfully and knowingly false because Defendant, on May 12, 1992, presented to an immigration officer a photo-switched passport and altered visa bearing the name Ilamis Pierre, and subsequently stated in her immigration benefits application filed before the Immigration Court on September 26, 1996:

a. "None" in response to the question "Other names used."

103. The above answers were willfully and knowingly false because on May 12, 1992, Defendant arrived at the United States at Miami, Florida, upon which she sought to procure admission into the United States as a nonimmigrant by presenting to an immigration officer a photo-switched passport and altered visa bearing the name Ilamis Pierre, but marked or checked "No" in her Form I-485 to Part 3, Question 10, which asked "... have you, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the U.S., or any other immigration benefit?".

104. The above answers were willfully and knowingly false because Defendant, on May 12, 1992, presented to an immigration officer a photo-switched passport and altered visa bearing the name Ilamis Pierre, and subsequently stated the following in her Form N-400:

a. "N/A" in response to the question "If you have ever used other names,

provide them below."

105. The above answers were willfully and knowingly false because Defendant stated her complete alien file number in her immigration benefits application and Form G-325A filed before the Immigration Court on August 4, 1992, but subsequently in her immigration benefits application filed before the INS on September 26, 1996 she stated the following:

a. "None" as to whether she had an alien registration number.

106. The above answers were willfully and knowingly false because Defendant left blank the box entitled "All other names used (including names by previously marriages)" in the Form G-325A she filed before the INS on February 16, 1999, whereas she used the name Ilamis Pierre in a photo-switched passport that she presented to an immigration officer on May 12, 1992, and used the name Rola Ilfrard in an immigration benefits application she filed before the Immigration Court on August 4, 1992.

107. Defendant's unlawful acts adversely reflected on her moral character during the statutory period.

108. No extenuating circumstances exist for the unlawful acts.

109. Therefore, Defendant could not establish good moral character and was ineligible to naturalize.

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

COUNT III

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (False Testimony)

111. The United States re-alleges and incorporates by reference the factual and legal

allegations contained in Sections I and II of this Complaint.

112. To be eligible for naturalization, there is a statutory requirement that an applicant must show that he or she has been a person of good moral character for the five-year period before filing his or her naturalization application until the applicant becomes a naturalized U.S. citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(i). This period is generally referred to as the "statutory period."

113. Defendant filed her naturalization application on March 11, 2011, and she naturalized on August 10, 2011. Thus, to be eligible for naturalization, Defendant was required to establish that she was a person of good moral character during her "statutory period" from March 11, 2006, until August 10, 2011.

114. Defendant completed and filed her naturalization application during her "statutory period."

115. Defendant was statutorily barred from showing that she was a person of good moral character because she gave false testimony, orally and under oath, during the statutory period, for the purpose of obtaining an immigration benefit. 8 U.S.C. § 1101(f)(6).

116. Defendant gave false testimony for the purpose of naturalization when, during her naturalization interview, she testified under oath "No" when asked "Have you ever been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason?".

117. Defendant gave false testimony for the purpose of naturalization when, during her naturalization interview, she testified under oath "No" when asked "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?".

118. Defendant gave false testimony for the purpose of naturalization when, during her naturalization interview, she testified under oath "No" when asked "Have you ever lied to any U.S. Government official to gain entry or admission into the United States?".

119. Defendant gave false testimony for the purpose of naturalization when, during her naturalization interview, she testified under oath "No" when asked "Have you ever been ordered to be removed, excluded, or deported from the United States?".

120. Defendant gave false testimony for the purpose of naturalization when, during her naturalization interview, she testified under oath "No" when asked "Have you ever applied for any kind of relief from removal, exclusion, or deportation?".

121. The above testimony was false because on May 12, 1992, Defendant arrived at the United States at Miami, Florida, upon which she attempted or sought to procure admission into the United States as a nonimmigrant by presenting to an immigration officer a photo-switched passport and altered visa bearing the name Llamis Pierre.

122. The above testimony was false because Defendant was arrested and taken into custody by the INS on May 12, 1992.

123. The above testimony was false because Defendant filed an immigration benefits application before the Immigration Court on August 4, 1992, as a form of relief from exclusion.

124. The above testimony was false because Defendant was ordered excluded by an Immigration Judge on November 9, 1992, and such order became final as of May 5, 1993.

125. The above testimony was false because Defendant stated her name was Rola Ilfrard and year of birth as 1974 in the immigration benefits application she filed before the Immigration Court on August 4, 1992, and subsequently stated her name was Rolla Thanis and year of birth was 1973 in the immigration benefits application she filed before the Immigration

Court on September 26, 1996 and in her Form I-485.

126. The above testimony was false because Defendant stated her name was Rola Ilfrard and year of birth as 1974 in the immigration benefits application she filed before the Immigration Court on August 4, 1992, and subsequently stated her name was Rola Thanis and year of birth was 1973 in her Form N-400.

127. The above testimony was false because Defendant, on May 12, 1992, presented to an immigration officer a photo-switched passport and altered visa bearing the name Ilamis Pierre, and stated "None" to the question "Other names used" in her immigration benefits application filed before the Immigration Court on September 26, 1996.

128. The above testimony was false because on May 12, 1992, Defendant arrived at the United States at Miami, Florida, upon which she sought to procure admission into the United States as a nonimmigrant by presenting to an immigration officer a photo-switched passport and altered visa bearing the name Ilamis Pierre, but marked or checked "No" in her Form I-485 to Part 3, Question 10, which asked "... have you, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the U.S., or any other immigration benefit?".

129. The above testimony was false because Defendant, on May 12, 1992, presented to an immigration officer a photo-switched passport and altered visa bearing the name Ilamis Pierre, and stated "N/A" to the question "If you have ever used other names, provide them below" in her Form N-400.

130. The above testimony was false because Defendant stated "None" as to whether she had an alien registration number in her immigration benefits application filed before the Immigration Court on September 26, 1996, whereas she was previously assigned an alien file

number which she wrote in her immigration benefits application and Form G-325A filed before the Immigration Court on August 4, 1992.

131. The above testimony was false because Defendant left blank the box entitled "All other names used (including names by previously marriages)" in the Form G-325A she filed before the INS on February 16, 1999, whereas she used the name Ilamis Pierre in a photo-switched passport that she presented to an immigration officer on May 12, 1992, and used the name Rola Ilfrard in an immigration benefits application she filed before the Immigration Court on August 4, 1992.

132. The above testimony was given deliberately and with a subjective intent to deceive USCIS and for the purpose of naturalizing. Because Defendant could not establish the requisite good moral character during her statutory period, she was ineligible for naturalization. 8 U.S.C. § 1427(a)(3).

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

COUNT IV

PROCUREMENT OF U.S. CITIZENSHIP BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION

134. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I and II of this Complaint.

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

136. As set forth above, Defendant concealed or willfully misrepresented throughout the naturalization process—on her sworn written naturalization application and in her oral testimony under oath at the naturalization interview—numerous material facts.

137. Defendant concealed a material fact or made a willful misrepresentation when she completed her naturalization application by answering in writing, and by testifying under oath, "No" to Question 16 in Part 10, which asked: "Have you EVER been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason?" (emphasis in original).

138. Defendant concealed a material fact or made a willful misrepresentation when she completed her naturalization application by answering in writing, and by testifying under oath, "No" to Question 23 in Part 10, which asked: "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?" (emphasis in original).

139. Defendant concealed a material fact or made a willful misrepresentation when she completed her naturalization application by answering in writing, and by testifying under oath, "No" to Question 24 in Part 10, which asked: "Have you EVER lied to any U.S. Government official to gain entry or admission into the United States? (emphasis in original).

140. Defendant concealed a material fact or made a willful misrepresentation when she completed her naturalization application by answering in writing, and by testifying under oath, "No" to Question 27 in Part 10, which asked: "Have you EVER been ordered to be removed, excluded, or deported from the United States?" (emphasis in original).

141. Defendant concealed a material fact or made a willful misrepresentation when

she completed her naturalization application by answering in writing, and testifying under oath, "No" to Question 28 in Part 10, which asked: "Have you EVER applied for any kind of relief from removal, exclusion, or deportation?" (emphasis in original).

142. The above was a concealment of a material fact or a willful misrepresentation because on May 12, 1992, Defendant arrived at the United States at Miami, Florida, upon which she attempted or sought to procure admission into the United States as a nonimmigrant by presenting to an immigration officer a photo-switched passport and altered visa bearing the name Llamis Pierre.

143. The above was a concealment of a material fact or a willful misrepresentation because Defendant was arrested and taken into custody by the INS on May 12, 1992.

144. The above was a concealment of a material fact or a willful misrepresentation because Defendant filed an immigration benefits application before the Immigration Court on August 4, 1992, as a form of relief from exclusion.

145. The above was a concealment of a material fact or a willful misrepresentation because Defendant was ordered excluded by an Immigration Judge on November 9, 1992, and such order became final as of May 5, 1993.

146. The above was a concealment of a material fact or a willful misrepresentation because Defendant stated her name was Rola Ilfrard and year of birth was 1974 in the immigration benefits application she filed before the Immigration Court on August 4, 1992, and subsequently stated her name was Rolla Thanis and year of birth was 1973 in her immigration benefits application filed before the Immigration Court on September 26, 1996, and in her Form I-485.

147. The above was a concealment of a material fact or a willful misrepresentation

because on May 12, 1992, Defendant arrived at the United States at Miami, Florida, upon which she sought to procure admission into the United States as a nonimmigrant by presenting to an immigration officer a photo-switched passport and altered visa bearing the name Ilamis Pierre, but marked or checked "No" in her Form I-485 to Part 3, Question 10, which asked "... have you, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the U.S., or any other immigration benefit?".

148. The above was a concealment of a material fact or a willful misrepresentation because Defendant stated her name was Rola Ilfrard and year of birth was 1974 in the immigration benefits application she filed before the Immigration Court on August 4, 1992, and subsequently stated her name was Rola Thanis and her year of birth was 1973 in her Form N-400.

149. The above was a concealment of a material fact or a willful misrepresentation because Defendant, on May 12, 1992, presented to an immigration officer a photo-switched passport bearing the name Ilamis Pierre, and subsequently stated "None" to the question "Other names used" in her immigration benefits application filed before the Immigration Court on September 26, 1996, and stated "N/A" to the question "If you have ever used other names, provide them below" in her Form N-400.

150. The above was a concealment of a material fact or a willful misrepresentation because Defendant stated "None" as to whether she had an alien file number in her immigration benefits application filed before the Immigration Court on September 26, 1996, whereas she was previously assigned an alien file number which she wrote in her immigration benefits application filed before the Immigration Court on August 4, 1992.

151. The above was a concealment of a material fact or a willful misrepresentation because Defendant left blank the box entitled "All other names used (including names by previously marriages)" in the Form G-325A she filed before the INS on February 16, 1999, whereas she used the name Ilamis Pierre in a photo-switched passport that she presented to an immigration officer on May 12, 1992, and used the name Rola Ilfrard in an immigration benefits application she filed before the Immigration Court on August 4, 1992.

152. At no point during her naturalization proceedings did Defendant disclose that she attempted to procure admission into the United States by presenting a photo-switched passport and altered visa to an immigration official.

153. At no point during her naturalization proceedings did Defendant disclose that she sought to procure immigration benefits under the identities Ilamise Pierre or Rola Ilfrard.

154. At no point during her naturalization proceedings did Defendant disclose that she was detained by the INS and ordered excluded, and that the appeal of her exclusion order was dismissed.

155. Each of Defendant's misrepresentations and concealments were willful, as Defendant had knowledge that the information she provided was false and/or incomplete, and did not believe her own testimony at her naturalization interview was true.

156. Each of Defendant's concealments and misrepresentations was material to her naturalization application because each had a natural tendency to influence USCIS' decision whether to approve her naturalization application to wit, USCIS would have determined that Defendant was inadmissible at adjustment and therefore failed to meet the naturalization requirement under 8 U.S.C. § 1429 for lawful admission to permanent residence.

157. Defendant therefore procured her naturalization by concealment of a material fact or by a willful misrepresentation, and this Court must revoke her U.S. citizenship under 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

WHEREFORE, the United States of America respectfully requests:

(1) A declaration that Defendant illegally procured her U.S. citizenship;

(2) A declaration that Defendant procured her U.S. citizenship by concealment of material facts and by willful misrepresentation;

(3) Judgment revoking and setting aside the order admitting Defendant to U.S. citizenship and canceling Certificate of Naturalization No. [redacted], effective as of the original date of the order and certificate, August 10, 2011.

(4) Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship that she obtained as a result of her August 10, 2011 naturalization;

(5) Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against her, her Certificate of Naturalization No. [redacted] and any copies thereof in her possession—and to make good faith efforts to recover and immediately surrender any copies thereof that she knows are in the possession of others—to the Attorney General, or his designated representative, including undersigned counsel;

(6) Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against her, any other indicia of U.S. citizenship (including, but not limited to, U.S. passports or passport cards, Enhanced Drivers Licenses, and other relevant documents, whether current or expired), and any copies thereof in her possession—and to make good faith

efforts to recover and then surrender any copies thereof that she knows are in the possession of others—to the Attorney General, or his designated representative, including undersigned counsel; and

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

Dated:

Respectfully submitted,

JASON A. READING QUIÑONES
UNITED STATES ATTORNEY

BY: ROBERT BROWN (Affiliate) Digitally signed by ROBERT BROWN (Affiliate) Date: 2026.10.02 11:49:23 -04'00'

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