UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	Civil Action No. 1:25-cv-2863
Plaintiff,	)	
v.	)	**COMPLAINT TO REVOKE NATURALIZATION**
CARLOS ALBERTO ALEMAN-VERTIZ,	)	
Defendant.	)	

I. PRELIMINARY STATEMENT

The United States of America ("Plaintiff") brings this civil action under 8 U.S.C. § 1451(a) against Carlos Alberto Aleman-Vertiz ("Defendant") to revoke his U.S. citizenship. Defendant fraudulently and unlawfully procured U.S. citizenship by concealing criminal conduct in which he engaged prior to naturalizing and for which he was charged and convicted after naturalizing. Specifically, before he became a U.S. citizen, Defendant sexually assaulted a child under the age of thirteen. After naturalizing, Defendant pleaded guilty to one count of Predatory Criminal Sexual Assault of a Child, in violation of 720 ILCS 5/12-14.1(a)(1). *See People v. Carlos Aleman*, No. 18CR-6231-01 (Ill. Cir. Ct. May 10, 2019). Throughout his naturalization proceedings, Defendant misrepresented and concealed his criminal conduct, thus unlawfully procuring his naturalization.

This complaint seeks revocation of Defendant's naturalization on four independent grounds. First, Defendant illegally procured his naturalization in that he lacked the statutorily required good moral character to naturalize because he committed unlawful acts adversely reflecting on his moral character during the period when he was required to demonstrate good moral character, and no extenuating circumstances exist that would lessen his guilt. Second, Defendant lacked the required good moral character to naturalize because he committed a crime involving moral turpitude during his good moral character period for which he was convicted after he naturalized. Third, Defendant lacked the required good moral character to naturalize because he falsely testified under oath during his naturalization interview about his prior criminal conduct. Finally, throughout his naturalization proceedings, Defendant willfully misrepresented and concealed facts that were material to determining his naturalization eligibility.

Based on Defendant's actions described further below and in the attached affidavit showing good cause, the United States brings this civil action under 8 U.S.C. § 1451(a) 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 filed under 8 U.S.C. § 1451(a) to revoke and set aside the order admitting Defendant to U.S. citizenship and to cancel Defendant's Certificate of Naturalization No. [redacted].

2. This Court has subject-matter jurisdiction under 8 U.S.C. § 1451(a) and 28 U.S.C. §§ 1331 and 1345.

3. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant's residence prior to incarceration is in this District.

III. PARTIES

4. Plaintiff is the United States of America.

5. Defendant is a naturalized U.S. citizen who resided in Chicago, Illinois, prior to his incarceration.

IV. FACTUAL BACKGROUND

6. The affidavit of Jason Hines, Special Agent with U.S. Immigration and Customs Enforcement, showing good cause for this action as required by 8 U.S.C. § 1451(a), is attached as Exhibit A.

IMMIGRATION HISTORY

7. In 1990, Defendant, a native and citizen of Mexico, entered the United States without inspection.

8. On August 22, 2002, Defendant adjusted his status to permanent resident after applying with U.S. Citizenship and Immigration Services ("USCIS") as the spouse of his naturalized citizen wife.

NATURALIZATION PROCEEDINGS

Naturalization Application

9. On or about July 28, 2007, Defendant filed with USCIS a Form N-400, Application for Naturalization ("naturalization application"), seeking citizenship based on his status as the spouse of a U.S. citizen and a permanent resident for at least three years. *See* Ex. B – Form N-400, Application for Naturalization.

10. In his naturalization application, Defendant answered "No" to Part 10, Section D, Question 15, which asked: "Have you **ever** committed a crime or offense for which you were **not** arrested?" (emphasis in original).

11. In his naturalization application, Defendant answered "No" to Part 10, Section D, Question 23, 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).

12. Part 11 of the naturalization application states, in part, "I certify, under penalty of perjury under the laws of the United States of America, that this application, and the evidence submitted with it, are all true and correct." On or about July 23, 2007, Defendant dated and signed his naturalization application beneath that statement, certifying under penalty of perjury that all his responses on the application were true and correct.

Naturalization Interview

13. On May 15, 2008, a USCIS officer interviewed Defendant regarding his naturalization application to determine his eligibility for naturalization.

14. At the beginning of the interview, the USCIS officer placed Defendant under oath.

15. During the naturalization interview, Defendant orally testified under oath that he had *never* committed a crime or offense for which he was not arrested, consistent with his written response to Part 10, Section D, Question 15.

16. During the naturalization interview, Defendant orally testified under oath that he had *never* given false or misleading information to any U.S. government official while applying for any immigration benefit, consistent with his written response to Part 10, Section D, Question 23.

17. During the naturalization interview, Defendant made no changes to his naturalization application, as noted by the "0" in handwritten ink by the interviewing USCIS officer.

18. At the end of the naturalization interview, Defendant again signed his naturalization application in the presence of the USCIS officer and again swore under penalty of perjury that the contents of his naturalization application were true and correct to the best of his knowledge and belief.

19. Based on the information Defendant supplied in his naturalization application and in the sworn answers he gave during his naturalization interview, USCIS approved the naturalization application on May 15, 2008.

Oath of Allegiance

20. On June 19, 2008, based on Defendant's approved naturalization application and the responses he provided that same day on Form N-445, Notice of Naturalization Oath Ceremony, Defendant was administered the oath of allegiance, admitted to U.S. citizenship, and issued Certificate of Naturalization No. [redacted] *See* Ex. C – Form N-550, Certificate of Naturalization.

ILLINOIS STATE CRIMINAL CHARGES AND CONVICTION

21. On May 9, 2018, the state of Illinois issued an eleven-count Indictment in Case No. 18CR-6231-01 charging Defendant with eight counts of Predatory Criminal Sexual Assault of a Child (victim under the age of thirteen) (Counts 1-8), in violation of 720 ILCS 5/12-14.1(a)(1); two counts of Criminal Sexual Assault (against a family member victim under the age of eighteen) (Counts 9-10), in violation of 720 ILCS 5/12-13(a)(3); and one count of Aggravated Criminal Sexual Abuse (upon a victim under the age of thirteen) (Count 11), in violation of 720 ILCS 5/12-16(c)(1)(i). *See* Ex. D – Criminal Record at Information Indictment Return Sheet.

22. On May 10, 2019, Defendant pleaded guilty to Count 5, a single count of Predatory Criminal Sexual Assault of a Child (victim under the age of thirteen), in violation of 720 ILCS 5/12-14.1(a)(1),[1] for acts that occurred "on or about July 21, 2005 and continuing on through July 20, 2006." *Id.*; *see also id.* at Criminal Disposition Sheet; Certified Statement of

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[1] Defendant's Indictment charges him with violating 720 ILCS 5/12-14.1(a)(1) of the Illinois Compiled Statutes 1992 but indicates the statute was renumbered as 720 ILCS 5/11-1.40(a)(1) effective July 1, 2011.

Conviction/Disposition. The court sentenced Defendant to ten years of imprisonment with three years of mandatory supervised release and required lifetime sex offender registration. Ex. D at Criminal Disposition Sheet; Certified Statement of Conviction/Disposition.

FALSE STATEMENTS AND TESTIMONY

Commission of a Crime or Offense for Which Not Arrested

23. From July 21, 2005, to July 20, 2006, Defendant committed a crime for which he had not been arrested at the time he naturalized in 2008, to wit: Predatory Criminal Sexual Assault of a Child (victim under the age of thirteen), in violation of 720 ILCS 5/12-14.1(a)(1).

24. Accordingly, in submitting his July 28, 2007 naturalization application, Defendant's representation in response to Part 10, Section D, Question 15, that he had *never* committed a crime or offense for which he was not arrested, was false.

25. Additionally, Defendant's sworn testimony at his May 15, 2008 naturalization interview in response to Part 10, Section D, Question 15, that he had *never* committed a crime or offense for which he was not arrested, was false.

26. Defendant knew his answer to Part 10, Section D, Question 15, as well as his testimony in orally responding to this question at his naturalization interview, was false because Defendant knew that, from July 21, 2005, to July 20, 2006 – prior to his 2007-2008 naturalization proceedings – he had committed a crime by sexually assaulting a child under the age of thirteen, a violation of 720 ILCS 5/12-14.1(a)(1), Predatory Criminal Sexual Assault of a Child (victim under the age of thirteen).

False or Misleading Information to any U.S. Government Official While Applying for an Immigration Benefit

27. On or about July 28, 2007, when Defendant submitted his naturalization application, and again on May 15, 2008, when USCIS interviewed Defendant in support of his

application, Defendant provided false information to a U.S. government official while applying for an immigration benefit, to wit: representing in his naturalization application and at interview that he had *never* committed a crime for which he had not been arrested, when, from July 21, 2005, to July 20, 2006, he *had* committed – but had not yet been arrested for – the crime of sexually assaulting a child under the age of thirteen, a violation of 720 ILCS 5/12-14.1(a)(1), Predatory Criminal Sexual Assault of a Child (victim under the age of thirteen).

28. Accordingly, in submitting his July 28, 2007 naturalization application, Defendant's representation in response to Part 10, Section D, Question 23, that he had *never* provided false or misleading information to any U.S. government official while applying for an immigration benefit, was false.

29. Additionally, Defendant's sworn testimony at his May 15, 2008 naturalization interview in response to Part 10, Section D, Question 23, that he had *never* provided false or misleading information to any U.S. government official while applying for an immigration benefit, was false.

30. Defendant knew his answer to Part 10, Section D, Question 23, as well as his testimony in orally responding to this question at his naturalization interview, was false because Defendant knew that, in submitting his naturalization application and interviewing in support of it, he had provided false information by representing that he had *never* committed a crime for which he had not been arrested.

V. GOVERNING LAW

Congressionally Imposed Prerequisites to the Acquisition of Citizenship

31. 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). 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) ("A[] [noncitizen] 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).

32. 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). 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.*; 8 C.F.R. § 316.10(a)(1).

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

34. As a matter of law, an applicant necessarily lacks good moral character if he commits a crime involving moral turpitude ("CIMT") during the statutory period and later either is convicted of the crime or admits his commission of the criminal activity. 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(A)); 8 C.F.R. § 316.10(b)(2)(i) (providing that an applicant "shall be found to lack good moral character" if, for example, he committed and was convicted of one or more crimes involving moral turpitude).

35. Congress also has explicitly precluded individuals who give false testimony for the purpose of obtaining immigration benefits from establishing the good moral character necessary to naturalize. 8 U.S.C. § 1101(f)(6).

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

37. Thus, an individual who commits an unlawful act adversely reflecting upon his or her moral character cannot meet the good moral character requirement unless he or she proves that extenuating circumstances existed that would palliate or ameliorate guilt. *See* 8 C.F.R. § 316.10(b)(3)(iii); *see also* 8 U.S.C. § 1101(f) (flush language).

38. "[A] conviction during the statutory period is not necessary for a finding that an applicant lacks good moral character. It is enough that the offense was 'committed' during that time." *United States v. Suarez*, 664 F.3d 655, 661 (7th Cir. 2011) (discussing 8 U.S.C. § 1101(f)(3) and 8 C.F.R. § 316.10(b)(3)(iii)). Where an individual has been convicted, he or she is collaterally estopped from contesting all issues necessarily decided in the criminal matter. *See id.* at 663 (citing *United States v. Jean-Baptiste*, 395 F.3d 1190, 1192 (11th Cir. 2005), *cert. denied*, 546 U.S. 852 (2005)) (stating that a defendant "may not . . . re-litigate issues decided in his criminal case" in a subsequent civil denaturalization action).

The Denaturalization Statute

39. 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 misrepresenting facts that are material to the decision on whether to grant his or her naturalization application, Congress enacted 8 U.S.C. § 1451.

40. Under 8 U.S.C. § 1451(a), a 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 by willful misrepresentation.

41. Failure to comply with any of the congressionally imposed prerequisites to the acquisition of citizenship renders the citizenship "illegally procured." *Fedorenko*, 449 U.S. at 506.

42. Naturalization was procured by concealment of a material fact or by willful misrepresentation, where: (1) the naturalized citizen misrepresented or concealed some fact during the naturalization process; (2) the misrepresentation or concealment was willful; (3) the fact was material; and (4) the naturalized citizen procured citizenship as a result of the misrepresentation or concealment. *Kungys v. United States*, 485 U.S. 759, 767 (1988).

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

VI. CAUSES OF ACTION

COUNT ONE

ILLEGAL PROCUREMENT OF NATURALIZATION
LACK OF GOOD MORAL CHARACTER
(Crime Involving Moral Turpitude)

44. Plaintiff re-alleges and incorporates by reference the factual and legal allegations in Sections II through V of this complaint.

45. As outlined above, to be eligible for naturalization an applicant must show that he or she has been a person of good moral character for the five-year statutory period before he or

she files a naturalization application and until the time he or she becomes a naturalized United States citizen. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1). Thus, Defendant was required to establish that he was a person of good moral character from July 28, 2002, until June 19, 2008 (the "statutory period").

46. Defendant was statutorily barred from showing that he was a person of good moral character because he committed a CIMT during his statutory period. 8 U.S.C. § 1101(f)(3); 8 C.F.R. § 316.10(b)(2)(i).

47. As outlined above, Defendant pleaded guilty to one count of Predatory Criminal Sexual Assault of a Child, in violation of 720 ILCS 5/12-14.1(a)(1).

48. The count to which Defendant pleaded guilty, Count 5, cites the timeframe of his crime as July 21, 2005, to July 20, 2006, which is within his statutory period.

49. Defendant's crime of Predatory Criminal Sexual Assault of a Child, in violation of 720 ILCS 5/12-14.1(a)(1) – to which he pleaded guilty in 2019 for his 2005-2006 conduct, and which requires that a perpetrator 17 years of age or older commit an act of sexual penetration with a victim who is under 13 years of age – constitutes a CIMT because it is a sexual offense involving a particularly young victim whose status as a minor child cannot reasonably be doubted. *See Ashcroft v. Free Speech Coal.*, 535 U.S. 234, 244 (2002) ("The sexual abuse of a child is a most serious crime and an act repugnant to the moral instincts of a decent people."); *United States v. Dave*, No. 13 C 8867, 2015 WL 5590696, at *2 (N.D. Ill. Sept. 21, 2015) ("The inherent impropriety of sexual contact between an adult and a child, which animates statutory rape laws, has led numerous courts to conclude that even strict liability sex offenses involving minors are morally turpitudinous. . . . In short, the Court holds that aggravated sexual abuse of a minor is a crime involving moral turpitude.") (examining 720 ILCS 5/11-1.60(d) (aggravated

criminal sexual abuse), formerly numbered as 720 ILCS 5/12-16, prohibiting "an act of sexual penetration or sexual conduct with a victim who[m] [the perpetrator knows] is at least 13 years of age but under 17 years of age" by a perpetrator who "is at least 5 years older than the victim"); *Matter of Dingena*, 11 I. & N. Dec. 723 (BIA 1966) (finding that a crime is a CIMT "[i]f sexual intercourse is present, and it is established that the female is under the age of consent").

50. Because Defendant was convicted of a CIMT that he committed during the statutory period, he was barred under 8 U.S.C. § 1101(f)(3) from showing he had the good moral character necessary to become a naturalized United States citizen.

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

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

COUNT TWO

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

53. Plaintiff re-alleges and incorporates by reference the factual and legal allegations in Sections II through V of this complaint.

54. As outlined above, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during his "statutory period," which runs from July 28, 2002, until the date he became a United States citizen on June 19, 2008. *See* 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

55. Defendant could not establish the requisite good moral character for naturalization because he committed an unlawful act during the statutory period that reflected adversely upon

his moral character, and no extenuating circumstances exist that would lessen his guilt. *See* 8 C.F.R. § 316.10(b)(3)(iii); 8 U.S.C. § 1101(f) (flush language).

56. Specifically, as set forth above, Defendant sexually assaulted a child under the age of thirteen, in violation of 720 ILCS 5/12-14.1(a)(1).

57. Based on the specific count to which Defendant pleaded guilty, Count 5, his conduct occurred between July 21, 2005, and July 20, 2006, which is within his statutory period.

58. Defendant cannot establish extenuating circumstances with regard to his unlawful act that renders his conduct less reprehensible than it otherwise would be or that tend to palliate or lessen his guilt. He therefore cannot avoid the regulatory bar on establishing good moral character at 8 C.F.R. § 316.10(b)(3)(iii).

59. The catch-all provision for unlawful acts at 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) applies to Defendant regardless of whether the statutory CIMT bar set forth above also applies to him.

60. Because Defendant committed an unlawful act that adversely reflected on his moral character during the statutory period, and he cannot demonstrate extenuating circumstances, he was barred under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) from showing that he had the good moral character necessary to become a naturalized United States citizen.

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

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

COUNT THREE

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

63. Plaintiff re-alleges and incorporates by reference the factual and legal allegations in Sections II through V of this complaint.

64. As outlined above, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during his "statutory period," which runs from July 28, 2002, until the date he became a United States citizen on June 19, 2008. *See* 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

65. During his naturalization interview with USCIS on May 15, 2008, which is within his statutory period, Defendant gave false testimony to secure an immigration benefit.

66. As outlined above, during his 2008 interview, and after being placed under oath by the interviewing officer, Defendant falsely testified that he had *never* committed a crime or offense for which he was not arrested, despite having sexually assaulted a child under the age of thirteen, in violation of 720 ILCS 5/12-14.1(a)(1).

67. As outlined above, also during his 2008 interview, and after being placed under oath by the interviewing officer, Defendant falsely testified that he had *never* given false or misleading information to any U.S. government official while applying for any immigration benefit, despite having lied to USCIS in his naturalization application and at his interview by representing that – notwithstanding his sexual assault of a child under the age of thirteen between July 21, 2005, and July 20, 2006 – he had *never* committed a crime or offense for which he was not arrested.

68. Defendant's false testimony under oath for the purpose of obtaining his naturalization made him ineligible to naturalize because he was barred under 8 U.S.C.

§ 1101(f)(6) from showing that he had the good moral character necessary to be naturalized as a U.S. citizen.

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

<u>COUNT FOUR</u>

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

70. Plaintiff re-alleges and incorporates by reference the factual and legal allegations in Sections II through V of this complaint.

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

72. As set forth above, throughout his naturalization process, including in his naturalization application and during his naturalization interview, Defendant concealed his criminal actions and willfully misrepresented that (a) he had *never* committed a crime or offense for which he had not been arrested; and (b) he had *never* given false or misleading information to any U.S. government official while applying for an immigration benefit.

73. Defendant knew these two representations were false and misleading, and he therefore provided these two resulting misrepresentations willfully.

74. Defendant's misrepresentations were material to his naturalization because the disclosure of his sexual assault conduct and the disclosure that, in submitting his naturalization application and interviewing in support of it, he lied about his sexual assault conduct, would have had a natural tendency to influence USCIS's decision whether to approve Defendant's naturalization application because such information directly related to statutory and regulatory

eligibility criteria that USCIS is required to consider when deciding whether to grant or deny a naturalization application.

75. Finally, Defendant procured his naturalization because of his misrepresentations and concealment. Had Defendant disclosed the truth about his criminal conduct, he would have disclosed his ineligibility for naturalization, and USCIS would not have approved his application or administered the oath of allegiance.

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

PRAYER FOR RELIEF

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

1. A declaration that Defendant illegally procured his naturalization;

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

3. Judgment revoking and setting aside Defendant's naturalization and canceling Certificate of Naturalization No. [redacted] effective as of the original date of the order and certificate, June 19, 2008;

4. Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages in connection with his June 19, 2008 naturalization;

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

6. Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against him, any other indicia of U.S. citizenship – including, but not limited to, U.S. passports (and passport cards, if applicable), as well as any enhanced driver's licenses, whether valid 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 her representative, including undersigned counsel; and

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

Dated: March 18, 2025

Respectfully submitted,

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