

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
SEAD MILJKOVIC, a/k/a)
Sead Dukic,)
)
Defendant.)
_____)

Civil Action No.:

**COMPLAINT TO REVOKE
NATURALIZATION**

I. PRELIMINARY STATEMENT OF THE CASE

Through this civil action, the United States seeks to revoke the naturalization of an individual who immigrated to the United States under a fictitious identity, received numerous immigration benefits under that fictitious identity, and, ultimately, naturalized as a U.S citizen under that fictitious identity. Using the name Sead Dukic, Defendant came to the United States, became a permanent resident of the United States, and, later, naturalized as a U.S. citizen. But Defendant is not actually Sead Dukic. His real name is Sead Miljkovic, and he is a former member of [REDACTED]

[REDACTED] the U.S. Government granted him naturalized citizenship under the name Sead Dukic.

[REDACTED] in 1995, Defendant fled to neighboring Slovenia. From there, Defendant came to the United States. He first submitted two applications to come to the United States under his real name, Sead Miljkovic, but the U.S. government denied both applications. Later, he submitted a third application under the fictitious

name “Sead Dukic,” falsifying his name and other biographical details. The U.S. government approved this application in 1999, allowing Defendant to enter the United States. Using this Sead Dukic identity, Defendant continued to lie to U.S. immigration authorities about his identity in subsequent applications for permanent resident status and, later, naturalization. Defendant became a U.S. citizen in April 2007 under the name of Sead Dukic, as the U.S. government approved Defendant’s naturalization application while being unaware of his true identity and the fact that he was wanted—under his real name—on charges of war crimes against civilians in his native Bosnia.

Following the U.S. government’s discovery of Defendant’s true identity, the United States charged Defendant with three counts of Passport Fraud and three counts of Torture. *See United States v. Sead Miljkovic a/k/a Sead Dukic*, 1:23-cr-55 (E.D. Tenn.). On June 16, 2025, Defendant signed an agreement to plead guilty to one count of Passport Fraud, admitting that he is actually Sead Miljkovic and that he had willfully falsified his name and date of birth on prior applications to the U.S. Government for immigration benefits. With the attached affidavit showing good cause, the United States of America now brings this civil action on the grounds that Defendant illegally procured his naturalization and procured naturalization by willfully misrepresenting and concealing material facts during his naturalization process. Under 8 U.S.C. § 1451(a), the United States requests that the Court revoke and set aside the order admitting Defendant to citizenship and 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 his Certificate of Naturalization No.



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

3. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391, because Defendant resides in this District.

III. PARTIES

4. Plaintiff is the United States of America.

5. Defendant is Sead Miljkovic, who is a naturalized U.S. citizen under the name Sead Dukic.

IV. FACTUAL ALLEGATIONS

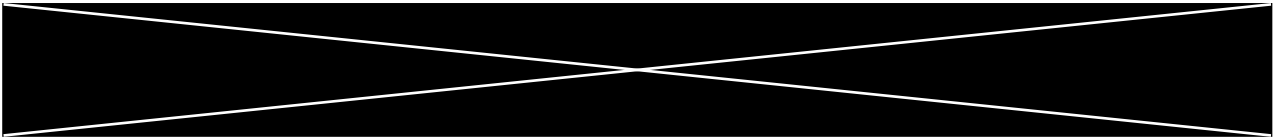
6. The affidavit of  a Resident Agent in Charge with U.S. Immigration and Customs Enforcement (“ICE”), an agency of the U.S. Department of Homeland Security, showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached as Exhibit A.

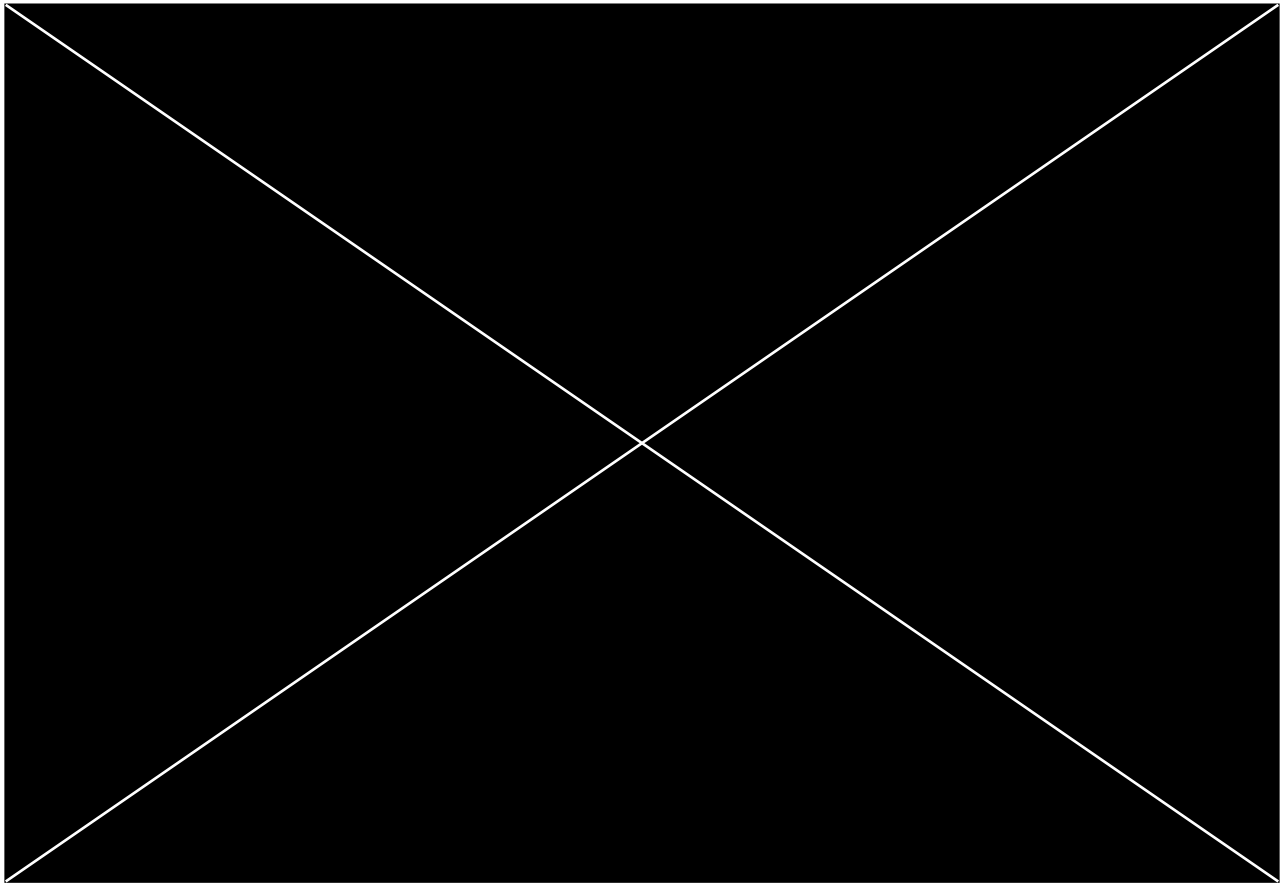
7. Defendant was born in 1972.

8. Defendant was born in the city of Bihac within the country of Bosnia and Herzegovina (hereinafter, “Bosnia”).

9. Between 1992 and 1995, there was armed conflict in Bosnia after Bosnia declared independence from the Socialist Federal Republic of Yugoslavia.

10. In or around 1993, certain Bosnians opposed to the central Bosnian government established their own government in northwest Bosnia. 





16. In 1995, Defendant left Bosnia and entered Slovenia.

DEFENDANT'S IMMIGRATION HISTORY

Defendant's Applications to Come to the United States

First Application

17. On or about July 2, 1996, Defendant, using the name Sead Miljkovic, filed a form that served as an application for permission to come to the United States ("First Application"), from Slovenia.

18. Question 1 of the First Application asked for the applicant's name. Defendant used the name Sead Miljkovic in response to this question.

19. Question 3 of the First Application asked for the applicant's date of birth. Defendant listed a birth date in 1972¹ in response to this question.
20. Question 3 of the First Application asked for the applicant's place of birth. Defendant listed "Bihac" as his city of birth and "BH" as his country of birth.
21. In the First Application, Defendant indicated that he was married to a woman named Esma Miljkovic, whose maiden name was Esma Drananovic.
22. In the First Application, Defendant indicated that he married Esma Drananovic on July 25, 1996.
23. In connection to his First Application, Defendant submitted a document to U.S. immigration officials that purported to be a marriage certificate showing that he married Esma Drananovic on July 25, 1996.
24. Defendant completed a "Form G-325C – Biographic Information" and submitted it with his First Application.
25. The Form G-325C required the applicant to list any "Former Husbands or Wives." In the Form G-325C that he submitted with his First Application, Defendant responded "None" to this question.
26. The Form G-325C required the applicant to provide the name of his father. In the Form G-325C that he submitted with his First Application, Defendant indicated that his father's name was Meho Miljkovic.

¹ In compliance with the privacy protections required by Federal Rule of Civil Procedure 5.2(a)(2), this filing only includes the year of birth and will omit the month and day.

27. The former Immigration and Naturalization Service (“INS”)² processed Defendant’s First Application and assigned Defendant alien number  under the name of Sead Miljkovic.

28. On September 24, 1996, a U.S. government official interviewed Defendant in Ljubljana, Slovenia, concerning Defendant’s First Application.

29. On November 4, 1996, INS denied Defendant’s First Application.

Second Application

30. On or about April 22, 1997, Defendant, again using the name Sead Miljkovic, filed a second form that served as an application for permission to come to the United States (“Second Application”) from Slovenia.

31. Question 1 of the Second Application asked for the applicant’s name. Defendant used the name Sead Miljkovic in response to this question.

32. Question 3 of the Second Application asked for the applicant’s date of birth. Defendant listed a birthdate in 1972—the same birthdate as on his First Application—in response to this question.

33. Question 3 of the Second Application asked for the applicant’s place of birth. Defendant again listed “Bihac” as his city of birth and “BK” as his country of birth.

34. Question 7 of the Second Application asked for the name of the applicant’s spouse. Defendant listed “N/A” in response to this question.

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 immigration responsibilities of the INS were divided among three separate entities within the DHS: ICE, Customs and Border Protection, and U.S. Citizenship and Immigration Services.

35. Defendant completed a second “Form G-325C – Biographic Information” (“Second Form G-325C”) and submitted it with his Second Application.

36. The Second Form G-325C required the applicant to provide the name of his father. In the Second Form G-325C, Defendant again indicated that his father’s name was Meho Miljkovic.

37. The INS processed Defendant’s Second Application and assigned Defendant alien number  under the name of Sead Miljkovic.

38. The INS denied the Second Application.

Third Application

39. On or about September 10, 1999, Defendant, using the name Sead Dukic, filed a third form that served as an application for permission to come to the United States (“Third Application”) from Croatia.

40. Question 1 of the Third Application asked for the applicant’s name. Defendant used the name Sead Dukic in response to this question.

41. Question 3 of the Third Application asked for the applicant’s date of birth. Defendant listed a birthdate in 1971 in response to this question.

42. Question 3 of the Third Application asked for the applicant’s place of birth. Defendant listed “V. Kladusa” as his city of birth and “BK” as his country of birth.

43. In his Third Application, Defendant indicated that he was married to a woman named Suzana Dukic, whose maiden name was Suzana Jablanovic.

44. In his Third Application, Defendant indicated that he married Suzana Jablanovic on July 24, 1995.

45. In connection to his Third Application, Defendant submitted a document to U.S. immigration officials that purported to be a marriage certificate showing that he married Suzana Jablanovic on July 24, 1995.

46. Defendant completed a “Form G-325C – Biographic Information” (“Third Form G-325C”) and submitted it with his Third Application.

47. The Third Form G-325C asked for the applicant’s name. In the Third Form G-325C, Defendant used the name Sead Dukic in response to this question.

48. The Third Form G-325C required the applicant to list any “Former Husbands or Wives.” In the Third Form G-325C, Defendant wrote “None” in response to this question.

49. The Third Form G-325C required the applicant to list “All Other Names Used.” In the Third Form G-325C, Defendant responded “None” to this question.

50. The Third Form G-325C required the applicant to provide his father’s name. In the Third Form G-325C, Defendant indicated that his father’s name was Muhamed Dukic.

51. A U.S. government official interviewed Defendant in Zagreb, Croatia, on September 10, 1999, concerning his Third Application.

52. During this interview, and in the presence of the U.S. government official, Defendant signed his Third Application and thereby made the following certification: “I, Sead Dukic, do swear (affirm) that I know the contents of this registration subscribed by me including the attached documents, that the same are true to the best of my knowledge . . . and that this registration was signed by me with my full, true name.”

53. Based on Defendant’s written application and on his responses during the interview, INS approved Defendant’s Third Application on September 10, 1999.

54. Under the identity of Sead Dukic, Defendant was admitted to the United States on November 9, 1999.

Defendant's Adjustment Application

55. On or about June 20, 2004, Defendant filed a Form I-485, Application to Register Permanent Residence or Adjust Status ("Adjustment Application") (attached as Exhibit B), with U.S. Citizenship and Immigration Services ("USCIS").

56. Part 1 of the Adjustment Application required Defendant to provide his "Given Name" and "Family Name." Defendant listed "Sead" as his Given Name and "Dukic" as his Family Name.

57. Part 1 of the Adjustment Application required Defendant to provide his date of birth. Defendant listed a birthdate in 1971.

58. Question 10 of Part 3 of the Adjustment Application asked Defendant "[H]ave you, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the United States or any immigration benefit?" Defendant answered "No" to this question.

59. Defendant completed a Form-325A and submitted it with his Adjustment Application.

60. The Form-325A asked for the applicant's city and country of birth. Defendant responded that he was born in "V. Kladusa Bosnia."

61. The Form 325A asked for "All Other Names Used" by the applicant. Defendant left this section blank.

62. The Form 325A asked for the applicant's father's name. Defendant responded that his father's name was Muhamed Dukic.

63. On or about June 20, 2004, Defendant signed his Adjustment Application under penalty of perjury, certifying the information it contained was true and correct.

64. Based on the information Defendant provided in his Adjustment Application, USCIS approved the application and granted Defendant the status of permanent resident under the name Sead Dukic.

NATURALIZATION PROCEEDINGS

Naturalization Application

65. On or about July 25, 2006, Defendant filed a Form N-400, Application for Naturalization (“Naturalization Application”) (attached as Exhibit C), with USCIS.

66. In his Naturalization Application, in Part 1, Section A, Defendant listed “Sead” as his Given/First Name and “Dukic” as his Family/Last Name.

67. Part 1, Section C, of the Naturalization Application states, “If you have ever used any other names, provide them below.” Defendant left this section blank.

68. In Part 3, Section B, of his Naturalization Application, Defendant listed a birthdate in 1971.

69. In his naturalization application, Defendant answered “1” to Part 8, Section A, which asked “How many times have you been married (including annulled marriages)?”

70. In his naturalization application, Defendant answered “No” to Part 10, 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?”

71. In his naturalization application, Defendant answered “No” to Part 10, Question 24, which asked: “Have you **EVER** lied to any U.S. government official to gain entry or

admission into the United States?”

72. On or about July 25, 2006, using the name Sead Dukic, Defendant signed his naturalization application under penalty of perjury, thereby certifying that his answers to the questions therein were true and correct.

Naturalization Interview

73. On February 21, 2007, a USCIS adjudicator orally interviewed Defendant regarding his naturalization application to determine his eligibility for naturalization (“naturalization interview”).

74. At the beginning of the naturalization interview, the USCIS adjudicator placed Defendant under oath.

75. During the naturalization interview, the USCIS adjudicator asked Defendant many of the same questions found in the written Naturalization Application.

76. During the naturalization interview, Defendant orally testified under oath that his name was “Sead Dukic,” consistent with his written response to Part 1, Section A of his Naturalization Application.

77. During the naturalization interview, Defendant orally testified under oath that his date of birth was a date in 1971, consistent with his written response to Part 3, Section B of his Naturalization Application.

78. 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 or to prevent deportation, exclusion, or removal, consistent with his written response to Part 10, Question 23 of his Naturalization Application.

79. During the naturalization interview, Defendant orally testified under oath that he had never lied to any U.S. government official to gain entry or admission into the United States, consistent with his written response to Part 10, Question 24 of his Naturalization Application.

80. During the naturalization interview, Defendant made one change to his naturalization interview, which was handwritten in ink by the interviewing USCIS adjudicator.

81. At the end of the naturalization interview, Defendant again signed the Naturalization Application in the presence of the USCIS adjudicator and again swore that the contents of his Naturalization Application, including the one numbered change, were true and correct to the best of his knowledge.

82. Based on the information supplied by Defendant in his Naturalization Application and in the sworn answers he gave during his naturalization interview, USCIS approved the Naturalization Application.

Oath of Allegiance

83. On April 17, 2007, Defendant submitted a completed Form N-445, Notice of Naturalization Oath Ceremony, to USCIS.

84. Form N-445 asked Defendant a number of questions about his activity and eligibility after his February 21, 2007, interview with the USCIS adjudicator regarding his N-400.

85. Defendant marked the box "No" to answer all the questions on his Form N-445.

86. On April 17, 2007, based on Defendant's approved Naturalization Application and on the responses he provided that same date on Form N-445, Defendant was administered the oath of allegiance, admitted to U.S. citizenship, and issued Certificate of Naturalization No.



(attached as Exhibit D) under the name Sead Dukic.

DEFENDANT'S CRIMINAL PROCEEDINGS

87. On January 23, 2007, a court in Bihac, Bosnia, issued an arrest warrant against Defendant on the charge of “War Crimes Against Civilians,” in violation of Article 154, paragraph 2, of the Criminal Code of Bosnia and Herzegovina.

88. Defendant has not appeared before a court in Bosnia on these charges.

89. On June 27, 2023, a grand jury in the U.S. District Court for the Eastern District of Tennessee indicted Defendant on three counts of Passport Fraud, in violation of 18 U.S.C. § 1542. *See* Indictment, *United States v. Sead Miljkovic a/k/a Sead Dukic*, No. 1:23-cr-55 (E.D. Tenn. June 27, 2023) (attached as Exhibit E).

90. Count 1 of the Indictment alleges that, on April 17, 2017, Defendant willfully and knowingly made false statements in an application for a U.S. passport, specifically: that his last name was Dukic, that his date of birth was in 1971, and that he had not used other names.

91. Count 2 of the Indictment charged Defendant with the knowing and willful use of a U.S. passport that had been secured by reason of a false statement, specifically a false last name, a false date of birth, and a false statement that Defendant had not used other names. Count 2 alleged that Defendant used such a passport in support of a passport renewal application.

92. Count 3 of the Indictment charged Defendant with the knowing and willful attempt to use a U.S. passport that had been secured by reason of a false statement, specifically a false last name, a false date of birth, and a false statement that Defendant had not used other names. Count 3 alleged that Defendant attempted to use such a passport to depart the United States.

93. On June 28, 2023, the Court held an arraignment on the Indictment. During this arraignment, Defendant stated that his name was “Sead Miljkovic” and that he was born in 1972.

See Transcript of Arraignment, *United States v. Sead Miljkovic a/k/a Sead Dukic*, No. 1:23-cr-55 (E.D. Tenn. June 28, 2023) (attached as Exhibit F).

94. On December 6, 2023, a grand jury in the U.S. District Court for the Eastern District of Tennessee issued a Superseding Indictment against Defendant that added three counts of Torture, in violation of 18 U.S.C. § 2340A. See Superseding Indictment, *United States v. Sead Miljkovic a/k/a Sead Dukic*, No. 1:23-cr-55 (E.D. Tenn. Dec. 6, 2023) (attached as Exhibit G).

95. Counts 1 through 3 of the Superseding Indictment charged Defendant with the commission of [REDACTED]

96. Counts 4 through 6 of the Superseding Indictment are identical to the three counts of the original indictment, charging Defendant with Passport Fraud, in violation of 18 U.S.C. § 1542.

97. On June 16, 2025, Defendant signed a plea agreement in which he agreed to plead guilty to Count 5 of the Superseding Indictment, to wit, Passport Fraud in violation of 18 U.S.C. § 1542. Plea Agreement, *United States v. Sead Miljkovic a/k/a Sead Dukic*, 1:23-cr-55 (E.D. Tenn.) (attached as Exhibit H).

98. In the Plea Agreement, Defendant affirmed that his true last name is Miljkovic and that his true date of birth was in May 1972. He further affirmed that his use of the last name Dukic and a date of birth in November 1971 in applications to the U.S. Government was willfully false.

99. Defendant further affirmed in his Plea Agreement that he had submitted applications to the U.S. Government using the name Sead Miljkovic in or about July 1996 and in or about April 1997.

DEFENDANT'S PETITION FOR NAME CHANGE

100. On December 1, 2025, in the Chancery Court of Hamilton, Tennessee, Defendant filed a Petition for Name Change. (Attached as Exhibit I).

101. In his Petition for Name Change, Defendant states that he was born in May 1972. (*Id.*, ¶ 1).

102. In his Petition for Name Change, Defendant states that his father's name is Meho Miljkovic. (*Id.*).

103. In his Petition for Name Change, Defendant states that after filing two applications with the U.S. government using the name Sead Miljkovic and the May 1972 birthdate, in 1999 he filed an application with the U.S. government on which he changed his name to Sead Dukic and used a different birthdate. (*Id.* at ¶¶ 2-3).

104. In his Petition for Name Change, Defendant states that he applied to naturalize as a U.S. citizen under the Dukic name and that his application was granted under that name in 2006. (*Id.* at ¶ 7).

GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

105. No individual 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).

106. To qualify for naturalization, an alien must have been lawfully admitted to the United States for permanent residence. *See* 8 U.S.C. § 1427(a)(1); *see also* 8 U.S.C. § 1429.

107. Congress has also mandated that an alien 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 typically begins five years before the date the applicant files the naturalization application, and it continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *See id.*

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

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

B. The Denaturalization Statute

110. 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 him or her naturalization application, Congress enacted 8 U.S.C. § 1451.

111. Under 8 U.S.C. § 1451(a), this Court must revoke an order of naturalization and cancel the individual’s Certificate of Naturalization if his or her naturalization was *either*:

- a. illegally procured, *or*
- b. procured by concealment of a material fact or by willful misrepresentation.

112. 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.

113. An individual procured naturalization 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. *See Kungys v. United States*, 485 U.S. 759, 767 (1988).

114. Where the government establishes that the 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.

CAUSES OF ACTION

COUNT I

ILLEGAL PROCUREMENT OF NATURALIZATION Not Lawfully Admitted for Permanent Residence (Fraud or Willful Misrepresentation of a Material Fact)

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

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

117. The term “lawfully” requires compliance with the substantive legal requirements for admission, and not mere procedural regularity. *Turfah v. U.S. Citizenship & Immigr. Servs.*, 845 F.3d 668, 672 (6th Cir. 2007).

118. To be eligible for permanent resident status, an alien must be admissible to the United States. 8 U.S.C. § 1255(a).

119. An alien who seeks to procure (or has sought to procure or has procured) any immigration benefit by fraud or willfully misrepresenting a material fact is inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

120. As outlined above, Defendant misrepresented material facts in his Third Application to enter the United States and in his Adjustment Application.

121. In both his Third Application and his Adjustment Application, Defendant made multiple knowing and willful misrepresentations to conceal his true identity. In both these applications, Defendant:

- a. Indicated that his name was “Sead Dukic” when his name is, in fact, Sead Miljkovic.
- b. Indicated that his date of birth was a date in 1971 when his actual date of birth was a date in 1972.
- c. Indicated that he was born in the city of V. Kladusa, Bosnia, when he was born in the city of Bihac, Bosnia.
- d. Indicated that his father’s name was Muhamed Dukic when his father’s name is actually Meho Miljkovic.
- e. Indicated that he had not used any names other than Sead Dukic when he had previously used the name Sead Miljkovic.

122. Further, Defendant made inconsistent statements about his marital status and history in his First, Second, and Third Applications:

- a. In his First Application, submitted in 1996, Defendant indicated he was married to Esma Miljkovic (née Drananovic) and that the date of their marriage was July 25, 1996.
- b. In his Second Application, submitted in 1997, Defendant indicated that he was not—and had never been—married.
- c. In his Third Application, submitted in 1999, Defendant indicated that he was married to Suzana Dukic (née Jablanovic) and that the date of their marriage was July 24, 1995.

123. Given that Defendant provided three different—and inconsistent—responses about his marital status and history to U.S. government officials in three applications *after* the dates he provided for his purported marriage to Esma Drananovic (July 25, 1996) and Suzana Jablanovic (July 24, 1995), and that none of his applications disclosed any prior marriages despite a requirement to do so, *at least two* of Defendant's inconsistent representations regarding his marital status and history were necessarily false.

124. Defendant's willful misrepresentations concerning (1) his name and other identifying biographical information and (2) his marital status had the natural tendency to influence the decision-maker to grant both his refugee applications and his application to adjust status to permanent resident.

125. Because Defendant willfully misrepresented these material facts, he was inadmissible at the time he adjusted status to permanent resident, and, therefore, he was never

lawfully admitted for permanent residence in accordance with the substantive legal requirements to obtain that status.

126. 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.

127. Because Defendant was ineligible for naturalization, he illegally procured his citizenship, and the Court must therefore revoke his citizenship as provided in 8 U.S.C. § 1451(a).

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION Lack of Good Moral Character (False Testimony)

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

129. Defendant illegally procured his naturalization because he was statutorily precluded from establishing the good moral character necessary to naturalize on account of his false testimony for the purpose of obtaining an immigration benefit.

130. Congress has mandated that an alien 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 naturalization application and continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *See id.*

131. Defendant submitted his naturalization application on July 25, 2006, and naturalized on April 17, 2007. Thus, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from July 25, 2001, until April 17, 2007.

132. Defendant gave false testimony to secure an immigration benefit within this period, during his February 21, 2007 naturalization interview with USCIS.

133. During this interview, Defendant provided false oral testimony under oath in response to multiple questions to conceal his true identity, to wit:

- a. Despite his name being Sead Miljkovic, Defendant testified orally and under oath to USCIS that his name was Sead Dukic.
- b. Despite his date of birth being a date in 1972, Defendant testified orally and under oath to USCIS that his date of birth was a date in 1971.
- c. Despite having lied about his name, date and place of birth, father's name, and whether he had used any other names in his Third Application and his Adjustment Application, Defendant falsely testified orally and under oath to USCIS that he had never given false or misleading information to any U.S. government official while applying for an immigration benefit.
- d. Despite having lied about his name, date and place of birth, father's name, and whether he had used any other names in this Third Application, Defendant falsely testified orally and under oath to USCIS that he had never lied to any U.S. government official to gain entry or admission into the United States.

134. Defendant's false oral testimony under oath for the purpose of obtaining his naturalization made him ineligible for naturalization, because 8 U.S.C. § 1101(f)(6) precludes individuals who give false testimony for the purpose of obtaining immigration benefits from being able to establish the good moral character necessary to naturalize as a U.S. citizen.

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

COUNT III

PROCUREMENT OF UNITED STATES CITIZENSHIP BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION

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

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

138. As discussed in paragraphs 65 through 86 above, throughout the naturalization process, Defendant concealed and willfully misrepresented his identity and his having previously provided false or misleading information to U.S. government officials while applying to come to the United States and while applying for permanent resident status.

139. Specifically, in both his Naturalization Application and during his naturalization interview, Defendant misrepresented his name and date of birth, and he falsely stated that he had never given false testimony for the purpose of obtaining any immigration benefit and that he had never lied to any U.S. government official to gain entry or admission into the United States. Further, in his Naturalization Application, he had falsely stated that he had never used any names other than Sead Dukic.

140. Defendant knew his misrepresentations and concealment of these matters were false and misleading, and he therefore made such misrepresentations willfully.

141. Defendant's misrepresentations were material to his naturalization because the disclosure of his true identity—Sead Miljkovic—as well as his prior misrepresentations to U.S. officials in earlier immigration proceedings would have had a natural tendency to influence USCIS's decision whether to approve Defendant's application for naturalization.

142. Defendant procured his naturalization as a result of these misrepresentations. Indeed, at the time USCIS approved Defendant's application for naturalization, a court in Bosnia had issued an arrest warrant for war crimes against civilians under his real name—a fact that was highly relevant to the determination of whether Defendant possessed the good moral character required to naturalize. Moreover, as demonstrated above in Counts 1 and 2 of this complaint, the concealed and misrepresented facts concealed Defendant's ineligibility for naturalization, and USCIS would have denied Defendant's naturalization application had he been truthful.

143. A court must revoke naturalization when, as here, an individual procures citizenship by concealing material facts or making willful misrepresentations. See 8 U.S.C. § 1451(a).

144. Because Defendant procured his citizenship by concealing material facts and by making willful misrepresentations, this Court must revoke Defendant's citizenship pursuant to the requirements of 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

WHEREFORE, the United States of America respectfully requests:

- (1) A declaration that Defendant procured his citizenship illegally;
- (2) A declaration that Defendant procured his citizenship by concealment of material facts and by willful misrepresentation;
- (3) Judgment revoking and setting aside the order admitting Defendant to citizenship

and canceling Certificate of Naturalization No. [REDACTED], effective as of the original date of the order and certificate, April 17, 2007.

(4) Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to United States citizenship that he obtained as a result of his April 17, 2007 naturalization;

(5) Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment against him, his Certificate of Naturalization No. [REDACTED] and any copies thereof in his possession—and to make good faith efforts to recover and immediately surrender any copies thereof that he 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 him, any other indicia of United States citizenship (including, but not limited to, U.S. passports and other relevant documents, whether current or expired), and any copies thereof in his possession, dominion, or control—and to make good faith efforts to recover and then surrender any copies thereof that he 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: January 5, 2026

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Respectfully submitted,

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