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

CASE NO. 1:26-cv-23914

UNITED STATES OF AMERICA, Plaintiff, vs. LEIDYS DELMAS GARCIA, Defendant.	)	**COMPLAINT TO REVOKE NATURALIZATION**

I. PRELIMINARY STATEMENT

The United States of America brings this civil action against Defendant Leidys Delmas Garcia ("Delmas Garcia"), to revoke her naturalized U.S. citizenship. This action under 8 U.S.C. § 1451(a) is based on Delmas Garcia's criminal conduct prior to naturalizing, for which she was charged and convicted after naturalizing. Specifically, before she became a citizen of the United States, Delmas Garcia engaged in criminal activity that she concealed throughout the naturalization process and that disqualified her from U.S. citizenship

From approximately October 2018 through November 2022, Delmas Garcia conspired to fraudulently bill commercial insurance company Blue Cross Blue Shield ("BCBS") for approximately $24,170,263 in false medical claims. At her naturalization interview in January 2019, Delmas Garcia stated that she had never committed a crime or offense for which she had not been arrested. On July 24, 2023, however, she pleaded guilty to – and was ultimately convicted of – engaging in a conspiracy to commit health care fraud beginning in approximately October 2018, in violation of 18 U.S.C. § 1349. In light of Delmas Garcia's fraudulent scheme, which she misrepresented and concealed throughout her naturalization proceedings, she was ineligible for naturalization and thus procured her citizenship unlawfully. Additionally, because

she withheld her prior crimes from the government throughout her naturalization proceedings, she also procured her citizenship by concealment of a material fact or by willful misrepresentation. Accordingly, as shown below, Delmas Garcia unlawfully naturalized, and this Court must order the denaturalization of Delmas Garcia.

II. PARTIES, JURISDICTION, AND VENUE

1. This is an action filed under 8 U.S.C. § 1451(a) to revoke and set aside the decision admitting Delmas Garcia to U.S. citizenship and to cancel Delmas Garcia's Certificate of Naturalization No. [redacted], issued on January 19, 2019.

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

3. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391, because Delmas Garcia last residence prior to her current incarceration was in [redacted] which is within the jurisdiction and venue of this Court.

4. Plaintiff is the United States of America, suing on behalf of itself.

5. Delmas Garcia is a native of Cuba and obtained her U.S. citizenship through naturalization.

6. Delmas Garcia is currently incarcerated. Delmas Garcia's last known address of residence prior to her incarceration was in [redacted]

III. FACTUAL BACKGROUND

7. The affidavit of Alex M. Melendez, a Deportation Officer with U.S. Immigration and Customs Enforcement, 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 hereto as Exhibit A.

A. Delmas Garcia's Fraud Scheme & Federal Conviction

8. In November 2022, Delmas Garcia, together with others, was charged by Indictment with one count of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. § 1349, and nine counts of Health Care Fraud, in violation of 18 U.S.C. § 1347, in the United States District Court for the Southern District of Florida. Indictment, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. Nov. 17, 2022), ECF No. 1 (attached as Exh. B).

9. In the Indictment, the United States alleged that, from in or around October 2018, and continuing through in or around November 2022, Delmas Garcia and her co-conspirators did willfully and knowingly conspire to defraud health care benefit programs managed by commercial insurance company BCBS. *Id.*

10. On July 24, 2023, Delmas Garcia entered a Plea Agreement whereby she agreed to plead guilty to Conspiracy to Commit Health Care Fraud, and the United States agreed to recommend a reduction in sentencing. Plea Agreement ¶¶ 1, 7, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. July 24, 2023), ECF No. 136 (attached as Exh. C).

11. On July 24, 2023, Delmas Garcia signed a Factual Proffer, which she filed with the Plea Agreement and in which she admitted the following facts:

a. Beginning in or around October 2018, and continuing through, in or around November 2022, Delmas Garcia and her co-conspirators organized a healthcare fraud conspiracy to create physical therapy clinics that would fraudulently bill BCBS for physical therapy services that were not medically necessary and/or never provided;

b. During the conspiracy period, 30 physical therapy clinics billed BCBS approximately $36,728,595 for physical therapy and diagnostic services which were medically unnecessary and/or never provided;

c. Delmas Garcia and her co-conspirators established and managed the fraudulent clinics;

d. Delmas Garcia and her co-conspirators paid kickbacks to recruiters and patients in furtherance of the scheme and to bill BSBS for physical therapy services that were never provided;

e. Delmas Garcia and her co-conspirators ultimately caused BCBS to pay out approximately $8,671,377 to the clinics for the fraudulent claims;

f. Delmas Garcia had involvement with 21 of the fraudulent clinics;

g. The 21 fraudulent clinics billed BCBS approximately $24,170,263 during the conspiracy period;

h. BCBS paid approximately $5,846,267.27 to the 21 clinics as reimbursement during the conspiracy period;

i. Delmas Garcia received approximately $1,599,933 for her participation in the scheme for either her personal benefit or for distribution to others.

Factual Proffer, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. July 24, 2023), ECF No. 137 (attached as Exh. D).

12. Following the entry of her guilty plea, the U.S. District Court for the Southern District of Florida convicted Delmas Garcia of one count of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. § 1349. *See* Judgment, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. Oct. 24, 2023), ECF No. 216 (attached as Exh. E).

13. As a result of her conviction for the crime of Conspiracy to Commit Health Care Fraud, the U.S. District Court for the Southern District of Florida sentenced Delmas Garcia to 68 months in prison followed by 3 years of supervised release, ordered her to pay $4,239,752 in restitution, and ordered her to forfeit $1,599,933. *Id.*; *see* Plea Agreement ¶ 10.

B. Defendant's Naturalization Application and Oath Ceremony

14. On April 6, 2018, Delmas Garcia applied to naturalize and become a U.S. citizen by filing a Form N-400, Application for Naturalization ("Naturalization Application") with U.S. Citizenship and Immigration Services ("USCIS"). *See* Form N-400, Application for Naturalization (attached as Exh. F); USCIS Electronic Immigration System ("USCIS ELIS") Decision at 1 (attached as Exh. G).

15. On her Naturalization Application, Delmas Garcia checked "No" in response to Part 12, Question 22, which asked: "Have you **EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested?" Naturalization Application at 14 (emphasis in original).

16. On her Naturalization Application, Delmas Garcia checked "No" in response to Part 12, Question 31, 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?" *Id.* at 15.

17. On or about April 2, 2018, Delmas Garcia signed the Naturalization Application under penalty of perjury, thereby certifying that her answers to the questions therein were true and correct. *Id.* at 17.

18. On January 3, 2019, a USCIS Immigration Services Officer orally interviewed Delmas Garcia regarding her naturalization application to determine her eligibility for naturalization. USCIS ELIS Decision at 2.

19. At the beginning of the interview, the USCIS Immigration Services Officer placed Delmas Garcia under oath. *Id.* at 3.

20. During the interview, the USCIS Immigration Services Officer asked Delmas Garcia, consistent with Part 12, Question 22 of Delmas Garcia's Naturalization Application, whether she had ever committed a crime or offense for which she was not arrested. *Id.* at 9

21. Delmas Garcia verbally confirmed her written response to Part 12, Question 22 of her Naturalization Application, testifying under oath that she had never committed a crime or offense for which she was not arrested. *Id.*

22. Delmas Garcia's oral testimony, under oath, regarding her commission, assistance in commission, or attempted commission of a crime or offense was false.

23. During the interview, the USCIS Immigration Services Officer asked Delmas Garcia, consistent with Part 12, Question 31 of Delmas Garcia's Naturalization Application, whether she had ever given false or misleading information to any U.S. Government official while applying for any immigration benefit. *Id.* at 10.

24. Delmas Garcia verbally confirmed her written response to Part 12, Question 31 of her Naturalization Application, testifying under oath that she had never given false or misleading information to any U.S. Government official while applying for any immigration benefit. *Id.*

25. Delmas Garcia's oral testimony, under oath, regarding the submission of false or misleading information to a U.S. Government official while applying for any immigration benefit, was false.

26. At the end of the interview, Delmas Garcia again swore, under penalty of perjury and in the presence of Officer Martinez, that the contents of her application, including the attestation of changes, were true and correct to the best of her knowledge. USCIS ELIS Decision at 14-16, 20.

27. At no point during the naturalization process did Delmas Garcia disclose to USCIS her conspiracy to commit health care fraud.

28. Based upon the information Delmas Garcia supplied on her Naturalization Application and on the sworn answers she gave during her January 3, 2019, naturalization interview, USCIS approved the application. USCIS ELIS Decision at 25.

29. On January 19, 2019, Delmas Garcia took the Oath of Allegiance to become a U.S. citizen and was issued Certificate of Naturalization No. [redacted] *See* N-445, Notice of Naturalization Oath Ceremony (attached as Exh. H); Form N-550, Certificate of Naturalization (attached as Exh. I).

IV. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of U.S. Citizenship.

30. 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); *see also id.* (an individual "who seeks political rights as a member of the Nation can rightfully obtain them only upon the terms and conditions specified by Congress." (quoting *Ginsberg*, 243 U.S. at 474)).

31. Among other requirements, 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).

32. 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. 8 U.S.C. § 1101(f).

33. As a matter of law, an applicant necessarily lacks good moral character if he or she commits a crime involving moral turpitude ("CIMT") during the statutory period and later either is convicted of the crime or admits to the commission of the criminal act. 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 applicants "shall be found to lack good moral character" if, for example, they committed and were convicted of one or more CIMTs).

34. Congress has also 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).

35. 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).

36. Under the catch-all provision, individuals who commit unlawful acts during the statutory period that adversely reflect upon their moral character cannot meet the good moral

character requirement, unless they prove that extenuating circumstances existed. *See* 8 C.F.R § 316.10(b)(3)(iii); 8 U.S.C. § 1101(f) (flush language).

37. Thus, an individual unlawfully procures naturalization if he or she commits unlawful acts during the statutory period, even if he or she was convicted of those crimes after being granted citizenship. *See United States v. Jean-Baptiste*, 395 F.3d 1190, 1193-94 (11th Cir. 2005), *cert. denied*, 546 U.S. 852 (2005).

B. The Denaturalization Statute

38. 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 a naturalization application, Congress enacted 8 U.S.C. § 1451.

39. 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.

40. 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 (quoting 8 U.S.C. § 1451(a)).

41. 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. *See Kungys v. United States*, 485 U.S. 759, 767 (1988).

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

V. CAUSES OF ACTION

COUNT I

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (CRIME INVOLVING MORAL TURPITUDE)

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

44. As alleged in paragraph 31, to be eligible for naturalization an applicant must show that she has been a person of good moral character for the five-year statutory period before she files a naturalization application, and until the time she becomes a naturalized U.S. citizen. 8 U.S.C. §§ 1427(a)(3), 1429; 8 C.F.R. § 316.10(a)(1).

45. Delmas Garcia was therefore required to establish that she was a person of good moral character from April 6, 2013, which was five years before she applied for naturalization, until the date she became a U.S. citizen on January 19, 2019 (the "statutory period").

46. Delmas Garcia was statutorily precluded from establishing the good moral character necessary to naturalize because she committed a CIMT during the statutory period and later both admitted to the commission of the criminal act and was convicted of that act. 8 U.S.C. § 1101(f)(3); 8 C.F.R. § 316.10(b)(2)(i).

47. As set forth above at paragraphs 8 through 11, Delmas Garcia conspired with others to open and operate medical clinics to generate approximately $36,728,595 in false medical claims billed to BCBS, resulting in Delmas Garcia and her co-conspirators receiving $8,671,377 in BCBS reimbursement payments, with Delmas Garcia personally receiving $1,599,933 as a result of her participation in the criminal conspiracy.

48. Delmas Garcia was charged with one count of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. § 1349, for willfully and knowingly conspiring to commit Health Care Fraud, in violation of 18 U.S.C. § 1347.

49. Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. § 1349, involves moral turpitude because the underlying crime—Health Care Fraud, in violation of § 1347—is a reprehensible act with an intent to defraud. *Jordan v. De George*, 341 U.S. 223, 229 (1951) ("American courts have, without exception, included [fraud] crimes within the scope of moral turpitude."); *Zarate v. U.S. Att'y Gen.*, 26 F.4th 1196, 1206 (11th Cir. 2022) (explaining that crimes with an intent to defraud categorically involve moral turpitude).

50. Delmas Garcia committed the crime between October 2018 and November 2022, which was during the statutory period of her naturalization.

51. On July 24, 2023, Delmas Garcia pleaded guilty to the charge of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. § 1349, and was adjudicated guilty.

52. Because Delmas Garcia committed a CIMT during the statutory period and later both admitted and was convicted of the crime, Delmas Garcia was barred under 8 U.S.C. § 1101(f)(3) from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

53. Because Delmas Garcia could not demonstrate the requisite good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

54. Because she was ineligible to naturalize, Delmas Garcia illegally procured her citizenship, and this Court must revoke her citizenship under 8 U.S.C. § 1451(a).

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (UNLAWFUL ACTS)

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

56. As alleged in paragraphs 31, 44, and 45, to be eligible for naturalization, Delmas Garcia was required to establish that she was a person of good moral character from April 6, 2013, to January 19, 2019

57. Delmas Garcia could not establish the requisite good moral character for naturalization because she committed unlawful acts during the statutory period that reflected adversely on her moral character, and there were no extenuating circumstances that would lessen her guilt. *See* 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

58. As set forth above at paragraphs 8 through 11, 49, and 51, Delmas Garcia pleaded guilty to and was convicted of Conspiracy to Commit Health Care Fraud, in violation of 18 U.S.C. § 1349, which adversely reflected on her moral character because it involves moral turpitude.

59. As alleged in paragraphs 9, 11, and 45, Delmas Garcia committed the crime during the statutory period of her naturalization.

60. Delmas Garcia cannot establish extenuating circumstances with regard to the conspiratorial conduct and fraudulent acts underlying her guilty plea pursuant to 18 U.S.C. § 1349 that would render her conduct less reprehensible than it otherwise would be or that tend to palliate or mitigate her guilt.

61. Therefore, Delmas Garcia cannot avoid the regulatory bar on establishing good moral character found in 8 C.F.R. § 316.10(b)(3)(iii).

62. The regulatory "unlawful acts" bar on establishing good moral character found in 8 C.F.R. § 316.10(b)(3)(iii) applies to Delmas Garcia regardless of whether the statutory CIMT bar (set forth in Count I) also applies.

63. Delmas Garcia's unlawful conduct precluded her under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) from showing that she had the good moral character necessary to become a naturalized U.S. citizen.

64. Because Delmas Garcia was unable to demonstrate good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

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

COUNT III

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

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

67. As alleged in paragraphs 31, 44, and 45, to be eligible for naturalization, Delmas Garcia was required to establish that she was a person of good moral character from April 6, 2013, to January 19, 2019.

68. As alleged in paragraphs 17 through 22, Delmas Garcia provided false testimony for the purpose of obtaining an immigration benefit when she swore, under oath, during her January 3, 2019, naturalization interview, that she had never committed a crime or offense for which she had not been arrested.

69. As alleged in paragraphs 17 through 19, and 23 through 25, Delmas Garcia provided false testimony for the purpose of obtaining an immigration benefit when she swore, under oath, during her January 3, 2019, naturalization interview, that she had never given false or misleading information to any U.S. Government official while applying for any immigration benefit.

70. Delmas Garcia's testimony on each of the foregoing issues was knowingly false and for the purpose of obtaining an immigration benefit, namely naturalization.

71. Because Delmas Garcia provided false testimony under oath during the statutory period, she was barred under 8 U.S.C. § 1101(f)(6) from showing that she had the good moral character necessary to naturalize. 8 U.S.C. § 1101(f)(6); 8 C.F.R. § 316.10(b)(2)(vi).

72. Because Delmas Garcia was unable to demonstrate good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

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

COUNT IV

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

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

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

76. As set forth above, throughout the naturalization process, Delmas Garcia willfully misrepresented and concealed her involvement in a criminal conspiracy to defraud BCBS by submitting, or causing to be submitted, false and fraudulent claims for physical therapy services that were not medically necessary and/or never provided.

77. Specifically, Delmas Garcia voluntarily and deliberately represented during her January 3, 2019, naturalization interview that she had never knowingly committed any crime or offense for which she had not been arrested, despite knowing that such representations were false and misleading.

78. Delmas Garcia knew the representations that she had never knowingly committed any crime or offense for which she had not been arrested were false because starting in approximately October 2018, she had been member of a conspiracy to commit health care fraud that she had joined with knowledge of its unlawful purpose, as she later admitted to in her Plea Agreement.

79. Delmas Garcia's misrepresentations were material to her naturalization because the disclosure of her fraudulent scheme would have had the natural tendency to influence USCIS's decision whether to approve her Naturalization Application.

80. Based on Delmas Garcias's conviction for Conspiracy to Commit Health Care Fraud and the false statements she made at her naturalization interview, it is fair to infer that she could not have established the necessary good moral character for naturalization. Indeed, had Delmas Garcia disclosed the truth about her criminal conduct, USCIS would have discovered her statutory ineligibility for naturalization and would not have approved her application or administered the oath of allegiance.

81. Delmas Garcia thus procured her naturalization by willful misrepresentation and concealment of material facts, and this Court must revoke her citizenship pursuant to the requirements of 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

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

1. A declaration that Delmas Garcia illegally procured her citizenship;

2. A declaration that Delmas Garcia procured her citizenship by concealment and willful misrepresentation of material facts;

3. Judgment revoking and setting aside Delmas Garcia's naturalization and canceling Certificate of Naturalization No. [redacted], effective as of January 19, 2019, the original date of the order and certificate;

4. Judgment forever restraining and enjoining Delmas Garcia from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship that she obtained as a result of her January 19, 2019, naturalization;

5. Judgment requiring Delmas Garcia to surrender and deliver, within 10 days of the entry of judgment against her, her Certificate of Naturalization 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 Acting Attorney General, or his representative, including undersigned counsel;

6. Judgment requiring Delmas Garcia to surrender and deliver, within 10 days of the entry of judgment against her, any other indicia of U.S. citizenship (including, but not limited to, U.S. passports, passport cards, and Enhanced Drivers Licenses, whether valid 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 Acting Attorney General or his representative, including undersigned counsel; and

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

Dated: June 4, 2026

Respectfully submitted,

JASON A. READING QUIÑONES
United States Attorney
Southern District of Florida

MATTHEW J. FEELEY
Assistant United States Attorney
Southern District of Florida

BRETT A. SHUMATE
Assistant Attorney General
U.S. Department of Justice, Civil Division

JENNIFER J. KEENEY
Associate Director
Office of Immigration Litigation

JOHN J.W. INKELES
Chief, Denaturalization Unit

JENNIFER P. LEVINGS
Assistant Director

/s/ Joannabelle M. Aquino
Joannabelle M. Aquino
Trial Attorney
Office of Immigration Litigation
U.S. Department of Justice, Civil Division
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20044

(202) 305-5018
Joannabelle.Aquino@usdoj.gov

Attorneys for the United States of America

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

CASE NO. 1:26-cv-23914

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	)
vs.	)
	)
LEIDYS DELMAS GARCIA,	)
	)
Defendant.	)
	)

EXHIBITS IN SUPPORT OF
COMPLAINT TO REVOKE NATURALIZATION

A. Affidavit of Good Cause of Alex M. Melendez, Deportation Officer, ICE, DHS (May 27, 2026)

B. Indictment, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. Nov. 17, 2022), ECF No. 1

C. Plea Agreement, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. July 24, 2023), ECF No. 136

D. Factual Proffer, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. July 24, 2023), ECF No. 137

E. Judgment, *United States v. Fernandez Delmas, et al.*, No. 1:22-cr-20560-KMW-2 (S.D. Fla. Oct. 24, 2023), ECF No. 216

F. Form N-400, Application for Naturalization

G. USCIS Electronic Immigration System ("USCIS ELIS") Decision

H. Form N-445, Notice of Naturalization Oath Ceremony

I. Form N-550, Certificate of Naturalization