UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO. 0:26-cv-62030

UNITED STATES OF AMERICA,

Plaintiff,

v.

TATIANA POWER,

Defendant.

COMPLAINT TO REVOKE NATURALIZATION

Plaintiff, the United States of America, by its attorneys, alleges as follows:

I. PRELIMINARY STATEMENT OF THE CASE

The United States of America brings this civil action against Defendant Tatiana Power ("Power" or "T. Power") to revoke her naturalized U.S. citizenship under 8 U.S.C. § 1451(a). Before she became a citizen of the United States, Power engaged in criminal activity that she concealed throughout the naturalization process and that disqualified her from U.S. citizenship.

Power naturalized in 2010. Before she naturalized, Power conspired to commit money laundering for a business [redacted] numerous websites. In 2022, after she naturalized, Power pleaded guilty and was convicted of Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h).

The Court must denaturalize Power on three grounds. First, she illegally procured her U.S. citizenship because she committed an unlawful during the statutory period before she naturalized that precluded her from demonstrating the requisite good moral character. Second, she illegally procured her U.S. citizenship because she provided false testimony at her naturalization interview, which also precluded her from demonstrating the requisite good moral character. Third, she concealed and willfully misrepresented her unlawful acts, which adversely reflected on her moral character, throughout her naturalization proceedings. Accordingly, the United States seeks a judgment that revokes and sets aside the order admitting Power to U.S. citizenship and that cancels her certificate of naturalization.

II. PARTIES, JURISDICTION, AND VENUE

1. This is an action filed under 8 U.S.C. § 1451(a) to revoke and set aside the order admitting Power to U.S. citizenship and to cancel Certificate of Naturalization No. 33083079 issued on February 26, 2010.

2. Plaintiff is the United States of America.

3. Defendant is a naturalized U.S. citizen whose last known residential address is in Weston, Florida, before she was incarcerated.

4. This 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).

5. Venue is proper in the Southern District of Florida under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Power last resided in this District before she was incarcerated.

6. The affidavit of Ronald Dorman, a Deportation Officer with U.S. Immigration and Customs Enforcement 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.

III. FACTUAL BACKGROUND

A. Power's Immigration Proceedings

7. Power is a native of Moldova.

8. On or about July 3, 2004, Power married U.S. citizen Kenneth Power.

9. On or about January 19, 2005, Power's husband filed a Form I-130, Petition for Alien Relative, seeking immediate relative immigrant status for Power as his spouse.

10. A true and complete copy of the Form I-130 described in Paragraph 9, except for redactions of personally identifying information immaterial to this action, is attached as Exhibit B.

11. Power's husband submitted four copies of a Form G-325A, Biographic Information, and a Form I-864, Affidavit of Support under Section 231A of the Act, with the Form-130 petition.

12. A true and complete copy of the four copies of the Form G-325A described in Paragraph 11, except for redactions of personally identifying information immaterial to this action, is attached as Exhibit C.

13. On each of the Form G-325As, Power's husband was asked to identify the full name and address of his current employer, his occupation, and the date he began employment, and Power's husband answered: "Self Employed," "Internet Sales," and "March 2003."

14. A true and complete copy of the Form I-864 described in Paragraph 11, except for redactions of personally identifying information immaterial to this action, is attached as Exhibit D.

15. On the Form I-864, Power's husband was asked about his employment, and he answered that he was self-employed in "internet sales, affiliate programs, webhosting."

16. The Form I-130 petition was approved January 19, 2005.

17. On or about July 1, 2005, Power filed a Form DS-230, Application for Immigrant Visa and Alien Registration, with the U.S. Department of State.

18. A true and complete copy of the visa application described in Paragraph 17, except for redactions of personally identifiable information immaterial to this action, is attached as Exhibit E.

19. Power filed the visa application seeking a "CR-1" conditional resident visa that would allow her to enter and live in the United States conditioned on her marriage to U.S. citizen Kenneth Power.

20. Question 14 of the visa application asked Power to identify her "Spouse's occupation," and she answered, "Self Employed Internet Sales."

21. Question 23 of the visa application asked Power to identify "In what occupation do you intend to work in the United States?" and Power answered, "'Employed by husband (self-em-ed)."

22. On February 8, 2005, Power signed the visa application before a Consular Officer in Bucharest, Romania, attesting that the statements in the applications were made by her and were true and complete to the best of her knowledge and belief.

23. The U.S. Department of State approved Power's visa application and, on or about October 30, 2005, she entered the United States as a conditional permanent resident.

24. On November 25, 2008, U.S. Citizenship and Immigration Services ("USCIS") approved Power's application to remove the conditions on her permanent resident status retroactive to June 24, 2005.

25. On or about December 9, 2009, Power filed a Form N-400, Application for Naturalization, with USCIS.

26. A true and complete copy of the naturalization application described in Paragraph 25, except for redactions of personally identifying information immaterial to this action, is attached as Exhibit F.

27. Part 5, Section B of Power's naturalization application asked her to list where she worked for the last five years, and Powers responded that she worked at Power Trading INC in Weston, Florida, from "01/20/2009 to Present."

28. On her naturalization application, Power listed the same street address in Weston, Florida, for both her residential address and the address of her employer, Power Trading INC.

29. Part 10, Section D, Question 15 of Power's naturalization application asked, "Have you **ever** committed a crime or offense for which you were **not** arrested?" (Emphasis in the original.)

30. Power checked the box "No" to answer Part 10, Section D, Question 15 of her naturalization application.

31. Part 10, Section D, Question 23 of Power's naturalization application 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."

32. Power checked the box "No" to answer Part 10, Section D, Question 23 of her naturalization application.

33. On or about December 1, 2009, Power signed the naturalization application under penalty of perjury, thereby certifying that her answers to the questions therein were true and correct.

34. In support of her naturalization application, Power submitted the joint 2008 federal tax returns filed by Power and her husband, including a Schedule B, Profit or Loss from Business, indicating that Power and her husband operated a "Webhosting, Design & Programming" business at their home address in calendar year 2008.

35. In support of her naturalization application, Power submitted the joint 2009 federal tax returns Power and her husband filed and a Form W-2, Wage and Tax Statement, indicating that she earned $37,500 while employed by Power Trading, Inc. in calendar year 2009.

36. A true and complete copy of the tax documents that Power submitted with her naturalization application, including the documents described in Paragraphs 33 and 35, except for redactions of personally identifying information immaterial to this action, is attached as Exhibit G.

37. On February 10, 2010, USCIS Immigration Officer Gina Sankar orally interviewed Power on her eligibility for naturalization.

38. At the beginning of the interview, Officer Sankar placed Power under oath.

39. During the interview, Officer Sankar asked Power, consistent with Part 10, Section D, Part 15 of her naturalization application, whether she had ever committed a crime or offense for which she was not arrested.

40. Power orally confirmed her written response to Part 10, Section D, Question 15 of her naturalization application, stating under oath that she had never committed any crime or offense for which she was not arrested.

41. During the interview, Officer Sankar asked Power, consistent with Part 10, Section D, Question 23 of her naturalization application, whether she had ever given false or misleading information to any U.S. government official when applying for any immigration benefit or to prevent deportation.

42. Power orally confirmed her written response to Part 10, Section D, Question 15 of her naturalization application, stating under oath that she had never given false or misleading

information to any government official when applying for any immigration benefit or to prevent deportation.

43. At the end of the interview, Power signed the naturalization application in the presence of Officer Sankar and again swore that the contents of her naturalization application, including seven numbered changes, were true and correct to the best of her knowledge and belief.

44. On or about February 26, 2010, Power completed and submitted a Form N-445, Notice of Naturalization Oath Ceremony, to USCIS.

45. A true and complete copy of the Form N-445 notice described in Paragraph 44, except for redactions of personally identifying information immaterial to this action, is attached as Exhibit I.

46. Question 3 of the Form N-445 notice asked, "After the date you were first interviewed on your Application for Naturalization, Form N-400: have you knowingly committed any crime or offense, for which you have not been arrested?"

47. Power checked the box "No" to answer Question 3 of her Form N-445 notice.

48. At no point during the naturalization process did Power disclose to USCIS her participation in a conspiracy to commit money laundering that promoted a business that advertised and distributed visual depictions of minors engaged in sexually explicit conduct and that concealed the true nature of the business's transactions.

49. Based upon the information supplied by Power in her naturalization application and on the sworn oral answers she gave during her February 10, 2010 naturalization interview, USCIS approved the naturalization application.

50. On February 26, 2010, Power took the Oath of Allegiance to become a U.S. citizen, and she was issued Certificate of Naturalization No. [redacted]

51. A true and complete copy of the naturalization certified described in Paragraph 50, except for redactions of personally identifying information immaterial to this action, is attached as Exhibit I.

B. Power's Criminal Conviction

52. In July 2021, Power was charged by a grand jury of the Middle District of Florida of one count of Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h); three counts of International Promotional Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and (2); and one count of Concealment Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and (2). Indictment, *United States v. Power*, No. 8:21-cr-244-MSS-AAS (M.D. Fla. July 28, 2021), ECF No. 1.

53. A true and complete copy of the Indictment described in Paragraph 52 is attached as Exhibit J.

54. The grand jury alleged that, "[b]eginning on an unknown date, but as [sic] least as early as in or around 2005, and continuing through and including in or around November 2019," Power knowingly and willfully conspired with others to commit money laundering in violation of 18 U.S.C. § 1956(h). Ex. J at 6.

55. The grand jury alleged that Power conspired to commit money laundering both inside and outside the United States to promote "the production, advertisement, and distribution of visual depictions of minors engaged in sexually explicit conduct . . ., bank fraud . . ., and an offense against a foreign nation involving the sexual exploitation of children," with financial transactions that were "designed, in whole or in part, to conceal and disguise the nature, location,

source, ownership, and control of the proceeds of said unlawful activities, and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i)." Ex. J at 6–8.

56. The grand jury described the means by which the conspirators laundered money, including, *inter alia*, [redacted] Ex. J at 8.

57. In December 2021, Power signed and the parties entered a Plea Agreement by which Power would plead guilty to Count One of the Indictment, which charged her with Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h), and the remaining counts would be dismissed. Plea Agreement, *id.* (M.D. Fla. Dec. 21, 2021), ECF No. 29.

58. A true and complete copy of the Plea Agreement described in Paragraph 57 is attached as Exhibit K.

59. In the Plea Agreement, Power admitted the following facts:

a. She "laundered and retained at least $2,211,651.89 as a result of the commission of the offense." Ex. K at 11.

b. "From an unknown date but from as early as 2009 through November 2019," Power "conspired with other persons to launder money for [redacted]." Ex. K at 21–22.

c. The Newstar Enterprise operated Newstar Websites, which were founded "no later than 2005," and included over 100 websites dedicated to [redacted] Ex. K at 22–23.

d. Power and her husband were "[p]rincipals of the Newstar Enterprise" and "directed and controlled those functions essential to the operation of the Newstar Enterprise." Ex. K at 23.

e. Power Trading, Inc. was the "corporate entity" and held the bank accounts for Newstar Enterprise. Ex. K at 23.

f. "From an unknown date but as early as 2009 and continuing through November 2019, T. Power—knowing that the Newstar Enterprise existed solely to support and facilitate the Newstar Websites and with knowledge of the Newstar Websites' content—agreed to help run the Newstar Enterprise by overseeing its finances." Ex. K at 28.

g. "Between 2009 and 2019, in furtherance of this conspiracy to launder money from the Newstar Enterprise and with the intent to promote the carrying on and concealment of the Newstar Enterprise's unlawful activities relating to the Newstar Websites and ongoing bank fraud, T. Power engaged in a serious of acts." Ex. K at 29.

h. Powers and her husband "maintained offices at their residence located [in] Weston, Florida, and used the residence to conduct Newstar Enterprise's unlawful activities relating to the Newstar Websites." Ex. K at 28.

i. "Beginning on an unknown date but no later than 2009, and continuing through November 2019, T. Power routinely kept the accounting books for Power Trading (and thus the Newstar Enterprise)." Ex. K at 28.

j. "In her roles as 'bookkeeper,' Vice President of Power Trading, and part owner of Power Trading, T. Power agreed to and did oversee Power Trading's bank accounts, managed its QuickBooks, and advised coconspirators on how to evade law enforcement and how to hide the true nature of transactions." Ex. K at 28.

k. T. Power also routinely assisted in the making of payments on behalf of the Newstar Enterprise from Power Trading bank accounts to coconspirators responsible for operating the Newstar Websites and populating the Newstar Websites with Newstar-produced content, some of which involved [redacted]" Ex. K at 28.

l. "From the earliest available financial data beginning in January 2009 until November 2019, T. Power, knowing the monies were derived from unlawful activities, caused the receipt and transfer of at least $4,677,025 for the Newstar Enterprise intending to promote and conceal its activities relating to the Newstar Websites and its use of fraudulently opened bank accounts in the United States." Ex. K at 30.

60. On January 3, 2022, the United States District Court held a plea hearing during which Power pleaded guilty to Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h). Tr. of Plea Hr'g 36:1–5, *id.*, (M.D. Fla. Feb. 11, 2026), ECF No. 77.

61. At the plea hearing, the Court confirmed that Power had read the facts in the Plea Agreement and discussed them with her attorney, and she agreed that all the facts were true. *Id.* 32:22–35:12.

62. A true and complete copy of the transcript of the plea hearing described in Paragraph 60 is attached as Exhibit L.

63. On April 7, 2022, the United States filed a Sentencing Memorandum requesting that the Court sentence Power to a guidelines sentence. Sentencing Memo., *id.*, (M.D. Fla. Apr. 7, 2022), ECF No. 47.

64. A true and complete copy of the Sentencing Memorandum described in Paragraph 60 is attached as Exhibit M.

65. The Sentencing Memorandum explained that, "[f]rom as early as 2009 but likely much earlier," Power "began working for the Newstar Enterprise—an internet-based husband run by her late husband, Kenneth Power, aimed at [redacted]" Ex. M at 1.

66. The Sentencing Memorandum explained that the Newstar Websites were "[f]ounded around 2005" by Power's husband and were a collection of websites "that were purportedly dedicated to [redacted] depicting the supposed child 'models'." Ex. M at 4.

67. The United States attached the Electronic Articles of Incorporation for Power Trading, Inc. as an exhibit to the Sentencing Memorandum. Ex. M at 95–96.

68. The Electronic Articles of Incorporation were filed with the State of Florida on January 20, 2009, and listed Power as Vice President. Ex. M at 95–96.

69. The United States attached Power's resume as an exhibit to the Sentencing Memorandum. Ex. L at 127–28.

70. Power's resume listed her "Professional Work Experience" to include "Bookkeeper – part time" with "Power Trading INC – Weston, FL" from "Jan 2009-Current." Ex. M at 127.

71. On April 13, 2022, the United States District Court adjudicated Power guilty of Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h), and sentenced her to 151 months. J., *id.* (M.D. Fla. Apr. 29, 2022), ECF No. 55.

72. A true and complete copy of the Judgment described in Paragraph 71 is attached as Exhibit N.

73. In February 2024, the United States District Court reduced Power's sentence to 101 months on the government's request under Federal Rule of Criminal Procedure 35(b). Am. J., *id.* (M.D. Fla. Feb. 5, 2024), ECF No. 73.

74. Power is serving her sentence in a residential reentry facility in Orlando, Florida.

IV. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship.

75. No alien has a right to naturalization "unless all statutory requirements are complied with." *United States v. Ginsberg*, 243 U.S. 472, 474-75 (1917).

76. 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).

77. 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 . . . ." 8 U.S.C. § 1427(a).

78. The required statutory period for good moral character for an applicant for naturalization who is married to a U.S. citizen begins three 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. 8 U.S.C. §§ 1427(a), 1430(a); 8 C.F.R. § 316.10(a)(1).

79. 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).

80. 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).

81. Further, Congress created a "catch-all" provision on whether an applicant for naturalization can demonstrate good moral character, 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).

82. Thus, under the catch-all provision, individuals who, during the statutory period, commit unlawful acts that adversely reflect on their moral character cannot meet the good moral character requirement, unless they prove extenuating circumstances. *See* 8 U.S.C. § 1101(f) (flush language); 8 C.F.R § 316.10(b)(3)(iii).

B. The Denaturalization Statute

83. 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.

84. 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.

85. Failure to comply with any of the congressionally imposed prerequisites to the acquisition of citizenship renders the naturalization "illegally procured." *Fedorenko*, 449 U.S. at 506 (quoting 8 U.S.C. § 1451(a)).

86. Naturalization was procured by concealment of a material fact or by willful misrepresentation where: (1) the naturalized citizen concealed or willfully misrepresented 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 concealment or misrepresentation. *Kungys v. United States*, 485 U.S. 759, 767 (1988).

87. Where the government establishes that the defendant's citizenship was procured illegally or by concealment of material facts or willful misrepresentation, "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
(Unlawful Acts that Adversely Reflect on Moral Character)

88. Power 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 to excuse her actions. *See* 8 U.S.C. § 1101(f) (flush language); 8 C.F.R. § 316.10(b)(3)(iii).

89. As alleged in Paragraphs 77 and 78, Congress has required an applicant for naturalization who is the spouse of a U.S. citizen to prove that she has been a person of good moral character for the three-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), 1429, 1430(a); 8 C.F.R. § 316.10(a)(1).

90. Power was required to establish that she was a person of good moral character from December 7, 2006, which was three years before she applied for naturalization, until the date she became a U.S. citizen on February 26, 2010 (the "statutory period").

91. After Power naturalized, as alleged in Paragraphs 60 and 71, Power was arrested for, pleaded guilty to, and was convicted of Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h).

92. Power began conspiring to commit money laundering during the statutory period of her naturalization.

93. As alleged in Paragraphs 54, a grand jury charged Power with conspiring to commit money laundering on an unknown date at least as early as in or around 2005.

94. As alleged in Paragraphs 59(b), 59(f), and 59(g), Power admitted in the Plea Agreement that she conspired to commit money laundering beginning at least as early as 2009 and continuing until 2019.

95. As alleged in Paragraphs 13, 15, 20 and 21, Power came to the United States in 2005 intending to work for her husband's "internet sales" business.

96. As alleged in Paragraph 59(c), Power's husband's internet sales business was the Newstar Enterprise that operated Newstar Websites, which were founded no later than 2005 and included over 100 websites dedicated to hosting galleries of images of minors engaged in sexually explicit conduct.

97. As alleged in Paragraphs 34, tax documents Power submitted in support of her naturalization application indicated that Power and her husband operated the internet sales business at their home in 2008.

98. As alleged in Paragraphs 67 and 68, Power filed the articles of incorporation for Power Trading Inc. on January 20, 2009.

99. As alleged in Paragraphs 27, 35, 59(j), 69, and 70, Power was bookkeeper, vice president, and part owner of Power Trading Inc. beginning when it was incorporated in January 2009.

100. As alleged in Paragraph 59(e), Power Trading Inc. was the "corporate entity" and held bank accounts for Newstar Enterprise.

101. As alleged in Paragraphs 59(i) and 59(k), in her role as bookkeeper managing the finances of Power Trading Inc., Power made payments on behalf of Newstar Enterprise to coconspirators responsible for operating the Newstar Websites and populating the Newstar

Websites with Newstar-produced content, some of which involved [redacted] in sexually explicit conduct.

102. Power's conspiring to commit money laundering adversely reflected on her moral character because it involved "baseness, vileness, or depravity." *Daye v. U.S. Att'y Gen.*, 38 F.4th 1355, 1360 (11th Cir. 2022) (citation omitted).

103. Power's conspiring to commit money laundering was base, vile, and depraved because, as described in Paragraphs 57 to 59, she conspired to commit money laundering as the bookkeeper of Power Trading Inc. where she managed the finances to maintain websites designed to advertise, sell, distribute, and otherwise [redacted] sexually explicit conduct.

104. Power's actions at Power Trading Inc. also adversely reflected on her moral character because, as alleged in Paragraph 59(g), 59(j), and 59(l), she concealed bank fraud, including the use of fraudulently opened bank accounts, and advised coconspirators on how to evade law enforcement and how to hide the true nature of transactions the websites made depicting minors engaged in sexually explicit conduct.

105. Power could not establish extenuating circumstances that would mitigate her culpability for her crime, and, therefore, she could not avoid the regulatory bar on establishing good moral character, which made her ineligible for naturalization.

106. Because Power was ineligible to naturalize, she illegally procured her naturalization.

107. Because Power illegally procured her naturalization, this Court must revoke her naturalization under 8 U.S.C. § 1451(a).

COUNT II

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

108. As alleged in Paragraph 90, to be eligible for naturalization, Power was required to establish that she was a person of good moral character from December 7, 2006, to February 26, 2010.

109. Providing false testimony is an enumerated act for lacking good moral character. 8 U.S.C. § 1101(f)(6).

110. Power provided false testimony for the purpose of obtaining an immigration benefit, namely naturalization, when, as alleged in Paragraphs 39 to 42, she orally testified, under oath, at her February 10, 2010 naturalization interview that she had never committed a crime or offense for which she had not been arrested.

111. Power's response about never having committed a crime or offense for which she was not arrested was false because, as alleged in Paragraphs 91 to 101, Power conspired to commit money laundering, in violation of 18 U.S.C. § 1956(h), at least as early as 2009, and she was not arrested until after she naturalized.

112. Power also provided false testimony for the purpose of obtaining an immigration benefit when, as alleged in Paragraphs 41 and 42, she orally testified, under oath, at her February 10, 2010 naturalization interview that she had never given false or misleading information to any U.S. government official when applying for any immigration benefit or to prevent deportation.

113. Power's response about never having given false or misleading information to any U.S. government official when applying for any immigration benefit or to prevent deportation was false because, as alleged in Paragraphs 29 and 91 to 101, Power answered "No" to Part 10, Section D, Question 15 of her naturalization application stating that she had never committed a

crime or offense for which she was not arrested when, in fact, she had conspired to commit money laundering, in violation of 18 U.S.C. § 1956(h), beginning as early as 2009.

114. Because Power 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).

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

116. Because she was ineligible to naturalize, Power illegally procured her naturalization.

117. Because Power illegally procured her naturalization, this Court must revoke her naturalization under 8 U.S.C. § 1451(a).

COUNT III

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

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

119. Throughout her naturalization process, Power concealed and willfully misrepresented her involvement in a criminal conspiracy to commit money laundering that promoted a business that advertised and distributed visual depictions of minors engaged in sexually explicit conduct and that concealed the true nature of the business's transactions.

120. Specifically, Power voluntarily and deliberately represented on her naturalization application, in her naturalization interview, and on her Form N-445 that she had never committed

any crime or offense for which she had not been arrested, despite knowing that such representations were false and misleading.

121. Power also voluntarily and deliberately represented on her naturalization application and in her naturalization interview that she had never given false or misleading information to any U.S. government official when applying for any immigration benefit, despite knowing that such representations were false and misleading.

122. Power made these representations willfully.

123. Power's misrepresentations were material to her naturalization because the disclosure of her criminal conspiracy to commit money laundering that promoted a business that advertised and distributed visual depictions of minors engaged in sexually explicit conduct and that concealed the true nature of the business's transactions would have had the natural tendency to influence USCIS's decision whether to approve her naturalization application.

124. Based on Power's conviction for conspiracy to commit money laundering and on the false statements she made on her naturalization application and at her naturalization interview, it is fair to infer that she could not have established the necessary good moral character for naturalization. Indeed, had Power disclosed the truth about her criminal conduct, she would have disclosed her ineligibility for naturalization, and USCIS would not have approved her naturalization application or administered the oath of allegiance.

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

PRAYER FOR RELIEF

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

1. A declaration that Power illegally procured her citizenship;

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

3. Judgment revoking and setting aside Power's naturalization and canceling Certificate of Naturalization No. [redacted], effective as of February 26, 2010, the original date of the order and certificate;

4. Judgment forever restraining and enjoining Power from claiming any rights, privileges, benefits, or advantages in connection with her February 26, 2010 naturalization;

5. Judgment requiring Power to surrender and deliver, within ten days of the entry of judgment, her Certificate of Naturalization, and any copies thereof in her possession—and to make good faith efforts to recover and 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 Power to surrender and deliver, within ten days of the entry of judgment, any other indicia of U.S. citizenship, whether valid or expired, (including, but not limited to, U.S. passports, passport cards, and Enhanced Driver's Licenses), and any copies thereof in her possession—and to make good faith efforts to recover and 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.

July 24, 2026

Respectfully submitted,

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