

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	26-cv-2189
Plaintiff,	)	
	)	Hon.
v.	)	
	)	
JASWINDER SINGH, Axx-xxx-668, a.k.a.	)	COMPLAINT TO REVOKE
SURINDER SINGH, Axx-xxx-279,	)	NATURALIZATION
Defendant.	)	
	)	
	)	
	)	

I. PRELIMINARY STATEMENT OF THE CASE

The United States of America (“Plaintiff”) brings this civil action against Defendant Jaswinder Singh, a.k.a. Surinder Singh (“Defendant”) to revoke his naturalized U.S. citizenship under 8 U.S.C. § 1451(a). Plaintiff alleges that Defendant procured his naturalization unlawfully and that he willfully misrepresented and concealed material facts in applying to naturalize.

Before he naturalized as a U.S. citizen in 2011 under the identity Jaswinder Singh, Defendant previously sought immigration benefits in the United States under the identity Surinder Singh. In 1992, officers with the former Immigration and Naturalization Service (“INS”)¹ encountered Defendant when he arrived at J.F.K. International Airport. He identified himself as “Surinder Singh.” Defendant claimed that he was not married and had no children. Using that

¹ On March 1, 2003, the INS ceased to exist as an independent agency within the Department of Justice, and many of its functions were transferred to the newly formed Department of Homeland Security. *See* Homeland Security Act of 2002, Pub. L. No. 107-296, §§ 441, 451, 471, 116 Stat. 2135 (Nov. 25, 2002). The INS was divided into several separate agencies, including United States Citizenship and Immigration Services (“USCIS”), Customs and Border Protection, and Immigration and Customs Enforcement. USCIS assumed naturalization authority from the INS. This Complaint will refer to INS where appropriate.

identity, Surinder Singh sought an immigration benefit and entered into the United States pending his claim. Defendant failed to appear at his hearing, and his exclusion case was closed. On September 6, 1999, Defendant, still using the name Surinder Singh, claimed he married U.S. Citizen Denise House Singh in August of 1999, and sought to adjust his status through that marriage. That application was denied as a result of a lack of proof of his spouse's U.S. citizenship.

On October 20, 2003, Defendant filed an application for an immigration visa and permanent residence using the name Jaswinder Singh and a different date of birth and basis for his claim. He also claimed that he married Paramjit Kaur in 1991 and had two children (born in 1992 and 1993). A visa was issued on January 9, 2004. On November 16, 2011, Defendant naturalized under the identity and immigration history of Jaswinder Singh. Defendant did not disclose his prior immigration history under the Surinder Singh identity in any of his immigration applications or proceedings under the Jaswinder Singh identity.

Defendant's actions and conduct statutorily barred him from becoming a U.S. citizen and render his naturalization unlawfully procured. Thus, with the attached affidavit showing good cause, Plaintiff brings this civil action to revoke and set aside the order admitting Defendant to citizenship and to cancel his certificate of naturalization.

II. JURISDICTION AND VENUE

1. This is an action under 8 U.S.C. § 1451(a) to revoke and set aside the order admitting Defendant to U.S. citizenship and to cancel Certificate of Naturalization No. XXXXX387, issued November 16, 2011.

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

3. Venue is proper in this district pursuant to 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391, because Defendant resides in Lansing, Michigan, within the jurisdiction and venue of this Court.

III. PARTIES

4. Plaintiff is the United States of America.

5. Defendant is a naturalized U.S. citizen and purports to be a native of India.

Jaswinder Singh and Surinder Singh are one and the same person.

IV. FACTUAL ALLEGATIONS

6. The affidavit of Nasim Sargordan, Immigration Services Officer, USCIS, an agency within the Department of Homeland Security, showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached as Exhibit A.

A. Defendant's Immigration Proceedings Under the Identity Surinder Singh.

7. On or about October 13, 1992, INS officers encountered Defendant when he arrived at J.F.K. International Airport. Defendant lacked documents permitting him to enter the United States. The INS officers took a sworn statement, attached as Exhibit B,² during which Defendant stated, *inter alia*, the following:

- a. his true and correct name was Surinder Singh;
- b. he was born on XX/XX/1966 in India;³
- c. he was not married; and
- d. he had no children;

² Exhibits reflecting immigration documents are excerpted from a certified copy of the alien file (A File) associated with the respective alien number (A Number).

³ The date, and other information throughout the complaint, is withheld under FRCP 5.2 and the Privacy Act, 5 U.S.C. § 552a(b).

8. In addition to the sworn statement, INS also took the Defendant's fingerprints. Ex. C.

9. INS assigned Defendant A# xx-xxx-279 and issued an order to appear for deferred inspection, noting that the Defendant had appeared without any documents and without a U.S. address. Ex. D.

10. On October 16, 1992, Surinder Singh was again fingerprinted by INS. Ex. E.

11. On October 20, 1992, Defendant, using the name Surinder Singh, applied for an immigration benefit in the United States. Ex. F.

12. As part of the application, Defendant stated that he was not married and had no children. *Id.*

13. Defendant stated that his father was Mohinder Singh, and his mother was Harbans Kaur. *Id.*

14. The Defendant was provided with a notice for hearing before an immigration judge for a hearing on February 10, 1993. Ex. G. The Defendant did not appear for that hearing, or the subsequently rescheduled hearing, and his case was administratively closed. Ex. H.

15. On September 23, 1999, Denise House Singh filed a Petition for Alien Relative. Ex. I.

16. The petition claimed that Denise House married Surinder Singh on August 20, 1999. *Id.*

17. As part of that application, Surinder Singh filled out a biographic information form. Ex. J.

18. The biographic information form claimed that this was the Defendant's first marriage. *Id.*

19. The Petition for Alien Relative was ultimately denied because Denise House Singh failed to provide proof of U.S. citizenship.

B. Defendant's Immigration Proceedings Under the Identity Jaswinder Singh.

20. On or around March 17, 2004, Defendant, using a different identity, Jaswinder Singh, filed an application and sworn statement for immigrant visa and alien registration with the Department of State. Ex. K.

21. In this application, Defendant attested that:

- a. his name was Jaswinder Singh;
- b. he had not used any different names previously;
- c. he was born on XX/XX/1967⁴, in Punjab, India;
- d. he had been married only one time to Paramjit Kaur, and that the marriage occurred on August 2, 1991;
- e. he had two children, born in 1992 and 1993;
- f. he had never visited the United States;
- g. he lived in India his entire life; and
- h. his parents were Mohinder Singh and Harbans Kaur.

22. As part of this application, the Defendant stated that he was not an alien “who seeks or has sought a visa, entry into the United States, or any immigration benefit by fraud or misrepresentation...”

23. As part of this application, the Defendant swore that the information he provided as part of this application was “true and complete to the best of my knowledge and belief”.

⁴ This date of birth is the same date, albeit exactly one year apart, as the date of birth used by the Surinder Singh identity.

24. Defendant's visa application under the name Jaswinder Singh was granted.

25. Defendant arrived in the United States under the name Jaswinder Singh, and was given A# xx-xxx-668. Ex. L.

26. Defendant also provided a fingerprint on April 3, 2004. *Id.*

27. On or around February 24, 2011, the Defendant submitted an Application for Naturalization. Ex. M.

28. In this application, Defendant stated that:

- a. his name was Jaswinder Singh and that he had never used any other name;
- b. he was born on XX/XX/1967;
- c. he was only married one time, to Paramjit Kaur, on August 2, 1991;
- d. he had two children, born in 1992 and 1993;
- e. he had never been arrested, cited, or detained by any law enforcement, including INS;
- f. he had never given false or misleading information to any U.S. government official while applying for any immigration benefit;
- g. he had never lied to any U.S. government official to gain entry or admission into the United States;
- h. exclusion proceedings were not pending against him;
- i. he had never applied for any kind of relief from removal, exclusion or deportation.

29. The Defendant declared under the penalty of perjury that his application and the evidence submitted with it was true and correct.

30. Defendant's application for naturalization was granted, and on November 16, 2011, the Defendant was issued a certificate of naturalization. Ex. N.

C. Fingerprint Analysis Confirms Surinder Singh and Jaswinder Singh are the Same Individual

31. In addition to the numerous similarities between the two identities, including the same surname, same parent names, and same birthday (albeit one year apart), the Defendant's fingerprints were used under both identities.

32. On October 13, 1992, Defendant, using the name Surinder Singh, was fingerprinted upon his arrival to the country. (Ex. O, Ex. 1.5)

33. On October 16, 1992, Defendant, using the name Surinder Singh, was fingerprinted again by INS. (Ex. O, Ex. 1.6).

34. On April 3, 2004, Defendant, using the name Jaswinder Singh, submitted a Form I-551 Data Collection Card, on which he provided a fingerprint. (Ex. O, Ex. 1.4)

35. On August 14, 2009, Defendant, using the name Jaswinder Singh, provided his fingerprints upon entry to the country. (Ex. O, Ex. 1.3).

36. On April 9, 2010, Defendant, using the name Jaswinder Singh, provided his fingerprints upon entry to the country. (Ex. O, Ex. 1.2).

37. On April 19, 2011, as part of naturalization application, Defendant, using the name Jaswinder Singh, provided his fingerprints. (Ex. O, Ex. 1.1).

38. Analysis and comparison of the fingerprint submissions described in Paragraphs 32 through 37 above confirm that the same individual provided all the fingerprint impressions. Ex. O.

V. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

39. 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). 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 alien who seeks political rights as a member of this Nation can rightfully obtain them only upon the terms and conditions specified by Congress[.]”) (quoting *Ginsberg*, 243 U.S. at 474)).

40. 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)(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.*

41. Congress has defined the term “lawfully admitted for permanent residence” to mean “the status of having been lawfully accorded the privilege of residing permanently in the United States as an immigrant in accordance with the immigration laws.” *See* 8 U.S.C. § 1101(a)(20).

42. The term “lawfully” requires compliance with substantive legal requirements for admission, and not mere procedural regularity. *See* 8 U.S.C. § 1101(a)(20); *Monet v. INS*, 791 F.2d 752, 753 (9th Cir. 1978).

43. An individual who, by fraud or willfully misrepresenting a material fact, seeks to procure (or has sought to procure or has procured) a visa, other documentation, or admission into the United States or other benefit provided for in the Immigration and Nationality Act (“INA”) is inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

B. The Denaturalization Statute

44. 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 his or her naturalization application, Congress enacted 8 U.S.C. § 1451.

45. Under 8 U.S.C. § 1451(a), this Court must revoke a U.S. citizen’s naturalization and cancel his Certificate of Naturalization if naturalization was either:

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

46. 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.

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

48. Where the government establishes that a defendant’s citizenship was procured 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.

VI. CAUSES OF ACTION

COUNT ONE

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

49. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this complaint.

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

51. As noted above, the term “lawfully” denotes compliance with substantive legal requirements, not mere procedural regularity. *See* 8 U.S.C. § 1101(a)(20); *Monet v. INS*, 791 F.2d 752, 753 (9th Cir. 1978).

52. Among the applicable provisions in the INA at the time of Defendant’s adjustment of status to permanent resident was the requirement that he be admissible to the United States. *See* 8 U.S.C. §§ 1159(b)(5), 1255(a).

53. Under the law in effect at the time that Defendant adjusted his status, an individual who by fraud or by willfully misrepresenting a material fact was seeking to procure (or had sought to procure or had procured) a visa, other documentation, admission into the United States, or other benefit provided under the INA, was inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

54. Defendant was never lawfully admitted to the United States as a permanent resident and cannot satisfy the requirements of 8 U.S.C. §§ 1427(a)(1) and 1429, because he was inadmissible at the time of his adjustment to permanent resident status.

55. Defendant sought to procure admission into the United States and other benefits provided for in the INA by fraud or willfully misrepresenting a material fact. Specifically, at the time Defendant adjusted his status to permanent resident using the name Jaswinder Singh, he had previously sought to procure and had been denied immigration benefits using the name Surinder Singh. Indeed, at the time that Defendant adjusted to permanent resident status, he was the subject of an administratively closed exclusion case.

56. Because Defendant made sworn statements in immigration benefit applications that cannot be simultaneously true, he was inadmissible.

57. Defendant's false statements regarding his name, alien number, date of birth, date of entry into the United States, and his immigration history were material to determining his eligibility for the immigration benefits for which he applied. Defendant's false statements had the natural tendency to influence a decision by the immigration officer(s) to approve his application(s). Defendant thus sought to procure an immigration benefit by fraud or willfully misrepresenting a material fact.

58. Because Defendant was inadmissible at the time he adjusted to permanent resident status, he was never lawfully admitted for permanent residence in accordance with the substantive legal requirements to obtain that status.

59. 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.

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

COUNT TWO

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

61. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this Complaint.

62. As outlined above, to be eligible for naturalization, Congress has mandated that an applicant must show that he or she has been a person of good moral character for the five-year statutory period before filing his or her naturalization application until the time the applicant becomes a naturalized U.S. citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(i).

63. Defendant filed his naturalization application on February 24, 2011, and he naturalized on November 16, 2011. Thus, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during his “statutory period” from February 24, 2006, until March 30, 2005

64. Defendant completed and filed his naturalization application during his “statutory period.”

65. Defendant violated 18 U.S.C. § 1001(a)(1)-(3) by knowingly and willfully concealing in his naturalization application—a matter within the jurisdiction of the executive, branch of the Government of the United States—that he had previously used a different identity and that he been ordered excluded and deported under that identity.

66. Specifically, Defendant violated 18 U.S.C. § 1001(a)(1)-(3) when he completed and filed his naturalization application by answering “no” to Question 23 in Part 10, which asked: “Have you **EVER** given false or misleading information to any U.S. Government official while

applying for any immigration benefit or to prevent deportation, exclusion, or removal?” (emphasis in original).

67. Specifically, Defendant violated 18 U.S.C. § 1001(a)(1)-(3) when he completed and filed his naturalization application by answering “no” to Question 24 in Part 10, which asked: “Have you **EVER** lied to any U.S. Government official to gain entry or admission into the United States?” (emphasis in original).

68. Specifically, Defendant violated 18 U.S.C. § 1001(a)(1)-(3) when he completed and filed his naturalization application by answering “no” to Question 28 in Part 10, which asked: “Have you **EVER** applied for any kind of relief from removal, exclusion, or deportation?” (emphasis in original).

69. No extenuating circumstances exist that would palliate Defendant’s guilt for violating 18 U.S.C. § 1001(a)(1)-(3).

70. Because Defendant committed unlawful acts during the statutory period during which he was required to maintain good moral character, he was and remains ineligible for naturalization under 8 U.S.C. §§ 1427(a)(1) and 1429.

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

COUNT THREE

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

72. The United States realleges and incorporates by reference the allegations set forth in Sections I through V of this Complaint.

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

74. As set forth herein, throughout the naturalization process, Defendant willfully misrepresented and concealed, among other things: (i) his use of another identity, including a different date of birth; (ii) his prior exclusion proceedings; (iii) his prior application for an immigration benefit; (iv) that he had given false or misleading information to a U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal; (v) that removal, exclusion, rescission, or deportation proceedings were pending against him; (vi) that he had lied to a U.S. Government official to gain entry or admission into the United States; (vii) and that he had previously applied for relief from removal, exclusion, or deportation. Defendant knew each of these statements to be false.

75. Defendant made such misrepresentations voluntarily and deliberately, despite knowing that such representations were false and misleading. Accordingly, Defendant made these misrepresentations willfully.

76. Defendant's misrepresentations were material to his naturalization because the disclosure of his multiple identities, multiple claimed dates of birth, prior application for an immigration benefit, prior order of exclusion and deportation, and prior representations to U.S. Government officials while applying for an immigration benefit would have had a natural tendency to influence USCIS's decision whether to approve Defendant's application for naturalization. Indeed, had USCIS been aware of this information, it would have denied his naturalization application.

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

PRAYER FOR RELIEF

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

- (1) A declaration that Defendant illegally procured his citizenship;
- (2) A declaration that Defendant procured his citizenship by concealment of material fact and by willful misrepresentation;
- (3) Judgment revoking and setting aside the order admitting Defendant to citizenship and canceling Certificate of Naturalization No. XXXXX387, effective as of the original date of the certificate, November 16, 2011;
- (4) Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages under any document which evidences United States citizenship obtained as a result of his November 16, 2011 naturalization;
- (5) Judgment requiring the Defendant, within ten (10) days of the entry of judgment against him, to surrender and deliver his Certificate of Naturalization No. XXXXX387 and any copies thereof in his possession or control (and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others), to the Attorney General, or her designated representative, including undersigned counsel;
- (6) Judgment requiring the Defendant, within ten (10) days of the entry of judgment, to surrender and deliver any other indicia of U.S. citizenship (including, but not limited to, United States passports and passport cards, Enhanced Drivers License, and other relevant documents), whether current or expired, and any copies thereof in his possession or control—and to make good

faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others—to the Attorney General, or her representative, including undersigned counsel; and

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

Dated: July 29, 2026

Respectfully submitted,

TIMOTHY VERHEY
United States Attorney

/s/ Jacob L. Carlton
JACOB L. CARLTON
ALISE HILDRETH-JOLING
Assistant United States Attorneys
U.S. Attorney's Office
Western District of Michigan
330 Ionia Avenue NW, Suite 501
Grand Rapids, MI 49503
Tel: (616) 456-2404
Jacob.Carlton@usdoj.gov
Alise.Hildreth-Joling@usdoj.gov