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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

EDDIE JONES APPAH, )

a/k/a OSEI APPAH, )

Defendant. )  
\_\_\_\_\_ )

CASE NO. \_\_\_\_\_

**COMPLAINT TO REVOKE  
NATURALIZATION**

The United States of America (Plaintiff) brings this civil action against Defendant Eddie Jones Appah, a.k.a. Osei Appah (Defendant) to revoke his U.S. citizenship under 8 U.S.C. § 1451(a). Plaintiff alleges that Defendant illegally procured his naturalization and that he willfully misrepresented and concealed material facts in applying to naturalize.

### PRELIMINARY STATEMENT OF THE CASE

Before he naturalized as a U.S. citizen, Defendant arrived in the United States at New York, New York on October 10, 1994. Two and a half months later, on December 30, 1994, Defendant, using the identity “Osei Appah” unsuccessfully sought immigration benefits for himself and his wife, Florence Apentang. In his pursuit of immigration benefits, Defendant provided a birth certificate and a marriage certificate both stating that he was born in Ghana in 1960. At or around that time, the Immigration and Naturalization Service (INS)<sup>1</sup> assigned Defendant Alien Number XXX-XXX-418. After Defendant withdrew his requests for immigration benefits, he was given until April 16, 1997, to leave the United States. On information and belief, Defendant did not depart.

Instead, Defendant, using the name “Eddie Jones Appah,” married a U.S. citizen on January 11, 2006, who, in March 2006, filed a Form I-130, Petition for Alien Relative (visa application) on Defendant’s behalf. Defendant filed his Form I-485, Application to Register Permanent Residence or Adjust Status (adjustment of status application) based on that visa application. In his adjustment of status application, Defendant claimed that his name was Eddie Jones Appah (not Osei Appah, as he previously stated in his 1994 benefits application), that he was born in 1949 (not in 1960, as he previously stated in his 1994 benefits application), and last entered the United States on February 3, 2002. INS assigned Defendant Alien Number XXX-XXX-282 at that time. The adjustment application was approved in February 2007. Defendant, using the “Eddie Jones Appah” identity, applied to naturalize in 2011. USCIS approved his

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<sup>1</sup> On March 1, 2003, the functions of the former INS were transferred from the Department of Justice to three agencies (Immigration and Customs Enforcement (ICE), Customs and Border Protection (CBP), and Citizenship and Immigration Services (USCIS)) in the newly formed Department of Homeland Security (DHS). *See* Homeland Security Act, Pub. L. No. 107-296, 116 Stat. 2135 (2002).

application, and Defendant naturalized as a U.S. citizen in 2012. However, throughout his immigration proceedings, Defendant failed to disclose his prior immigration history and his prior use of a different identity.

Defendant's actions and conduct statutorily barred him from becoming a U.S. citizen and rendered his naturalization unlawfully procured. Additionally, they demonstrate that he procured his naturalization by concealment and willful misrepresentation. With the attached affidavit showing good cause, therefore, the United States of America brings this civil action on the grounds that Defendant illegally procured his naturalization and willfully misrepresented and concealed material facts during the 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.

#### **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.  issued on March 21, 2012.

2. The 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 Defendant resides in Atlantic City, New Jersey, within the jurisdiction and venue of this Court.

#### **PARTIES**

4. Plaintiff is the United States of America.

5. Defendant Eddie Jones Appah, a.k.a. Osei Appah is a naturalized U.S. citizen,

whose last known address is in Atlantic City, New Jersey.

6. Eddie Jones Appah and Osei Appah are one and the same person.

**FACTUAL ALLEGATIONS**

7. The affidavit of Martha E. Mendoza-Valencia, an Immigration Services Officer with U.S. Citizenship and Immigration Services (USCIS), an agency with the U.S. Department of Homeland Security (DHS), showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached as Exhibit A.

**A. Defendant's Immigration History Using the Osei Appah Identity.**

8. On October 10, 1994, Defendant arrived at New York, New York.
9. On or about December 30, 1994, Defendant affirmatively requested immigration benefits.
10. Using the name "Osei Appah," Defendant supplemented his application for immigration benefits with a Form G-325A, Biographic Information (Form G-325A), as part of his application representing the following:
  - a. His name was Osei Appah;
  - b. Did not answer if he had ever used any other names;
  - c. He was born in Accra, Ghana;
  - d. He married Florence Apenteng (born in 1960) on January 1, 1978, in Ghana.
11. Defendant signed the Form G-325A under the following advisal: "SEVERE PENALTIES ARE PROVIDED BY LAW FOR KNOWINGLY AND WILLFULLY FALSIFYING OR CONCEALING A MATERIAL FACT." *Id.*
12. A true and accurate copy of Defendant's Form G-325A, except for redactions of immaterial personally identifying information, is attached as Exhibit B.

13. Defendant accompanied his benefit application and Form G-325A with a Birth Certificate and a Marriage Certificate reiterating the information above. *Id.*

14. Defendant submitted fingerprints to the INS on November 28, 1994.

15. INS interviewed Defendant on April 19, 1995, regarding his application for immigration benefits.

16. At the conclusion of this interview, Defendant again signed his application and swore that the contents were true and correct.

17. On April 16, 1996, Defendant withdrew his application for immigration benefits and agreed to depart the United States no later than April 16, 1997.

18. There is no evidence in the record that Defendant departed within the voluntary departure period.

**B. Defendant's Immigration History Under the "Eddie Jones Appah" Identity**

19. On March 19, 2006, Patricia Ann Reale, a U.S. citizen, filed a Form I-130, Petition for Alien Relative (visa petition), on behalf of Defendant, indicating his name was "Eddie Jones Appah," and seeking to classify him as a spouse of a U.S. citizen.

20. A true and accurate copy of the Form I-130, except for redactions of immaterial personally identifying information, is attached as Exhibit C.

21. The visa petition stated that Defendant married Patricia Ann Reale on January 11, 2006, in New Jersey, and that Defendant had never been in immigration proceedings. *Id.*

22. USCIS assigned alien registration number XXX-XXX-282 to "Eddie Jones Appah."

23. Defendant simultaneously filed a Form I-485, Application to Register Permanent Residence or Adjust Status ("Adjustment Application") with USCIS.

24. A true and accurate copy of Defendant's Adjustment Application, except for redactions of immaterial personally identifying information, is attached as Exhibit D.

25. Defendant signed the Adjustment Application under penalty of perjury on or about February 10, 2006, thereby representing the application and the evidence submitted with it was all true and correct.

26. On the Adjustment Application, Defendant represented the following:

- a. His name was Eddie Jones Appah;
- b. Indicated that he had never used any other names;
- c. His date of birth was in 1949;
- d. He last entered the United States at New York, New York, on February 3, 2002, as a B-2 non-immigrant visitor;
- e. He had three children: JSA (born in 1980); EOA (born in 1981); and JA (born in 2002);
- f. He had not, 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.

27. A true and accurate copy of Defendant's Form I-94, Departure Record, except for redactions of immaterial personally identifying information, is attached as Exhibit E.

28. In connection with his adjustment application, Defendant submitted a Form G-325A signed under severe penalties by law for knowingly and willfully falsifying or concealing a material fact.

29. A true and accurate copy of Defendant's Form G-325A, except for redactions of immaterial personally identifying information, is attached as Exhibit F.

30. On Defendant's Form G-325, he represented:

- a. His name was Eddie Jones Appah;
- b. He had used no other names;
- c. His date of birth was in 1949;
- d. He was born in Nkawkaw, Ghana;
- e. His prior wife's name was Paulina Apenteng, born in 1964, and they divorced on February 15, 2005, in Ghana.

31. In support of his adjustment application, Defendant submitted a Birth Certificate and a divorce decree consistent with the information provided.

32. USCIS approved both the visa and the adjustment applications on February 12, 2007, and accorded him conditional permanent resident status. *Id.*

33. On or about January 26, 2009, Defendant filed a Form I-751, Petition to Remove Conditions on Residence.

34. A true and accurate copy of Defendant's Petition to Remove Conditions on Residence, except for redactions of immaterial personally identifying information, is attached as Exhibit G.

35. In Defendant's Petition to Remove Conditions on Residence, he represented:

- a. His name was Eddie Jones Appah;
- b. He was born in 1949;
- c. He did not use any other names;
- d. He had three children: JSA (born in 1980); EOA (born in 1981); and JA (born in 2002);
- e. He was not in removal, deportation, or rescission proceedings.

36. Defendant signed his Petition to Remove Conditions on or about November 26, 2008, and subscribed, under penalty of perjury, the petition and evidence submitted with it was true and correct.

37. On June 4, 2009, USCIS approved Defendant's petition to remove conditions. *Id.*

**C. Defendant Unlawfully Naturalizes as Eddie Jones Appah.**

**a. Naturalization Application**

38. On or about December 27, 2011, Defendant, using the identity of Eddie Jones Appah, filed a Form N-400, Application for Naturalization ("Naturalization Application"), with USCIS, based on having been a permanent resident for at least five years.

39. A true and accurate copy of Defendant's Naturalization Application, except for redactions of immaterial personally identifying information, is attached as Exhibit H.

40. On or about February 6, 2012, in support of his Naturalization Application, Defendant provided his biometric information, including his fingerprints and a passport style photograph of himself.

41. On his Naturalization Application, Defendant stated that his legal name was Eddie Appah Jones, that he was born in 1949, and that was then married to Patricia Ann Reale.

42. In Part 1, Question C, the Naturalization Application asked, "If you have ever used other names, provide them below."

43. In response to In Part 1, Question C of the Naturalization Application, Defendant answered "N/A."

44. In Part 8, Section F, Question 1, of his Naturalization Application, Defendant indicated that he was previously married to Paulina Apenteng and that they divorced on February 15, 2005.

45. In Part 9, Section B, of his Naturalization Application, Defendant indicated that he had three children: JSA. (born in 1980); EOA (born in 1981); and JA (born in 2002).

46. Part 10, Section D, Question 23, of his Naturalization Application asked if Defendant had “**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?”

47. In response to Part 10, Section D, Question 23, of his Naturalization Application, Defendant answered “No.”

48. Part 10, Section E, Question 25, of his Naturalization Application asked Defendant, “Are removal, exclusion, rescission, or deportation proceedings pending against you?”

49. In response to Part 10, Section E, Question 25, of his Naturalization Application, Defendant answered “No.”

50. Part 10, Section E, Question 28, asked “Have you **ever** applied for any kind of relief from removal, exclusion, or deportation?”

51. In response to Part 10, Section E, Question 28, Defendant answered “No.”

52. On or about December 19, 2011, Defendant signed his name in Part 11 of the application certifying, under penalty of perjury, that its contents were true and correct.

**b. Naturalization Interview**

53. On March 21, 2012, a USCIS officer orally interviewed Defendant, in person, under oath, to determine his eligibility for naturalization.

54. Consistent with his statement in Part 9, Section B, of his naturalization application, Defendant orally and under oath testified he had three children.

55. Consistent with his statement in Part 10, Section D, Question 23, of his

naturalization application, Defendant orally and under oath testified 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.

56. Given the opportunity to correct any mistakes or supplement his naturalization application, Defendant only corrected information regarding his prior marriage and his current wife's prior marriage history.

57. At the end of his March 21, 2012 interview, Defendant again signed his application under penalty of perjury, attesting that he knew the contents of the naturalization application, including corrections, were true and correct.

58. Based on his written application and the testimony Defendant provided during his naturalization interview, USCIS approved Defendant's application on March 21, 2012. *Id.*

59. Based on the approved naturalization application, on that same day, March 21, 2012, Defendant took the Oath of Allegiance, was admitted as a citizen of the United States, and was issued Certificate of Naturalization No.  under the identity of Eddie Jones Appah. *See Exhibit I.*

#### **E. Fingerprint Analysis**

64. Eddie Jones Appah and Osei Appah are one and the same person.

65. Fingerprint evidence demonstrates by clear, convincing and unequivocal evidence that the same individual submitted fingerprints under both the Osei Appah and the Eddie Jones Appah identities.

66. A true and accurate copy of the Fingerprint Comparison Report, except for redactions of immaterial personally identifying information, is attached as Exhibit J.

## GOVERNING LAW

### **A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship**

67. 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).

68. 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)).

69. Under the first ground for denaturalization, illegal procurement, citizenship is “illegally procured” if the applicant failed to comply with any of the congressionally imposed prerequisites to the acquisition of citizenship. *Fedorenko*, 449 U.S. at 506.

70. Among other requirements for naturalization, Congress mandated that an applicant for naturalization must demonstrate that he or she has 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.

71. The term “lawfully admitted for permanent residence” means “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. 8 U.S.C. § 1101(a)(20). Lawful admission “denotes compliance with substantive legal requirements, not mere procedural regularity.” *Savane v. Sec’y United States Dep’t of Homeland Sec.*, 164 F.4th 93, 98 (3d Cir. 2026) (citations and marks omitted).

72. Under the law in effect at the time of Defendant's admission as a permanent resident, Congress mandated that an individual who had been deported from the United States was inadmissible for ten years after the date of such departure. *See* 8 U.S.C. § 1182(a)(9)(A)(ii).

73. Congress also mandated that an individual may not naturalize unless that person "during all periods referred to in [8 U.S.C. § 1427(a)] has been and still is a person of good moral character." *See* 8 U.S.C. § 1427(a).

74. The required statutory period for good moral character typically begins five years before the date the applicant files the application for naturalization, and continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *See* 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

75. For a person seeking to naturalize who is the spouse of a U.S. citizen, the period is three years before the date he or she files the naturalization application. 8 U.S.C. § 1430.

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

77. In addition to the enumerated classes of persons precluded from establishing the good moral character necessary to naturalize, Congress also created a "catch-all" provision, which states, "[t]he fact that any person is not within any of the [statutorily described] classes shall not preclude a finding that for other reasons such person is or was not of good moral character." *See* 8 U.S.C. § 1101(f).

78. Applicants who commit unlawful acts adversely reflecting upon their moral character cannot meet the good moral character requirement, unless they prove that extenuating circumstances exist. *See* 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

79. An alien 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 immigration benefit is inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

**B. The Denaturalization Statute**

80. 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.

81. 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.

82. 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.

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

84. Where the government establishes that the 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.

## **CAUSES OF ACTION**

### **COUNT I**

#### **ILLEGAL PROCUREMENT OF NATURALIZATION Not Lawfully Admitted for Permanent Residence (Procured By Fraud or Willful Misrepresentation of Material Fact)**

85. The United States re-states and incorporates by reference the foregoing Factual Allegations as though fully set forth herein.

86. As discussed above, to qualify for naturalization, an applicant must be lawfully admitted to the United States for permanent residence. *See* 8 U.S.C. § 1429.

87. The term "lawfully" requires compliance with the substantive legal requirements for admission, and not mere procedural regularity. *See Savane, 164 F.4th at 98.*

88. At all times relevant to this Complaint, the governing law provided that an alien 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 immigration benefit is inadmissible. *See* 8 U.S.C. § 1182(a)(6)(C)(i).

89. Defendant was inadmissible under 8 U.S.C. § 1182(a)(6)(C)(i) at the time of his adjustment to permanent resident status, because he both sought to procure, and did procure, admission into the United States or other immigration benefits by fraud or by willfully misrepresenting material facts.

90. Defendant was never lawfully admitted 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 as a permanent resident where he, by fraud or willfully misrepresenting a material fact, sought to procure or procured a visa, other documentation, or admission into the United States or other immigration benefit.

91. As set forth in paragraphs 19 through 37 of this Complaint, Defendant applied for admission as a permanent resident using a different name and date of birth than those which he previously used, but he represented that he had never used any other names, thus misrepresenting his immigration history in the United States.

92. At the time Defendant was granted adjustment of status under the Eddie Jones Appah identity, he swore to, among other things, a name, a date of birth, the number and identities of his children, a date, place, and manner of entry into the United States, and an immigration history that are irreconcilable with prior sworn statements on the same subject. Defendant knew he was misrepresenting his identity and immigration history, and these misrepresentations were material.

93. Because Defendant made sworn statements in immigration benefit applications that cannot both be simultaneously true, he was inadmissible. 8 U.S.C. § 1182(a)(6)(C)(i).

94. Defendant's false sworn statements regarding his name, his date of birth, and his immigration history were material to determining his eligibility for the immigration benefits for which he applied.

95. Defendant's false sworn statements had the natural tendency to influence a decision by the immigration officer to approve his admission as a lawful permanent resident

96. Defendant, thus, sought to procure an immigration benefit by fraud or willfully misrepresenting material facts, rendering him inadmissible at the time his status was adjusted to

that of a permanent resident.

97. Because Defendant was inadmissible at the time his status was adjusted to that of a permanent resident, Defendant was not lawfully admitted for permanent residence.

98. Because Defendant was not lawfully admitted for permanent residence, he was and remains ineligible for naturalization under 8 U.S.C. § 1429.

99. Because Defendant was ineligible for naturalization, he illegally procured his naturalization.

100. Because Defendant illegally procured his naturalization, this Court must revoke that naturalization as provided for in 8 U.S.C. § 1451(a).

## **COUNT II**

### **ILLEGAL PROCUREMENT OF NATURALIZATION**

#### **Lack of Good Moral Character**

#### **(False Testimony)**

101. The United States re-alleges and incorporates by reference the foregoing paragraphs.

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

103. As discussed above, an applicant for naturalization must satisfy the statutory requirement of demonstrating that he is a person of good moral character for the five-year statutory period before he filed his naturalization application, and until the time he becomes a naturalized United States citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(1).

104. Defendant was required to establish that he was a person of good moral character from December 27, 2008, until he became a U.S. citizen on March 21, 2012 (the statutory period).

105. Defendant was statutorily barred from establishing the good moral character necessary to naturalize because, during the statutory period, he provided false testimony, orally and under oath, for the purpose of obtaining an immigration benefit, including naturalization. *See* 8 U.S.C. § 1101(f)(6).

106. Specifically, as set forth in paragraphs 53 through 59, during the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when he swore, orally and under oath during his March 21, 2012, that:

- a. he had never used any names other than Eddie Jones Appah;
- b. he had never given false or misleading information to any U.S. government official while applying for an immigration benefit or to prevent deportation or exclusion;
- c. he had never lied to any U.S. government official to gain entry or admission into the United States; and
- d. he had never applied for any kind of relief from removal, exclusion, or deportation.

107. Defendant's testimony on each of the questions discussed above was oral, under oath, knowingly false, and for the purpose of obtaining an immigration benefit, namely naturalization.

108. Because, during the statutory period, he provided false testimony orally and under oath for the purpose of obtaining his naturalization, Defendant was barred under 8 U.S.C. §

1101(f)(6) from showing that he had the good moral character necessary to become a naturalized United States citizen.

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

110. Because he was ineligible to naturalize, Defendant illegally procured his citizenship.

111. Because he illegally procured his citizenship, the Court must revoke his citizenship, as provided for by 8 U.S.C. § 1451(a).

### **COUNT III**

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

112. The United States re-alleges and incorporates by reference the foregoing paragraphs.

113. 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 willful misrepresentation.

114. As discussed in paragraphs 19 through 59 above, throughout the naturalization process, Defendant willfully misrepresented and concealed facts related to his use of an alternate identity and his immigration history.

115. Specifically, Defendant misrepresented on his naturalization application and later testified at his naturalization interview before an immigration adjudicator that he had never used other names; that he had never given false testimony for the purpose of obtaining any immigration benefit; that he had never lied to any U.S. government official to gain entry or

admission into the United States; and that he had never applied for any kind of relief from removal, deportation or exclusion.

116. Defendant made the misrepresentations and concealments identified in the foregoing paragraph voluntarily, despite knowing that such representations were false and misleading.

117. Accordingly, Defendant made these representations willfully.

118. Defendant's false statements and testimony about these matters were material to determining his eligibility for naturalization.

119. Defendant's false statements and testimony had the natural tendency to influence a decision by USCIS to approve his Form N-400. In fact, as shown above, the concealed and misrepresented facts rendered Defendant ineligible for naturalization, and USCIS would have denied his N-400 application had he been truthful.

120. Defendant, therefore, procured his naturalization by concealment of material facts and willful misrepresentations.

121. Because Defendant procured his naturalization by concealment of material facts and willful misrepresentations, the Court must revoke his citizenship under 8 U.S.C. § 1451(a).

#### **PRAYER FOR RELIEF**

**WHEREFORE**, 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 facts and by willful misrepresentation;

(3) Judgment revoking and setting aside the order admitting Defendant to citizenship and canceling Certificate of Naturalization No. , effective as of the original date of the order and certificate, March 21, 2012;

(4) Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship, that he obtained as a result of his March 21, 2012 naturalization;

(5) Judgment requiring Defendant to surrender and deliver, within ten days of the entry of judgment, his Certificate of Naturalization No. , and any copies thereof in his possession or control—and to make good faith efforts to recover and immediately surrender any copies thereof that he knows are in the possession or control of others—to the Acting 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, any other indicia of U.S. citizenship, including, but not limited to, U.S. passports (valid or expired), U.S. passport cards (valid or expired), Enhanced Driver's Licenses (valid or expired), 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 Acting 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: July 30, 2026

ROBERT FRAZER  
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Respectfully submitted,

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