UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, Plaintiff, v. RAJBIR SINGH SIDHU, [redacted] a.k.a. Rajinder Singh, [redacted], a.k.a. Jinder Singh, [redacted] Defendant.	Civil Action No. 26-6116 **COMPLAINT TO REVOKE NATURALIZATION**

I. PRELIMINARY STATEMENT OF THE CASE

The United States of America ("Plaintiff") brings this civil action against Defendant Rajbir Singh Sidhu (a.k.a. Rajinder Singh and Jinder 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 Defendant naturalized as a U.S. citizen in 2007 under the identity Ragbir Singh Sidhu, immigration judges had twice ordered him deported from the United States under his Rajinder Singh and Jinder Singh identities. In February 1993, Defendant presented himself applied for an immigration benefit with the former Immigration and Naturalization Service

("INS")[1] and identified himself as "Rajinder Singh" ("RS").[2] INS placed Defendant in exclusion proceedings and released him on bond. Defendant filed for an immigration benefit in June 1993, which was denied by an immigration judge in September 1994. The immigration judge ordered him deported, but there is no record that departed the United States pursuant to the deportation order.

While the RS application was still on appeal, Defendant, now using the identity Jinder Singh, ("JS"), filed a second application for an immigration benefit. On September 19, 1995, an INS officer determined that he did not qualify for the immigration benefit for which he applied. JS appeared for an initial hearing on October 20, 1995 with legal representation, but the hearing was continued. On May 3, 1996, JS did not appear for a hearing and was ordered deported *in absentia*, although JS's attorney was present. Once again, the INS has no record of him ever leaving the United States in compliance with the deportation order.

On January 2, 1996, while JS's application was still pending, Defendant now using the Sidhu identity, filed a third application for an immigration benefit. This time INS approved Defendant's application. Defendant became a lawful permanent resident in 1999 and a citizen in 2007 after making many misrepresentations during the naturalization process.

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

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[1] On March 1, 2003, the INS ceased to exist as an independent agency within the Department of Justice, and most of its functions were transferred to the newly formed Department of Homeland Security. *See* Homeland Security Act of 2002, Pub. L. No. 107-296, §§ 441, 451, 471, 116 Stat. 2135 (Nov. 25, 2002). The 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.

[2] When using the Rajinder Singh identity, Defendant sometimes also stated that his name was Harjinder Singh.

cause, the United States 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. [redacted], issued October 12. 2007.

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 Reading, Pennsylvania, 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. Rajinder Singh, Jinder Singh and Rajbir Singh Sidhu are one and the same person.

IV. FACTUAL ALLEGATIONS

6. The affidavit of Dwayne William, Immigration Services Officer, USCIS, 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 Rajinder Singh

7. On February 9, 1993, Defendant presented himself for inspection at the John F. Kennedy Airport Port of Entry in New York City. *Id.* at ¶ 1. The INS assigned him alien registration number [redacted]. INS placed him into exclusion proceedings after he gave certain basis information. *Id.* at ¶ 1-2. Defendant represented that:

a. his legal name was Harjinder Singh;

b. he was born on [redacted] in Punjab, India;

c. he had never used of been known by any other names;

d. he was a native of Indiae. *Id.*

8. On February 9, 1993, using the name, Rajinder Singh, Defendant provided his fingerprints to the INS. *See* [redacted], dated February 18, 2020, Ex. 2.3, attached hereto as Exhibit "B".

9. On June 8, 1993, Defendant applied for an immigration benefit with the immigration court, at which he made essentially the same representations as above concerning his birth date and non-use of other names. Ex. A at ¶ 3. The immigration judge denied Defendant's application on September 29, 1994 and ordered him deported. *Id.* at ¶ 4.

10. Defendant appealed to the Board of Immigration Appeals (BIA) but the appeal was denied on October 25, 1996. *Id.* at ¶¶ 5-6. The government has no record showing that Defendant departed the United States pursuant to immigration judge's order. *Id.* at ¶ 7.

B. Defendant's Applications Under the Jinder Singh Identity

11. On August 7, 1995, Defendant filed a second application for an immigration benefit. *Id.* at ¶ 8. On this application, he represented that his name was Jinder Singh, his birthdate was [redacted] and that he was married to Gurmeet Kaur. *Id.*

12. An immigration officer determined that Defendant did not qualify for the immigration benefit and referred his application to an immigration judge on September 19, 1995. *Id.* at ¶ 10.

13. Defendant failed to appear at this immigration hearing on May 3, 1996 and was ordered deported *in absentia. Id.* at ¶ 14.

14. Defendant failed to appear for deportation and the government has no record of him leaving the United States pursuant to that deportation order. *Id.* at ¶ 16.

C. Defendant's Applications Under the Rajbir Singh Sidhu Identity

15. Defendant filed a third application for an immigration benefit on January 2, 1996, while his JS immigration application remained pending. *Id.* at ¶ 17. This time Defendant stated, under penalty of perjury, that his name was Rajbir Singh Sidhu and his birthdate was [redacted]. *Id.*

16. On February 22, 1996, his application for an immigration benefit was approved. *Id.* at ¶ 19.

17. Defendant filed his Application for Permanent Residence on May 12, 1997. On his form I-485, Defendant represented he had never been ordered deported from the United States or that he had ever procured an immigration benefit through fraud or willful misrepresentation. *Id.* at ¶ 20.

18. INS approved Defendant as a permanent resident on October 8, 1999. *Id.* at ¶ 22.

19. On February 22, 2007, Defendant filed an application for naturalization. *Id.* at ¶ 23. He represented again that he had never lied to any government official to gain entry or admission into the United States, that he had never been ordered removed or deported and that he had not used other names. *Id.*

20. USCIS approved Defendant's application on August 23, 2007. *Id.* at ¶ 24.

21. Defendant was admitted as a citizen on October 12, 2007. *Id.* at ¶ 25.

D. Fingerprint Analysis Confirms Rajinder Singh, Jinder Singh and Rajbir Singh Sidhu are the Same Individual.

22. On February 9, 1993, Defendant submitted his fingerprints to INS under the Rajinder Singh identity. Ex. B at 2.3.

23. On February 13, 1993, Defendant submitted a fingerprint card bearing the name Harjinder (Rajinder) Singh. *Id* at 2.2.

24. On March 24, 1994, Defendant submitted a fingerprint card bearing the name Harjinder (Rajinder) Singh. *Id* at 2.4.

25. On May 30,1994, Defendant submitted a fingerprint card under his Jinder Singh identity. *Id.* at 2.8.

26. Defendant, using his Rajbir Sidhu identity, submitted a fingerprint card on February 8, 1996. *Id.* at 2.7.

27. On February 5, 1997, Defendant submitted his Green Card fingerprints in support of his I-485 application. *Id.* at 2.5.

28. In support of his N-400 naturalization application, Defendant once again submitted fingerprints on March 20, 2007. *Id.* at 2.1.

29. Analysis and comparison of the fingerprint submissions described in Paragraphs 21 through 27 above confirm that the same individual provided all the fingerprint impressions. *Id.* at 1.

V. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

30. 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)).

31. Congress has mandated that an applicant for naturalization demonstrate that he has been lawfully admitted to the United States for permanent residence. 8 U.S.C. § 1429.

32. 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).

33. The term "lawfully" requires compliance with substantive legal requirements for admission, and not mere procedural regularity. *Koszelnik v. Sec'y of Dep't of Homeland Sec.*, 828 F.3d 175, 180-81 (3d Cir. 2016); *Saliba v. Att'y Gen. of United States*, 828 F.3d 182, 192 (3d Cir. 2016); *Gallimore v. Att'y Gen.*, 619 F.3d 216, 223 & n.6 (3d Cir. 2010). If the government adjusts an alien's status to that of a permanent resident when the alien was not eligible for adjustment, the alien did not "lawfully" obtain permanent resident status and is ineligible for naturalization. *Koszelnik*, 828 F.3d at 180-81.

34. Congress requires that an applicant for adjustment of status be eligible to receive an immigrant visa and that an immigrant visa be immediately available to him at the time the application to adjust status was filed. INA § 245(a), 8 U.S.C. § 1255(a).

35. Under the law in effect at the time Defendant's adjustment application was approved, as today, an alien who sought an immigrant visa on the basis of a marriage entered into during deportation proceedings was ineligible for adjustment of status, unless the alien established by clear and convincing evidence that the marriage met certain good faith requirements. INA § 245(e), 8 U.S.C. § 1255(e). As to the underlying petition, the petition itself may not be approved until the alien has resided outside the United States for two years after the date of marriage, INA § 204(g), 8 U.S.C. § 1154(g), unless the alien meets the good faith exception in INA § 245(e), 8 U.S.C. § 1255(e).

36. Under the law in effect at the time Defendant's adjustment application was approved, as today, Congress required that applicants for adjustment of status be "admissible." INA § 245(a)(2), 8 U.S.C. § 1255(a)(2).

37. An individual who, by fraud or willfully misrepresenting a material fact, seeks to procure a visa, other documentation, or admission into the United States or other benefit provided for in the INA is inadmissible. INA § 212(a)(6)(C)(i), 8 U.S.C. § 1182(a)(6)(C)(i).

38. 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.* For those applying for naturalization under INA § 319, 8 U.S.C. § 1430, based on marriage to a

United States citizen spouse, the statutory period begins three years before the date of application, continuing until the applicant takes the oath of allegiance and becomes a U.S. citizen. INA § 319, 8 U.S.C. § 1430.

39. Congress has explicitly precluded individuals within certain enumerated classes from being able to establish the good moral character necessary to naturalize. 8 U.S.C. § 1101(f)(6). 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, "The 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). Such claims are evaluated on a case-by-case basis taking into account "the standards of the average citizen in the community of residence." 8 C.F.R. § 316.10(a)(2).

40. An applicant who, during the statutory period, commits an unlawful act adversely reflecting upon his or her moral character cannot meet the good moral character requirement, unless he or she proves extenuating circumstances exist. 8 C.F.R. § 316.10(b)(3)(iii).

B. The Denaturalization Statute

41. 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.

42. 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.

43. 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.

44. 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).

45. 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)

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

47. 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. As noted above, the term "lawfully" denotes compliance with substantive legal requirements, not mere procedural regularity. *Koszelnik*, 828 F.3d at 180-81.

48. The law requires that an applicant for adjustment of status be "admissible." INA § 245(a)(2), 8 U.S.C. § 1255(a)(2).

49. 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 INA is inadmissible. INA 212(a)(6)(C)(i), 8 U.S.C. § 1182(a)(6)(C)(i).

50. 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.

51. Defendant sought to procure admission into the United States and other benefits provided for in the INA by fraud or willfully misrepresenting material facts. Specifically, Defendant failed to disclose that he had been ordered deported, had previously used the Rajinder Singh and Jinder Singh identities, and had misrepresented other material facts during immigration proceedings. Indeed, at the time that Defendant adjusted to permanent resident status, he was subject of an outstanding order of deportation under the names Rajinder Singh and Jinder Singh.

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

53. Defendant's false statements regarding his name, date of birth, 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. Defendant thus sought to procure an immigration benefit by fraud or willfully misrepresenting a material fact.

54. 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. 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. *Koszelnik v. Sec'y of Dep't of Homeland Sec.*, 828 F.3d 175, 180-81 (3d Cir. 2016).

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

COUNT TWO

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

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

57. As outlined above, to be eligible for naturalization, Congress has mandated that an applicant for naturalization under INA § 319, 8 U.S.C. § 1430, based on marriage to a United States citizen spouse, must show that he or she has been a person of good moral character for the five-year period before filing his or her naturalization application until the time the applicant becomes a naturalized U.S. citizen. 8 U.S.C. §§ 1430(a), 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

58. Defendant filed his naturalization application on February 22, 2007 and he naturalized on October 12, 2007. Thus, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during his "statutory period" beginning from February 22, 2002 and through his naturalization date of October 12, 2007.

59. Defendant completed and filed his naturalization application during his "statutory period."

60. 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 deported under that identity.

61. 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).

62. 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).

63. Specifically, Defendant violated 18 U.S.C. § 1001(a)(1)-(3) when he completed and filed his naturalization application by answering "no" to Question 27 in Part 10, which asked: "Have you **EVER** been ordered to be removed, excluded, or deported from the United States?" (emphasis in original).

64. 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).

65. No extenuating circumstances exist that would palliate Defendant violation of 18 U.S.C. § 1001(a)(1)-(3).

66. 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. §§ 1430(a), 1427(a)(1) and 1429.

67. 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

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

69. 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.

70. 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 order of deportation; (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) that he had been ordered to be removed, excluded, or deported from the United

States; (viii) and that he had previously applied for relief from removal, exclusion, or deportation. Defendant knew each of these statements to be false.

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

72. 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 deportation, and prior misrepresentations 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.

73. 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. [redacted], effective as of the original date of the certificate, October 12, 2007;

(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 October 12, 2007 naturalization;

(5) Judgment requiring the Defendant, within ten days of the entry of judgment against him, to surrender and deliver his Certificate of Naturalization No. [redacted] 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 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: August 20, 2026

Respectfully submitted,

DAVID METCALF
United States Attorney

s/*Gregory B. David*
GREGORY B. DAVID
Assistant United States Attorney
Chief, Civil Division

/s/ *Colin Cherico*
COLIN M. CHERICO
Assistant United States Attorney
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106-4476
(215) 861-8788
Colin.Cherico@usdoj.gov

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff Philadelphia
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Colin M. Cherico, AUSA/US Attorney's Office EDPA, 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106/ (215) 861-8788

DEFENDANTS

Rajbir Singh Sidhu

County of Residence of First Listed Defendant Chester
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*
J. Alexander Short, Esq., Lehigh Valley Immigration law, LLC, 609 W. Hamilton Street, Ste. 102, Allentown, PA 18101/(484) 763-4984

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- [x] 1 U.S. Government Plaintiff
- [ ] 2 U.S. Government Defendant
- [ ] 3 Federal Question *(U.S. Government Not a Party)*
- [ ] 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	[ ] 1	[ ] 1	Incorporated *or* Principal Place of Business In This State	[ ] 4	[ ] 4
Citizen of Another State	[ ] 2	[ ] 2	Incorporated *and* Principal Place of Business In Another State	[ ] 5	[ ] 5
Citizen or Subject of a Foreign Country	[ ] 3	[ ] 3	Foreign Nation	[ ] 6	[ ] 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- [ ] 110 Insurance
- [ ] 120 Marine
- [ ] 130 Miller Act
- [ ] 140 Negotiable Instrument
- [ ] 150 Recovery of Overpayment & Enforcement of Judgment
- [ ] 151 Medicare Act
- [ ] 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- [ ] 153 Recovery of Overpayment of Veteran's Benefits
- [ ] 160 Stockholders' Suits
- [ ] 190 Other Contract
- [ ] 195 Contract Product Liability
- [ ] 196 Franchise

REAL PROPERTY
- [ ] 210 Land Condemnation
- [ ] 220 Foreclosure
- [ ] 230 Rent Lease & Ejectment
- [ ] 240 Torts to Land
- [ ] 245 Tort Product Liability
- [ ] 290 All Other Real Property

TORTS

PERSONAL INJURY
- [ ] 310 Airplane
- [ ] 315 Airplane Product Liability
- [ ] 320 Assault, Libel & Slander
- [ ] 330 Federal Employers' Liability
- [ ] 340 Marine
- [ ] 345 Marine Product Liability
- [ ] 350 Motor Vehicle
- [ ] 355 Motor Vehicle Product Liability
- [ ] 360 Other Personal Injury
- [ ] 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- [ ] 365 Personal Injury - Product Liability
- [ ] 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- [ ] 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- [ ] 370 Other Fraud
- [ ] 371 Truth in Lending
- [ ] 380 Other Personal Property Damage
- [ ] 385 Property Damage Product Liability

CIVIL RIGHTS
- [ ] 440 Other Civil Rights
- [ ] 441 Voting
- [ ] 442 Employment
- [ ] 443 Housing/ Accommodations
- [ ] 445 Amer. w/Disabilities - Employment
- [ ] 446 Amer. w/Disabilities - Other
- [ ] 448 Education

PRISONER PETITIONS

Habeas Corpus:
- [ ] 463 Alien Detainee
- [ ] 510 Motions to Vacate Sentence
- [ ] 530 General
- [ ] 535 Death Penalty

Other:
- [ ] 540 Mandamus & Other
- [ ] 550 Civil Rights
- [ ] 555 Prison Condition
- [ ] 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- [ ] 625 Drug Related Seizure of Property 21 USC 881
- [ ] 690 Other

LABOR
- [ ] 710 Fair Labor Standards Act
- [ ] 720 Labor/Management Relations
- [ ] 740 Railway Labor Act
- [ ] 751 Family and Medical Leave Act
- [ ] 790 Other Labor Litigation
- [ ] 791 Employee Retirement Income Security Act

IMMIGRATION
- [ ] 462 Naturalization Application
- [x] 465 Other Immigration Actions

BANKRUPTCY
- [ ] 422 Appeal 28 USC 158
- [ ] 423 Withdrawal 28 USC 157

INTELLECTUAL PROPERTY RIGHTS
- [ ] 820 Copyrights
- [ ] 830 Patent
- [ ] 835 Patent - Abbreviated New Drug Application
- [ ] 840 Trademark
- [ ] 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- [ ] 861 HIA (1395ff)
- [ ] 862 Black Lung (923)
- [ ] 863 DIWC/DIWW (405(g))
- [ ] 864 SSID Title XVI
- [ ] 865 RSI (405(g))

FEDERAL TAX SUITS
- [ ] 870 Taxes (U.S. Plaintiff or Defendant)
- [ ] 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- [ ] 375 False Claims Act
- [ ] 376 Qui Tam (31 USC 3729(a))
- [ ] 400 State Reapportionment
- [ ] 410 Antitrust
- [ ] 430 Banks and Banking
- [ ] 450 Commerce
- [ ] 460 Deportation
- [ ] 470 Racketeer Influenced and Corrupt Organizations
- [ ] 480 Consumer Credit (15 USC 1681 or 1692)
- [ ] 485 Telephone Consumer Protection Act
- [ ] 490 Cable/Sat TV
- [ ] 850 Securities/Commodities/ Exchange
- [ ] 890 Other Statutory Actions
- [ ] 891 Agricultural Acts
- [ ] 893 Environmental Matters
- [ ] 895 Freedom of Information Act
- [ ] 896 Arbitration
- [ ] 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- [ ] 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

- [x] 1 Original Proceeding
- [ ] 2 Removed from State Court
- [ ] 3 Remanded from Appellate Court
- [ ] 4 Reinstated or Reopened
- [ ] 5 Transferred from Another District *(specify)*
- [ ] 6 Multidistrict Litigation - Transfer
- [ ] 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:
8 U.S.C. § 1451(a)

Brief description of cause:
Revocation of Naturalization

VII. REQUESTED IN COMPLAINT:

- [ ] CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $

CHECK YES only if demanded in complaint:
JURY DEMAND: [ ] Yes [x] No

VIII. RELATED CASE(S) IF ANY *(See instructions):*

JUDGE _____ DOCKET NUMBER _____

DATE
Aug 20, 2026

SIGNATURE OF ATTORNEY OF RECORD
/s/ Colin Cherico, AUSA

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. Origin. Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

Place of Accident, Incident, or Transaction: Philadelphia, PA

RELATED CASE IF ANY: Case Number:_____ Judge:_____

1. Does this case involve property included in an earlier numbered suit? Yes ☐
2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? Yes ☐
3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? Yes ☐
4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? Yes ☐
5. Is this case related to an earlier numbered suit even though none of the above categories apply? If yes, attach an explanation. Yes ☐

I certify that, to the best of my knowledge and belief, the within case ☐ **is** / ☒ **is not** related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☐ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief ***see certification below***
- ☒ 16. All Other Federal Question Cases. *(Please specify)*: 8 USC 1451(a)

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury *(Please specify)*:_____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: *(Please specify)*_____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ **does** / ☒ **does not** have implications beyond the parties before the court and ☐ **does** / ☒ **does not** seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of $150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

Exhibit A

UNITED STATES OF AMERICA	)	
	)	
In the Matter of the Revocation	)	AFFIDAVIT OF GOOD CAUSE
of the Naturalization of	)	
	)	
Rajbir Singh Sidhu, A# [redacted]	)	
a/k/a Rajinder Singh, a/k/a Harjinder Singh,	)	
A# [redacted]	)	
a/k/a Jinder Singh, A# [redacted]	)	
	)	

I, Dwayne Williams, declare under penalty of perjury as follows:

I am an Immigration Services Officer with U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security (DHS).[1] In this capacity, I have access to the official records of DHS, including the immigration files of Rajbir Singh Sidhu, A[redacted], a/k/a Rajinder Singh, a/k/a Harjinder Singh, A[redacted], a/k/a Jinder Singh, A[redacted] ("Sidhu").

I have examined records relating to Sidhu, including his immigration files. Based upon my review of immigration and personal records relating to Sidhu, the information set forth in this Affidavit of Good Cause is true and correct.

Based on the facts and law, good cause exists to institute proceedings pursuant to section 340(a) of the Immigration and Nationality Act (INA), 8 U.S.C. § 1451(a),[2] to revoke the citizenship of Sidhu and to cancel his Certificate of Naturalization.

The last known place of residence for Sidhu is [redacted], [redacted], [redacted].

[1]Pursuant to the Department of Homeland Security Reorganization Plan, Homeland Security Act of 2002, Pub. L. No. 107-296, 116 Stat. 2135 (2002), 6 U.S.C. §§ 101-557, as of March 1, 2003, the Immigration and Naturalization Service (INS) was abolished and its functions were transferred to USCIS within the DHS. This Affidavit will refer to INS or USCIS as appropriate.

[2] While some provisions of the Immigration and Nationality Act, as contained in the United States Code, have been renumbered throughout the years, not all provisions have undergone such renumbering. Where necessary, this Affidavit of Good Cause lists the applicable year for a United States Code reference. If no year is included within the citation, it means that the United States Code citation is the same today as it was during the time in question.

BACKGROUND

DHS records, including fingerprint comparison, establish that the person who naturalized as Sidhu is the same person who was previously ordered excluded and deported under the name Rajinder Singh a/k/a/ Harjinder Singh and ordered deported under the name Jinder Singh.

Immigration History as Rajinder Singh a/k/a Harjinder Singh
D.O.B [redacted], A [redacted]

1. On February 9, 1993, the individual in question, using the name Rajinder Singh, presented himself for inspection at the John F. Kennedy International Airport Port of Entry without documentation. He was sent to deferred inspection, where he was interviewed by an immigration officer and testified as to the following:
   - his legal name was Harjinder Singh;
   - he had never used or been known by any other names;
   - he was born on [redacted], in Punjab, India; and
   - he was a native and citizen of India.

   Based on his sworn testimony, the immigration officer determined he was excludable from the United States.
2. On February 9, 1993, the Immigration and Naturalization Service ("INS") issued him a Form I-122, Notice to Applicant for Admission Detained/Deferred for Hearing before Immigration Judge, placing him into exclusion proceedings. He was charged with being excludable under INA 212(a)(7)(B)(i)(I), 212(a)(7)(B)(i)(II) and 212(a)(7)(A)(i)(I). The Form I-122 identified him as Rajinder Singh and assigned him alien registration number A[redacted]. The Form I-122 was served in person and advised him that his initial exclusion hearing would be on June 8, 1993, at an immigration court located in New York, New York.
3. On June 8, 1993, he appeared at his initial exclusion hearing and filed an application for an immigration benefit, with the immigration court. On this application, signed under penalty of perjury, he represented:
   - his name was Harjinder Singh;
   - he did not use any other names;
   - he was born on [redacted], in Ludhiana, Punjab, India;

- he last entered the United States on February 9, 1993, at New York;
- he was not married; and
- he did not have children.

4. On September 29, 1994, the immigration court denied his application for an immigration benefit and ordered him excluded and deported from the United States.
5. On October 6, 1994, he filed a Form EOIR-26, Notice of Appeal, with the Board of Immigration Appeals ("BIA"), appealing the decision of the immigration court.
6. On October 25, 1996, the BIA dismissed his appeal.
7. USCIS has no record that he departed the United States pursuant to the order of exclusion and deportation.

Immigration History as Jinder Singh
D.O.B [redacted], A [redacted]

8. On August 7, 1995, the same individual using the name Jinder Singh filed a second application for an immigration benefit with INS. Under this identity, INS assigned him alien registration number A [redacted]. On this application, signed under penalty of perjury, he represented:
   - his name was Jinder Singh;
   - he was born on [redacted], in India;
   - he last entered the United States on May 15, 1995, at Texas, without inspection;
   - he was married to Gurmeet Kaur; and
   - he did not have children.
9. On September 18, 1995, he appeared for an interview at the INS Office in Rosedale, New York.
10. On September 19, 1995, an INS officer determined that he did not qualify for the immigration benefit sought and referred his application to an immigration judge.
11. On October 2, 1995, he was personally served with a Form I-221, Order to Show Cause and Notice of Hearing ("OSC"), charging him as deportable pursuant to section 241(a)(1)(B) of the INA, for entering the United States without inspection. The OSC instructed him to appear for his initial immigration court hearing at the immigration court in New York, New York on October 20, 1995.

12. On October 20, 1995, he appeared for his initial hearing before the immigration court and was represented by his attorney, Wai-Sim M. Cheung. His case was continued to December 20, 1995.
13. The December 20, 1995 hearing was continued to May 3, 1996.
14. On May 3, 1996, he failed to appear at his immigration hearing and was ordered deported *in absentia* from the United States. His attorney was present at this hearing.
15. On December 17, 1996, INS issued a Form I-166, notice to deportable alien to surrender ("Form I-166"), instructing him to appear at the immigration office located at 26 Federal Plaza, New York, New York, 10278, 12th Floor, Room 12-110, on January 22, 1997, at 9:00 a.m. for departure to India.
16. On January 22, 1997, he failed to appear for deportation, and USCIS has no record that he departed the United States pursuant to the order of deportation.

Immigration History as Rajbir Singh Sidhu
D.O.B [redacted], A[redacted]

17. On January 2, 1996, the same individual, using the name Rajbir Singh Sidhu, filed a third application for an immigration benefit with INS. INS assigned him alien registration number A[redacted]. On the application, signed under penalty of perjury, he represented:
    - his name was Rajbir Singh Sidhu;
    - he was born on [redacted], in India;
    - he last entered the United States on March 14, 1995, at Brownsville, Texas, without inspection;
    - he was married to Harjeet Kaur; and
    - he did not have any children.
18. On February 8, 1996, he appeared for an interview at the INS Office in San Francisco, California.
19. On February 22, 1996, he received notice that his application for an immigration benefit was approved.

20. On May 12, 1997, he filed a Form I-485, Application to Register Permanent Residence or Adjust Status ("Form I-485"). He was represented by attorney Wai-Sim M. Cheung. On his Form I-485, signed under penalty of perjury, he represented:
    - his name was Rajbir Singh Sidhu;
    - his date of birth was [redacted];
    - he was born in Burj Littan, India;
    - he last entered the United States on March 14, 1995, at Brownsville, Texas, without inspection;
    - he was married to Harjeet Kaur;
    - he had never been deported from the U.S., or removed from the U.S. at government expense, or excluded within the past year, and was not then in exclusion or deportation proceedings;
    - he had never 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.
21. Along with the Form I-485, he also submitted a Form G-325A, signed under penalty of perjury, in which he represented:
    - his name was Rajbir Singh Sidhu;
    - he had not used other names;
    - he was born on [redacted], in Burj Littan, India; and
    - he was married to Harjeet Kaur.
22. On October 8, 1999, INS approved Sidhu's Form I-485 without interview. He was accorded lawful permanent resident status as of October 8, 1998.
23. On February 22, 2007, he filed a Form N-400, Application for Naturalization ("Form N-400"), based on having been a lawful permanent resident for a period of five years. On his Form N-400, signed under penalty of perjury, he represented:
    - his current legal name was Rajbir Singh Sidhu;
    - he had not used other names;
    - he was born on [redacted];
    - he was married to Harjeet Kaur and had no previous marriages;

- he had never been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason;
- he had never been charged with committing any crime or offense;
- 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;
- he had never lied to any U.S. Government official to gain entry or admission into the United States; and
- he had never been ordered to be removed, excluded or deported from the United States.

24. On August 23, 2007, Sidhu appeared for an interview on his N-400 and made no changes to his written responses. At the end of the August 23, 2007, interview, he again signed the N-400 affirming and certifying under penalty of perjury that the contents of his application were true and correct to the best of his knowledge and belief. That same day, USCIS approved Sidhu's N-400 application.
25. On October 12, 2007, Sidhu took the Oath of Allegiance and was admitted as a United States citizen. He was issued Certificate of Naturalization No. [redacted].

ILLEGAL PROCUREMENT OF NATURALIZATION

Illegal Procurement of Naturalization
Not Lawfully Admitted for Permanent Residence
Inadmissible Based on Fraud or Misrepresentation

26. To be eligible for naturalization, an applicant must have been lawfully admitted for permanent residence in accordance with all applicable provisions of the INA. INA § 318, 8 U.S.C. § 1429.
27. Among the INA provisions applicable at the time of Sidhu's adjustment of status to permanent resident was the requirement that he be admissible to the United States. INA § 209(b), 8 U.S.C. § 1159(b) (1999).
28. Under the law then in effect, an individual who by fraud or 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. INA § 212(a)(6)(C)(i), 8 U.S.C. § 1182(a)(6)(C)(i).

29. Based on the information contained above, Sidhu willfully misrepresented material facts, specifically, his identity and immigration history.
30. Because Sidhu misrepresented material facts, he was inadmissible to the United States at the time of his adjustment of status and was not lawfully admitted for permanent residence; accordingly, he illegally procured his naturalization.

Illegal Procurement of Naturalization
Lack of Good Moral Character
Unlawful Acts

31. As an applicant for naturalization under section 316(a) of the INA, Sidhu was required to establish that he was a person of good moral character during the period beginning five years prior to the filing of his application for naturalization and continuing until the time of admission to citizenship. This period is generally referred to as the "statutory period."
32. Sidhu filed his application for naturalization on February 22, 2007; accordingly, he was required to establish that he was a person of good moral character from February 22, 2002, until the time of his admission to citizenship on October 12, 2007.
33. Under the law then in effect, an individual could not establish good moral character if, during the statutory period, he committed unlawful acts that adversely reflected on his moral character, unless he could establish extenuating circumstances. INA § 101(f); 8 U.S.C. §1101(f); 8 C.F.R. § 316.10(b)(3)(iii).
34. Based on the facts contained above, during the statutory period Sidhu committed unlawful acts that adversely reflected on his moral character as he made false statements in conjunction with his naturalization application. Specifically, Sidhu provided false information regarding his identity, immigration history and whether he had ever provided false or misleading information to any immigration official.
35. Sidhu cannot establish extenuating circumstances in light of the deliberate and continuing nature of his violations. Accordingly, he was not eligible for naturalization and illegally procured his naturalization.

PROCUREMENT OF NATURALIZATION BY WILLFUL MISREPRESENTATION

OR CONCEALMENT OF MATERIAL FACTS

36. A naturalized citizen is subject to revocation of naturalization if he procured naturalization by willfully misrepresenting or concealing material facts.
37. Based on the facts contained above, Sidhu willfully misrepresented his identity and immigration history throughout the naturalization process.
38. The misrepresentations made by Sidhu during the naturalization process were material to determining his eligibility for naturalization because they would have had the natural tendency to influence the decision whether to approve his naturalization application. In fact, Sidhu misrepresented and concealed facts that would have shown that he was not lawfully admitted for permanent residence in accordance with all applicable provisions of the INA, and thus was ineligible for naturalization under INA § 318, 8 U.S.C. § 1429.
39. Sidhu was able to procure his naturalization because he concealed or misrepresented material facts regarding his identity and immigration history.

DECLARATION IN LIEU OF JURAT
(28 U.S.C. § 1746)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7, 2026, at San Bernardino, California.

DWAYNE S WILLIAMS

Digitally signed by DWAYNE S WILLIAMS
Date: 2026.07.07 08:08:03 -07'00'

Dwayne Williams
Immigration Services Officer
United States Citizenship and Immigration Services
Department of Homeland Security