

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 3:26-CV-2804

IBURAHIM SILLAH, a/k/a EBRIMA
SILLAH,

Defendant.

COMPLAINT TO REVOKE NATURALIZATION

The United States of America (“Plaintiff”) files this civil action against Defendant, Ibrahima Sillah, a.k.a. Ebrima Sillah (“Defendant”), to revoke his naturalized United States citizenship pursuant to 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. 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.

I. Parties, Jurisdiction, and Venue

1. This is an action filed under 8 U.S.C. § 1451(a) to revoke and set aside the decision admitting Defendant to U.S. citizenship and to cancel Defendant’s Certificate of

Naturalization (No. ) issued November 22, 2013.

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

3. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391, because Defendant resides in this District, within the Dallas Division.

4. Plaintiff is the United States of America.

5. Defendant was born outside the United States and was not a U.S. citizen at the time of birth, but later obtained U.S. citizenship through naturalization. Iburahim Sillah and Ebrima Sillah are one and the same person.

II. Background

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

A. Immigration Benefit Request Under the Name Ebrima Sillah

7. Defendant came into contact with immigration authorities in the United States in 1994 when, using the name Ebrima Sillah, he filed an immigration benefit request and was issued Alien Registration Number (A-Number) .

8. On Defendant's 1994 immigration benefit request form, which was signed under penalty of perjury, Defendant represented that:

- His name was Ebrima Sillah.
- He had not used other names.

- He was born on [REDACTED] 1964, in Gambia.
- He did not have an A-Number.
- He last arrived in the United States on October 7, 1992, at San Ysidro, California.
- He was married.
- He did not have children.
- He had been detained.

9. Defendant was placed in removal/deportation proceedings and appeared before an immigration judge in 1995. The immigration judge denied Defendant's applications for relief, but granted voluntary departure until September 12, 1995, with an alternate order of deportation to Gambia if Defendant failed to depart as required under the voluntary departure.

10. Defendant did not, however, surrender for voluntary departure, turning his voluntary departure order into a deportation order.

B. Immigration Benefit Request—and Subsequent Naturalization—Under the Name Ibrahima Sillah

11. In 1996, Defendant again applied for an immigration benefit, but this time under the name Ibrahima Sillah, and we assigned an A-Number of [REDACTED] under this name.

12. On his 1996 immigration benefit request form, which was signed under penalty of perjury, Defendant represented that:

- His name was Ibrahima Sillah.

- He had not used other names.
- He was born on [REDACTED] 1969, in Liberia.
- He did not have an A-Number.
- He last arrived in the United States on October 9, 1991, without inspection.
- He was not in exclusion or deportation proceedings.
- He was single.
- He did not have children.
- His father's name was Sillah Alimame.
- His mother's name was Aisah Sillah.
- He had not been arrested.

13. Defendant's immigration benefit request under the name Iburahim Sillah was granted in 1997, and in 1999 Defendant applied to become a permanent resident under that same name. In this application, which was signed under penalty of perjury, Defendant represented that:

- His name was Iburahim Sallah (which was an apparent misspelling of his last name, and which was corrected in the course of Defendant's interview with an immigration officer at the time of his adjustment of status interview).
- He was born on [REDACTED] 1969, in Liberia.
- His A-Number was A [REDACTED]
- He was married to Fartumah Sillah, born in 1978, in Gambia.

- He had one child: Ahamad Sillah, born on  1998, in Gambia.
- His father's name was Alimameh.
- His mother's name was Aisah.
- He had never applied for permanent resident status in the United States.
- He represented he was Muslim and addressed no other present and past membership in or affiliation with any political organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place since his 16th birthday.
- He had never, in or outside of the United States, been arrested, cited, charged, indicted fined, or imprisoned for breaking or violating any law or ordinance, excluding traffic violations.
- He had never been deported from the U.S. or removed from the U.S. at government expense, excluded within the past year, nor was he now in exclusion or deportation proceedings.
- He was not under a final order of civil penalty for violating section 274C of the INA (Immigration and Nationality Act) for use of fraudulent documents, nor had he, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the U.S., or any other immigration benefit.

14. Defendant also submitted a Form G-325A in 1999 in which he represented that:

- His name was Ibrahima Sillah.
- He had not used other names.
- He was born on [REDACTED] 1969, in Liberia.
- His father's name was Alimameh Sillah.
- His mother's name was Aisah Sillah.
- He was married to Fartumah Sillah, whom he married on November 16, 1997, in Gambia.

15. Defendant was approved for permanent resident status in 2006 under the name Ibrahima Sillah.

16. In 2013, Defendant filed a Form N-400 naturalization application under the name Ibrahima Sillah, based on having been a permanent resident for at least five years. In this application, Defendant represented under penalty of perjury that:

- His name was Ibrahima Sillah.
- He had not used any other names.
- He was born on [REDACTED] 1969, in Liberia
- His country of nationality was Liberia.
- He had been married once.
- He was married to Hatu Sillah, whom he married on November 16, 1997.
- 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 given any false or misleading information to any U.S. government official while applying for any immigration benefit 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.
- Neither removal, exclusion, rescission, nor deportation proceedings were pending against him.
- He had never been removed, excluded, or deported from the United States.
- He had never been ordered to be removed, excluded, or deported from the United States.
- He had never applied for any kind of relief from removal, exclusion, or deportation.

17. Defendant later appeared for a naturalization interview during which time he was placed under oath and testified that his name is Iburahim Sillah, that he was born on  1969, in Liberia and his nationality is of Gambia, that he had been married twice, that he had seven children, that he 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, and that he had never lied to any U.S. government official to gain entry or admission into the United States. Defendant also orally answered “no” to various questions, including question about whether he had previously been denied, order removed/deported/excluded, or previously applied for any kind of relief

against removal/deportation/exclusion.

18. At the conclusion of his naturalization interview, Defendant swore that his application form was true and correct, with corrections/additions that had been made during the interview. On the basis of the application as corrected during the interview, Defendant was granted naturalization and, under the name Iburahim Sillah, took the oath of allegiance and was admitted as a U.S. citizen in 2013.

III. Causes of Action

COUNT ONE ILLEGAL PROCUREMENT OF NATURALIZATION NOT LAWFULLY ADMITTED FOR PERMANENT RESIDENCE (Final Order of Deportation Outstanding at Adjustment)

19. 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.

20. 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.2s 752, 753 (9th Cir. 1978).

21. Under the law in effect at the time of Defendant’s adjustment of status to permanent resident, the exclusive jurisdiction over applications for adjustment of status filed by applicants (other than certain arriving aliens) in deportation or removal proceedings, including applicants with a final order of deportation or removal. 8 C.F.R. § 245.2(a)(1).

22. 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.

COUNT TWO
ILLEGAL PROCUREMENT OF NATURALIZATION
NOT LAWFULLY ADMITTED FOR PERMANENT RESIDENCE
(Adjustment procured by Fraud of Willful Misrepresentation)

23. The preceding paragraphs are incorporated by reference.

24. 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.

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

26. 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 admissible. *See* 8 U.S.C. § 1182(A)(6)(C)(i).

27. Defendant was never lawfully admitted into 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.

28. Under 8 U.S.C. § 1451(a), Defendant’s citizenship should be revoked, and his Certificate of Naturalization cancelled, because Defendant procured his naturalization

by concealment of material facts and by willful misrepresentations.

29. Specifically, Defendant knowingly concealed information or made willful misrepresentations on his naturalization form and in his naturalization interview when he stated that he had not used other names, had never been previously detained, had never given any false or misleading information to any U.S. government official while applying for any immigration benefit, had never been ordered removed, excluded, or deported from the United States, and had never applied for any kind of relief from removal, exclusion, or deportation.

30. Defendant's misrepresentations were material to his naturalization because the disclosures of his previous application for immigration benefits, denial of immigration benefits and grant of voluntary departure and alternate order of deportation, and use of a different identity would have had a natural tendency to influence the decision of whether to approve Defendant's naturalization application because those misrepresentations related to the statutory eligibility criteria for such benefit.

31. Defendant's misrepresentations were also material to his naturalization because the disclosures of the fact that he had previously been ordered removed/deported/excluded from the U.S. would have had a natural tendency to influence the decision of whether to approve Defendant's naturalization application because those misrepresentations related to the statutory eligibility criteria for such benefit.

COUNT THREE
ILLEGAL PROCUREMENT OF NATURALIZATION
LACK OF GOOD MORAL CHARACTER
(Unlawful Acts with No Extenuating Circumstances)

32. The preceding paragraphs are incorporated by reference.

33. As an applicant for naturalization under section 316(a) of the INA, Defendant 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.”

34. Defendant filed his application for naturalization on June 26, 2013; accordingly, he was required to establish that he was a person of good moral character from June 26, 2008, until the time of his admission to citizenship on November 22, 2013.

35. 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). Specifically, Defendant violated 18 U.S.C. § 1001(a)(1)-(3) by knowingly and willfully concealing material facts 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, that he been ordered deported under that identity, and that he had given false information to a U.S. government official when applying for an immigration benefit, among other material facts.

36. Based on the facts contained above, during the statutory period Defendant committed unlawful acts that adversely reflected on his moral character.

37. Specifically, Defendant provided false information regarding his identity, immigration history and whether he ever provided false or misleading information, or lied, to a U.S. Government official while applying for an immigration benefit or to prevent deportation. Defendant could not establish extenuating circumstances; accordingly, he could not establish that he was a person of good moral character. Because he could not establish good moral character, he was not eligible for naturalization and illegally procured his naturalization.

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

38. The preceding paragraphs are incorporated by reference.

39. As an applicant for naturalization under section 316(a) of the INA, Defendant 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.”

40. Defendant filed his application for naturalization on June 26, 2013; accordingly, he was required to establish that he was a person of good moral character from June 26, 2008, until the time of his admission to citizenship on November 22, 2013.

41. Under the law then in effect, an individual who, during the statutory period,

provided false testimony for the purpose of obtaining an immigration benefit could not establish good moral character. INA § 101(f)(6); 8 U.S.C. § 1101(f)(6).

42. Based on the facts contained above, Defendant provided false testimony while under oath during his naturalization interview. Specifically, Defendant provided false testimony regarding:

- whether he had ever been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason;
- whether he 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;
- whether he had ever lied to any U.S. government official to gain entry or admission into the United States;
- whether he had ever been removed, excluded, or deported from the United States;
- whether he had ever been ordered to be removed, excluded, or deported from the United States; and
- whether he had ever applied for any kind of relief from removal, exclusion, or deportation.

43. Because Defendant provided false testimony to obtain an immigration benefit during the statutory period, he was not eligible for naturalization; accordingly, he

illegally procured his naturalization.

COUNT FIVE
PROCUREMENT OF NATURALIZATION BY WILLFUL
MISREPRESENTATION OR CONCEALMENT OF MATERIAL FACTS

44. The preceding paragraphs are incorporated by reference.

45. 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.

46. Based on the facts contained above, Defendant willfully misrepresented his identity and immigration history throughout the naturalization process.

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

48. The misrepresentations made by Defendant 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.

49. In fact, Defendant 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.

50. 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.

51. Defendant was able to procure his naturalization because he concealed or misrepresented material facts regarding his identity and immigration history.

IV. Prayer for Relief

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

1. Declaring that Defendant illegally procured his citizenship;
2. Declaring that Defendant procured his citizenship by concealment and willful misrepresentation of material facts;
3. Revoking and setting aside Defendant's naturalization and canceling Certificate of Naturalization, effective as of the original date of the order and certificate;
4. Forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship;
5. Requiring Defendant to surrender and deliver, within ten days of the entry of judgment against him, his Certificate of Naturalization and any copies thereof in his possession—and to make good faith efforts to recover and immediately surrender any copies thereof that he knows are in the possession of others—to the Attorney General through his representative, the undersigned counsel;

6. Requiring Defendant to surrender and deliver, within ten days of the entry of judgment against him, any other indicia of U.S. citizenship (including, but not limited to, U.S. passports) and any copies thereof in his possession—and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession of others—to the Attorney General through his representative, the undersigned counsel; and

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

Respectfully submitted,

RYAN RAYBOULD
UNITED STATES ATTORNEY

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UNITED STATES OF AMERICA

In the Matter of the Revocation
of the Naturalization of

Ibrahim Sillah,

A

a.k.a. Ebrima Sillah,

A

AFFIDAVIT OF GOOD CAUSE

I, Nasim Sargordan, declare under penalty of perjury as follows:

I am an Officer with U.S. Citizenship and Immigration Services (USCIS), Department of Homeland Security (DHS). In this capacity, I have access to the official records of DHS, including the immigration files of Ibrahima Sillah, A [REDACTED] a.k.a. Ebrima Sillah, A [REDACTED]

I have examined records relating to Sillah, including but not limited to, his immigration files. Based upon my review of records relating to Sillah, I state, on information and belief that the information set forth in this Affidavit of Good Cause is true and correct.

Based on the facts and law contained herein, good cause exists to institute proceedings pursuant to section 340(a) of the Immigration and Nationality Act (INA), 8 U.S.C. § 1451(a),¹ to revoke the citizenship of Sillah and to cancel his Certificate of Naturalization.

The last known place of residence for Sillah is [REDACTED] Dallas, Texas 75237.

¹ 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 Sillah is the same person who was previously ordered deported under the name Ebrima Sillah.

Immigration History as Ebrima Sillah D.O.B. [REDACTED] 1964, A [REDACTED]

1. On November 28, 1994, the individual in question, using the name Ebrima Sillah, filed an application for immigration benefit with the Immigration and Naturalization Service (INS). Under this identity, INS issued his Alien Registration Number (A-Number) A [REDACTED] [REDACTED]
2. On the application, which he signed on October 15, 1994, under penalty of perjury, he represented that:
 - His name was Ebrima Sillah.
 - He had not used other names.
 - He was born on [REDACTED] 1964, in Gambia.
 - He did not have an A-Number.
 - He last arrived in the United States on October 7, 1992, at San Ysidro, California.
 - He was married.
 - He did not have children.
 - He had been detained.
 - He was a member of Moja Movement.
3. In support of the application, he filed a Form G-325A, Biographic Information (Form G-325A), signed under severe penalties for knowingly and willfully falsifying or concealing a material fact. In his Form G-325A, he represented that:
 - His name was Ebrima Sillah.
 - He had not used any other names.
 - He was born on [REDACTED] 1964, in Gambia.
 - He was married to Fatou Sillah, whom he married in June of 1991.
 - His father's name was Alihagi Sillah.
 - His mother's name was Aisaton Sillah.

4. On January 26, 1995, Sillah appeared at the INS Office in Los Angeles, California for an interview related to his benefit request.
5. By notice dated February 9, 1995, INS informed Sillah that it found he was not credible on material points of his application and referred him to the immigration court.
6. On February 9, 1995, INS personally served him with a Form I-221, Order to Show Cause and Notice of Hearing (OSC), charging him as deportable from the United States pursuant to INA section 241(a)(1)(B), as an alien who entered the United States without inspection. The OSC ordered him to appear before the immigration judge on April 16, 1995.
7. On May 16, 1995, the case was adjourned until July 6, 1995, then continued to July 12, 1995.
8. On July 12, 1995, the immigration judge denied his applications for relief, but granted him voluntary departure until September 12, 1995, with an alternate order of deportation to Gambia if he failed to depart as required.
9. On July 24, 1995, he filed a Form EOIR-26, Notice of Appeal to the Board of Immigration Appeals (BIA) of Decision of Immigration Judge.
10. On June 20, 1996, the BIA dismissed his appeal. The BIA's decision granted him a period of 30 days, or any extension beyond that time as may be granted by the district director to voluntarily depart, and provided that in the event of a failure to depart, that he would be deported as provided in the immigration judge's order.
11. By notice dated July 24, 1996, INS served him, via certified mail, with a Form I-166, notice to deportable alien to surrender, instructing him to appear on August 28, 1996, at 10:15 am, at 300 North Los Angeles Street, Los Angeles, California 90012, for deportation to Gambia.
12. On August 28, 1996, Sillah failed to surrender for deportation, leaving his deportation order outstanding.
13. On November 9, 1998, Sillah filed Form I-539, Application to Extend/Change Nonimmigrant Status, with INS. The form was not completed nor signed.
14. On November 9, 1998, INS rejected Sillah's Form I-539.

Immigration History as Ibrahima Sillah
D.O.B. [REDACTED] 1969, A [REDACTED]

15. On December 31, 1996, the individual in question, using the name Ibrahima Sillah, filed an application for immigration benefit with INS. Under this identity, INS issued his A-Number A [REDACTED]
16. On the application, which he signed on December 20, 1996, under penalty of perjury, he represented that:
- His name was Ibrahima Sillah.
 - He had not used other names.
 - He was born on [REDACTED] 1969, in Liberia.
 - He did not have an A-Number.
 - He last arrived in the United States on October 9, 1991, without inspection.
 - He was not in exclusion or deportation proceedings.
 - He was single.
 - He did not have children.
 - His father's name was Sillah Alimame.
 - His mother's name was Aisah Sillah.
 - He had not been arrested.
17. On April 23, 1997, he appeared for his interview at the INS Office in El Paso, Texas, accompanied by an interpreter in the Mandingo language.
18. On August 4, 1997, INS approved his application for an immigration benefit.
19. On October 7, 1999, Sillah filed a Form I-485, Application to Register Permanent Residence or Adjust Status (Form I-485). On his Form I-485, Sillah represented under penalty of perjury that:
20. On his Form I-485, signed under penalty of perjury, Sillah represented that:
- His name was Ibrahima Sillah.
 - An apparent misspelling of his last name, which was corrected by the interviewing officer at the time of his adjustment of status interview.
 - He was born on [REDACTED] 1969, in Liberia.
 - His A-Number was A [REDACTED]
 - He was married to Fartumah Sillah, born in 1978, in Gambia.

- He had one child: Ahamad Sillah, born on [REDACTED] 1998, in Gambia.
- His father's name was Alimameh.
- His mother's name was Aisah.
- He had never applied for permanent resident status in the United States.
- He represented he was Muslim and addressed no other present and past membership in or affiliation with any political organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place since his 16th birthday.
- He had never, in or outside of the United States, been arrested, cited, charged, indicted fined, or imprisoned for breaking or violating any law or ordinance, excluding traffic violations.
- He had never been deported from the U.S. or removed from the U.S. at government expense, excluded within the past year, nor was he now in exclusion or deportation proceedings.
- He was not under a final order of civil penalty for violating section 274C of the INA for use of fraudulent documents, nor had he, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry into the U.S., or any other immigration benefit.

21. In support of his Form I-485, he filed a Form G-325A, signed on May 27, 1999, under severe penalties for knowingly and willfully falsifying or concealing a material fact. In his Form G-325A, he represented that:

- His name was Iburahim Sillah.
- He had not used other names.
- He was born on [REDACTED] 1969, in Liberia.
- His father's name was Alimameh Sillah.
- His mother's name was Aisah Sillah.
- He was married to Fartumah Sillah, whom he married on November 16, 1997, in Gambia.
- He had no former spouse.

22. On July 5, 2007, USCIS approved Sillah's Form I-485 and he was accorded lawful permanent resident status as of July 5, 2006.

23. On June 26, 2013, Sillah filed with USCIS a Form N-400, Application for Naturalization (Form N-400) based upon having been a lawful permanent resident for at least five years. On his Form N-400, Sillah represented under penalty of perjury that:

- His name was Ibrahima Sillah.
- He had not used any other names.
- He was born on [REDACTED] 1969, in Liberia
- His country of nationality was Liberia.
- He had been married once.
- He was married to Hatu Sillah, whom he married on November 16, 1997.
- He had children: (1) Isa Sillah, born on [REDACTED] 1998, in Gambia; (2) Fatima Sillah, born on [REDACTED] 2001, in Gambia; (3) Mohamed Sillah, born on [REDACTED] 2004, in Gambia; (4) Ahmed Sillah, born on [REDACTED] 2006, in Gambia; (5) Mounmed Lamin Sillah, born on [REDACTED] 2006, in Gambia; (6) Q [REDACTED] born on [REDACTED] 2010, in Gambia; and (7) I [REDACTED] born on [REDACTED] 2013, in Gambia.
- He had never been a member of or associated with any organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place.
- He had never committed a crime or offense for which he was not arrested.
- 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 been convicted of a crime or offense.
- He had never received a suspended sentence, been placed on probation, or been paroled.
- He had never been in jail or prison.
- He had never been married to more than one person at the same time.
- He had never given any false or misleading information to any U.S. government official while applying for any immigration benefit 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.
- Neither removal, exclusion, rescission, nor deportation proceedings were pending against him.
- He had never been removed, excluded, or deported from the United States.
- He had never been ordered to be removed, excluded, or deported from the United States.
- He had never applied for any kind of relief from removal, exclusion, or deportation.
- He had taken two trips of 24 hours or more outside of the United States during the last five years to Gambia.

24. On September 30, 2013, Sillah appeared for an interview at the USCIS Field Office in Irving, Texas, to determine his eligibility for naturalization. During the course of his interview, Immigration Services Officer (ISO) Sarah Johnson placed Sillah under oath and asked him the following questions:

- What is your current legal name?
- What is your date of birth?
- What is your country of birth?
- What is your country of nationality?
- What is your current marital status?
- How many times have you been married?
- Who is your current and prior spouse?
- How many sons and daughters have you had?
- Have you ever been a member of or associated with any organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other places?
- Have you ever committed a crime or offense for which you were not arrested?
- Have you ever been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason?
- Have you ever been charged with committing any crime or offense?
- Have you ever been convicted of a crime or offense?

- Have you ever received a suspended sentence, been placed on probation, or been paroled?
- Have you ever been in jail or prison?
- Have you ever been married to more than one person at the same time?
- 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?
- Have you ever lied to any U.S. government official to gain entry or admission into the United States?
- Are removal, exclusion, rescission, or deportation proceedings pending against you?
- Have you ever been removed, excluded, or deported from the United States?
- Have you ever been ordered to be removed, excluded, or deported from the United States?
- Have you ever applied for any kind of relief from removal, exclusion, or deportation?
- Have you taken any trips of 24 hours or more outside of the United States during the last five years? If yes, to where and for how long?

25. In response, Sillah testified his name is Ibrahima Sillah. He testified he was born on   1969, in Liberia and his nationality is of Gambia. He testified he had been married twice - he was married to Hatu Sillah since November 16, 1997, and he was previously married to Umu Tunkara, whom he was married to from 2004 to 2006. He testified he had been married to more than one person at the same time. He testified he had seven children. He testified 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 testified he never lied to any U.S. Government official to gain entry or admission into the United States. He orally answered "no" to the remaining questions listed above.

26. During the course of the naturalization interview, the interviewing officer, ISO Sarah Johnson made a total of 19 corrections/additions to Sillah's Form N-400. At the

conclusion of his naturalization interview, Sillah swore that the contents of his Form N-400, including the nineteen corrections/additions, were true and correct.

27. On the basis of Sillah's written application and the testimony that he provided during his naturalization interview, USCIS approved Sillah's Form N-400 on October 2, 2013.
28. On November 22, 2013, Sillah, under the name Iburahim Sillah, took the Oath of Allegiance and was admitted as a citizen of the United States. USCIS issued his Certificate of Naturalization No.

ILLEGAL PROCUREMENT OF NATURALIZATION

**Illegal Procurement of Naturalization
Not Lawfully Admitted for Permanent Residence
Final Order of Deportation Outstanding at Adjustment**

29. 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.
30. Under the law in effect at the time of Sillah's adjustment of status to permanent resident, as today, the immigration court generally had exclusive jurisdiction over applications for adjustment of status filed by applicants (other than certain arriving aliens) in deportation or removal proceedings, including applicants with a final order of deportation or removal. 8 C.F.R. § 245.2(a)(1).
31. Sillah was subject to an order of deportation under the name of Ebrima Sillah as of July 12, 1995, and filed his application for adjustment of status on October 7, 1999. Because Sillah misrepresented certain facts in connection with his application, USCIS was not aware of the outstanding order of deportation, and approved his application for adjustment of status on July 5, 2007.
32. Because the immigration court had exclusive jurisdiction over Sillah's application for adjustment of status at the time it was approved by USCIS, he was not lawfully admitted for permanent residence; accordingly, he illegally procured his naturalization.

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

33. 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.
34. Among the INA provisions applicable at the time of Sillah's adjustment of status to permanent resident was the requirement that he be admissible to the United States. INA § 209(b)(5), 8 U.S.C. § 1159(b)(5).
35. Under the law then in effect, as today, 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).
36. Based on the information contained above, Sillah willfully misrepresented material facts, specifically, his identity and immigration history.
37. Because Sillah 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**

38. As an applicant for naturalization under section 316(a) of the INA, Sillah 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."
39. Sillah filed his application for naturalization on June 26, 2013; accordingly, he was required to establish that he was a person of good moral character from June 26, 2008, until the time of his admission to citizenship on November 22, 2013.
40. 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). Specifically, Sillah violated 18 U.S.C. § 1001(a)(1)-(3) by knowingly and willfully concealing material facts 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, that he been ordered deported under that identity, and that he had given false information to a U.S. government official when applying for an immigration benefit, among other material facts.
41. Based on the facts contained above, during the statutory period Sillah committed unlawful acts that adversely reflected on his moral character. Specifically, Sillah provided false information regarding his identity, immigration history and whether he ever provided false or misleading information, or lied, to a U.S. Government official while applying for an immigration benefit or to prevent deportation. Sillah could not establish extenuating circumstances; accordingly, he could not established that he was a person of good moral character. Because he could not establish good moral character, he was not eligible for naturalization and illegally procured his naturalization.

**Illegal Procurement of Naturalization
Lack of Good Moral Character
False Testimony**

42. As an applicant for naturalization under section 316(a) of the INA, Sillah 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."
43. Sillah filed his application for naturalization on June 26, 2013; accordingly, he was required to establish that he was a person of good moral character from June 26, 2008, until the time of his admission to citizenship on November 22, 2013.
44. Under the law then in effect, an individual who, during the statutory period, provided false testimony for the purpose of obtaining an immigration benefit could not establish good moral character. INA § 101(f)(6); 8 U.S.C. § 1101(f)(6).
45. Based on the facts contained above, Sillah provided false testimony while under oath during his naturalization interview. Specifically, Sillah provided false testimony regarding:
- whether he had ever been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason;
 - whether he 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;
 - whether he had ever lied to any U.S. government official to gain entry or admission into the United States;
 - whether he had ever been removed, excluded, or deported from the United States;
 - whether he had ever been ordered to be removed, excluded, or deported from the United States; and
 - whether he had ever applied for any kind of relief from removal, exclusion, or deportation.

46. Because Sillah provided false testimony to obtain an immigration benefit during the statutory period, he was not eligible for naturalization; accordingly, he illegally procured his naturalization.

**PROCUREMENT OF NATURALIZATION BY WILLFUL MISREPRESENTATION
OR CONCEALMENT OF MATERIAL FACTS**

47. A naturalized citizen is subject to revocation of naturalization if he procured naturalization by willfully misrepresenting or concealing material facts.
48. Based on the facts contained above, Sillah willfully misrepresented his identity and immigration history throughout the naturalization process.
49. The misrepresentations made by Sillah 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, Sillah 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.
50. Sillah 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 2, 2026, at Camp Springs, Maryland.

NASIM
SARGORDAN

Digitally signed by NASIM
SARGORDAN
Date: 2026.07.02 13:24:19 -04'00'

Nasim Sargordan
Adjudication Officer
United States Citizenship and Immigration Services
Department of Homeland Security