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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DEXTER ANSON, [REDACTED],¹
a.k.a. GEORGE OPOKU, [REDACTED],**

Defendant.

CIVIL ACTION NO. _____

**COMPLAINT TO REVOKE
NATURALIZATION**

I. PRELIMINARY STATEMENT OF THE CASE

The United States of America (“Plaintiff”) brings this civil action against Defendant Dexter Anson (“Defendant”), to revoke his naturalized U.S. citizenship under 8 U.S.C.

¹ Pursuant to the Privacy Act, 5 U.S.C. § 552a(b), Plaintiff will redact information throughout this document and its exhibits that includes social security numbers, dates of birth, places of birth, alien numbers, passport numbers, phone numbers, and tax information, which are precluded from disclosure. *Rouse v. U.S. Dep’t of State*, 567 F.3d 408, 413 (9th Cir. 2009).

§ 1451(a). Plaintiff alleges that Defendant illegally procured his naturalization and that he procured his naturalization by willfully misrepresenting and concealing material facts.

Before he naturalized as a U.S. citizen on December 2, 2005, an Immigration Judge (“IJ”) ordered Defendant, under the identity of George Opoku, removed from the United States to Ghana, in absentia, on August 8, 1995. The former Immigration and Naturalization Service (“INS”)² issued him Alien Identification Number (“A”) [REDACTED].

Meanwhile, in July 1999, while his removal proceedings were pending, Defendant submitted a Diversity Visa application to the State Department under the name Dexter Anson, and he was issued [REDACTED]. The application was approved and Defendant was admitted to the United States as a permanent resident in August 1999. In 2005, Defendant applied for naturalization, concealing his prior immigration history and his previously claimed identity.

Defendant’s actions and conduct to conceal his identity and his removal order statutorily barred him from becoming a U.S. citizen. On this basis, Defendant illegally procured his naturalization. Additionally, because Defendant failed to disclose his criminal conduct throughout his naturalization application process, he procured his naturalization by concealment of a material fact or by willful misrepresentation, a separate ground on which Plaintiff seeks Defendant’s naturalization revocation under 8 U.S.C. § 1451(a).

With the attached affidavit showing good cause, Plaintiff brings this civil action.

² On March 1, 2003, the INS ceased to exist as an independent agency within the Department of Justice, and many of its functions were transferred to the newly formed Department of Homeland Security. *See* Homeland Security Act of 2002, Pub. L. No. 107-296, §§ 441, 451, 471, 116 Stat. 2135 (Nov. 25, 2002). The INS was divided into several separate agencies, including United States Citizenship and Immigration Services (“USCIS”), Customs and Border Protection, and Immigration and Customs Enforcement. USCIS assumed naturalization authority from the INS. This Complaint will refer to INS where appropriate.

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 United States citizenship and to cancel his Certificate of Naturalization No. [REDACTED], issued on December 2, 2005.

2. The Court has subject-matter 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 the District of Connecticut under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant's last known residence was in Hartford, Connecticut, which is 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 native of Ghana. Dexter Anson ([REDACTED]) and Georgeo Opoku ([REDACTED]) are one and the same person.

IV. FACTUAL ALLEGATIONS

6. As required by 8 U.S.C. § 1451(a), an affidavit of good cause for this action, signed by William Kew, Special Agent ("SA"), U.S. Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"), is attached as Exhibit A to this Complaint.

A. Defendant's Immigration Proceedings under the Identity of George Opoku (Axxx-xxx-498)

7. On or about June 2, 1987, Defendant entered the United States without inspection under the name George Opoku.

8. On May 23, 1994, the former INS served Defendant with Form I-221 Order to Show cause, alleging that he was a native and citizen of Ghana who entered the United States

without inspection on or about June 2, 1987, and that he was subject to deportation pursuant to 8 U.S.C. § 1231(a)(1)(B) (entered without inspection).

9. A true and accurate copy of Defendant's Order to Show Cause and Notice of Hearing ("OSC"), except for immaterial redactions of personally identifying information, is attached as Exhibit B.

10. In a motion to change venue filed with the Immigration Court, Defendant, through counsel, admitted the factual allegations and removal charge in the OSC. Exhibit C, Excerpt from October 13, 1994 Immigration Hearing Transcript.

11. During removal proceedings in Hartford, Connecticut, Defendant filed applications for immigration benefits.

12. In March 1993, Defendant submitted a signed Form G-325A, Biographic Information, that included fingerprints.

13. The Form G-325A, signed by Defendant, did not disclose the use of other names.

14. Defendant stated that he was born in Accra, Ghana in 1957.

15. Defendant listed his mother as Florence Aboagyewa.

16. A true and accurate copy of Defendant's G-325A, Biographic Information, including fingerprints, except for immaterial redactions of personally identifying information and information barred by privacy regulations, is attached as Exhibit D.

17. On March 21, 1996, the immigration judge denied Defendant's applications and ordered him deported to Ghana.

18. A true and accurate transcript of the March 21, 1996 Oral Decision of the Immigration Judge, except for immaterial redactions of personally identifying information and information barred by privacy regulations, is attached as Exhibit E.

19. Defendant appealed to the Board of Immigration Appeals (“BIA”) which, on January 18, 2001, remanded the matter back to the immigration judge for further consideration.

20. A true and accurate copy of the BIA January 18, 2001 decision, except for immaterial redactions of personally identifying information and the release of information barred by privacy regulations, is attached as Exhibit F.

21. On remand, Defendant failed to appear at his January 17, 2002 immigration hearing and the immigration judge ordered him removed to Ghana in absentia.

22. A true and accurate copy of the Immigration Judge’s January 17, 2002 Order, except for immaterial redactions of personally identifying information, is attached as Exhibit G.

23. That same day, DHS issued a Warrant of Removal/Deportation, a Warning to Alien Ordered Removed or Deported, and a Notice to Surrender for Deportation.

24. A true and accurate copy of the Form I-205 Warrant of Removal/Deportation issued to Defendant, except for immaterial redactions of personally identifying information, is attached as Exhibit H.

25. A true and accurate copy of the Form I-294, Warning to Alien Ordered Removed or Deported issued to Defendant, except for immaterial redactions of personally identifying information, is attached as Exhibit I.

26. A true and accurate copy of the Form I-166, Notice to Surrender for Deportation issued to Defendant, except for immaterial redactions of personally identifying information, is attached as Exhibit J.

B. Defendant’s Immigration Proceedings Under the Identity of Dexter Anson ()

27. Meanwhile, on August 16, 1998, Defendant submitted a Diversity Visa application to the State Department under the name Dexter Anson.

28. A true and accurate copy of Defendant's Diversity Visa application, except for immaterial redactions of personally identifying information and information redacted by the State Department, is attached as Exhibit K.

29. On his Diversity Visa application, Defendant stated that he was born in Accra, Ghana in 1954.

30. On his Diversity Visa application, when asked if he used any other name, Defendant indicated only "Boadi."

31. On his Diversity Visa application, Defendant listed his mother as Florence Aboagyena.

32. In Part II - Sworn Statement of the Diversity Visa Application, Defendant checked "No" in Section 28.f., which stated that aliens within the following are ineligible for a visa: "An alien who failed to attend a hearing on deportation or inadmissibility within the last five years; who seeks or has sought a visa, entry into the United States, or an immigration benefit by fraud or misrepresentation"

33. The application was approved on May 28, 1999, and Defendant was admitted as a permanent resident on August 12, 1999.

34. On February 18, 2005, Defendant, under the name Dexter Anson, filed an Application for Naturalization ("N-400") with United States Citizenship and Immigration Service ("USCIS").

35. A true and accurate copy of Defendant's Form N-400, except for immaterial redactions of personally identifying information, is attached as Exhibit L.

36. In Defendant's N-400, he claimed that he was born in Ghana in 1954.

37. In response to Part 1, Question C of Defendant's N-400, which asked: "If you have **EVER** used other names, provide them below," Defendant left the question blank.

(emphasis in original)

38. In Defendant's N-400, Defendant did not disclose that, as outlined above in paragraphs 8 to 13 and 14 to 18, he previously used the name George Opoku when he submitted his applications for immigration benefits, and when he submitted his Form G-325A, Biographic Information, in 1993.

39. In his N-400, Defendant answered "no" to Question 15, Part 10D, which asked: "Have you **EVER** committed a crime or offense for which you were not arrested (including INS and military officers) for any reason?" (emphasis in original).

40. In his N-400, Defendant answered "no" to Question 27, Part 10E which asked: "Have you **EVER** been ordered to be removed, excluded, or deported from the United States?" (emphasis in original).

41. In his N-400, Defendant answered "no" to Question 28, Part 10E, which asked: "Have you **EVER** applied for any kind of relief from removal, exclusion, or deportation?" (emphasis in original).

42. On February 15, 2005, Defendant signed the N-400, certifying under penalty of perjury that the information it contained was true and correct.

C. "Dexter Anson" Is Interviewed for Naturalization and Takes the Oath of Allegiance

43. On October 26, 2005, Defendant appeared before a USCIS Officer in support of his naturalization application and was placed under oath and interviewed concerning the responses he provided to questions in his naturalization application ("naturalization interview").

44. At his naturalization interview, the USCIS Officer asked Defendant Part 10D, Question 15, "Have you **EVER** committed a crime or offense for which you were not arrested (including INS and military officers) for any reason?" (emphasis in original).

45. At his naturalization interview Defendant orally and under oath responded in the negative to Part 10D, Question 15, thereby testifying under oath that he had never committed a crime or offense for which he had not been arrested.

46. At his naturalization interview, the USCIS Officer asked Defendant Part 10D, Question 23, "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).

47. At his naturalization interview Defendant orally and under oath responded in the negative to Part 10D, Question 23, thereby testifying under oath that he had never committed a crime or offense for which he had not been arrested.

48. At his naturalization interview, the USCIS Officer asked Defendant Part 10D, Question 24, "Have you **EVER** lied to any U.S. government official to gain entry or admission into the United States?" (emphasis in original).

49. At his naturalization interview Defendant orally and under oath responded in the negative to Part 10D, Question 24, thereby testifying under oath that he had never lied to any U.S. government official to gain entry or admission into the United States.

50. At his naturalization interview, the USCIS Officer asked Defendant Part 10E, Question 27, "Have you **EVER** been ordered to be removed, excluded, or deported from the United States?" (emphasis in original).

51. At his naturalization interview Defendant orally and under oath responded in the negative to Part 10E, Question 27, thereby testifying under oath that he had never been ordered to be removed, excluded, or deported from the United States.

52. At his naturalization interview, the USCIS Officer asked Defendant Part 10E, Question 28, "Have you **EVER** applied for any kind of relief from removal, exclusion, or deportation?"

53. At his naturalization interview Defendant orally and under oath responded in the negative to Part 10E, Question 28, thereby testifying under oath that he had never applied for any kind of relief from removal, exclusion, or deportation.

54. At the conclusion of his naturalization interview, Defendant again signed his N-400 naturalization application, thereby swearing and certifying under penalty of perjury that the contents of the application, as well as all evidence submitted in support of the application, were true and correct to the best of Defendant's knowledge and belief.

55. On October 26, 2005, based on his naturalization application and his testimony at the naturalization interview, USCIS approved Defendant's N-400.

56. On December 2, 2005, Defendant completed Form N-445, Notice of Naturalization Oath Ceremony and again represented that he had never given false or misleading information to any U.S. government official while applying for any immigration benefit.

57. A true and accurate copy of Defendant's December 2, 2005 Form N-445, except for immaterial redactions of personally identifying information, is attached as Exhibit M.

58. On December 2, 2005, based on Defendants approved naturalization application, Defendant was administered the oath of allegiance, admitted to United States citizenship, and issued Certificate of Naturalization No. .

59. A true and accurate copy of Defendant's Certificate of Naturalization, except for immaterial redactions of personally identifying information, is attached as Exhibit N.

D. Fingerprint Analysis Confirms George Opoku ([REDACTED]) and Dexter Anson ([REDACTED]) Are the Same Person

60. The fingerprints George Opoku submitted in connection with his applications for immigration benefits match the fingerprints submitted by Dexter Anson in connection with his naturalization application.

61. Between September 20, 2026, and September 22, 2026, Senior Fingerprint Specialist Stephanie Fox examined the electronic fingerprint impression card for George Opoku and the electronic fingerprint impression card for Dexter Anson.

62. The Senior Fingerprint Specialist concluded that the impressions examined were made by the same individual.

63. A true and accurate copy of the Senior Fingerprint Specialist's Fingerprint Analysis with analyzed fingerprint cards, except for immaterial redactions of personally identifying information, is attached as Exhibit O.

E. Dexter Anson Admits To Using The Name George Opoku When He Applied For A Passport Through The State Department

64. On February 7, 2025, Defendant, using the Dexter Anson identity, filed an Application for a U.S. Passport with the U.S. Department of State.

65. A true and accurate copy of Defendant's certified passport records, except for immaterial redactions of personally identifying information, is attached as Exhibit P.

66. On Defendant's February 7, 2025 Application for U.S. Passport, Question 9 asked him to list all other names used.

67. Defendant answered Question 9 on his February 7, 2025 Application for U.S. Passport by listing the name George Opoku.

V. THE GOVERNING LAW

A. Congressionally Imposed Prerequisites to Acquiring Citizenship

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

69. 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” *See* 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 United States permanent residence and subsequently resided in the United States for at least five years prior to the date of application. *See* 8 U.S.C. § 1427(a)(1); *see also* 8 U.S.C. § 1429.

70. To qualify for naturalization, an applicant must have been lawfully admitted to the United States for at least five years prior to the date of application. *See* 8 U.S.C. § 1427(a)(1); *see also* 8 U.S.C. § 1429.

71. The term “lawfully” as used in 8 U.S.C. § 1427(a)(1) “connotes more than just procedural regularity; it suggests that the substance of an action complied with the governing

law.” *Rahman v. Garland*, 791 F. Supp. 3d 357, 364 (E.D.N.Y. 2025) (quoting *De La Rosa v. U.S. Dep’t of Homeland Sec.*, 489 F.3d 551, 554 (2d Cir. 2007)).

72. That status requires the applicant to have been admitted in compliance with the substantive legal requirements—as opposed merely to the procedural requirements—of permanent residence.” *See United States v. Mahmood*, No. 3:17-cv-1562 (MPS), 2020 WL 532062, at *6 (D. Conn. Feb. 3, 2020) (an alien who did not meet the requirements for naturalization under 8 U.S.C. §§ 1427(a) and 1429 was not “lawfully admitted” to permanent residence, “because naturalization requires strict compliance with all the congressionally imposed prerequisites to the acquisition of citizenship[, f]ailure to comply with any of these conditions renders the certificate of citizenship illegally procured.”) (quoting *Fedorenko v. United States*, 449 U.S. 490, 506 (1981) (internal marks omitted)).

73. 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” *See* 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 naturalization application and continues until the applicant takes the oath of allegiance and becomes a United States citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(1).

74. Congress has explicitly precluded individuals who give false testimony for the purpose of obtaining immigration benefits from being able to establish the good moral character necessary to naturalize. *See* 8 U.S.C. § 1101(f)(5); *see also* 8 C.F.R. § 316.10(b)(2)(vi).

75. Further, Congress also has created a “catch-all” provision precluding individuals from establishing the requisite good moral character to naturalize, which states, “[t]he fact that

any person is not within any of the foregoing [specified] classes shall not preclude a finding that for other reasons such person is or was not of good moral character.” See 8 U.S.C. § 1101(f).

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

77. A conviction during the statutory period is not necessary for a finding that an applicant lacks good moral character. It is enough that the offense was “committed” during that time. *United States v. Gayle*, 996 F. Supp. 2d 42, 53 (D. Conn. 2014) (“The term ‘unlawful acts’ within the regulation encompasses bad acts that led to a post-naturalization conviction.”) (citing *United States v. Jean-Baptiste*, 395 F.3d 1190, 1194 (11th Cir. 2005) (“we affirm the district court’s well-reasoned determination that, because he committed a drug offense as established by his later conviction, Jean-Baptiste was precluded under 8 U.S.C. § 1101(f)(8), as elaborated in 8 C.F.R. § 316.10(b)(iii), from establishing good moral character, and was therefore barred from acquiring citizenship”)).

B. The Denaturalization Statute

78. 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.

79. 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.

80. 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.

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

82. Where the government establishes that the defendant’s citizenship was procured illegally or by willful misrepresentation of material facts, “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 ALIEN SUBJECT TO REMOVAL ORDER

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

84. No person shall be naturalized against whom there is outstanding a final finding of deportability pursuant to a warrant of arrest issued under the INA. 8 U.S.C. § 1429.

85. No application for naturalization shall be considered if there is pending against the applicant a removal proceeding pursuant to a warrant of arrest issued under the INA. 8 U.S.C. § 1429.

86. Defendant is the subject of a final removal order because an Immigration Judge ordered him removed in absentia on January 17, 2002, under the name George Opoku.

87. Because Defendant failed to appear for his deportation as scheduled, there remains an outstanding deportation order against him.

88. Because Defendant is the subject of an outstanding final deportation order, he was and remains ineligible for naturalization under 8 U.S.C. § 1429.

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

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

COUNT TWO

ILLEGAL PROCUREMENT OF NATURALIZATION NOT LAWFULLY ADMITTED FOR PERMANENT RESIDENCE (Illegal Entrants and Immigration Violators—Misrepresentation 8 U.S.C. § 1182(a)(6)(C)(i))

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

92. 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.

93. The term “lawfully” denotes compliance with substantive legal requirements, not mere procedural regularity. 8 U.S.C. § 1101(a)(20). *Rahman*, 791 F. Supp. 3d at 364.

94. Among the applicable provisions in the INA at the time Defendant received his Diversity Visa was the requirement that he not have applied for an immigration benefit by fraud or misrepresentation. 8 U.S.C. § 1182(a)(6) (1994).

95. 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 his application for immigration benefits by fraud and misrepresentation under the name George Opoku rendered him ineligible for the diversity visa.

96. Defendant's false statement regarding his immigration history are material to determining his eligibility for the immigration benefits for which he applied.

97. Defendant's false statements had the natural tendency to influence a decision by the State Department to approve his application for the diversity visa. Defendant thus procured an immigration benefit by fraud or willfully misrepresenting a material fact. 8 U.S.C. § 1182(a)(6)(C)(i).

98. Because Defendant was not lawfully admitted for permanent residence, he was and remains ineligible for naturalization under 8 U.S.C. §§ 1429 and 1427(a)(1).

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

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

COUNT THREE

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (Procured by False Testimony - 8 U.S.C. § 1101(f)(6))

101. Plaintiff re-alleges and incorporates by reference Sections I through V of the complaint.

102. As outlined above, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during the statutory period from February

18, 2000, five years before the filing of his Form N-400 on February 18, 2005, until the time he took the Oath of Allegiance on December 2, 2005 (“statutory period”). 8 U.S.C. §1427(a)(3); 8 C.F.R. § 316.10(a)(1).

103. An applicant for naturalization is statutorily precluded from establishing the good moral character necessary to naturalize if he has given false testimony during the statutory period for the purpose of obtaining an immigration benefit. *See* 8 U.S.C. § 1101(f)(6).

104. Defendant provided false testimony for the purpose of obtaining an immigration benefit on October 26, 2005, when he was interviewed under oath in connection with his naturalization application.

105. Specifically, at his October 26, 2005 naturalization interview, Defendant testified orally and under oath that he had never: committed a crime or offense for which he was not arrested; given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or admission into the United States; been ordered deported; or applied for any kind of relief from deportation.

106. Defendant’s testimony was false because, as described above in paragraphs 8-13 and 14-18, Defendant—through his applications for immigration benefits, Form G-325A, and his application for a diversity visa—previously committed the crime of providing materially false information to the government in violation of 18 U.S.C. § 1001(a).

107. Defendant knew his testimony that he had never committed a crime or offense for which he was not arrested to be false.

108. Because Defendant provided false testimony under oath for the purpose of obtaining his naturalization, he was barred under 8 U.S.C. § 1101(f)(6) from showing that he had the requisite good moral character to become a naturalized United States citizen.

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

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

111. Because Defendant illegally procured his citizenship, this Court therefore must revoke his naturalization as provided under 8 U.S.C. § 1451(a).

COUNT FOUR

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (Unlawful Acts Adversely Reflecting Moral Character)

112. Plaintiff re-alleges and incorporates by reference Sections I through V of the complaint.

113. As outlined above, to be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during the statutory period, from February 18, 2000, five years before he filed his Form N-400, until the time he took the Oath of Allegiance on December 2, 2005. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

114. Defendant could not establish the requisite good moral character for naturalization because he committed unlawful acts during the statutory period that reflected adversely on his moral character and for which there were no extenuating circumstances. *See* 8 U.S.C. § 1101(f) (flush language); 8 C.F.R. § 316.10(b)(3)(iii); *see also, e.g., United States v. Pizzuti*, No. 24-cv-

9228 (CS), 2026 WL 948361, at *11 (S.D.N.Y. Apr. 8, 2026) citing (*United States v. Dang*, 488 F.3d 1135, 1139-41 (9th Cir. 2007)).

115. Defendant committed at least three unlawful acts during his statutory period that adversely reflect on his moral character when he violated three federal statutes that criminalize making false statements to federal officials.

116. Specifically, Defendant falsely swore in an immigration matter, in violation of 18 U.S.C. § 1546(a) when, on February 18, 2005, in response to Part 7 (Additional Eligibility Factors), Question 15, of his Form N-400, Defendant denied, under penalty of perjury, having committing a crime for which he had not been arrested and when, on October 26, 2005, he denied the same, while under oath, during his naturalization interview.

117. Defendant violated 18 U.S.C. § 1546(a) and (b)(3) during the statutory period when he completed and filed his naturalization application by failing to disclose in Part I of his N-400 the use of other names to be admitted to the United States and when he denied in Part 10, Questions 23, 24, 27, and 28 that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or admission into the United States; been ordered deported; or applied for any kind of relief from deportation.

118. During the statutory period, 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—his use of other names to be admitted to the United States in Part I of his N-400 and when he denied in Part 10, Questions 23, 24, 27, and 28 that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to

any U.S. government official to gain entry or admission into the United States; been ordered deported; or applied for any kind of relief from deportation.

119. Defendant committed perjury, in violation of 18 U.S.C. § 1621, when, on his naturalization application, Defendant, under penalty of perjury when he denied in Part 10, , Questions 23, 24, 27, and 28 that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or admission into the United States; been ordered deported; or applied for any kind of relief from deportation.; and when, at his naturalization interview, he denied the same, while under oath.

120. No extenuating circumstances exist that would palliate Defendant's guilt for violating 18 U.S.C. §§ 1001(a)(1)-(3), 1546(a) and (b)(3), or 1621. *Paul v. Johnson*, No. 1:12-mc-32 GLS/RFT, 2014 WL 2532472, at *3 (N.D.N.Y. June 5, 2014) (citing *United States v. Suarez*, 664 F.3d 655, 662 (7th Cir.2011) ("Extenuating circumstances are those which render a[n act] less reprehensible than it otherwise would be"); *Jean-Baptiste*, 395 F.3d at 1195).

121. Because Defendant committed unlawful acts during the statutory period during which he was required to maintain good moral character, and no extenuating circumstances exist to palliate his guilt, he was and remains ineligible for naturalization under 8 U.S.C. §§ 1427(a)(1) and 1429.

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

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

COUNT FIVE

**PROCUREMENT OF UNITED STATES CITIZENSHIP BY CONCEALMENT
OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION**

124. Plaintiff re-alleges and incorporates by reference Sections I through V of the complaint.

125. Under 8 U.S.C. § 1451(a), this Court must revoke a naturalized person's citizenship and cancel his Certificate of Naturalization if that person procured his naturalization by concealment of a material fact or by willful misrepresentation.

126. Naturalization is 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 because of the misrepresentation or concealment. *Kungys*, 485 U.S. at 767.

127. As set forth herein, throughout the naturalization process, Defendant willfully misrepresented and concealed, among other things: (i) his use of another identity, (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 he had lied to a U.S. Government official to gain entry or admission into the United States; (vi) that he had been ordered to be removed, excluded, or deported from the United States; (vii) and that he had previously applied for relief from removal, exclusion, or deportation.

128. Defendant also concealed and willfully misrepresented at his naturalization interview the fact that he had committed a crime for which he had not been arrested, 18 U.S.C.

§§ 1001(a), 1546, 1621, through the materially false information he provided to the government in his applications for immigration benefits, Form G-325A, and in his Diversity Visa application.

129. Defendant knew each of these statements to be false. Indeed, he later admitted the use of the name George Opoku when filed an application for a new passport in 2025, after claiming that his prior passport was stolen.

130. Defendant made such misrepresentations knowingly and voluntarily. Accordingly, Defendant made these misrepresentations willfully.

131. Defendant's misrepresentations and omissions were material to his naturalization because the disclosure of his multiple identities, prior applications for immigration benefits, prior order of exclusion and deportation, and prior representations to U.S. Government officials while applying for immigration benefits 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 the truth, USCIS would have likely denied his naturalization application.

132. Defendant thus procured his naturalization by willful concealment and misrepresentation of material facts. This Court therefore must revoke his naturalization as provided under 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands:

- (1) A declaration that Defendant illegally procured his citizenship;
- (2) A declaration that Defendant procured his citizenship by concealment of material facts and by willful misrepresentation;

(3) Judgment revoking and setting aside the order admitting Defendant as a United States citizen and cancelling Certificate of Naturalization No. [REDACTED], issued to Defendant on December 2, 2005;

(4) Judgment forever restraining and enjoining the Defendant from claiming any rights, privileges, benefits, or advantages under any document which evidences United States citizenship as a result of his December 2, 2005 naturalization.

(5) Judgment requiring Defendant, within ten days of judgment, to immediately surrender and deliver 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 know are in the possession or control of others), to the Attorney General, or his designated representatives, including undersigned counsel;

(6) Judgment requiring Defendant, within ten (10) days of the entry of judgment, to surrender and deliver any other indicia of United States citizenship (including, but not limited to, United States passports and passport cards, Enhanced Driver's 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 to his representative, including undersigned counsel; and

(7) Judgment granting the United States any other relief as may be lawful and proper.

Dated: October 1, 2026

DAVID X. SULLIVAN
United States Attorney
District of Connecticut

Respectfully submitted,

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Assistant Attorney General

JENNIFER J. KEENEY
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/s/ Joanna L. Watson
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UNITED STATES OF AMERICA)

In the Matter of the Revocation of)
Naturalization of)

Dexter ANSON,)
[REDACTED], a.k.a.)
George Opoku,)
[REDACTED])

AFFIDAVIT OF GOOD CAUSE

I, William Kew, being duly sworn, hereby depose and state as follows:

I. Introduction and Agent Background

I have been employed as a Special Agent (“SA”) of the U.S. Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) since February 19, 2019, and am currently assigned to the Office of the Special Agent in Charge (“SAC”), New England.

In my capacity as a SA for ICE HSI, I have access to the official records of the DHS, including the immigration files (“A-file”) of Dexter ANSON (“ANSON”) ([REDACTED]), and George OPOKU (“OPOKU”) ([REDACTED]). 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 ANSON and to cancel his Certificate of Naturalization.

The facts in this affidavit come from my personal review of the A-files of ANSON and OPOKU and information obtained from other law enforcement officers, witnesses and records. Based upon my review of this information, I state, upon information and belief, that the contents

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.

of this affidavit are true and correct to the best of my knowledge and that sufficient cause exists to bring denaturalization proceedings against ANSON.

The last known place of residence for ANSON is [REDACTED] [REDACTED]

I. Case Summary

DHS records, including fingerprint comparison, establish that the person who naturalized as ANSON is the same person who was previously in deportations proceedings under the name George OPUKO.

A. Immigration History as George OPOKU, D.O.B. xx xx, 1957, [REDACTED]

1. On or about June 2, 1987, ANSON entered the United States without inspection under the name George OPOKU.
2. On or about May 3, 1994, the former Immigration and Neuralization Service ("INS") issued a Form I-221, Order to Show Cause and Notice of Hearing (OSC), to place OPOKU in deportation proceedings. The OSC charged him under former INA § 242(a)(1)(B), 8 U.S.C. § 1252(a)(1)(B) (1994), as having entered the United States without inspection.
3. On October 13, 1994, he admitted the factual allegations in the OSC and conceded deportability. He requested a change of venue since he was living in Connecticut. He also applied for immigration benefits.
4. Along with his applications, OPOKU submitted Form G-325A, Biographic Information, stating that he was born in Ghana in 1957. He indicated that he never used any other names, and that his mother's name was Aboagyewa Florence.

5. On March 21, 1996, OPOKU appeared with counsel for his merits hearing in immigration court on his applications for immigration benefits. At the conclusion of the hearing the Immigration Judge denied his applications and ordered him deported to Ghana.
6. OPOKU filed an administrative appeal with the Board of Immigration Appeals (“BIA”) on or about March 29, 1996.
7. On July 18, 2001, the BIA issued its decision remanding the matter back to the Immigration Judge.
8. On or about January 17, 2002, OPOKU failed to appear for his remanded immigration court proceedings, and his counsel stated that he had no contact with OPOKU since late September 2001. The immigration judge ordered OPOKU deported in absentia.
9. On or about December 14, 2002, former INS sent by certified mail to OPOKU’s last known address, a Form I-205, Warrant of Removal/Deportation, a Form I-294, Warning to Alien Ordered Removed or Deported, and a Form I-166, Notice to Surrender for Deportation, detailing INS’s plans for deportation. The mail was returned unclaimed.

**B. Immigration History as Dexter ANSON, D.O.B. xx xx, 1954, **

10. On or about August 16, 1998, the same individual, using the name Dexter ANSON, submitted to the State Department a Form 230, Application for Immigrant Visa and Alien Registration. He indicated he was born in 1954, in Ghana, his father’s name was Stephen Anson, his mother’s name was Florence Aboagyena, and they both were deceased.

11. After receiving notice that his application for a Diversity Visa was selected for further processing, it appears ANSON returned to his native country of Ghana. The records do not reflect when or how he returned to Ghana.
12. On July 20, 1999, ANSON appeared in person at the U.S. Embassy in Ghana, for an interview on his Diversity Visa ("DV-1") application. In Part II, section 28 of his application (Sworn Statement), which listed classifications that are ineligible for a visa, ANSON checked "no" for all the classifications, including (f), listing that [he was not in the category of] anyone who applied for an immigration benefit by fraud or misrepresentation [and] was ineligible for a diversity visa.
13. On May 28, 1999, ANSON was issued a DV-1, Immigrant Visa. On August 12, 1999, ANSON entered the United States in New York, New York, as a permanent resident and he was assigned .
14. On or about February 18, 2005, ANSON filed an Application for Naturalization, Form N-400, with the Saint Albans, Vermont, Center Adjudications Office of the United States Citizenship and Immigration Service ("USCIS"). In his Form N-400, ANSON represented that he was born in Ghana in 1954, and did not list other names in Part I, Question C. In addition, in his Form N-400, ANSON by checking the "no" boxes in Part 10, Questions 23, 24, 27, and 28, confirmed that he had never: given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or admission into the United States; been ordered deported; or applied for any kind of relief from deportation.

15. On or about October 26, 2005, USCIS Officer Daniel Kazmierski interviewed ANSON under oath regarding ANSON's Naturalization Application. Based on his written application and naturalization interview, USCIS approved ANSON's Application for Naturalization on or about October 26, 2005. ANSON took the Oath of Allegiance on or about December 2, 2005, and was admitted to United States citizenship on that date. He was issued a Certificate of Naturalization, number [REDACTED].

C. Fingerprint Analysis Confirms George Opoku ([REDACTED]) and Dexter Anson ([REDACTED]) Are the Same Person

16. On September 18, 2026, I sent the electronic fingerprint card bearing fingerprint impressions and the name George Opoku, and the electronic fingerprint card bearing fingerprint impressions and the name Dexter ANSON for fingerprint analysis, and after an examination that was conducted by Sephanie Fox, Senior Fingerprint Specialist, from September 20, 2026 to September 22, 2026, it was determined that the fingerprints were made by the same individual.

IV. Illegal Procurement

ANSON illegally procured citizenship in five ways: 1) he was subject to a removal order; 2) he was not lawfully admitted for permanent residence; 3) he lacked good moral character during the statutory period because he provided false testimony; 4) he lacked good moral character during the statutory period because he committed unlawful acts; and 5) he procured citizenship by concealment of a material fact or willful misrepresentation.

A. ANSON illegally procured naturalization because he was subject to a removal order

1. No person shall be naturalized against whom there is outstanding a final finding of deportability pursuant to a warrant of arrest issued under the INA. INA § 318, 8 U.S.C. § 1429.
2. No application for naturalization shall be considered if there is pending against the applicant a removal proceeding pursuant to a warrant of arrest issued under the INA. INA § 318, 8 U.S.C. § 1429.
3. Because Defendant is the subject of a final removal order issued by an Immigration Judge on January 17, 2002, under the name George Opoku, and that deportation order remains outstanding, he was and remains ineligible for naturalization under INA § 318, 8 U.S.C. § 1429; Accordingly, ANSON's naturalization was procured illegally.

B. ANSON illegally procured naturalization because he was not lawfully admitted for permanent resident based on fraud or willful misrepresentation

1. 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.
2. 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), 8 U.S.C. § 1182(a)(6) (1994).

3. Based on the information contained above, ANSON willfully misrepresented material facts, specifically, his identity and immigration history when he applied for the Diversity Visa.
4. Because ANSON misrepresented material facts, he was inadmissible to the United States at the time he was admitted as a lawful permanent resident on the Diversity Visa. Accordingly, ANSON's naturalization was procured illegally.

C. ANSON illegally procured naturalization because he lacked good moral character based on his false testimony

1. To be eligible for naturalization, ANSON was required to establish that he was a person of good moral character during the statutory period, from February 18, 2000, five years before he filed his Form N-400, until the time he took the Oath of Allegiance on December 2, 2005. INA § 316(a)(3), 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).
2. An applicant for naturalization is statutorily precluded from establishing the good moral character necessary to naturalize if he has given false testimony during the statutory period for the purpose of obtaining an immigration benefit. *See* INA § 101(f)(6), 8 U.S.C. § 1101(f)(6).
3. Based on the information above, ANSON provided false testimony to obtain an immigration benefit when he was interviewed under oath in connection with his naturalization application, including: that he had never committed a crime or offense for which he was not arrested; given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or

admission into the United States; been ordered deported; or applied for any kind of relief from deportation.

4. Because Defendant provided false testimony under oath for the purpose of obtaining his naturalization, he was barred under 8 U.S.C. § 1101(f)(6) from showing that he had the requisite good moral character to become a naturalized United States citizen.
5. Accordingly, he was not eligible for naturalization and illegally procured his naturalization.

D. ANSON illegally procured naturalization because he lacked good moral character as he committed unlawful acts during the statutory period

1. To be eligible for naturalization, ANSON was required to establish that he was a person of good moral character during the statutory period, from February 18, 2000, five years before he filed his Form N-400, until the time he took the Oath of Allegiance on December 2, 2005. INA § 316, 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).
2. 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).
3. ANSON committed at least three unlawful acts during his statutory period that adversely reflect on his moral character when he violated three federal statutes that criminalize making false statements to federal officials:
 - a. ANSON violated 18 U.S.C. § 1546(a) and (b)(3) during the statutory period when he completed and filed his naturalization application by

failing to disclose in Part I of his N-400 the use of other names to be admitted to the United States and when he denied in Part 10, Questions 23, 24, 27, and 28 that he had never: given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or admission into the United States; been ordered deported; or applied for any kind of relief from deportation.

- b. During the statutory period, ANSON 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—his use of other names to be admitted to the United States in Part I of his N-400 and when he denied in Part 10, Questions 23, 24, 27, and 28 that he had never: given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or admission into the United States; been ordered deported; or applied for any kind of relief from deportation.
- c. Defendant committed perjury, in violation of 18 U.S.C. § 1621, when, on his naturalization application, Defendant, under penalty of perjury when he denied in Part 10, , Questions 23, 24, 27, and 28 that he had never: given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation; lied to any U.S. government official to gain entry or admission into the United

States; been ordered deported; or applied for any kind of relief from deportation.; and when, at his naturalization interview, he denied the same, while under oath.

5. No extenuating circumstances exist that would palliate ANSON's guilt for violating 18 U.S.C. §§ 1001(a)(1)-(3), 1546(a) and (b)(3), or 1621.
6. Because ANSON committed unlawful acts during the statutory period during which he was required to maintain good moral character, and no extenuating circumstances exist to palliate his guilt, he was and remains ineligible for naturalization under INA §§ 316(a)(1), 318, 8 U.S.C. §§ 1427(a)(1) and 1429.
7. Because he was ineligible to naturalize, Defendant illegally procured his citizenship.

E. ANSON illegally procured naturalization by willfully misrepresenting or concealing material facts

1. A naturalized citizen is subject to revocation of naturalization if he procured naturalization by willfully misrepresenting or concealing material facts.
2. Based on the facts contained above, ANSON willfully misrepresented and concealed his immigration history throughout the naturalization process, including: (i) his use of another identity, (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 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.

3. Defendant also concealed and willfully misrepresented at his naturalization interview the fact that he had committed a crime for which he had not been arrested, 18 U.S.C. §§ 1001(a), 1546, 1621, through the materially false information he provided to the government in his applications for immigration benefits, Form G-325A, and in his Diversity Visa application.
4. The misrepresentations made by ANSON 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, ANSON 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 he was ineligible for naturalization under INA § 318, 8 U.S.C. § 1429.
5. ANSON was able to procure his naturalization because he concealed or misrepresented material facts regarding his identity and immigration history. Accordingly, Defendant illegally procured his citizenship.

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
September 30, 2026.

WILLIAM J KEW

Digitally signed by WILLIAM J KEW
Date: 2026.09.30 13:20:05 -04'00'

William Kew
Special Agent
U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
Homeland Security Investigations
New England