

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	No. 26-cv-2536
	)	
<b>v.</b>	)	<b>COMPLAINT TO REVOKE</b>
	)	<b>NATURALIZATION</b>
<b>SALAH OSMAN AHMED,</b>	)	
<b>a/k/a SALMAN,</b>	)	
<b>Defendant.</b>	)	

**I. PRELIMINARY STATEMENT**

Pursuant to 8 U.S.C. § 1451(c), the United States seeks to revoke and set aside the order admitting to United States citizenship Defendant Salah Osman Ahmed a/k/a Salman (“Defendant” or “Ahmed”) and to cancel his Certificate of Naturalization. Defendant procured, by concealment of a material fact or by willful misrepresentation, the order admitting him to United States citizenship and his Certificate of Naturalization.

Just months after he naturalized, Defendant admittedly began providing material support to terrorists. Specifically, he traveled to Somalia to fight and kill Ethiopians on behalf of the terrorist group al-Shabaab. On March 18, 2008, the U.S. Secretary of State designated al-Shabaab a Foreign Terrorist Organization under 8 U.S.C. § 1189. Defendant’s material support for this terrorist group so shortly after he gained citizenship establishes that when he naturalized, he lacked the requisite attachment to the principles of the Constitution and dedication to the good order and happiness of the United States. For that reason, the Court must revoke Defendant’s U.S. citizenship, pursuant to 8 U.S.C. § 1451(c).

## **II. JURISDICTION, VENUE, AND PARTIES**

1. This is an action filed under 8 U.S.C. § 1451(c) to revoke and set aside the order admitting Defendant to U.S. citizenship and to cancel Defendant's Certificate of Naturalization Number 30140859.

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(c).

3. Plaintiff is the United States of America ("Plaintiff").

4. Defendant is Salah Osman Ahmed.

5. Defendant was born in Somalia in 1982.

6. Defendant obtained U.S. citizenship through naturalization.

7. Venue is proper in the District of Minnesota under 8 U.S.C. § 1451 and 28 U.S.C. § 1391 because Defendant's last known residence was in Fridley, Minnesota, which is within the jurisdiction and venue of this Court, and a substantial portion of the events giving rise to this Complaint arose from events occurring within this judicial district.

## **III. DEFENDANT'S IMMIGRATION HISTORY**

8. As required by 8 U.S.C. § 1451, an affidavit showing good cause for this action, signed by Jonathan D. Duzan, Special Agent, Department of Homeland Security ("DHS"), U.S. Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"), is attached to this Complaint. *See* Exhibit 1, Affidavit of Good Cause.

9. Defendant was admitted to the United States on September 30, 1999.

10. On May 27, 2004, United States Citizenship and Immigration Services ("USCIS") adjusted Defendant's immigration status to permanent resident.

11. On October 31, 2006, Defendant signed his Form N-400, Application for Naturalization (“N-400”), and certified under the penalty of perjury that the N-400 was true and correct.

12. On November 3, 2006, Defendant filed his N-400 with USCIS.

13. A true and complete copy of Defendant’s N-400, except for redactions of personally identifying information immaterial to this action, is attached here as Exhibit 2.

14. On the N-400, Defendant answered “yes” to Part 10, Question H34, “Do you support the Constitution and form of government of the United States?”

15. On the N-400, Defendant answered “yes” to Part 10, Question H35, “Do you understand the full Oath of Allegiance to the United States?”

16. On the N-400, Defendant answered “yes” to Part 10, Question H36, “Are you willing to take the full Oath of Allegiance to the United States?”

17. On July 17, 2007, a USCIS employee interviewed Defendant about his naturalization application (“Naturalization Interview”).

18. At the beginning of the Naturalization Interview, the USCIS employee placed Defendant under oath.

19. During the Naturalization Interview, the USCIS employee asked Defendant if he supported the Constitution and form of government of the United States.

20. In response to that question, Defendant said, under oath, that he supported the Constitution and form of government of the United States, consistent with his earlier written answer to Part 10, Question H34 of his N-400.

21. During the Naturalization Interview, the USCIS employee asked Defendant if he understood the full Oath of Allegiance to the United States.

22. In response to that question, Defendant affirmed, under oath, that he understood the full Oath of Allegiance to the United States, consistent with his earlier written answer to Part 10, Question H35 of his N-400.

23. During the Naturalization Interview, the USCIS employee asked Defendant whether he was willing to take the full Oath of Allegiance to the United States.

24. In response to that question, Defendant affirmed, under oath, that he was willing to take the full Oath of Allegiance to the United States, consistent with his earlier written answer to Part 10, Question H36 of his N-400.

25. On July 17, 2007, USCIS approved Defendant's N-400.

26. On August 15, 2007, Defendant took the Oath of Allegiance, was naturalized as a United States citizen, and was issued Certificate of Naturalization Number 30140859.

27. In taking the Oath of Allegiance, Defendant swore to "support and defend the Constitution and laws of the United States of America against all enemies, foreign, and domestic" and to "bear true faith and allegiance to the same."

28. A true and complete copy of Defendant's Certificate of Naturalization, except for redactions of personally identifying information immaterial to this action, is attached hereto as Exhibit 3.

#### **IV. DEFENDANT'S CRIMINAL HISTORY**

29. Beginning "in or about" September 2007, Defendant conspired with others to travel to Somalia and join forces fighting against the Ethiopian military.

30. Defendant and his co-conspirators agreed to travel to Somalia to fight the Ethiopian military and potentially kill Ethiopian officers and soldiers, Defendant referred to it as "jihad."

31. Prior to their departure for Somalia, Defendant and his co-conspirators solicited donations to pay for travel to Somalia under the false pretenses of building new mosques in rural areas.

32. In December 2007, Defendant flew to Somalia and joined al-Shabaab.

33. Shortly after arriving in Somalia, Defendant learned that al-Shabaab would also be fighting the Transitional Federal Government of Somalia (“TFG”).

34. The TFG was the internationally recognized provisional government of Somalia from October 2004 to August 2012.

35. Even after learning that al-Shabaab would be targeting the TFG, Defendant joined an al-Shabaab training camp while in Somalia.

36. While in Somalia, Defendant received weapons training, including the use of AK-47 rifles, rocket propelled grenades, and various small arms.

37. Additionally, while in Somalia, Defendant assisted in building a training camp for al-Shabaab.

38. While in Somalia, Defendant contacted individuals in the United States, requesting money so that he could purchase a firearm.

39. On March 18, 2008, the U.S. Secretary of State designated al-Shabaab a Foreign Terrorist Organization under 8 U.S.C. § 1189.

40. While at the training camp, Defendant developed a skin condition.

41. Defendant cited the skin condition he developed as a basis, among other reasons, for departing the training camp.

42. In April 2008, Defendant returned to the United States.

43. Prior to departing Somalia, Defendant obtained a fraudulent marriage certificate as an alibi for his travels to Somalia.

44. Defendant fabricated that alibi in anticipation of questioning by U.S. Government officials upon his return to the United States.

45. On July 30, 2008, and December 8, 2008, Special Agents with the Federal Bureau of Investigation (“FBI”) interviewed Defendant regarding his travel to Somalia.

46. During those two interviews, Defendant made false statements to the FBI agents about the circumstances of and reason for his travel to Somalia.

47. On February 19, 2009, Defendant and a co-defendant, Abdifatah Yusuf Isse, were indicted in the United States District Court for the District of Minnesota. *See* Indictment, *United States v. Isse et al.*, No. 09-cr-00050 (D. Minn. Feb. 19, 2009) (“Indictment”).

48. A true and complete copy of the Indictment is attached hereto as Exhibit 4.

49. Count One of the Indictment alleged that from “in or about September 2007 through in or about December 2008”, Defendant provided material support to terrorists, in violation of 18 U.S.C. § 2339A(a).

50. Count One of the Indictment further alleged that the material support Defendant provided to terrorists consisted of personnel, including himself, and that he provided that material support “knowing and intending that the material support and resources were to be used in preparation for and in carrying out a violation of Title 18, United States Code, Section 956(a) (1) (conspiracy to kill, kidnap, maim or injure persons in a foreign country); all in violation of Title 18, United States Code, Section 2339A(a).”

51. Count Two of the Indictment alleged that Defendant engaged in a conspiracy to kill, kidnap, maim, and injure persons outside of the United States, in violation of 18 U.S.C. § 956.

52. Count Three of the Indictment alleged that Defendant gave false statements, in violation of 18 U.S.C. § 1001(a)(2).

53. Count Three of the Indictment further alleged that on or about July 30, 2008, Defendant knowingly and willfully made a false, fraudulent, and fictitious material statement and representation to FBI agents when “he stated that he did not know anyone on his flight to Somalia in December 2007, when, in fact, he traveled to Somalia together with an individual he knew, so that they could fight *jihad* in Somalia.”

54. Count Four of the Indictment alleged that Defendant gave false statements, in violation of 18 U.S.C. § 1001(a)(2).

55. Count Four of the Indictment also alleged that on or about December 8, 2008, Defendant knowingly and willfully made a false, fraudulent, and fictitious material statement and representation to agents of the FBI when “he stated that he traveled alone and did not know anyone on his flights to Somalia in December 2007, when, in fact, he traveled to Somalia together with an individual he knew, so that they could fight *jihad* in Somalia.”

56. On July 28, 2009, Defendant pleaded guilty to and was convicted of Count One of the Indictment.

57. Defendant’s guilty plea to, and conviction for, Count One of the Indictment establishes that from “in or about” September 2007 to “in or about” December 2008, Defendant provided material support to terrorists, in violation of 18 U.S.C. § 2339A(a).

58. In October 2012, Defendant testified under oath as a government witness in *United States v. Omar*, No. 09-cr-242 (D. Minn.) (“*Omar Trial*”).

59. During the *Omar Trial*, Defendant testified as follows:

Q. What had you been doing in Somalia before you were arrested?

A. I’m sorry. Say it one more time.

Q. Certainly. What had you been doing in Somalia that led to your arrest?

A. I went to Somalia to fight with Ethiopians.

Q: Did you join al-Shabaab while you were there?

A: Yes.

Q: Did you stay at a safe house in Somalia?

A: Yes.

Trial Tr. (Oct. 5, 2012) 999:21-1000:5, *United States v. Omar*, No. 09-cr-242 (D. Minn. Apr. 11, 2014), ECF No. 343 (“Oct. 5 Trial Tr.”).

60. A true and complete copy of relevant excerpts of the Oct. 5 Trial Tr. is attached hereto as Exhibit 5.

61. Defendant testified under oath that he joined al-Shabaab, thus becoming a member of al-Shabaab.

62. During the *Omar Trial*, Defendant testified as follows:

Q: Now, before you left what was your understanding of what you would be going to Somalia to do?

A: To fight with the Ethiopians.

Q: And what type of fighting would this be?

A: Like a war or anything.

Q: Would you be shooting at Ethiopians?

A: Yes.

Q: Would you be trying to kill them?

A: Yes.

Q: Would they be trying to kill you?

A: Yes.

Q: Did you understand that that was the plan that you had agreed to join?

A: Yes.

Oct. 5 Trial Tr. 1032:12-25.

63. During the *Omar* Trial, Defendant testified as follows:

Q: So when you went to Somalia, you went, you say, to fight Ethiopian soldiers, right?

A: Yes.

Q: You went there for jihad, true?

A. Fighting with Ethiopians was jihad, yes.

Q: To fight for your religion, right?

A: Not for religion, we didn't go for the religion first. We went to—like nationalism.

Trial Tr. (Oct. 9, 2012) 1139: 4-11, *United States v. Omar*, No. 09-cr-242 (D. Minn. Apr. 11, 2014), ECF No. 344 (“Oct. 9 Trial Tr.”).

64. During the *Omar* Trial, Defendant testified as follows:

Q: You were willing to be a killer, right? That's why you're in all this trouble, isn't it, you were willing to be a killer?

A: I don't know if I call myself a killer, but going to a war there is a chance you might get killed or kill or something defending your country.

Oct. 9 Trial Tr. 1140:12-17.

65. During the *Omar* Trial, Defendant testified as follows:

Q: Now, I want to know: When is the first time that you figured out that you were going to be involved as an al-Shabaab recruit?

A: Before I left, the last days, they said when we get—go to Somalia and meet up with their guy, they mention the name al-Shabaab as youth. They didn't mention they are terrorists or bad people. They mention the young men for the country, to defend the country, something like that. But I figured out and fully understood al-Shabaab and the group when I get to Marka.

Oct. 9 Trial Tr. 1170:22-1171:6.

66. During the *Omar* Trial, Defendant also testified as follows:

Q: Where did you understand you would be going from Marka?

A: To a camp.

Q: And who would be running that camp?

A: Al-Shabaab groups.

Oct. 9 Trial Tr. 1060:3-6.

67. A true and complete copy of relevant excerpts of the Oct. 9 Trial Tr. is attached hereto as Exhibit 6.

68. While at a safehouse in Marka, early on in Defendant's travel to Somalia, and prior to traveling to the al-Shabaab training camp, Defendant "fully understood" the organization he joined, al-Shabaab.

69. On May 14, 2013, Defendant was sentenced to thirty-six months of imprisonment and twenty years of supervised release. *See* Judgment in a Criminal Case, *United States v. Ahmed*, No. 09-cr-00050 (D. Minn. May 29, 2013), ECF No. 165 ("Judgment").

70. A true and complete copy of the Judgment is attached hereto as Exhibit 7.

71. In applying the terrorism enhancement to the Defendant's sentence, the court found as follows:

Pursuant to facts stipulated to in his plea agreement and his testimony at trial, the record demonstrates that the defendant agreed to travel to Somalia in December of 2007 to assist al-Shabaab in forcing the Ethiopian military out of Somalia, which the defendant knew would include fighting and killing.

Once he arrived in Somalia, he learned that al-Shabaab had also intended to kill members of the Somali TFG. While the defendant may not have agreed with that objective, he nonetheless participated in some initial training on AK-47s, rocket-propelled grenades, machine guns at the al-Shabaab safe house in Marka.

He also raised funds necessary to purchase his own AK-47 and to assist in building the training camp for approximately two weeks.

These facts demonstrate that the defendant joined a criminal conspiracy whose objective was to kill, injure, or maim Ethiopian soldiers and Somalis supporting the TFG.

Tr. of Sentencing Hr'g (May 14, 2013) 11:2-19, *United States v. Ahmed*, No. 09-cr-00050 (D. Minn. Sept. 3, 2013), ECF No 182, ("Sentencing Hearing").

72. A true and complete copy of the Sentencing Hearing is attached hereto as Exhibit 8.

## **V. APPLICABLE LAW**

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

73. Congress has determined that an alien does not have the right to naturalization "unless all statutory requirements are complied with." *United States v. Ginsberg*, 243 U.S. 472, 475 (1917). The Supreme Court has held 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); *see also id.* ("An alien who seeks political rights as a member

of this Nation can rightfully obtain them only upon the terms and conditions specified by Congress.”) (quoting *Ginsberg*, 243 U.S. at 474)).

74. Additionally, Congress has mandated that an individual may not naturalize unless that person “during all the periods referred to in this subsection has been and still is a person of good moral character, attached to the principles of the Constitution of the United States, and well disposed to the good order and happiness of the United States ” 8 U.S.C. § 1427(a)(3).

75. The required statutory period for good moral character, attaching oneself to the principles of the Constitution, and being well disposed to the good order and happiness of the United States, prescribed in 8 U.S.C. § 1427(a)(3), begins five years before the date the applicant files the application for naturalization and continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

76. Finally, Congress has mandated that no person may become naturalized as a U.S. citizen if they affiliate with, or become a member of certain organizations, including any terrorist organization described as follows:

any organization that advocates or teaches (A) the overthrow by force or violence or other unconstitutional means of the Government of the United States or of all forms of law; or (B) the duty, necessity, or propriety of the unlawful assaulting or killing of any officer or officers (either of specific individuals or of officers generally) of the Government of the United States or of any other organized government because of his or their official character; or (C) the unlawful damage, injury, or destruction of property; or (D) sabotage;

8 U.S.C. § 1424(a)(4).

77. The Immigration and Nationality Act (“INA”) describes “affiliation” to include “the giving, loaning, or promising of support or of money or any other thing of value for any purpose to any organization shall be presumed to constitute affiliation”. 8 U.S.C. § 1101(e)(2).

78. Al-Shabaab has been and remains affiliated with the terrorist organization al-Qa'ida.<sup>1</sup>

79. Al-Shabaab engages in murder, extortion, and various other crimes in Somalia and Eastern Africa.

80. Al-Shabaab has advocated for the overthrow of the Transitional Federal Government of Somalia.

81. Al-Shabaab advocates for the overthrow of organized governments, sabotage, and destruction of property, and the killing of other government's officers.

82. For those reasons, among others, the U.S. Secretary of State designated al-Shabaab a Foreign Terrorist Organization on March 18, 2008.

83. Al-Shabaab is a prohibited organization described in 8 U.S.C. § 1424(a)(4).

84. Al-Shabaab was a prohibited organization described in 8 U.S.C. § 1424(a)(4) when Defendant began to provide material support to al-Shabaab in or about September 2007.

85. Al-Shabaab was a prohibited organization described in 8 U.S.C. § 1424(a)(4) when Defendant traveled to Somalia in or about December 2007 and joined al-Shabaab.

#### ***The Denaturalization Statute***

86. Congress has recognized that there are situations in which an individual has naturalized despite failing to comply with all congressionally imposed prerequisites to the

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<sup>1</sup> “al-Qa'ida” is transliterated from Arabic text, and several spellings may be commonly used for a single transliterated word. *See United States v. Moussaoui*, 333 F.3d 509, 512 n.4 (4th Cir. 2003). This complaint follows the spelling convention used by the Department of State, except when quoting a source that uses a different spelling.

acquisition of citizenship, which includes concealing or willfully misrepresenting facts that are material to their naturalization application. Therefore, Congress enacted 8 U.S.C. § 1451.

87. Pursuant to 8 U.S.C. § 1451(a), this Court must revoke an order of naturalization and cancel the individual's Certificate of Naturalization if his or her naturalization was either illegally procured; or procured by concealment of a material fact or willful misrepresentation.

88. If a naturalized citizen, within five years of naturalizing, becomes affiliated with, or a member of, any organization that at the time of naturalization would have precluded such person from naturalizing, under the provisions of 8 U.S.C. § 1424, that membership or affiliation constitutes *prima facie* evidence that such person was not attached to the principles of the Constitution of the United States and was not well disposed to the good order and happiness of the United States at the time of naturalization. *See* 8 U.S.C. § 1451(c).

89. In the absence of countervailing evidence, such membership or affiliation with organizations described in 8 U.S.C. § 1424 requires the revocation and setting aside of the order admitting the defendant to citizenship and the cancellation of the Certificate of Naturalization for having been obtained by concealment of a material fact or by willful misrepresentation. *Id.*

90. Where the government establishes that a defendant's citizenship was procured illegally or by willful misrepresentation or concealment of material facts, "district courts lack equitable discretion to refrain from entering a judgment of denaturalization." *Fedorenko v. United States*, 449 U.S. 490, 517 (1981).

## **VI. CAUSE OF ACTION**

### **COUNT ONE**

#### **Naturalization Procured by Concealment of Material Facts or Willful Misrepresentation (A Member of or Affiliated with A Prohibited Organization per 8 U.S.C. § 1424 Within Five Years of Naturalization)**

91. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I through V of this Complaint.

92. In response to Part 10, Question H34 of his N-400, Defendant affirmed in his N-400 that he supported the Constitution and form of government of the United States.

93. During his Naturalization Interview, Defendant affirmed, under oath, that he supported the Constitution and form of government of the United States.

94. In response to Part 10, Question H35 of his N-400, Defendant affirmed in his N-400 that he understood the full Oath of Allegiance to the United States.

95. During his Naturalization Interview, Defendant affirmed, under oath, that he understood the full Oath of Allegiance to the United States.

96. In response to Part 10, Question H36 of his N-400, Defendant affirmed in his N-400 that he was willing to take the full Oath of Allegiance to the United States.

97. During his Naturalization Interview, Defendant affirmed, under oath, that he was willing to take the full Oath of Allegiance to the United States.

98. On August 15, 2007, Defendant took the Oath of Allegiance.

99. In taking the Oath of Allegiance, Defendant swore to “support and defend the Constitution and laws of the United States of America against all enemies, foreign, and domestic” and to “bear true faith and allegiance to the same.”

100. From in or about September 2007 to in or about December 2008, Defendant affiliated himself with and provided material support to terrorists.

101. Defendant affiliated himself with al-Shabaab within five years of naturalizing.

102. Defendant became a member of al-Shabaab within five years of naturalizing.

103. At the time of Defendant's naturalization, al-Shabaab was an organization described by 8 U.S.C. § 1424(a)(4).

104. Defendant's membership in, or affiliation with, al-Shabaab at the time of his naturalization would have precluded him from naturalization pursuant to 8 U.S.C. § 1424(a)(4).

105. Defendant's membership in, or affiliation with, al-Shabaab within five years of his naturalization constitutes *prima facie* evidence that he was not attached to the principles of the Constitution of the United States and was not well disposed to the good order and happiness of the United States at the time of his naturalization.

106. There is no countervailing evidence establishing that Defendant was attached to the principles of the Constitution of the United States and was well disposed to the good order and happiness of the United States at the time of his naturalization.

107. At the time of his naturalization, Defendant was not attached to the principles of the Constitution of the United States and was not well disposed to the good order and happiness of the United States.

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

## **VII. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff, the United States requests:

1. A declaration that Defendant illegally procured his citizenship;

2. Judgment revoking and setting aside the order admitting Defendant to citizenship and canceling Certificate of Naturalization No. 30140859 effective as of the original date of the order and certificate, August 15, 2007;

3. Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship that he obtained as a result of his August 15, 2007, naturalization.

4. Judgment requiring Defendant, within twenty-one days of judgment, to surrender and deliver his Certificate of Naturalization No. 30140859, and any copies thereof in his possession, and to make good faith efforts to recover and surrender any copies thereof that he knows are in the possession of others, to the Attorney General through undersigned counsel, his representative.

5. Judgment requiring Defendant, within twenty-one days of judgment, to surrender and deliver any other indicia of U.S. citizenship (including, but not limited to, any United States passports, passport cards, and Enhanced Drivers Licenses, whether valid or expired), 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 undersigned counsel, his representative; and

6. Judgment granting the United States such other relief as may be lawful and proper.

Dated: May 7, 2026

United States Attorney  
District of Minnesota

s/ Daniel N. Rosen

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Respectfully submitted,

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