

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA,)
)
 Plaintiff,) Civil Action No. 2:26-cv-1545
)
 v.)
)
 KEVIN ROBIN SUAREZ,) **COMPLAINT TO REVOKE**
) **NATURALIZATION**
)
 Defendant.)
)
 _____)

I. PRELIMINARY STATEMENT

The United States of America brings this civil action against Kevin Robin Suarez (“Defendant”) to revoke his naturalized U.S. citizenship under 8 U.S.C. § 1451(a). Before and after he became a U.S. citizen, Defendant arranged straw purchases of firearms for the purpose of trafficking them to Latin America, where they would be used by violent drug trafficking organizations. After naturalizing, Defendant was charged with and pleaded guilty to conspiring to falsify statements in records required to be kept by a firearms dealer. Defendant committed his crime prior to his naturalization. Nevertheless, throughout his naturalization proceedings, Defendant misrepresented and concealed his criminal conduct, and thus he unlawfully procured his naturalization.

Defendant’s criminal conduct requires revocation of his naturalization on four independent grounds. First, Defendant illegally procured his naturalization

because he lacked the statutorily required good moral character to naturalize because he had committed a crime involving moral turpitude for which he was later convicted. Second, Defendant illegally procured his naturalization because he lacked the statutorily required good moral character to naturalize because he had committed an unlawful act adversely reflecting on his moral character during the period he was required to demonstrate good moral character. Third, he also lacked the required good moral character because he had falsely testified under oath during his naturalization interview about his prior criminal actions. Fourth, Defendant willfully misrepresented and concealed material facts about his unlawful activity during the naturalization process.

Based on Defendant's actions described further below and in the attached affidavit showing good cause, the United States brings this civil action under 8 U.S.C. § 1451(a) to revoke and set aside the order admitting Defendant to citizenship and to cancel his Certificate of Naturalization.

II. PARTIES, JURISDICTION AND VENUE

1. This is an action filed under 8 U.S.C. § 1451(a) to revoke and set aside the order admitting Defendant to U.S. citizenship and to cancel Defendant's Certificate of Naturalization No. 38652496.
2. Plaintiff is the United States of America.
3. Defendant is a naturalized U.S. citizen and is a native of Bolivia.

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

5. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant resides in Naples, Florida (Collier County), within the jurisdiction and venue of this Court. *See* 8 U.S.C. § 1451(a) (permitting the filing of denaturalization proceedings “in the judicial district in which such person last had his residence”).

III. FACTUAL BACKGROUND

6. The affidavit of Soleil Randall, Special Agent with U.S. Immigration and Customs Enforcement Homeland Security Investigations, showing good cause for this action as required by 8 U.S.C. § 1451(a), is attached as Exhibit A.

A. Defendant’s Illegal Naturalization

a. Naturalization Application

7. Defendant became a permanent resident of the United States effective January 11, 2012.

8. On or about August 2, 2016, Defendant filed a Form N-400, Application for Naturalization (“Form N-400”), with U.S. Citizenship and Immigration Services (“USCIS”) seeking citizenship based on his status as a permanent resident for at least three years.

9. A true and complete copy of the Form N-400, except for redactions of personally identifying information immaterial to this action, is attached hereto as Exhibit B.

10. On his Form N-400, in Part 11, Question 18, where asked, “Did you **ever** sell, give, or provide weapons to any person, or help another person sell, give, or provide weapons to any person?” (emphasis in original), Defendant answered “No.”

11. On his Form N-400, in Part 11, Question 22, where asked, “Have you **ever** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **not** arrested?” (emphasis in original), Defendant answered “No.”

12. On or about March 11, 2016, Defendant signed his Form N-400, thereby certifying under penalty of perjury that the application and the evidence submitted with it were all true and correct.

b. Naturalization Interview

13. On or about December 14, 2016, a USCIS officer interviewed Defendant, under oath, to determine his eligibility for naturalization (“Naturalization Interview”).

14. During the course of the Naturalization Interview, consistent with his written response on his Form N-400, Defendant testified, orally and under oath,

that he had never sold, given, or provided weapons to any person, or helped another person sell, give, or provide weapons to any person.

15. During the course of the Naturalization Interview, consistent with his written response on his Form N-400, Defendant testified, orally and under oath, that he had never committed, assisted in committing, or attempted to commit, a crime or offense for which he was not arrested.

16. At the conclusion of his Naturalization Interview, Defendant signed his Form N-400 in Part 15, thereby certifying under penalty of perjury under the laws of the United States that he knew that the contents of his naturalization application, including corrections to the application made at his Naturalization Interview, were true and correct to the best of his knowledge and belief.

17. On or about December 17, 2016, based on Defendant's representations in his Form N-400 and his sworn testimony during his Naturalization Interview, USCIS approved Defendant's naturalization application.

c. Naturalization Ceremony

18. Before taking the oath of allegiance, Defendant received from USCIS a Form N-445, Notice of Naturalization Oath Ceremony ("N-445").

19. A true and complete copy of the Form N-445 is attached hereto as Exhibit C.

20. The Form N-445 directed Defendant to answer several questions regarding his actions since his Naturalization Interview.

21. Question 3 of the N-445 asked Defendant, “Since your interview, have you knowingly committed any crime or offense, for which you have not been arrested?”

22. Defendant answered Question 3 of his Form N-445 by checking the box marked “No.”

23. On or about January 5, 2017, Defendant signed the Form N-445 certifying that each answer was made by him or at his direction, and each answer was true and correct as of the date of his naturalization oath ceremony.

24. At no point during the naturalization process did Defendant disclose that he conspired to provide false information to a federally-licensed firearms dealer before he naturalized.

25. On January 5, 2017, Defendant took the oath of allegiance, was granted U.S. citizenship, and was issued Certificate of Naturalization No. 38652496 (“Certificate of Naturalization”).

26. A true and complete copy of the Certificate of Naturalization, exception for redactions of personally identifying information immaterial to this action, is attached here as Exhibit D.

B. Defendant's Crimes and Conviction

27. On August 28, 2019, a federal grand jury in the Middle District of Florida returned an indictment charging Defendant and his co-conspirators with conspiring to make false representations to a firearms dealer. *See* Indictment, *United States v. Suarez*, No. 2:19-cr-132-JLB-NPM (M.D. Fla. August 29, 2019) (“Indictment”).

28. A true and complete copy of the Indictment is attached hereto as Exhibit E.

29. The Indictment charged Defendant with conspiracy to cause false statements and representations to be made to persons licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required to be kept in the records of such persons, in violation of 18 U.S.C. § 924(a)(1)(A)

30. The Indictment alleged that Defendant’s conspiracy lasted “from at least as early as on or about May 31, 2016, and continuing through at least in or about November 2017.”

31. The Indictment charged that the manner and means by which Defendant and his co-conspirators sought to accomplish the conspiracy was through offering to pay and paying cash to induce individuals to purchase firearms on the conspirators’ behalf from licensed federal firearms dealers, and to cause the individuals to falsely claim to be the actual buyers of the firearms, thereby causing

to be created records retained by the firearms dealers to contain false information disguising the identity of the true buyer of the firearms.

32. Defendant was arrested pursuant to his Indictment on August 30, 2019.

33. Defendant signed a plea agreement on January 27, 2020, agreeing to plead guilty to Count 1 of the indictment. *See* Plea Agreement, *United States v. Suarez*, No. 2:19-cr-132-JLB-NPM (M.D. Fla. January 30, 2020) (“Plea Agreement”).

34. A true and complete copy of the Plea Agreement is attached hereto as Exhibit F.

35. The Plea Agreement contains a factual proffer that Defendant signed in support of the Plea Agreement (“Factual Proffer”).

36. In the Factual Proffer, Defendant admitted to the following facts:

- a. On or about July 20, 2016, Defendant solicited an individual to purchase firearms for his father, Jesus Suarez. Defendant explained that Jesus Suarez was willing to pay the individual \$100 for each firearm purchased on his behalf, and the individual agreed to the arrangement.
- b. On July 20, 2016, Defendant and the individual traveled to First Pawn, a federally licensed firearms dealer in Naples, to purchase firearms. At First Pawn, the individual purchased four rifles selected by Defendant

and completed an ATF Form 4473 in connection with the purchase.

Individuals seeking to purchase firearms from federal firearms dealers must complete ATF Form 4473 and provide it to the firearms dealer, who must maintain it in their records.

- c. On the ATF Form 4473, the individual falsely certified that he was the “actual transferee/buyer” of the firearms he purchased, even though he was merely a straw purchaser. Approximately ten days later, the individual provided the firearms to Jesus Suarez and was compensated \$400 in cash for the effort.
- d. On or about October 25, 2016, Defendant’s co-conspirator Andrea Suarez solicited an individual to purchase rifles from federally licensed firearms dealers in exchange for cash. The individual agreed to the arrangement, and on October 25, 2016, Defendant drove Andrea Suarez and the individual to Shoot Straight, a federally licensed firearms dealer in Fort Myers, to purchase firearms.
- e. At Shoot Straight, the individual purchased two rifles and completed an ATF Form 4473 in connection with the purchase. On the ATF Form 4473, the individual falsely certified that she was the “actual transferee/buyer” of the firearms, when she did not truly intend on

keeping them. Shortly after the transaction, the individual provided the two firearms to Andrea Suarez.

- f. Later on October 25, 2016, Defendant drove Andrea Suarez and the individual to Capital Pawn, another federally licensed firearms dealer in Fort Myers, to purchase a third rifle. At Capital Pawn, the individual purchased one rifle and again falsified an ATF Form 4473 to reflect that she was the “actual transferee/buyer” of the rifle, when she knew she was not. Shortly after the transaction, the individual provided the rifle to Andrea Suarez and was compensated approximately \$600 for the effort.

Exhibit F at 17-18.

37. On February 3, 2020, Defendant pleaded guilty to Count 1 of the Indictment, which charged him with conspiracy to cause false statements and representations to be made to persons licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required to be kept in the records of such persons, in violation of 18 U.S.C. § 924(a)(1)(A).

38. On September 17, 2020, a United States District Court adjudicated Defendant guilty and sentenced him to 37 months imprisonment. Judgment, *United States v. Suarez*, No. 2:19-cr-132-JLB-NPM (M.D. Fla. November 5, 2020) (“Judgment”)

39. A true and complete copy of the Judgment is attached hereto as Exhibit G.

IV. GOVERNING LAW

A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship

40. No alien has a right to naturalization “unless all statutory requirements are complied with.” *United States v. Ginsberg*, 243 U.S. 472, 474-75 (1917). Indeed, the Supreme Court has underscored that “[t]here must be strict compliance with all the congressionally imposed prerequisites to the acquisition of citizenship.” *Fedorenko v. United States*, 449 U.S. 490, 506 (1981) (noting that an individual “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).

41. Congress 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).

42. The required statutory period for good moral character 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. *Id.*; 8 C.F.R. § 316.10(a)(1).

43. As a matter of law, an applicant necessarily lacks good moral character if he commits a crime involving moral turpitude (“CIMT”) during the statutory period and later either is convicted of the crime or admits his commission of the criminal activity. 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(A)); 8 C.F.R. § 316.10(b)(2)(i) (providing that an applicant “shall be found to lack good moral character” if, for example, they committed and were convicted of one or more crimes involving moral turpitude).

44. Congress has also explicitly precluded an individual from establishing the good moral character necessary to naturalize if during the statutory period he gives false testimony for the purpose of obtaining immigration benefits. 8 U.S.C. § 1101(f)(6).

45. Congress also has created a “catch-all” provision that states, “[t]he fact that any person is not within any of the foregoing classes shall not preclude a finding that for other reasons such person is or was not of good moral character.” 8 U.S.C. § 1101(f) (flush language).

46. Thus, an individual who commits, during the statutory period, an unlawful act adversely reflecting upon his or her moral character cannot meet the good moral character requirement unless he or she proves that extenuating circumstances existed. *See* 8 U.S.C. § 1101(f) (flush language); 8 C.F.R. § 316.10(b)(3)(iii).

47. An individual unlawfully procures naturalization if he committed unlawful acts that adversely reflected on his moral character during the statutory period before he was naturalized, even if he was convicted of those crimes after he was granted citizenship. *See United States v. Jean-Baptiste*, 395 F.3d 1190, 1193–94 (11th Cir. 2005).

B. The Denaturalization Statute

48. Recognizing that there are situations in which 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.

49. Under 8 U.S.C. § 1451(a), a court must revoke an order of naturalization and cancel the individual’s Certificate of Naturalization if his or her naturalization was either:

- a. illegally procured, or
- b. procured by concealment of a material fact or by willful misrepresentation.

50. 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.

51. Naturalization has been 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).

52. Where the government establishes that a defendant's citizenship was procured illegally or by willful misrepresentation or concealment of a material fact, "district courts lack equitable discretion to refrain from entering a judgment of denaturalization." *Fedorenko*, 449 U.S. at 517.

V. CAUSES OF ACTION

COUNT ONE

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (Crime Involving Moral Turpitude)

53. The United States re-alleges and incorporates by reference the factual and legal allegations in Sections II through IV of this Complaint.

54. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from August 2, 2011, until he naturalized on January 5, 2017. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

55. Defendant was statutorily barred from showing that he was a person of good moral character because he committed a CIMT during the statutory period.

56. Specifically, Defendant committed conspiracy to cause false statements and representations to be made to persons licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required to be kept in the records of such persons, in violation of 18 U.S.C. § 924(a)(1)(A).

57. A violation of 18 U.S.C. § 924(a)(1)(A) is a CIMT.

58. The commission of a crime involving fraud or dishonesty constitutes a CIMT. *Itani v. Ashcroft*, 298 F.3d 1213, 1215 (11th Cir. 2002).

59. The crime of conspiracy to cause false statements and representations to be made to persons licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required to be kept in the records of such persons, in violation of 18 U.S.C. § 924(a)(1)(A), involves dishonesty that impairs or obstructs government functions and, therefore, is a CIMT. *See Zarate v. U.S. Att’y Gen.*, 26 F.4th 1196, 1205-06 (11th Cir. 2022).

60. Defendant conspired to commit false statements to be made to a firearms dealer from at least as early as on or about May 31, 2016, and continuing through at least in or about November 2017. Exhibit E at 5; *see also* Exhibit F at 17-18 (admitting specific dates and acts in furtherance of the conspiracy).

61. Because Defendant committed a CIMT during the statutory period, which he later admitted to and of which he was later convicted, he was barred under 8 U.S.C. § 1101(f)(3) from showing that he had the good moral character necessary to become a naturalized U.S. citizen.

62. Because Defendant could not establish the requisite good moral character under 8 U.S.C. § 1427(a)(3), he was ineligible for naturalization.

63. Because he was ineligible to naturalize, Defendant illegally procured his naturalization, and this Court must revoke his citizenship under 8 U.S.C. § 1451(a).

COUNT TWO

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (Unlawful Acts)

64. The United States re-alleges and incorporates by reference the factual and legal allegations in Sections II through IV of this Complaint.

65. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from August 2, 2011, until he naturalized on January 5, 2017. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

66. Defendant was statutorily barred from showing that he was a person of good moral character because he committed unlawful acts that adversely reflected on his moral character during the statutory period and he cannot establish

extenuating circumstances. *See* 8 U.S.C. § 1101(f) (flush language); 8 C.F.R. § 316.10(b)(3)(iii).

67. Specifically, Defendant could not establish the requisite good moral character for naturalization because during the statutory period Defendant committed conspiracy to cause false statements and representations to be made to persons licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required to be kept in the records of such persons, in violation of 18 U.S.C. § 924(a)(1)(A). *See* 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

68. Defendant conspired to cause false statements to be made to firearms dealers from at least as early as on or about May 31, 2016, through at least in or about November 2017, during the statutory period of his naturalization. Exhibit E at 5; *see also* Exhibit F at 17-18 (admitting specific dates and acts in furtherance of the conspiracy).

69. Defendant's crime involved fraud and dishonesty and, therefore, adversely reflected on his moral character.

70. The regulatory catch-all provision for unlawful acts at 8 C.F.R. § 316.10(b)(3)(iii) applies to Defendant regardless of whether the statutory CIMT bar (set forth in Count One) also applies to him.

71. The regulatory catch-all provision for unlawful acts at 8 C.F.R. § 316.10(b)(3)(iii) applies to Defendant because he committed the unlawful act during the statutory period before he was naturalized, even though he was convicted of the crime after he was granted citizenship. *See Jean- Baptiste*, 395 F.3d at 1193–94.

72. Defendant cannot establish extenuating circumstances with regard to his unlawful activity that render his conduct less reprehensible than it otherwise would be or tend to palliate or lessen his guilt.

73. Because Defendant committed unlawful acts that adversely reflected on his moral character during the statutory period and he cannot demonstrate extenuating circumstances, he was barred under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) from showing that he had the good moral character necessary to become a naturalized U.S. citizen.

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

75. Because Defendant was ineligible to naturalize, he illegally procured his citizenship, and 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
(False Testimony)**

76. The United States re-alleges and incorporates by reference the factual and legal allegations in Sections II through IV of this Complaint.

77. To be eligible for naturalization Defendant was required to establish that he was a person of good moral character from August 2, 2011, until he naturalized on January 5, 2017. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

78. Defendant was statutorily barred from showing that he was a person of good moral character because he gave false testimony during the statutory period, under oath, for the purpose of obtaining an immigration benefit, specifically, naturalization. 8 U.S.C. § 1101(f)(6); 8 C.F.R. § 316.10(b)(2)(vi).

79. First, during the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when he testified, orally and under oath, during his December 14, 2016, Naturalization Interview, in response to Part 11, Question 18 of his N-400, that he had never sold, given, or provided weapons to any person, or helped another person sell, give, or provide weapons to any person.

80. That testimony was false because, from May 31, 2016, through the date of his Naturalization Interview, and beyond, Defendant had, in fact, sold,

given, or provided weapons to another person, or helped another person sell, give, or provide weapons to another person when he aided in purchases of firearms for his father, Jesus Suarez.

81. Second, during the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit when he testified, under oath, during his December 14, 2016, Naturalization Interview, in response to Part 11, Question 22 of his N-400, that he had never committed a crime or offense for which he had not been arrested.

82. That testimony was false because prior to his Naturalization Interview Defendant had, in fact, committed the crime of conspiracy to cause false statements and representations to be made to persons licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required to be kept in the records of such persons, in violation of 18 U.S.C. § 924(a)(1)(A), and was not arrested for the crime until August 30, 2019, which was after his Naturalization Interview.

83. During his Naturalization Interview, Defendant provided false testimony orally and under oath for the purpose of obtaining his naturalization.

84. Because Defendant provided false testimony orally and 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 good moral character necessary to become a naturalized U.S. citizen.

85. Because Defendant could not establish the requisite good moral character, he was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

86. Because Defendant was ineligible to naturalize, he illegally procured his citizenship, and this Court must revoke his naturalization as provided under 8 U.S.C. § 1451(a).

COUNT FOUR

PROCUREMENT OF U.S. CITIZENSHIP BY CONCEALMENT OF A MATERIAL FACT OR WILLFUL MISREPRESENTATION

87. The United States re-alleges and incorporates by reference the factual and legal allegations in Sections II through IV of this Complaint.

88. Under 8 U.S.C. § 1451(a), this Court must revoke Defendant's citizenship and cancel his Certificate of Naturalization because he procured his citizenship by concealment of a material fact and by willful misrepresentation.

89. As set forth above in Section III, throughout the naturalization process, Defendant misrepresented and concealed in his sworn written N-400, his oral testimony under oath at his Naturalization Interview, and in his Form N-445 that he had never sold, given, or provided weapons to any person, or helped another person sell, give, or provide weapons to any person, and that he had never

committed a crime or offense for which he had not been arrested, despite being then engaged in a conspiracy to provide false statements to firearms dealers for which he had not yet been arrested.

90. At no point during the naturalization process did Defendant disclose that he conspired to provide false statements to firearms dealers during his statutory period.

91. Defendant made his misrepresentations and concealments with knowledge of their falsity, and therefore he made them willfully.

92. Defendant's misrepresentations and concealments were material to determining his naturalization eligibility because they had a natural tendency to influence USCIS's decision whether to approve his naturalization application.

93. Defendant procured his naturalization because of his misrepresentations and concealment; indeed, his concealed conduct rendered him ineligible for citizenship.

94. Defendant therefore procured his naturalization by willful misrepresentation and concealment of material facts, and this Court must revoke his naturalization pursuant to 8 U.S.C. § 1451(a).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following:

- (1) A declaration that Defendant illegally procured his naturalization;

- (2) A declaration that Defendant procured his citizenship by concealment of a material fact and by willful misrepresentation;
- (3) Judgment revoking and setting aside the order admitting Defendant to citizenship and canceling Certificate of Naturalization No. 38652496, effective as of the original date of the order and certificate, January 5, 2017;
- (4) Judgment forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages under any document that evidences U.S. citizenship obtained as a result of his January 5, 2017, naturalization;
- (5) Judgment requiring Defendant to surrender and deliver, within ten days of Judgment, his Certificate of Naturalization, as well as any copies thereof in his possession or control (and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others) to the Acting Attorney General through his representative, undersigned counsel;
- (6) Judgment requiring Defendant to surrender and deliver, within ten days of Judgment, any other indicia of U.S. citizenship, including but not limited to, U.S. passports, U.S. passport cards, and Enhanced Driver's Licenses, if applicable, as well as any copies thereof in his possession

or control (and to make good faith efforts to recover and then surrender any copies thereof that he knows are in the possession or control of others) to the Acting Attorney General through his representative, undersigned counsel; and

(7) Judgment granting the United States any other relief that may be lawful and proper in this case.

Dated: May 7, 2026

GREGORY W. KEHOE
United States Attorney
Middle District of Florida

RANDY HARWELL
Assistant United States Attorney
U.S. Attorney's Office
Middle District of Florida
400 North Tampa Street
Suite 3200
Tampa, FL 33602
Tel.: (813) 301-3008
E-mail: RHarwell@usa.doj.gov

Respectfully Submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

JENNIFER J. KEENEY
Associate Director
Office of Immigration Litigation

JOHN J. W. INKELES
Chief
Denaturalization Unit

s/ Christopher T. Lyerla
CHRISTOPHER T. LYERLA
Texas Bar Identification No. 24070189
Trial Attorney
United States Department of Justice
Civil Division
Office of Immigration Litigation
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 598-6499
E-mail: christopher.t.lyerla@usdoj.gov

Counsel for Plaintiff