

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RODGER GEORGE GURDON,

Defendant.

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Case No. 8:26-cv-02231

**COMPLAINT TO REVOKE
NATURALIZATION**

COMPLAINT

Plaintiff, the United States of America, by and through its undersigned counsel (“Plaintiff”), files this civil action against Defendant, Rodger George Gurdon (“Defendant”), to revoke his naturalized U.S. citizenship pursuant to 8 U.S.C. § 1451(a), and alleges as follows:

I. PRELIMINARY STATEMENT

The United States of America brings this civil action against Defendant to revoke his naturalized U.S. citizenship. This action under 8 U.S.C. § 1451(a) is based on Defendant’s criminal conduct prior to naturalizing, for which he was charged and convicted after naturalizing. Specifically, before he became a citizen of the United States, Defendant engaged in criminal activity that he concealed throughout the naturalization process and that disqualified him from U.S. citizenship.

Between approximately January 2009 and June 2013, Defendant conspired to steal and resell medical products from Walter Reed National Military Medical Center and Fort Belvoir Community Hospital for his own profit. Additionally, between June 2008 and June 2013, Defendant conspired to distribute and possess with intent to distribute 100 kilograms of marijuana. When Defendant filed his naturalization application in March 2010 and was

interviewed in June 2010, he stated that he had never committed a crime for which he had not been arrested. After naturalizing, however, Defendant pled guilty to committing, prior to his naturalization, the crimes of Conspiring to Steal Pre-Retail Medical Products, in violation of 18 U.S.C. § 371, Interstate Receipt of Stolen Property, in violation of 18 U.S.C. § 2315, and Conspiracy to Distribute Marijuana, in violation of 21 U.S.C. § 846. In light of Defendant's crimes, which he misrepresented and concealed throughout his naturalization proceedings, he was ineligible for naturalization and thus procured his citizenship unlawfully. Additionally, because he withheld his prior crimes from the government throughout his naturalization proceedings, he also procured his citizenship by concealment of a material fact or by willful misrepresentation. Accordingly, as shown below, Defendant unlawfully naturalized, and this Court must order the denaturalization of Defendant. Defendant's criminal conduct and his misrepresentations about his crimes during his naturalization process create a clear, convincing, and unequivocal case for his naturalization.

II. JURISDICTION, VENUE, AND PARTIES

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 Number 33776619.

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

3. Plaintiff is the United States of America.

4. Defendant is a native of Jamaica.

5. Defendant procured U.S. citizenship through naturalization.

6. Venue is proper in the District of Maryland under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Defendant resides in Lanham, Maryland, which is within the jurisdiction and venue of this Court.

III. FACTUAL BACKGROUND

7. As required by 8 U.S.C. § 1451(a), an affidavit showing good cause for this action, signed by Shantia Ricketts, Supervisory Detention and Deportation Officer with U.S. Immigration and Customs Enforcement, U.S. Department of Homeland Security, is attached to this Complaint. *See* Exhibit A, Affidavit of Good Cause.

A. Defendant's Criminal Charges & Federal Conviction

8. Prior to being charged, Defendant worked as a pharmacy technician at Fort Belvoir Community Hospital in Fort Belvoir, Virginia ("Fort Belvoir"), and was responsible for stocking the pharmacy with medications that had been ordered by Fort Belvoir.

9. At all relevant times, Defendant had access to the areas of the Fort Belvoir pharmacy where medical products, including but not limited to Norditropin and Botox, were stored.

10. Norditropin is a medical product regulated under the Food, Drug, and Cosmetics Act, Title 21, United States Code, Section 321, et seq.

11. Botox is a medical product regulated under the Food, Drug, and Cosmetics Act, Title 21, United States Code, Section 321, et seq.

12. Between approximately January 2009 and June 2013, Defendant stole Norditropin and Botox from Fort Belvoir.

13. Defendant's co-conspirator stole Norditropin and Botox from Walter Reed National Military Medical Center ("Walter Reed").

14. On or about June 8, 2013, Defendant's co-conspirator distributed the stolen Norditropin and Botox to Defendant.

15. Defendant subsequently sold the Norditropin and Botox that he had obtained from his co-conspirator to others.

16. Defendant subsequently sold Norditropin and Botox that he had stolen from Fort Belvoir to others.

17. Between approximately June 2008 and June 2013, Defendant conspired to distribute and possess with the intent to distribute 100 kilograms or more of a substance containing marijuana.

18. As a result of his crimes, on September 16, 2013, Defendant was indicted in the United States District Court for the District of Maryland on multiple counts related to a conspiracy to steal and resell medical products from Walter Reed and Fort Belvoir. *See* Indictment, *United States v. Gurdon*, No. 8:13-cr-00495-PWG-2 (D. Md. Sept. 16, 2013), ECF No. 50 (attached hereto as Exhibit B).

19. On February 14, 2014, Defendant was charged by a Superseding Information, which indicated that (1) the theft conspiracy occurred between approximately January 2009 and June 11, 2013; (2) Defendant "did receive, possess, and store goods of the value of \$5,000 or more, which traveled in interstate commerce, knowing the same to have been stolen"; and (3) from approximately June 2008 through June 2013, Defendant conspired to "distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana[.]" *See* Superseding Information Soley as to Rodger George Gurdon, *United States v. Gurdon*, No. 8:13-cr-00495-PWG-2 (D. Md. Feb. 14, 2014), ECF No. 91 ("Superseding Information") (attached hereto as Exhibit C).

20. On February 19, 2014, Defendant pled guilty to the three Counts in the Superseding Information: Conspiracy to Steal Pre-Retail Medical Products, in violation of 18 U.S.C. § 371; Interstate Receipt of Stolen Property, in violation of 18 U.S.C. § 2315; and Conspiracy to Distribute Marijuana, in violation of 21 U.S.C. § 846. *See* Criminal Minutes, *United States v. Gurdon*, No. 8:13-cr-00495-PWG-2, (D. Md. Feb. 19, 2014), ECF No. 94 (“Criminal Minutes”) (attached hereto as Exhibit D).

21. Following the entry of his guilty plea, Defendant was convicted of the three Counts in the Superseding Information. *See* Amended Judgment in a Criminal Case, *United States v. Gurdon*, No. 8:13-cr-00495-PWG-2, (D. Md. Sept 3, 2015), ECF No. 146 (“Amended Judgment”) (attached hereto as Exhibit E); Judgment in a Criminal Case, *United States v. Rodger George Gurdon*, No. 8:13-cr-00495-PWG-2 (D. Md. Sept 28, 2014), ECF No. 121 (“Judgment”) (attached hereto as Exhibit F).

22. As a result of Defendant’s conviction for his crimes, on August 25, 2014, Defendant was sentenced to 70 months in prison, followed by 5 years of supervised release, ordered to pay \$4,467,000 in restitution, and ordered to forfeit \$14,820.20. *See* Amended Judgment.

B. Defendant’s Naturalization Application and Oath Ceremony

23. On March 19, 2010, Defendant applied to naturalize and become a U.S. citizen by filing a Form N-400, Application for Naturalization (“Naturalization Application”) with U.S. Citizenship and Immigration Services (“USCIS”).

24. A true and complete copy of the Naturalization Application, except for redactions of immaterial personally identifying information, is attached hereto as Exhibit G.

25. On his Naturalization Application, Defendant checked “No” in response to Part 10, Question 15, which asked: “Have you **ever** committed a crime or offense for which you were **not** arrested?” *See* Naturalization Application, at 8.

26. On his Naturalization Application, Defendant checked “No” in response to Part 10, Question 23, which asked: “Have you **ever** given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?” *See* Naturalization Application, at 8.

27. On or about March 3, 2010, Defendant signed the Naturalization Application under penalty of perjury, thereby certifying that his answers to the questions therein were true and correct. *See* Naturalization Application, at 10.

28. On June 10, 2010, Naima Hunter, an officer with USCIS, orally interviewed Defendant regarding his Naturalization Application to determine his eligibility for naturalization.

29. At the beginning of the interview, Officer Hunter placed Defendant under oath.

30. During the interview, Officer Hunter asked Defendant, consistent with Part 10, Question 15 of Defendant’s Naturalization Application, whether he had ever committed a crime or offense for which he was not arrested.

31. Defendant verbally confirmed his written response to Part 10, Question 15 of his Naturalization Application, testifying, orally under oath, that he had never committed a crime or offense for which he was not arrested.

32. Officer Hunter then annotated on Defendant’s Naturalization Application a reference to Defendant’s previously filed Naturalization Application wherein Defendant disclosed arrests for possession of a toy gun and urinating in public. *See* Naturalization Application, at 8.

33. At all relevant times, Defendant's testimony regarding his commission of a crime or offense was false.

34. At his naturalization interview, Defendant did not disclose his involvement in the conspiracy to steal and resell medical products.

35. At his naturalization interview, Defendant did not disclose his involvement in the conspiracy to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana.

36. During the interview, Officer Hunter asked Defendant, consistent with Part 10, Question 23 of Defendant's Naturalization Application, whether he had ever given false or misleading information to any U.S. Government official while applying for any immigration benefit.

37. Defendant verbally confirmed his written response to Part 10, Question 23 of his Naturalization Application, testifying, orally and under oath that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit.

38. At all relevant times, Defendant's testimony regarding the submission of false or misleading information to a U.S. Government official while applying for any immigration benefit was false.

39. At his naturalization interview, Defendant did not disclose that he had provided false or misleading information to USCIS while applying for naturalization when he falsely checked "No" to Part 10, Question 15 of his Naturalization Application, which asked if Defendant had ever committed a crime or offense for which he was not arrested.

40. Defendant's answer of "No" to Part 10, Question 15 of his Naturalization Application was false or misleading because he had engaged in a criminal conspiracy to steal and resell medical products from Walter Reed and Fort Belvoir, between approximately January 2009 and June 2013, which he later admitted and for which he was later convicted. *See Amended Judgment.*

41. In addition, Defendant's answer of "No" to Part 10, Question 15 of his Naturalization Application was false or misleading because he had engaged in a criminal conspiracy to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, between June 2008 and June 2013, which he later admitted and for which he was later convicted. *See Amended Judgment.*

42. In fact, at no point during the naturalization process did Defendant disclose to USCIS that he had engaged in a conspiracy to steal and resell medical products.

43. Similarly, at no point during the naturalization process did Defendant disclose to USCIS that he had engaged in a conspiracy to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana.

44. At the end of the interview, Defendant again signed the Naturalization Application under penalty of perjury in the presence of the USCIS officer and swore that the contents of his application were true and correct to the best of his knowledge. *See Naturalization Application, at 10.*

45. Based upon the information Defendant supplied on his Naturalization Application and on the sworn answers he gave during his June 10, 2010 naturalization interview, USCIS approved the application on or about August 2, 2010.

46. On or about January 20, 2011, Defendant took the Oath of Allegiance to become a U.S. citizen and was issued Certificate of Naturalization Number 33776619.

47. A true and complete copy of Defendant's Certificate of Naturalization Number 33776619, except for redactions of immaterial personally identifying information, is attached hereto as Exhibit H.

IV. GOVERNING LAW

A. Congressionally imposed prerequisites to the acquisition of U.S. citizenship.

48. No alien has a right to naturalization "unless all statutory requirements are complied with." *United States v. Ginsberg*, 243 U.S. 472, 475 (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, 491 (1981); *see also id.* ("An alien who seeks political rights as a member of the Nation can rightfully obtain them only upon the terms and conditions specified by Congress" (quoting *Ginsberg*, 243 U.S. at 474)).

49. Among other requirements, Congress has mandated that an individual may not naturalize unless that person "during all periods referred to in this subsection has been and still is a person of good moral character . . ." 8 U.S.C. § 1427(a)(3). The required statutory period for good moral character begins five years before the date the applicant files the application for naturalization, and it continues until the applicant takes the oath of allegiance and becomes a U.S. citizen. *Id.*; 8 C.F.R. § 316.10(a).

50. Although Congress has not specifically defined what constitutes good moral character for naturalization purposes, the Immigration and Nationality Act lists certain classes of applicants who cannot be found to have the requisite good moral character. 8 U.S.C. § 1101(f).

51. As a matter of law, an applicant necessarily lacks good moral character if he or she commits a crime during their statutory period for which he or she received multiple criminal convictions and for which the aggregate sentences of confinement were five years or more. *See* 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(B)); 8 C.F.R. § 316.10(b)(2)(ii).

52. Congress has also 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)(6); 8 C.F.R. § 316.10(b)(2)(vi).

53. Individuals who commit unlawful acts adversely reflecting upon their moral character likewise cannot meet the good moral character requirement, unless they prove that extenuating circumstances existed. *See* 8 U.S.C. § 1101(f) (flush language); 8 C.F.R. § 316.10(b)(3)(iii).

54. Thus, an individual unlawfully procured naturalization if he or she committed unlawful acts during the statutory period, even if he or she was convicted of those crimes after being granted citizenship. *See Ibarra v. Bondi*, 136 F.4th 63, 68 n.6 (4th Cir. 2025); *United States v. Jean-Baptiste*, 395 F.3d 1190, 1193-94 (11th Cir. 2005), *cert. denied*, 546 U.S. 852 (2005); *United States v. Okeke*, 671 F. Supp. 2d 744, 749 (D. Md. 2009).

B. The denaturalization statute

55. 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.

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

57. 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 491.

58. 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. *See Kungys v. United States*, 485 U.S. 759, 767 (1988).

59. Where the government establishes that the 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*, 449 U.S. at 517.

V. CAUSES OF ACTION

COUNT I

ILLEGAL PROCUREMENT OF NATURALIZATION

LACK OF GOOD MORAL CHARACTER

(UNLAWFUL ACTS)

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

61. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from March 19, 2005 (the date five years prior to his filing of his Naturalization Application), until January 20, 2011, which was the date he became a U.S. citizen.

62. 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 there were no extenuating circumstances that would lessen his guilt.

8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

63. As set forth above at paragraphs 8 through 47, between approximately January 2009 and June 2013, Defendant conspired with others to steal and resell medical products.

64. As set forth above at paragraphs 8 through 47, between approximately June 2008 and June 2013, Defendant conspired with others to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana.

65. On February 19, 2014, Defendant pled guilty to the crimes of Conspiracy to Steal Pre-Retail Medical Products, in violation of 18 U.S.C. § 371, Interstate Receipt of Stolen Property, in violation of 18 U.S.C. § 2315, and Conspiracy to Distribute Marijuana, in violation of 21 U.S.C. § 846. *See* Criminal Minutes. He was subsequently convicted of all three offenses. *See* Amended Judgment; Judgment

66. Defendant committed certain unlawful acts for which he was convicted during his statutory period.

67. The unlawful acts for which Defendant was convicted adversely reflected upon Defendant's moral character.

68. Defendant cannot establish extenuating circumstances with regard to the unlawful acts for which he was convicted that would render his conduct less reprehensible than it otherwise would be or that tend to palliate or mitigate his guilt. He therefore cannot avoid the regulatory bar on establishing good moral character found in 8 C.F.R. § 316.10(b)(3)(iii).

69. Defendant's crimes so adversely reflected on Defendant's moral character during the statutory period that no evidence of his good moral character would permit Defendant to satisfy his burden of establishing good moral character as required for naturalization.

70. Because Defendant committed unlawful acts during his statutory period for which there are no extenuating circumstances, Defendant was barred under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(3)(iii) from establishing that he had the good moral character necessary to become a naturalized U.S. citizen.

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

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

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION

LACK OF GOOD MORAL CHARACTER

(MULTIPLE CRIMINAL CONVICTIONS)

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

74. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from March 19, 2005 (the date five years prior to his filing of his Naturalization Application), until he became a U.S. citizen on January 20, 2011.

75. Defendant could not establish the requisite good moral character for naturalization because he committed crimes during his statutory period for which he received multiple criminal convictions and for which the aggregate sentences of confinement were five years or more. *See* 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(B)); 8 C.F.R. § 316.10(b)(2)(ii).

76. As set forth above at paragraphs 8 through 47, during his statutory period, Defendant conspired with others to steal and resell medical products and he also conspired to

distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana.

77. As a result of his crimes, Defendant was charged with, pled guilty to, and was convicted of, inter alia, conspiring to steal and resell medical products, and conspiring to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana. *See* Superseding Indictment; Criminal Minutes.

78. Defendant committed the crimes for which he was convicted during his statutory period.

79. For his multiple convictions, Defendant was sentenced to confinement for 70 months. *See* Amended Judgment.

80. Because Defendant received multiple convictions for crimes he committed during his statutory period and was sentenced for those crimes to more than five years of confinement in the aggregate, Defendant was barred under 8 U.S.C. § 1101(f) and 8 C.F.R. § 316.10(b)(2)(ii) from establishing that he had the good moral character necessary to become a naturalized U.S. citizen.

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

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

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

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

84. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character from March 19, 2005, until the date he became a U.S. citizen, on January 20, 2011.

85. Defendant was statutorily precluded from showing that he was a person of good moral character because he gave false testimony, under oath, during the statutory period, 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).

86. 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 June 10, 2010 naturalization interview, that he had never committed a crime or offense for which he had not been arrested.

87. 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 June 10, 2010 naturalization interview, that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit.

88. Defendant's testimony was false because he had engaged in a criminal conspiracy to steal and resell medical products from Walter Reed National Military Medical Center and Fort

Belvoir Community Hospital, between approximately January 2009 and June 2013, which he later admitted and for which he was later convicted. *See* Amended Judgment.

89. In addition, Defendant's testimony was false because he had engaged in a criminal conspiracy to distribute and possess with the intent to distribute 100 kilograms or more of a substance containing marijuana, between approximately June 2008 until at least June 11, 2013, which he later admitted and for which he was later convicted. *See* Amended Judgment.

90. Defendant's testimony when he swore, orally and under oath, during his June 10, 2010 naturalization interview, that he had never committed a crime or offense for which he had not been arrested, was knowingly false and for the purpose of obtaining an immigration benefit, namely naturalization.

91. Defendant's testimony when he testified, orally and under oath, during his June 10, 2010 naturalization interview, that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit, was knowingly false and for the purpose of obtaining an immigration benefit, namely naturalization.

92. 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) and 8 C.F.R. § 316.10(b)(2)(vi) from showing that he had the good moral character necessary to become a naturalized U.S. citizen.

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

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

COUNT IV

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

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

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

97. As set forth above, throughout the naturalization process, Defendant willfully misrepresented and concealed his involvement in a criminal conspiracy to steal and resell medical products, between approximately January 2009 and June 2013, for which he was later convicted in the U.S. District Court for the District of Maryland.

98. As set forth above, throughout the naturalization process, Defendant willfully misrepresented and concealed his involvement in a criminal conspiracy to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, between approximately June 2008 and June 2013, for which he was later convicted in the U.S. District Court for the District of Maryland.

99. Specifically, Defendant represented on his Naturalization Application and during his naturalization interview that he had never knowingly committed any crime or offense for which he had not been arrested, despite knowing that such representations were false and misleading.

100. Defendant also represented during his naturalization interview that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit, despite knowing that his representation was false and misleading.

101. Defendant knew the representations that he had never knowingly committed any crime or offense for which he had not been arrested were false because starting in or about January 2009, he had been a member of a conspiracy to steal and resell medical products that he had joined with knowledge of its unlawful purpose, as he later pled guilty to and for which he was later convicted.

102. In addition, Defendant knew the representations that he had never knowingly committed any crime or offense for which he had not been arrested were false because starting in or about June 2008, he had been a member of a conspiracy to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, that he had joined with knowledge of its unlawful purpose, as he later plead guilty to and for which he was later convicted.

103. Defendant knew the representation that he had never given false or misleading information to any U.S. Government official while applying for any immigration benefit was false because he had signed his Naturalization Application and filed it with USCIS on March 19, 2010, after stating on his Naturalization Application that he had never committed any crime for which he was not arrested, even though starting in or about January 2009, he had been member of a conspiracy to steal and resell medical products that he had joined with knowledge of its unlawful purpose, as he later pled guilty to and for which he was later convicted.

104. In addition, Defendant knew the representation that he had never given false or misleading information to any U.S. Government official while applying for any immigration

benefit was false because he had signed his Naturalization Application and filed it with USCIS on March 19, 2010, after stating on his Naturalization Application that he had never committed any crime for which he was not arrested, even though starting in or about June 2008, he had been member of a conspiracy to distribute and possess with intent to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, that he had joined with knowledge of its unlawful purpose, as he later plead guilty to and for which he was later convicted.

105. Defendant's misrepresentations were material to his naturalization because the disclosure of his unlawful scheme would have had a natural tendency to influence USCIS's decision whether to approve Defendant's Naturalization Application as they related to statutory eligibility criteria for such benefit.

106. Had Defendant disclosed the truth about his criminal conduct, USCIS would have discovered his statutory ineligibility for naturalization and could not have approved his application or administered the oath of allegiance.

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

PRAYER FOR RELIEF

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

1. Declaring that Defendant illegally procured his citizenship;
2. Declaring that Defendant procured his citizenship by concealment and willful misrepresentation of material facts;

3. Revoking and setting aside Defendant's naturalization and canceling Certificate of Naturalization Number 33776619, effective as of the original date of the order and certificate, January 20, 2011;

4. Forever restraining and enjoining Defendant from claiming any rights, privileges, benefits, or advantages related to U.S. citizenship;

5. Requiring Defendant to surrender and deliver, within ten days of the entry of judgment against him, his Certificate of Naturalization and any copies thereof in his possession—and to make good faith efforts to recover and immediately surrender any copies thereof that he knows are in the possession of others—to the Acting Attorney General of the United States through his representative, undersigned counsel in Washington, DC;

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

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

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Dated: June 4, 2026

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Respectfully submitted,

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