

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

HASSAN SHERJIL KHAN,

Defendant.

No. 7:26 CIV. 3340

**COMPLAINT TO REVOKE
NATURALIZATION**

Plaintiff the United States of America, by its attorney, Jay Clayton, United States Attorney for the Southern District of New York, alleges as follows:

I. INTRODUCTION

1. This is a civil action by the United States of America (the “United States” or the “Government”) against defendant Hassan Sherjil Khan (“Defendant”), under section 340(a) of the Immigration and Nationality Act, 8 U.S.C. § 1451(a), to revoke and set aside the order admitting Defendant to United States citizenship and to cancel Defendant’s certificate of naturalization.

2. Before he became a naturalized U.S. citizen, Defendant had, in the words of the federal judge who sentenced Defendant to seventeen years in prison, “in many respects ruined the life of another human being.”

3. Defendant’s victim was a child whom Defendant had been sexually grooming from the time she was eleven, for whom he traveled to England so he could have sex with her when she was fifteen and he was twenty-four, and whom he continued to stalk for another year, even after she stopped communicating with him.

4. At Defendant’s sentencing, his victim described how Defendant’s grooming and abuse left her bedridden with depression, triggered hallucinations and anorexia, caused her to self-

harm, made her fall three years behind at school, and left her “confused about [her] thoughts and belief systems because they have been influenced by [Defendant].” She summarized the Defendant’s impact on her by saying, “I may stand here today alive, but I stand here today a shadow of the person that I could have been.”

5. Defendant’s sexual abuse of his victim in the years immediately prior to and after his application for U.S. citizenship rendered him statutorily ineligible for naturalization. Defendant therefore unlawfully procured his citizenship, which requires his denaturalization.

6. In addition, Defendant misrepresented and concealed his criminal history from U.S. Citizenship and Immigration Services (“USCIS”) throughout his naturalization proceedings. Defendant therefore procured his citizenship by concealment of a material fact or by willful misrepresentation—a separate ground for denaturalization.

7. Accordingly, upon the attached affidavit showing good cause, the United States brings this civil action to revoke Defendant’s naturalized U.S. citizenship.

II. JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction pursuant to 8 U.S.C. § 1451(a) and 28 U.S.C. §§ 1331 and 1345.

9. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391. Prior to his incarceration, Defendant resided in Yonkers, New York, within the Southern District of New York.

III. PARTIES

10. Plaintiff is the United States of America.

11. Defendant is a naturalized United States citizen who was born in Pakistan.

IV. FACTUAL ALLEGATIONS

12. The affidavit of Tiffany Guerrero, a Special Agent with Immigration and Customs Enforcement, a component of the U.S. Department of Homeland Security (“DHS”), showing good cause for this action, as required by 8 U.S.C. § 1451(a), is attached hereto as Exhibit A.

V. DEFENDANT’S CRIMINAL CONDUCT PRIOR TO NATURALIZATION

13. From at least in or about 2008, up to and including at least in or about May 2012, in the Southern District of New York and elsewhere, Defendant, unlawfully, willfully, and knowingly, did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, Victim-1, to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do so.

14. Defendant did so by using a computer and the Internet to persuade, induce, entice, and coerce Victim-1, a minor, to send images, videos, and live visual depictions of Victim-1 engaging in sexual activity to Defendant over the Internet.

15. In doing so, Defendant violated 18 U.S.C. § 2422(b).

16. Defendant met Victim-1 online in October 2007, when she was just eleven years old and he was twenty.

17. Defendant met Victim-1 in a virtual reality game for children called Habbo Hotel, which allows for chat room functionality and interaction through cartoon character “avatars.”

18. In April 2009, during a webcam video chat, Defendant wrote to Victim-1 that she looked “shockingly hot.”

19. In the same month, when Victim-1 referred to a photo of herself in a dance uniform, Defendant stated, in a series of messages, “i bet its like a super hot pic . . . i want to see it now . . . um any chance i may see it.”

20. In September 2009, Defendant asked Victim-1 “whats the age of consent” in her country of residence and suggested that “its probably 16 there.” Later that day, Defendant asked, “so how old do you want to be when you first do it, or is that too weird of a question haha,” and discussed with Victim-1 whether she would ever perform oral sex.

21. At the time of these 2009 chats, Victim-1 was just twelve. Defendant then was twenty-one and believed Victim-1 was thirteen because when they met—when Victim-1 was eleven—she told him she was twelve, to seem more grown-up. When Victim-1 turned thirteen, she revealed her true age to Defendant, who was then twenty-two.

22. In December 2009, in response to Victim-1 commenting that her hands were cold, Defendant wrote her that “lol you need to masterbate, then you’ll be able to feel them.” Defendant subsequently asked to see Victim-1’s stomach; when she said no, he replied, “i don’t know why i cant let this go. . . . you could just show it and get it over with[,] well both be happy that way lol.”

23. In September 2010, when Victim-1 was still thirteen, Defendant wrote to her, “yah you suck lollipops and you are practicing for bjs.”

24. In the following months, Defendant repeatedly asked Victim-1 to show more of herself on camera and asked her about her interest in various sexual acts.

25. Throughout 2010, the video chats between Defendant and Victim-1 became increasingly sexually explicit, including individual and mutual depictions of nudity and/or masturbation.

26. In August 2011, when Victim-1 was fourteen and Defendant was twenty-three, Defendant arranged to meet Victim-1 during a vacation she and her family took to New York City. During that visit, Defendant arranged to meet Victim-1 surreptitiously at a museum and, later, at

the hotel at which Victim-1 and her family were staying. At the hotel, Defendant took Victim-1 to a private area and kissed her.

27. In April 2012, Defendant traveled from New York State, where he resided, to England, where Victim-1 resided, with the intent to engage in illicit sexual conduct with Victim-1.

28. Shortly before Defendant traveled to England, he wrote to Victim-1 about his plans for their illicit sexual conduct, suggesting that she purchase condoms. “No,” Victim-1 responded, “because i look about two.” “Fine [. . .],” Defendant replied, “but you are ready to lose your virginity next week[?]”

29. During Defendant’s visit to England in April 2012, which lasted approximately nine days, Defendant engaged in oral and vaginal sex with Victim-1 on several occasions over multiple days. At that time, Defendant was twenty-four and Victim-1 was fifteen.

30. The crime of traveling abroad with the intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b), has two elements: (1) interstate or foreign travel and (2) intent to engage in illicit sexual conduct. *See* 18 U.S.C. § 2423(b); *United States v. Murphy*, 942 F.3d 73, 80 (2d Cir. 2019).

31. The term “illicit sexual conduct” as used in 18 U.S.C. § 2423(b) includes a sexual act with a person under 18 years of age that would constitute, among others, the crime of sexual abuse of a minor, in violation of 18 U.S.C. § 2243. *See* 18 U.S.C. § 2423(f); *S2 Modern Federal Jury Instructions-Criminal* 16.11 (2025).

32. The statute at 18 U.S.C. § 2243, in turn, criminalizes the knowing engagement in a sexual act with another person who is between 12 and 16 and is at least four years younger than the perpetrator. *See* 18 U.S.C. § 2243(a).

33. By traveling abroad with the intent to engage in illicit sexual conduct with Victim-1, Defendant violated 18 U.S.C. § 2423(b).

34. Before and after traveling to England with the intent of engaging in illicit sexual conduct with Victim-1, Defendant engaged in sexually explicit video chats with Victim-1 that included the following messages from Defendant:

- “So getting naked tomorrow then?” (April 2012).
- “btw take as much time as you want before feeling comfortable to get naked on cam again” (May 2012).
- “Everyday I think about it, and I just realize I was a terrible bf. I would . . . [g]uilt you into going on cam and showing me pictures and stuff. Guilt you even into perv sessions.” (Nov. 2012). “All I wanted to do was talk to you on the phone and see you naked on cam.” (Nov. 2012).

35. On July 26, 2013, after repeatedly telling Defendant to stop contacting her, Victim-1 emailed Defendant asking him to cease contact and stated, among other things, “You are creeping me out and this is getting too stalkerish.”

36. On July 29, 2013, Defendant responded with an email to Victim-1 that stated, in part, “If you are upset that I had sex with you last April then too bad, but I would do it again if I had the chance. I didn’t do anything wrong, in a lot of countries it would be legal, this age thing is a modern construct.”

37. Victim-1 sent her final email to Defendant on July 30, 2013, stating, “You are fucking stalking me!”

38. After that email, Defendant emailed Victim-1 more than forty times between August 2013 and January 2014.

39. In November 2015, after Victim-1 disclosed Defendant's actions to third parties, Defendant was charged with various crimes in a five-count Information ("Information") filed in the U.S. District Court for the Southern District of New York ("District Court").

40. A true and complete copy of the Information is filed herewith as Exhibit B.

41. Count 2 of the Information charged Defendant with coercing and enticing a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

42. On January 14, 2016, Defendant appeared in federal District Court for a plea hearing, represented by counsel. There, Defendant was sworn in and pleaded guilty to Count Two of the Information pursuant to a plea agreement with the Government.

43. During his January 14, 2016, plea hearing, Defendant admitted under oath to coercing and enticing a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b), as follows:

From the period of 2008 to 2013, I used the Internet while residing in the Southern District of New York to meet a girl named [REDACTED]. I learned through the course of our discussions over Internet chats that she was under the age of 18. I began a friendship with her that eventually became sexualized in nature.

In 2012 I made plans to visit England and Scotland and to meet her in England where she resided. I discussed these plans over the Internet in our chats. In April 2012, I did in fact visit her in England, and during our visit, we had sexual intercourse. During that time, she was the age of 15, and I was the age of 24. I knew that my conduct was not only illegal but morally wrong, and I'm deeply regretful of that conduct, your Honor.

Tr. of Jan. 14, 2016, Hearing at 11:20-12:8, *United States v. Khan*, No. 15-cr-804 (S.D.N.Y. Jan. 27, 2016), ECF No. 22 ("Plea Hearing Transcript").

44. A true and complete copy of relevant portions of the Plea Hearing Transcript is attached hereto as Exhibit C.

45. On June 24, 2016, the District Court conducted a sentencing hearing at which Victim-1 appeared in person and described the impact of Defendant's grooming and sexual abuse, including her suicidal ideation, trauma-induced psychosis, and years of crippling depression that Defendant caused.

46. The District Court then sentenced Defendant to seventeen years in prison, followed by ten years of supervised release, as well as restitution of \$500,000.

47. Defendant appealed his conviction and sentence, which the U.S. Court of Appeals for the Second Circuit affirmed except that it reversed and remanded a portion of the judgment relating to restitution. *United States v. Khan*, 726 F. App'x 73, 76 (2d Cir. 2018).

48. On July 16, 2018, the District Court entered an amended judgment that again sentenced Defendant to seventeen years in prison, followed by ten years of supervised release, but that amended the original judgment by altering the terms under which Defendant had to pay his restitution of \$500,000 ("Amended Judgment").

49. A true and complete copy of the Amended Judgment is attached hereto as Exhibit D.

50. Defendant is currently imprisoned at Federal Correctional Institution Fort Dix, in New Jersey, with a scheduled release date of July 21, 2029.

VI. DEFENDANT'S IMMIGRATION HISTORY

51. Defendant was born in Pakistan in 1987.

52. In 1996, when Defendant was nine, he and his family moved to Canada.

53. In 2003, Defendant and his family entered the United States after Defendant's father received an H-1B visa from the United States while Defendant received derivative H-4 nonimmigrant status.

54. On October 16, 2006, Defendant filed an application to adjust status to permanent resident.

55. Following approval of Defendant's application to adjust status to permanent resident, Defendant became a permanent resident of the United States on May 15, 2007.

56. On August 29, 2012—just four months after he had traveled to England with the intent to have illicit sexual contact with his fifteen-year-old victim—Defendant applied for U.S. citizenship by filing with USCIS a Form N-400 Application for Naturalization (“N-400”).

57. A true, complete, and certified copy of that N-400, except for redactions of personally identifying information that is immaterial to this action, is attached hereto as Exhibit E.

58. Prior to filing his N-400, Defendant signed it under a certification stating that under penalty of perjury, his responses on his N-400 were “true and correct.”

59. In response to Part 10.D, question 15 of his N-400, which asked, “Have you ever committed a crime or offense for which you were not arrested?” Defendant checked the box for “No.”

60. On April 18, 2013, an immigration services officer (“ISO”) interviewed Defendant under oath about his N-400 in New York City (“Naturalization Interview”). During the Naturalization Interview, the ISO asked Defendant whether he had ever committed a crime or offense for which he had not been arrested. In response, Defendant said no, consistent with his written response to Part 10.D., question 15 of his N-400.

61. At the conclusion of his interview, Defendant signed his N-400 again, certifying that he knew its contents and that his N-400, following any corrections made to it during his naturalization interview, was “true and correct to the best of my knowledge and belief.”

62. That same day, USCIS approved Defendant's N-400.

63. On May 17, 2013, Defendant took the oath of allegiance, was naturalized, and was issued Naturalization Certificate No. 35866328 (“Naturalization Certificate”).

64. A true, complete, and certified copy of the Naturalization Certificate, except for redactions of personally identifying information that is immaterial to this action, is attached hereto as Exhibit F.

VII. GOVERNING LAW

1. CONGRESSIONALLY IMPOSED PREREQUISITES TO THE ACQUISITION OF CITIZENSHIP

65. No individual “has the slightest right to naturalization unless all statutory requirements are complied with.” *United States v. Ginsberg*, 243 U.S. 472, 475 (1917). The Supreme Court has emphasized 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.* (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).

66. 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” *See* 8 U.S.C. § 1427(a)(3).

67. The required statutory period for good moral character begins five years before the date the individual files the application for naturalization, and it continues until the individual takes the oath of allegiance and becomes a U.S. citizen. *Id.*; 8 C.F.R. § 316.10(a)(1).

68. Although Congress has not specifically defined what constitutes good moral character for naturalization purposes, the Immigration and Nationality Act delineates certain

classes of applicants who cannot be found to have the requisite good moral character. 8 U.S.C. § 1101(f).

69. As a matter of law, an applicant lacks good moral character if he or she commits a crime involving moral turpitude (“CIMT”) during the statutory period and later either is convicted of the crime or admits his or her 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 applicants “shall be found to lack good moral character” if they committed and were convicted of or admitted to committing one or more CIMTs).

70. Congress has also expressly 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. 8 U.S.C. § 1101(f)(6).

71. Further, Congress created a “catch-all” provision, which 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).

72. Individuals who commit unlawful acts adversely reflecting upon their moral character cannot meet the good moral character requirement unless they prove that extenuating circumstances existed. *See* 8 C.F.R. § 316.10(b)(3)(iii).

73. 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 United States v. Jean-Baptiste*, 395 F.3d 1190, 1193-94 (11th Cir. 2005).

2. AN INDIVIDUAL WHO ILLEGALLY PROCURES CITIZENSHIP BY NATURALIZATION MUST BE DENATURALIZED

74. 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 whether to grant his or her naturalization application, Congress enacted 8 U.S.C. § 1451.

75. Under 8 U.S.C. § 1451(a), this Court must revoke an order admitting an individual to citizenship 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.

76. 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.

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

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

CAUSES OF ACTION

COUNT I

ILLEGAL PROCUREMENT OF NATURALIZATION LACK OF GOOD MORAL CHARACTER (CRIMES INVOLVING MORAL TURPITUDE)

79. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Paragraphs 1-78 of this Complaint.

80. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during the statutory period—*i.e.*, from August 29, 2007, until May 17, 2013, the date he became a U.S. citizen. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

81. An applicant for naturalization is statutorily precluded from establishing the good moral character necessary to naturalize where he commits a CIMT during the statutory period and is convicted of or admits to committing acts that constitute the essential elements of a CIMT. 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(A)(i)); 8 C.F.R. § 316.10(b)(2)(i).

82. As set forth above, during his statutory period, Defendant committed the crime of coercing and enticing a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

83. The crime of coercing and enticing a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b), is a CIMT.

84. Defendant was convicted of coercing and enticing a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

85. Because Defendant committed a CIMT during the statutory period and was later convicted of that CIMT, Defendant was barred under 8 U.S.C. § 1101(f)(3) (cross referencing 8 U.S.C. § 1182(a)(2)(A)) from showing that he had the good moral character necessary to become a naturalized U.S. citizen. *See* 8 C.F.R. § 316.10(b)(2)(i).

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

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

COUNT II

**ILLEGAL PROCUREMENT OF NATURALIZATION
LACK OF GOOD MORAL CHARACTER
(UNLAWFUL ACTS)**

88. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Paragraphs 1 through 87 of this Complaint.

89. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during the statutory period—*i.e.*, from August 29, 2007, until May 17, 2013, the date he became a U.S. citizen. 8 U.S.C. § 1427(a)(3); 8 C.F.R. § 316.10(a)(1).

90. An applicant for naturalization is statutorily precluded from establishing the requisite good moral character for naturalization where he commits unlawful acts during the statutory period that reflect adversely on his moral character, and there were no extenuating circumstances that would lessen his guilt. 8 C.F.R. § 316.10(b)(3)(iii).

91. As set forth above at paragraphs 18 through 25 and 34, during his statutory period, Defendant committed the unlawful act of coercion and enticement of a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

92. On January 14, 2016, Defendant pleaded guilty to and was convicted of committing, from 2008, up to and including at least in or about May 2012, the unlawful act of coercion and enticement of a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

93. On January 14, 2016, while under oath and represented by counsel, Defendant admitted to committing, from 2008 up to and including at least in or about May 2012, acts that constitute the essential elements of coercion and enticement of a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

94. As set forth above at paragraphs 26 through 34, during his statutory period, Defendant committed the unlawful act of traveling with intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b).

95. Defendant committed the unlawful act of traveling with intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b), when, in April 2012, Defendant traveled from New York State to England with the intent to engage there in illicit sexual conduct with Victim-1.

96. Defendant demonstrated his intent to travel to engage in illicit sexual conduct with Victim-1 when, shortly before Defendant traveled to England in April 2012 to engage in oral and vaginal sex with Victim-1, he wrote to her about his plans for their illicit sexual conduct and suggested that she purchase condoms.

97. Defendant cannot establish extenuating circumstances with regard to his criminal conduct 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).

98. Defendant's unlawful conduct precluded him under 8 U.S.C. § 1101(f) (flush language) 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.

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

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

COUNT III

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

101. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Paragraphs 1 through 100 of this Complaint.

102. To be eligible for naturalization, Defendant was required to establish that he was a person of good moral character during the statutory period—*i.e.*, from August 29, 2007, until May 17, 2013, the date he became a U.S. citizen. 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, during the statutory period, he has given false testimony to obtain an immigration benefit. *See* 8 U.S.C. § 1101(f)(6).

104. During the statutory period, Defendant provided false testimony for the purpose of obtaining an immigration benefit during his April 18, 2013, naturalization interview when he swore, under oath, that he had never committed a crime for which he had not been arrested.

105. Defendant's sworn testimony at his April 18, 2013, naturalization interview that he had never committed a crime for which he had not been arrested was false because, as set forth above, Defendant had, as of the date of his naturalization interview, knowingly committed the following crimes for which he had not been arrested:

a. coercion and enticement of a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b), and

b. travel with intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b).

106. Defendant's testimony that he had not committed a crime for which he was not arrested was knowingly false and for the purpose of obtaining an immigration benefit, namely naturalization.

107. 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 good moral character necessary to become a naturalized U.S. citizen.

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

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

COUNT IV

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

110. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Paragraphs 1 through 109 of this Complaint.

111. Under 8 U.S.C. § 1451(a), the Court must revoke an individual's citizenship and cancel his certificate of naturalization where it was procured by concealment of a material fact and by willful misrepresentation.

112. As alleged above, throughout the naturalization process, Defendant willfully misrepresented and concealed the criminal conduct that he committed during his statutory period.

113. Specifically, Defendant misrepresented on his naturalization application and during his naturalization interview that he had never committed any crime for which he had not been arrested.

114. Defendant knew the misrepresentations on his naturalization application were false because Defendant had knowingly committed the following crimes for which he had not been arrested as of the date of his filing of his Naturalization Application on or around August 29, 2012:

a. coercion and enticement of a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b), and

b. travel with intent to engage in illicit sexual conduct, in violation of 18 U.S.C. § 2423(b).

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

116. Defendant also knew the misrepresentations at his naturalization interview that he had never committed a crime for which he had not been arrested were false because less than three years later, Defendant admitted, under oath, to committing the illegal acts of coercion and enticement of a minor to engage in illegal sexual activity, in violation of 18 U.S.C. § 2422(b).

117. Defendant's misrepresentations were material to his naturalization because the disclosure of his criminal activity would have had a natural tendency to influence the Government's decision whether to approve Defendant's N-400; indeed, his misrepresentations related to statutory eligibility criteria for such benefit.

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

119. 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, respectfully requests:

(1) A declaration that Defendant illegally procured his citizenship;

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

(3) Judgment revoking and setting aside the order admitting Defendant to citizenship and canceling Certificate of Naturalization No. 35866328, effective as of the original date of the order and certificate, May 17, 2013;

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

(5) Judgment requiring Defendant, within ten (10) days of the entry of judgment, to surrender and deliver his Certificate of Naturalization No. 35866328 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 through the undersigned counsel located in Washington, D.C.;

(6) Judgment requiring Defendant, within ten (10) days of the entry of judgment, to surrender and deliver any other indicia of U.S. citizenship, including, but not limited to, U.S. passports, state-issued Enhanced Drivers Licenses, Permits, or Non-Driver Identification Cards, and other relevant documents, whether current 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 or control of others), to the Acting Attorney General through the undersigned counsel located in Washington, D.C.; and

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

Dated: New York, New York
April 23, 2026

JAY CLAYTON
United States Attorney for the
Southern District of New York

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Respectfully submitted,

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General Litigation and Appeals Section
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

HASSAN SHERJIL KHAN,

Defendant.

**COMPLAINT TO REVOKE
NATURALIZATION**

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

Hassan Sherjil Khan,

Defendant.

AFFIDAVIT OF GOOD CAUSE

Pursuant to 28 U.S.C. § 1746, I, Tiffany Guerrero, declare under penalty of perjury as follows:

1. I am a Special Agent for the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”). In this capacity, I have access to the official records of DHS, including the alien file (“A file”) of Hassan Sherjil Khan, A088-041-994.

2. I have examined Mr. Khan’s A file and selected filings from Mr. Khan’s criminal proceedings. Accordingly, I state, on information and belief, that the information set forth in this Affidavit of Good Cause is true and correct.

3. On August 29, 2012, Mr. Khan filed a Form N-400, Application for Naturalization (“N-400”) pursuant to section 316(a) of the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1427(a), with United States Citizenship and Immigration Service (“USCIS”), DHS.

4. On April 18, 2013, Mr. Khan was interviewed by Dawn Panetta, an Immigration Service Officer (“ISO”) of USCIS to determine his eligibility for naturalization.

5. Based on Mr. Khan’s written application and his testimony at the naturalization interview, ISO Panetta approved his application for naturalization the same day.

6. Consequently, on May 17, 2013, Mr. Khan was granted United States citizenship and issued Certificate of Naturalization, number 35866328.

I. Mr. Khan illegally procured his naturalization.

7. Mr. Khan illegally procured his naturalization because he could not have established that he was a person of good moral character.

8. As an applicant for naturalization pursuant to 8 U.S.C. § 1427(a), Mr. Khan was required to prove that he was, and continued to be, a person of good moral character from August 29, 2007, five years before he filed his application for naturalization on August 29, 2012, until the time he took the oath of allegiance on May 17, 2013 (the statutory period).

A. Mr. Khan illegally procured his naturalization because he committed crimes involving moral turpitude during his statutory period.

9. Mr. Khan could not have established that he was a person of good moral character because he committed crimes involving moral turpitude during the statutory period to which he has admitted or for which he has been convicted post-naturalization.

10. An individual who, during the statutory period, committed acts that constitute the essential elements of a crime involving moral turpitude punishable by more than one year incarceration, and at any point admits or is convicted of such conduct, is barred from establishing good moral character. *See* 8 U.S.C. § 1101(f)(3) (cross-referencing 8 U.S.C. § 1182(a)(2)(A)).

11. On June 24, 2016, as a result of a plea agreement, Mr. Khan was convicted in the United States District Court for the Southern District of New York for the offense of Coercion and Enticement of a Minor to Engage in Illegal Sex in violation of 18 U.S.C. § 2422(b).

12. The minimum term of imprisonment for this conviction is ten years and the maximum possible term is life imprisonment.

13. Mr. Khan pleaded guilty to Count 2 in the criminal information 15 Cr. 804 JSR

which was filed on November 18, 2015.

14. Count 2 of the information states that from at least in or about 2008, up to and including in or about May 2012, Mr. Khan unlawfully, willfully, and knowingly, did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, Victim-1, to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, Khan used a computer and the internet to persuade, induce, entice, and coerce Victim-1, a minor, to send images, videos, and live visual depictions of Victim-1 engaging in sexual activity to Khan over the internet.

15. During his plea allocution on January 14, 2016, Mr. Khan admits he used the internet to have a sexual relationship with a female under the age of eighteen from 2008 to 2013.

16. During his plea allocution on January 14, 2016, Mr. Khan admits that as a twenty-four-year-old, he traveled to England in April 2012 to meet Victim-1, who he knew was fifteen years old, and engaged in sexual intercourse.

17. During his plea allocution, Mr. Khan further states that he knew his conduct was illegal.

18. The aforementioned conduct constitutes crimes involving moral turpitude because they involve sexual abuse of a minor.

19. Mr. Khan was sentenced to 204 months imprisonment for his conviction for the offense of Coercion and Enticement of a Minor to Engage in Illegal Sex, in violation of 18 U.S.C. § 2422(b).

20. Because Mr. Khan committed crimes involving moral turpitude punishable by more than one-year of incarceration during the statutory period that he has since admitted to, as outlined above in paragraphs 11 through 17, he could not have established that he was a person

of good moral character during the five-year period immediately preceding the date he filed for naturalization.

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

22. Because he was ineligible to naturalize, Mr. Khan illegally procured his citizenship.

B. Mr. Khan illegal procured his naturalization because he committed unlawful acts during his statutory period.

23. Mr. Khan could not have established that he was a person of good moral character because he committed unlawful acts during the statutory period that reflected adversely on his moral character.

24. An individual who committed unlawful acts during the statutory period that reflected adversely on his moral character, where there were no extenuating circumstances that would lessen his guilt, is barred from establishing good moral character. See 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

25. Mr. Khan sexually abused a minor from 2008-2012.

26. Mr. Khan committed these unlawful acts during the statutory period.

27. These unlawful acts adversely reflected upon Mr. Khan's moral character.

28. Mr. Khan cannot establish extenuating circumstances with regard to his criminal conduct 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).

29. Mr. Khan's unlawful conduct precluded him 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.

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

31. Because Mr. Khan was ineligible to naturalize, he illegally procured his naturalization.

C. Mr. Khan illegally procured his naturalization because he gave false testimony during his statutory period.

32. Mr. Khan could not have established that he was a person of good moral character because during his naturalization interview, conducted under oath on April 18, 2013, he provided false testimony for the purpose of obtaining the immigration benefit of naturalization.

33. An individual who during the statutory period has given false testimony for the purpose of obtaining any immigration benefit, is barred from establishing good moral character. *See* 8 U.S.C. § 1101(f)(6).

34. On April 18, 2013, Mr. Khan appeared before ISO Panetta for an interview regarding his application for naturalization.

35. At the beginning of the naturalization interview, ISO Panetta placed Mr. Khan under oath, and Mr. Khan swore or affirmed that he would answer all questions truthfully.

36. During the naturalization interview, Mr. Khan falsely testified, under oath, that he had never committed a crime for which he had not been arrested.

37. In fact, since about 2008 to the date of his interview, Mr. Khan was involved in sexual abuse of a minor.

38. During his plea allocution on January 14, 2016, Mr. Khan admits he used the internet to have a sexual relationship with a female under the age of eighteen from 2008 to 2013.

39. During his plea allocution on January 14, 2016, Mr. Khan admits that as a twenty-four-year-old, he traveled to England in April 2012 to meet Victim-1, who he knew was fifteen years old, and engaged in sexual intercourse.

40. During his plea allocution, Mr. Khan further states that he knew his conduct was illegal.

41. Mr. Khan's testimony regarding whether he had ever committed a crime for which he had not been arrested was knowingly false and for the purpose of obtaining an immigration benefit, namely naturalization.

42. Because Mr. Khan 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 good moral character necessary to become a naturalized U.S. citizen.

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

II. Mr. Khan procured his naturalization by willful misrepresentation and concealment of material facts.

44. Mr. Khan willfully misrepresented and concealed his criminal conduct from 2008 to 2012 during the naturalization process.

45. Throughout the naturalization process, Mr. Khan willfully misrepresented and concealed his sexual abuse of a minor from 2008 to 2012, which he admitted to know was illegal conduct, and for which he was convicted post-naturalization.

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

47. Mr. Khan knew the representations on his Naturalization Application that he had never knowingly committed a crime for which he had not been arrested were false because Mr.

Khan had knowingly sexually abused a minor from 2008 to April 2012.

48. Mr. Khan also knew the representations at his naturalization interview that he had never knowingly committed a crime for which he had not been arrested were false because Mr. Khan had knowingly sexually abused a minor from 2008 to April 2012.

49. Mr. Khan's misrepresentations were material to his naturalization because the disclosure of his criminal activity would have had a natural tendency to influence the government's decision whether to approve Mr. Khan's N-400; indeed, they related to statutory eligibility criteria for such benefit.

50. Had Mr. Khan disclosed the truth about his criminal conduct, the government would have discovered his statutory ineligibility for naturalization and would not have approved his application or administered the oath of allegiance.

51. Mr. Khan thus procured his naturalization by willful misrepresentation and concealment of material facts.

III. Conclusion

52. For the foregoing reasons, good cause exists to institute proceedings pursuant to INA § 340(a), 8 U.S.C. § 1451(a), to revoke Mr. Khan's citizenship and to cancel his certificate of naturalization.

53. Mr. Khan is currently detained at FCI Fort Dix located at 5756 Hartford and Pointville Road Joint Base MDL, NJ 08640. His expected release date is July 21, 2029. Prior to his imprisonment, Mr. Khan resided at 286 Alta Vista Drive, Yonkers, NY 10710.

DECLARATION IN LIEU OF JURAT

(28 U.S.C. § 1746)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: April 22, 2026

TIFFANY A Digitally signed by
GUERRERO TIFFANY A GUERRERO
Date: 2026.04.22
11:55:01 -04'00'

Tiffany Guerrero, Special Agent
Department of Homeland Security,
Immigration and Customs Enforcement

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

HASSAN SHERJIL KHAN,

Defendant.

**COMPLAINT TO REVOKE
NATURALIZATION**

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

HASSAN KHAN,

Defendant.

INFORMATION

15 Cr. _____

15 CRIM 804

COUNT ONE

(Coercion and Enticement of a Minor to Engage in Illegal Sexual Activity)

The United States Attorney charges:

1. From at least in or about 2008, up to and including at least in or about April 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, unlawfully, willfully, and knowingly, did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years ("Victim-1") to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, KHAN used a computer and the Internet to persuade, induce, entice, and coerce Victim-1, a minor, to engage in sexual acts.

(Title 18, United States Code, Section 2422(b).)

JUDGE RAKOFF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/23/25

COUNT TWO

(Coercion and Enticement of a Minor to Engage in Illegal Sexual Activity)

The United States Attorney further charges:

2. From at least in or about 2008, up to and including at least in or about May 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, unlawfully, willfully, and knowingly, did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, Victim-1, to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, KHAN used a computer and the Internet to persuade, induce, entice, and coerce Victim-1, a minor, to send images, videos, and live visual depictions of Victim-1 engaging in sexual activity to KHAN over the Internet.

(Title 18, United States Code, Section 2422(b).)

COUNT THREE

(Sexual Exploitation of a Child)

The United States Attorney further charges:

3. From at least in or about 2008, up to and including at least in or about May 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose

of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, among other things, KHAN induced Victim-1, who during the time period was 12 to 15 years old and resided in a foreign country, to send sexually explicit images of herself to KHAN over the internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT FOUR

(Sexual Exploitation of a Child Outside of the United States)

The United States Attorney further charges:

4. From at least in or about 2008, up to and including at least in or about April 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct outside of the

United States, for the purpose of producing visual depictions of such conduct, intending such visual depictions to be transported to the United States by means including by using a means and facility of interstate and foreign commerce, to wit, KHAN induced a minor, Victim-1, who at all relevant times resided outside of the United States, to send images, videos, and live visual depictions of Victim-1 engaging in sexually explicit conduct to KHAN over the Internet.

(Title 18, United States Code, Sections 2251(c)(1),
(c)(2)(A), (e), and 2.)

COUNT FIVE

(Receipt of Child Pornography)

The United States Attorney further charges:

5. From at least in or about 2008, up to and including at least in or about April 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, knowingly did receive and distribute material containing child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, KHAN received over the internet

live video images sent from a child under the age of 16
containing sexually explicit images of the child.

(Title 18, United States Code, Sections
2252A(a)(2)(B) and (b)(1).)



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

HASSAN KHAN,

Defendant.

INFORMATION

15 Cr. ____

(18 U.S.C. §§ 2422(b); 2251(a) & (e);
2251(c)(1), (c)(2)(A) & (e);
2252A(a)(2)(B) & (b)(1); and 2.)

PREET BHARARA

United States Attorney.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

HASSAN SHERJIL KHAN,

Defendant.

**COMPLAINT TO REVOKE
NATURALIZATION**

EXHIBIT C

GIEHKHAP Plea

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 UNITED STATES OF AMERICA,

4 v.

15 CR 804

5 HASSAN KHAN,

6 Defendant.

7
8 New York, N.Y.
9 January 14, 2016
3:55 p.m.

10 Before:

11 HON. JED S. RAKOFF,

12 District Judge

13 APPEARANCES

14 PREET BHARARA

15 United States Attorney for the
16 Southern District of New York

ALEXANDER ROSSMILLER

17 Assistant United States Attorney

18 GRECO NEYLAND, PC

19 Attorneys for Defendant

JEFFERY GRECO

20 ALSO PRESENT: JONATHAN GERACI, FBI Agent

GIEHKHAP

Plea

1 (Case called)

2 MR. ROSSMILLER: Good afternoon, Your Honor. Alex
3 Rossmiller for the government. With me is Special Agent
4 Jonathan Geraci of the FBI.

5 THE DEPUTY CLERK: Would you spell his last name.

6 MR. ROSSMILLER: G-e-r-a-c-i.

7 THE CLERK: You.

8 MR. GRECO: Jeff Greco, G-r-e-c-o, with Mr. Khan who's
9 seated to my right, your left, your Honor.

10 THE COURT: Good afternoon. I understand that the
11 defendant wishes to withdraw his previously entered plea of not
12 guilty and enter a plea of guilty to Count Two of the
13 information in satisfaction of the information; is that
14 correct?

15 MR. GRECO: That is correct, your Honor.

16 THE COURT: We'll place the defendant under oath.

17 (Defendant sworn)

18 THE COURT: Mr. Khan, let me first advise you that
19 because you're under oath, anything that you say that is
20 knowingly false could subject you to punishment for perjury or
21 obstruction of justice or the making of false statements. Do
22 you understand?

23 THE DEFENDANT: I understand.

24 THE COURT: Do you read, write, speak, and understand
25 English?

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1 THE DEFENDANT: No, they haven't, your Honor.

2 THE COURT: Has anyone threatened or coerced you in
3 any way to get you to plead guilty in this case?

4 THE DEFENDANT: No, they haven't, your Honor.

5 THE COURT: Does the government represent that if this
6 case were to go to trial, it could through competent evidence
7 prove every essential element of this charge beyond a
8 reasonable doubt?

9 MR. ROSSMILLER: Yes, your Honor.

10 THE COURT: Does defense counsel know of any valid
11 defense that would prevail at trial or any other reason why his
12 client should not plead guilty?

13 MR. GRECO: No, your Honor.

14 THE COURT: Then, Mr. Khan, tell me in your own words
15 what it is that you did that makes you guilty of this offense.

16 THE DEFENDANT: From a period of 2008 to 2013, I used
17 the Internet while residing in the Southern District of New
18 York, and I met --

19 THE COURT: Take your time.

20 THE DEFENDANT: From the period of 2008 to 2013, I
21 used the Internet while residing in the Southern District of
22 New York to meet a girl named [REDACTED]. I learned
23 through the course of our discussions over Internet chats that
24 she was under the age of 18. I began a friendship with her
25 that eventually became sexualized in nature.

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1 In 2012 I made plans to visit England and Scotland and
2 to meet her in England where she resided. I discussed these
3 plans over the Internet in our chats. In April 2012, I did in
4 fact visit her in England, and during our visit, we had sexual
5 intercourse. During that time, she was the age of 15, and I
6 was the age of 24. I knew that my conduct was not only illegal
7 but morally wrong, and I'm deeply regretful of that conduct,
8 your Honor.

9 THE COURT: All right. Is there anything else
10 regarding the factual portion of the allocution that the
11 government wishes to add or wishes the Court to further inquire
12 about?

13 MR. ROSSMILLER: No, your Honor. Thank you.

14 THE COURT: Is there anything else regarding any part
15 of the allocution that either counsel wishes the Court to
16 further inquire about before I ask the defendant to formally
17 enter his plea? Anything else from the government?

18 MR. ROSSMILLER: Your Honor, not on the allocution,
19 but if the government could respectfully, it's a little bit of
20 an unusual situation with regard to the defendant's citizenship
21 status. He is a naturalized citizen. In the plea agreement
22 we've included some information that his citizenship status may
23 be affected by the plea given when the conduct occurred and
24 when he applied. And if the Court would please just ask the
25 defendant if he's been advised of those potential immigration

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1 consequences.

2 THE COURT: Thank you for bringing that to my
3 attention.

4 So, Mr. Khan, I think what the government is saying is
5 that even though you're an American citizen, there may be some
6 question about whether that will persist and whether therefore
7 you will be subject to deportation or other immigration
8 consequences. Do you understand that that possibility exists?

9 THE DEFENDANT: I understand, your Honor.

10 THE COURT: All right. Anything else?

11 MR. ROSSMILLER: Not from the government, your Honor.
12 Thank you.

13 THE COURT: Anything from defense counsel?

14 MR. GRECO: No, your Honor. The only thing I would
15 add is I did counsel Mr. Khan about that; and I did add the
16 caveat that I'm not an immigration attorney, I'm not trained in
17 the laws of immigration, and that if he needed to, he should
18 seek counsel for the immigration purposes. But I did advise
19 him that is something that potentially, but not necessarily,
20 could come to haunt him, for lack of a better word, in the
21 future when he's released from prison.

22 THE COURT: All right. So, Mr. Khan, in light of
23 everything that we've now discussed, how do you now plead to
24 Count Two of information 15 Criminal 804, guilty or not guilty?

25 THE DEFENDANT: Guilty, your Honor.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

HASSAN SHERJIL KHAN,

Defendant.

**COMPLAINT TO REVOKE
NATURALIZATION**

EXHIBIT D

UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

v.

HASSAN KHAN

Date of Original Judgment: 6/24/2018
 (Or Date of Last Amended Judgment)

Reason for Amendment:

- Correction of Sentence on Remand (18 U.S.C. 3742(f)(1) and (2))
- Reduction of Sentence for Changed Circumstances (Fed. R. Crim. P. 35(b))
- Correction of Sentence by Sentencing Court (Fed. R. Crim. P. 35(a))
- Correction of Sentence for Clerical Mistake (Fed. R. Crim. P. 36)

AMENDED JUDGMENT IN A CRIMINAL CASE

Case Number: 15cr804-01 (JSR)

USM Number: 72762-054

Jeffery Greco, Esq.

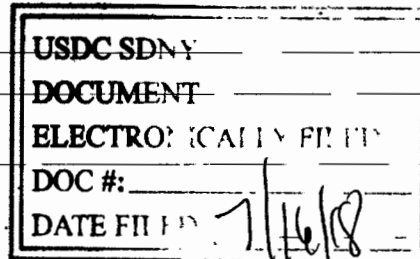
Defendant's Attorney

- Modification of Supervision Conditions (18 U.S.C. §§ 3563(c) or 3583(e))
- Modification of Imposed Term of Imprisonment for Extraordinary and Compelling Reasons (18 U.S.C. § 3582(c)(1))
- Modification of Imposed Term of Imprisonment for Retroactive Amendment(s) to the Sentencing Guidelines (18 U.S.C. § 3582(c)(2))
- Direct Motion to District Court Pursuant to 28 U.S.C. § 2255 or 18 U.S.C. § 3559(c)(7)
- Modification of Restitution Order (18 U.S.C. § 3664)

THE DEFENDANT:

- pleaded guilty to count(s) 2
- pleaded nolo contendere to count(s) which was accepted by the court.
- was found guilty on count(s) after a plea of not guilty.

The defendant is adjudicated guilty of these offenses:



Title & Section	Nature of Offense	Offense Ended	Count
18USC2422(b)	Coercion and Enticement of a Minor to Engage in Illegal Sex	9/4/2015	2

The defendant is sentenced as provided in pages 2 through 7 of this judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

- The defendant has been found not guilty on count(s) _____
- Count(s) 1,3,4,5 is is are dismissed on the motion of the United States.

It is ordered that the defendant must notify the United States Attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States attorney of material changes in economic circumstances.

7/6/2018
 Date of Imposition of Judgment

Jed S. Rakoff
 Signature of Judge
 Hon. Jed S. Rakoff, U.S.D.J.

Name and Title of Judge

Date

7/15/18

DEFENDANT: HASSAN KHAN
CASE NUMBER: 15cr804-01 (JSR)

IMPRISONMENT

The defendant is hereby committed to the custody of the Federal Bureau of Prisons to be imprisoned for a total term of :

Two Hundred Four (204) months jail, remanded.

The court makes the following recommendations to the Bureau of Prisons:

Incarceration in Fort Dix, Otisville, or Devens, Mass.

The defendant is remanded to the custody of the United States Marshal.

The defendant shall surrender to the United States Marshal for this district:

at _____ a.m. p.m. on _____ .

as notified by the United States Marshal.

The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons:

before 2 p.m. on _____ .

as notified by the United States Marshal.

as notified by the Probation or Pretrial Services Office.

RETURN

I have executed this judgment as follows:

Defendant delivered on _____ to _____

at _____ with a certified copy of this judgment.

UNITED STATES MARSHAL

By _____
DEPUTY UNITED STATES MARSHAL

DEFENDANT: HASSAN KHAN
CASE NUMBER: 15cr804-01 (JSR)

SUPERVISED RELEASE

Upon release from imprisonment, you will be on supervised release for a term of :

Ten (10) years.

MANDATORY CONDITIONS

1. You must not commit another federal, state or local crime.
2. You must not unlawfully possess a controlled substance.
3. You must refrain from any unlawful use of a controlled substance. You must submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.
 - The above drug testing condition is suspended, based on the court's determination that you pose a low risk of future substance abuse. *(check if applicable)*
4. You must make restitution in accordance with 18 U.S.C. §§ 3663 and 3663A or any other statute authorizing a sentence of restitution. *(check if applicable)*
5. You must cooperate in the collection of DNA as directed by the probation officer. *(check if applicable)*
6. You must comply with the requirements of the Sex Offender Registration and Notification Act (34 U.S.C. § 20901, *et seq.*) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in the location where you reside, work, are a student, or were convicted of a qualifying offense. *(check if applicable)*
7. You must participate in an approved program for domestic violence. *(check if applicable)*

You must comply with the standard conditions that have been adopted by this court as well as with any other conditions on the attached page.

DEFENDANT: HASSAN KHAN
CASE NUMBER: 15cr804-01 (JSR)

STANDARD CONDITIONS OF SUPERVISION

As part of your supervised release, you must comply with the following standard conditions of supervision. These conditions are imposed because they establish the basic expectations for your behavior while on supervision and identify the minimum tools needed by probation officers to keep informed, report to the court about, and bring about improvements in your conduct and condition.

1. You must report to the probation office in the federal judicial district where you are authorized to reside within 72 hours of your release from imprisonment, unless the probation officer instructs you to report to a different probation office or within a different time frame.
2. After initially reporting to the probation office, you will receive instructions from the court or the probation officer about how and when you must report to the probation officer, and you must report to the probation officer as instructed.
3. You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.
4. You must answer truthfully the questions asked by your probation officer.
5. You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
6. You must allow the probation officer to visit you at any time at your home or elsewhere, and you must permit the probation officer to take any items prohibited by the conditions of your supervision that he or she observes in plain view.
7. You must work full time (at least 30 hours per week) at a lawful type of employment, unless the probation officer excuses you from doing so. If you do not have full-time employment you must try to find full-time employment, unless the probation officer excuses you from doing so. If you plan to change where you work or anything about your work (such as your position or your job responsibilities), you must notify the probation officer at least 10 days before the change. If notifying the probation officer at least 10 days in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
8. You must not communicate or interact with someone you know is engaged in criminal activity. If you know someone has been convicted of a felony, you must not knowingly communicate or interact with that person without first getting the permission of the probation officer.
9. If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.
10. You must not own, possess, or have access to a firearm, ammunition, destructive device, or dangerous weapon (i.e., anything that was designed, or was modified for, the specific purpose of causing bodily injury or death to another person such as nunchakus or tasers).
11. You must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.
12. If the probation officer determines that you pose a risk to another person (including an organization), the probation officer may require you to notify the person about the risk and you must comply with that instruction. The probation officer may contact the person and confirm that you have notified the person about the risk.
13. You must follow the instructions of the probation officer related to the conditions of supervision.

U.S. Probation Office Use Only

A U.S. probation officer has instructed me on the conditions specified by the court and has provided me with a written copy of this judgment containing these conditions. For further information regarding these conditions, see *Overview of Probation and Supervised Release Conditions*, available at: www.uscourts.gov.

Defendant's Signature _____

Date _____

DEFENDANT: HASSAN KHAN
CASE NUMBER: 15cr804-01 (JSR)

SPECIAL CONDITIONS OF SUPERVISION

1. The defendant shall undergo a sex-offense-specific evaluation and participate in a sex offender treatment/and or mental health treatment program approved by the probation officer. The defendant shall abide by all rules, requirements, and conditions of the sex offender treatment program(s). The defendant shall waive his right of confidentiality in any records for mental health assessment and treatment imposed as a consequence of this judgment to allow the probation officer to review the defendant's course of treatment and progress with the treatment provider. The defendant will be required to contribute to the costs of services rendered in an amount approved by the probation officer, based on ability to pay or availability of third-party payment.
2. The defendant shall participate in the Computer/Internet Monitoring Program administered by the U.S. Probation Office. The defendant must provide the U.S. Probation Office advance notification of any computer(s), automated service(s), or connected device(s) that will be used during the term of supervision and that can access the Internet. The U.S. Probation Office is authorized to install any application as necessary to survey all activity on computer(s) or connected device(s) owned or operated by the defendant. The defendant may be required to pay the cost of monitoring services at the monthly rate provided by the U.S. Probation Office. The rate and payment schedule are subject to periodic adjustments by the U.S. Probation Office. The U.S. Probation Office shall be notified via electronic transmission of impermissible/suspicious activity or communications occurring on such computer or connected device, consistent with the computer monitoring policy in effect by the probation office. As triggered by impermissible/suspicious activity, the defendant shall consent to and cooperate with unannounced examinations of any computer equipment owned or used by the defendant. This examination shall include but is not limited to retrieval and copying of all data from the computer(s), connected device(s), storage media, and any internal or external peripherals, and may involve removal of such equipment for the purpose of conducting a more thorough inspection.
3. The defendant shall not have deliberate contact with any child under 18 years of age, unless approved by the probation department. The defendant shall not loiter within 100 feet of schoolyards, playgrounds, arcades, or other places primarily used by children under the age of 18.
4. The Court recommends that the defendant be supervised by the district of his residence.
5. The defendant shall have no contact of any kind, direct or indirect, with the victim.

DEFENDANT: HASSAN KHAN
CASE NUMBER: 15cr804-01 (JSR)

CRIMINAL MONETARY PENALTIES

The defendant must pay the following total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>JVTA Assessment*</u>	<u>Fine</u>	<u>Restitution</u>
TOTALS	\$ 100.00	\$	\$	\$ 500,000.00

- The determination of restitution is deferred until _____. An *Amended Judgment in a Criminal Case* (AO 245C) will be entered after such determination.
- The defendant shall make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss**</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
SEALED			

TOTALS \$ _____ 0.00 \$ _____ 0.00

- Restitution amount ordered pursuant to plea agreement \$ _____
- The defendant must pay interest on restitution and a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).
- The court determined that the defendant does not have the ability to pay interest, and it is ordered that:
 - the interest requirement is waived for fine restitution.
 - the interest requirement for the fine restitution is modified as follows:

* Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22.
** Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT: HASSAN KHAN
CASE NUMBER: 15cr804-01 (JSR)

SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties shall be due as follows:

- A Lump sum payment of \$ 100.00 due immediately, balance due
 - not later than _____, or
 - in accordance with C, D, E, or F below; or
- B Payment to begin immediately (may be combined with C, D, or F below); or
- C Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after the date of this judgment; or
- D Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or
- E Payment during the term of supervised release will commence within _____ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or
- F Special instructions regarding the payment of criminal monetary penalties:
 The defendant shall make restitution payable to the Clerk, U.S. District Court, in monthly installments of 15% of his gross monthly income over the period of supervision to commence 30 days after the start of supervision.

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during the period of imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

Joint and Several

Defendant and Co-Defendant Names and Case Numbers (including defendant number), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

- The defendant shall pay the cost of prosecution.
- The defendant shall pay the following court cost(s):
- The defendant shall forfeit the defendant's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) JVT A assessment, (8) penalties, and (9) costs, including cost of prosecution and court costs.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

HASSAN SHERJIL KHAN,

Defendant.

**COMPLAINT TO REVOKE
NATURALIZATION**

EXHIBIT E

Department of Homeland Security
U.S. Citizenship and Immigration Services

N-400 Application for Naturalization

Print clearly or type your answers using CAPITAL letters. Failure to print clearly may delay your application. Use black ink.

Part 1. Your Name (Person applying for naturalization)

Write your USCIS A-Number here:
A [REDACTED] 994

A. Your current legal name.

Family Name (Last Name)

KHAN Lodhi (1) ✓

Given Name (First Name)

HASSAN ✓

Full Middle Name (If applicable)

SHERJIL ✓

B. Your name exactly as it appears on your Permanent Resident Card.

Family Name (Last Name)

KHAN ✓

Given Name (First Name)

HASSAN ✓

Full Middle Name (If applicable)

S ✓

C. If you have ever used other names, provide them below.

Family Name (Last Name) Given Name (First Name) Middle Name

D. Name change (optional)

Read the Instructions before you decide whether to change your name.

1. Would you like to legally change your name? 2 Yes No

2. If "Yes," print the new name you would like to use. Do not use initials or abbreviations when writing your new name.

Family Name (Last Name)

Khan (3)

Given Name (First Name)

Hassan

Full Middle Name

Sherjil

Part 2. Information About Your Eligibility (Check only one)

I am at least 18 years old AND

- A. I have been a lawful permanent resident of the United States for at least five years.
- B. I have been a lawful permanent resident of the United States for at least three years, and I have been married to and living with the same U.S. citizen for the last three years, and my spouse has been a U.S. citizen for the last three years.
- C. I am applying on the basis of qualifying military service.
- D. Other (Explain) _____

For USCIS Use Only

Bar Code

Date Stamp



NBC*003039734

Remarks

Action Block



B



Part 3. Information About You

Write your USCIS A-Number here:

A [REDACTED] 994

A. U.S. Social Security Number

[REDACTED] 860 ✓

B. Date of Birth (mm/dd/yyyy)

[REDACTED] /1987 ✓

C. Date You Became a Permanent Resident (mm/dd/yyyy)

05/15/2007 ✓

D. Country of Birth

PAKISTAN ✓

E. Country of Nationality

CANADA ✓

F. Are either of your parents U.S. citizens? (If yes, see instructions)

Yes No

G. What is your current marital status?

Single, Never Married Married Divorced Widowed

Marriage Annulled or Other (Explain) _____

H. Are you requesting a waiver of the English and/or U.S. History and Government requirements based on a disability or impairment and attaching Form N-648 with your application?

Yes No

I. Are you requesting an accommodation to the naturalization process because of a disability or impairment? (See instructions for some examples of accommodations.)

Yes No

If you answered "Yes," check the box below that applies:

I am deaf or hearing impaired and need a sign language interpreter who uses the following language: _____

I use a wheelchair.

I am blind or sight impaired.

I will need another type of accommodation. Explain: _____

Part 4. Addresses and Telephone Numbers

A. Home Address - Street Number and Name (Do not write a P.O. Box in this space.)

Apartment Number

[REDACTED] [REDACTED]

City: YONKERS ✓ County: WESTCHESTER ✓ State: NEW YORK ✓ ZIP Code: 10710 ✓ Country: USA ✓

B. Care of

Mailing Address - Street Number and Name (If different from home address)

Apartment Number

[REDACTED] [REDACTED] [REDACTED]

City: [REDACTED] State: [REDACTED] ZIP Code: [REDACTED] Country: [REDACTED]

C. Daytime Phone Number (If any)

[REDACTED] ✓

Evening Phone Number (If any)

[REDACTED] ✓

E-Mail Address (If any)

[REDACTED]@gmail.com ✓

Part 5. Information for Criminal Records Search

Write your USCIS A-Number here:

A [REDACTED]-994

NOTE: The categories below are those required by the FBI. See instructions for more information.

A. Gender

Male Female

B. Height

Feet Inches

C. Weight

Pounds

D. Are you Hispanic or Latino?

Yes No

E. Race (Select one or more)

White Asian Black or African American American Indian or Alaskan Native Native Hawaiian or Other Pacific Islander

F. Hair color

Black Brown Blonde Gray White Red Sandy Bald (No Hair)

G. Eye color

Brown Blue Green Hazel Gray Black Pink Maroon Other

Part 6. Information About Your Residence and Employment

A. Where have you lived during the last five years? Begin with where you live now and then list every place you lived for the last five years. If you need more space, use a separate sheet of paper.

Street Number and Name, Apartment Number, City, State, Zip Code, and Country	Dates (mm/dd/yyyy)	
	From	To
Current Home Address - Same as Part 4.A	02/27/2010	Present
91 BEAUMONT CIRCLE, APT. 3, YONKERS, NY 10710	05/01/2006	02/27/2010

B. Where have you worked (or, if you were a student, what schools did you attend) during the last five years? Include military service. Begin with your current or latest employer and then list every place you have worked or studied for the last five years. If you need more space, use a separate sheet of paper.

Employer or School Name	Employer or School Address (Street, City, and State)	Dates (mm/dd/yyyy)		Your Occupation
		From	To	
SUNY DOWNSTATE MEDICAL UNIVERSITY	450 CLARKSON AVENUE BROOKLYN, NY 11203	08/15/2010	PRESENT	STUDENT
SUNY DOWNSTATE MEDICAL UNIVERSITY	450 CLARKSON AVENUE BROOKLYN, NY 11203	09/15/2011	04/15/2012	TUTOR
KAPLAN INC.	220 E POST ROAD WHITE PLAINS, NY 10601	09/01/2009	07/31/2010	TEACHER
SUNY BINGHAMTON UNIVERSITY	4400 VESTAL PARKWAY EAST BINGHAMTON, NY 13902	08/20/2008	05/28/2009	STUDENT

supported by student loans and parents (5)

Part 7. Time Outside the United States
(Including Trips to Canada, Mexico and the Caribbean Islands)

Write your USCIS A-Number here:
 A [REDACTED]-994

- A. How many total days did you spend outside of the United States during the past five years? 23 days
- B. How many trips of 24 hours or more have you taken outside of the United States during the past five years? 5 trips
- C. List below all the trips of 24 hours or more that you have taken outside of the United States since becoming a lawful permanent resident. Begin with your most recent trip. If you need more space, use a separate sheet of paper.

Date You Left the United States (mm/dd/yyyy)	Date You Returned to the United States (mm/dd/yyyy)	Did Trip Last Six Months or More?		Countries to Which You Traveled	Total Days Out of the United States
07/06/2012	07/09/2012	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	CANADA	3
04/05/2012	04/14/2012	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	UNITED KINGDOM	9
09/03/2011	09/05/2011	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	CANADA	2
12/25/2009	12/29/2009	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	CANADA	4
06/25/2007	06/30/2007	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	CANADA	5
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No		

Part 8. Information About Your Marital History

A. How many times have you been married (including annulled marriages)? 0 If you have **never** been married, go to Part 9.

B. If you are now married, give the following information about your spouse:

1. Spouse's Family Name (Last Name) Given Name (First Name) Full Middle Name (If applicable)

2. Date of Birth (mm/dd/yyyy) 3. Date of Marriage (mm/dd/yyyy) 4. Spouse's U.S. Social Security #

5. Home Address - Street Number and Name Apartment Number

City State Zip Code

Part 8. Information About Your Marital History (Continued)

Write your USCIS A-Number here:

A [redacted]-994

C. Is your spouse a U.S. citizen? Yes No

D. If your spouse is a U.S. citizen, give the following information:

1. When did your spouse become a U.S. citizen?

At Birth Other

If "Other," give the following information:

2. Date your spouse became a U.S. citizen

3. Place your spouse became a U.S. citizen (See instructions)

City and State

E. If your spouse is not a U.S. citizen, give the following information :

1. Spouse's Country of Citizenship

2. Spouse's USCIS A- Number (If applicable)

A

3. Spouse's Immigration Status

Lawful Permanent Resident Other

F. If you were married before, provide the following information about your prior spouse. If you have more than one previous marriage, use a separate sheet of paper to provide the information requested in Questions 1-5 below.

1. Prior Spouse's Family Name (Last Name)

Given Name (First Name)

Full Middle Name (If applicable)

2. Prior Spouse's Immigration Status

U.S. Citizen
 Lawful Permanent Resident
 Other

3. Date of Marriage (mm/dd/yyyy)

4. Date Marriage Ended (mm/dd/yyyy)

5. How Marriage Ended

Divorce Spouse Died Other

G. How many times has your current spouse been married (including annulled marriages)?

If your spouse has ever been married before, give the following information about your spouse's prior marriage.

If your spouse has more than one previous marriage, use a separate sheet(s) of paper to provide the information requested in Questions 1 - 5 below.

1. Prior Spouse's Family Name (Last Name)

Given Name (First Name)

Full Middle Name (If applicable)

2. Prior Spouse's Immigration Status

U.S. Citizen
 Lawful Permanent Resident
 Other

3. Date of Marriage (mm/dd/yyyy)

4. Date Marriage Ended (mm/dd/yyyy)

5. How Marriage Ended

Divorce Spouse Died Other

Part 9. Information About Your Children

Write your USCIS A-Number here:

A [REDACTED]-994

A. How many sons and daughters have you had? For more information on which sons and daughters you should include and how to complete this section, see the Instructions.

0 ✓

B. Provide the following information about all of your sons and daughters. If you need more space, use a separate sheet of paper.

Full Name of Son or Daughter	Date of Birth (mm/dd/yyyy)	USCIS A- number (if child has one)	Country of Birth	Current Address (Street, City, State and Country)
		A		
		A		
		A		
		A		
		A		
		A		
		A		
		A		

Add Children

Go to continuation page

Part 10. Additional Questions

Answer Questions 1 through 14. If you answer "Yes" to any of these questions, include a written explanation with this form. Your written explanation should (1) explain why your answer was "Yes" and (2) provide any additional information that helps to explain your answer.

A. General Questions.

- 1. Have you ever claimed to be a U.S. citizen (in writing or any other way)? Yes No
- 2. Have you ever registered to vote in any Federal, State, or local election in the United States? Yes No
- 3. Have you ever voted in any Federal, State, or local election in the United States? Yes No
- 4. Since becoming a lawful permanent resident, have you ever failed to file a required Federal, State, or local tax return? Yes No
- 5. Do you owe any Federal, State, or local taxes that are overdue? Yes No
- 6. Do you have any title of nobility in any foreign country? Yes No
- 7. Have you ever been declared legally incompetent or been confined to a mental institution within the last five years? Yes No

Part 10. Additional Questions (Continued)

Write your USCIS A-Number here:

A [REDACTED] 994

B. Affiliations.

8. a. Have you **ever** been a member of or associated with any organization, association, fund foundation, party, club, society, or similar group in the United States or in any other place? Yes No

b. If you answered "Yes," list the name of each group below. If you need more space, attach the names of the other group(s) on a separate sheet of paper.

Name of Group	Name of Group
1.	6.
2.	7.
3.	8.
4.	9.
5.	10.

9. Have you **ever** been a member of or in any way associated (*either directly or indirectly*) with:

- a. The Communist Party? Yes No
- b. Any other totalitarian party? Yes No
- c. A terrorist organization? Yes No

10. Have you **ever** advocated (*either directly or indirectly*) the overthrow of any government by force or violence? Yes No

11. Have you **ever** persecuted (*either directly or indirectly*) any person because of race, religion, national origin, membership in a particular social group, or political opinion? Yes No

12. Between March 23, 1933, and May 8, 1945, did you work for or associate in any way (*either directly or indirectly*) with:

- a. The Nazi government of Germany? Yes No
- b. Any government in any area (1) occupied by, (2) allied with, or (3) established with the help of the Nazi government of Germany? Yes No
- c. Any German, Nazi, or S.S. military unit, paramilitary unit, self-defense unit, vigilante unit, citizen unit, police unit, government agency or office, extermination camp, concentration camp, prisoner of war camp, prison, labor camp, or transit camp? Yes No

C. Continuous Residence.

Since becoming a lawful permanent resident of the United States:

13. Have you **ever** called yourself a "nonresident" on a Federal, State, or local tax return? Yes No

14. Have you **ever** failed to file a Federal, State, or local tax return because you considered yourself to be a "nonresident"? Yes No

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Part 10. Additional Questions (continued)

Write your USCIS A-Number here:

A [REDACTED] 994

D. Good Moral Character.

For the purposes of this application, you must answer "Yes" to the following questions, if applicable, even if your records were sealed or otherwise cleared or if anyone, including a judge, law enforcement officer, or attorney, told you that you no longer have a record.

- 15. Have you ever committed a crime or offense for which you were not arrested? Yes No
- 16. Have you ever been arrested, cited, or detained by any law enforcement officer (including USCIS or former INS and military officers) for any reason? Yes No
- 17. Have you ever been charged with committing any crime or offense? Yes No
- 18. Have you ever been convicted of a crime or offense? Yes No
- 19. Have you ever been placed in an alternative sentencing or a rehabilitative program (for example: diversion, deferred prosecution, withheld adjudication, deferred adjudication)? Yes No
- 20. Have you ever received a suspended sentence, been placed on probation, or been paroled? Yes No
- 21. Have you ever been in jail or prison? Yes No

If you answered "Yes" to any of Questions 15 through 21, complete the following table. If you need more space, use a separate sheet of paper to give the same information.

Why were you arrested, cited, detained, or charged?	Date arrested, cited, detained, or charged? (mm/dd/yyyy)	Where were you arrested, cited, detained, or charged? (City, State, Country)	Outcome or disposition of the arrest, citation, detention, or charge (No charges filed, charges dismissed, jail, probation, etc.)

Answer Questions 22 through 33. If you answer "Yes" to any of these questions, attach (1) your written explanation why your answer was "Yes" and (2) any additional information or documentation that helps explain your answer.

- 22. Have you ever:
 - a. Been a habitual drunkard? Yes No
 - b. Been a prostitute, or procured anyone for prostitution? Yes No
 - c. Sold or smuggled controlled substances, illegal drugs, or narcotics? Yes No
 - d. Been married to more than one person at the same time? Yes No
 - e. Helped anyone enter or try to enter the United States illegally? Yes No
 - f. Gambled illegally or received income from illegal gambling? Yes No
 - g. Failed to support your dependents or to pay alimony? Yes No
- 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? Yes No
- 24. Have you ever lied to any U.S. Government official to gain entry or admission into the United States? Yes No

Part 10. Additional Questions (Continued)

Write your USCIS A-Number here:
 A [redacted]-994

E. Removal, Exclusion, and Deportation Proceedings.

- 25. Are removal, exclusion, rescission, or deportation proceedings pending against you? Yes No
- 26. Have you ever been removed, excluded, or deported from the United States? Yes No
- 27. Have you ever been ordered to be removed, excluded, or deported from the United States? Yes No
- 28. Have you ever applied for any kind of relief from removal, exclusion, or deportation? Yes No

F. Military Service.

- 29. Have you ever served in the U.S. Armed Forces? Yes No
- 30. Have you ever left the United States to avoid being drafted into the U.S. Armed Forces? Yes No
- 31. Have you ever applied for any kind of exemption from military service in the U.S. Armed Forces? Yes No
- 32. Have you ever deserted from the U.S. Armed Forces? Yes No

G. Selective Service Registration.

- 33. Are you a male who lived in the United States at any time between your 18th and 26th birthdays in any status except as a lawful nonimmigrant? Yes No

If you answered "NO," go on to question 34.

If you answered "YES," provide the information below.

If you answered "YES," but you did not register with the Selective Service System and are still under 26 years of age, you must register before you apply for naturalization, so that you can complete the information below:

Date Registered (mm/dd/yyyy)

Selective Service Number

If you answered "YES," but you did not register with the Selective Service and you are now 26 years old or older, attach a statement explaining why you did not register.

H. Oath Requirements. (See Part 14 for the text of the oath)

Answer Questions 34 through 39. If you answer "No" to any of these questions, attach (1) your written explanation why the answer was "No" and (2) any additional information or documentation that helps to explain your answer.

- 34. Do you support the Constitution and form of government of the United States? Yes No
- 35. Do you understand the full Oath of Allegiance to the United States? Yes No
- 36. Are you willing to take the full Oath of Allegiance to the United States? Yes No
- 37. If the law requires it, are you willing to bear arms on behalf of the United States? Yes No
- 38. If the law requires it, are you willing to perform noncombatant services in the U.S. Armed Forces? Yes No
- 39. If the law requires it, are you willing to perform work of national importance under civilian direction? Yes No

20120503-35-410 2301 N28 010049 21 4322787 982912 2251 082912 N400CTU-660066

Part 11. Your Signature

Write your USCIS A-Number here:

A [REDACTED]-994

I certify, under penalty of perjury under the laws of the United States of America, that this application, and the evidence submitted with it, are all true and correct. I authorize the release of any information that the USCIS needs to determine my eligibility for naturalization.

Your Signature

Date (mm/dd/yyyy)

Hassan Sherjil Khan

08.27.12

Part 12. Signature of Person Who Prepared This Application for You (If applicable)

I declare under penalty of perjury that I prepared this application at the request of the above person. The answers provided are based on information of which I have personal knowledge and/or were provided to me by the above named person in response to the exact questions contained on this form.

Preparer's Printed Name

Preparer's Signature

[REDACTED]

[REDACTED]

Date (mm/dd/yyyy)

Preparer's Firm or Organization Name (If applicable)

Preparer's Daytime Phone Number

[REDACTED]

[REDACTED]

[REDACTED]

Preparer's Address - Street Number and Name

City

State

Zip Code

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

NOTE: Do not complete Parts 13 and 14 until a USCIS Officer instructs you to do so.

Part 13. Signature at Interview

I swear (affirm) and certify under penalty of perjury under the laws of the United States of America that I know that the contents of this application for naturalization subscribed by me, including corrections numbered 1 through 5 and the evidence submitted by me numbered pages 1 through 0, are true and correct to the best of my knowledge and belief.

Subscribed to and sworn to (affirmed) before me

Panetta

4/18/2013

Officer's Printed Name or Stamp

Date (mm/dd/yyyy)

Complete Signature of Applicant

Officer's Signature

Hassan Sherjil Khan

Dani Panetta

Part 14. Oath of Allegiance

If your application is approved, you will be scheduled for a public oath ceremony at which time you will be required to take the following Oath of Allegiance immediately prior to becoming a naturalized citizen. By signing, you acknowledge your willingness and ability to take this oath:

I hereby declare, on oath, that I absolutely and entirely renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state, or sovereignty, of whom or which I have heretofore been a subject or citizen;

that I will support and defend the Constitution and laws of the United States of America against all enemies, foreign and domestic;

that I will bear true faith and allegiance to the same;

that I will bear arms on behalf of the United States when required by the law;

that I will perform noncombatant service in the Armed Forces of the United States when required by the law;

that I will perform work of national importance under civilian direction when required by the law; and

that I take this obligation freely, without any mental reservation or purpose of evasion, so help me God.

Printed Name of Applicant

Complete Signature of Applicant

HASSAN SHERJIL KHAN

Hassan Sherjil Khan

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

- against -

HASSAN SHERJIL KHAN,

Defendant.

**COMPLAINT TO REVOKE
NATURALIZATION**

EXHIBIT F

THE UNITED STATES OF AMERICA



No. 35866328

DEPARTMENT OF

NATURALIZATION

Personal description of holder as of date of naturalization:

USCIS Registration No. A [redacted] 994

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

Date of birth: [redacted] 1987

Sex: MALE

(Complete and true signature of holder)

Height: [redacted] feet [redacted] inches

Be it known that, pursuant to an application filed with the Secretary of Homeland Security

Marital status: SINGLE

Country of former nationality: CANADA

at: NEW YORK, NEW YORK

The Secretary having found that:

HASSAN SHERJIL KHAN

residing at: YONKERS, NEW YORK



having complied in all respects with all of the applicable provisions of the naturalization laws of the United States, being entitled to be admitted as a citizen of the United States, and having taken the oath of allegiance at a ceremony conducted by

US DISTRICT COURT SOUTHERN DISTRICT

at: NEW YORK, NEW YORK

on: MAY 17, 2013

such person is admitted as a citizen of the United States of America.

Alfonso N. Macpherson, Director
U. S. Citizenship and Immigration Services