

# Exhibit A

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Eso RAZIC,  
([REDACTED] 061)

- c. On his refugee admission application, Sworn Statement of Refugee Applying for Entry into the United States, when asked whether he ever procured or attempted to procure a visa by fraud or misrepresentation he answered “no”.
- d. In his Registration for Classification as a Refugee, RAZIC claims he was in a detention camp in Dretelj, Bosnia Herzegovina.
- e. In his Registration for Classification as a Refugee, he claims he was a member of the former Yugoslavian military service as a private from May 1985 until May 1986.
- f. In his Registration for Classification as a Refugee, when asked to the names of “political, professional or social organizations” of which he has been a member of since his sixteenth birthday, he wrote, “none”.

IV. On February 22, 2001, his application to Register Permanent Residence or Adjust Status was granted.

- a. The I-485 application to Register Permanent Residence or Adjust Status was filed on August 2, 1999.
- b. When asked in Part 3, Section C, page 2 to list his “present and past membership in or affiliation with every political organization, association, fund, foundation, party, club, society, or similar group in the United States or in any other place since your 16<sup>th</sup> birthday..includ[ing] foreign military service”, he wrote, “none”.
- c. When asked in Part 3 question 1 whether “in or outside the U.S. [he] knowingly committed any crime of moral turpitude or a drug-related offense for which [he] was not arrested”, RAZIC answered “no”.

- d. When asked in Part 3 question 4 whether he ever “engaged in, conspired to engage in, or [intend] to engage in or [solicit] membership or funds for, . . . or assisted or provided any type of material support to, any person or organization that has ever engaged or conspired to engage in, sabotage, kidnapping, political assassination, hijacking, or any other form of terrorist activity”, RAZIC answered, “no”.
  - e. When asked in Part 3, question 8 whether he has ever “engaged in genocide, or otherwise ordered, incited, assisted or otherwise participated in the killing of any person because of race, religion, nationality, ethnic origin, or political opinion”, RAZIC answered, “no”.
  - f. RAZIC signed the application subject to penalty of perjury for false information.
  - g. Based on this application, RAZIC became a Lawful Permanent Resident on February 22, 2001 retroactive to his date of refugee admission.
- V. On March 26, 2004, RAZIC was sworn as a United States citizen in Davenport, Iowa.
- a. On May 2, 2003, RAZIC filed Form N-400, Application for Naturalization, with United States Citizenship and Immigration Services (USCIS).
  - b. When asked in the N-400, Part 10, Section B. Affiliations, question 11, whether he has “ever persecuted (either directly or indirectly) any person because of race, religion, national origin, membership in a particular social group, or political opinion, RAZIC answered, “no”.
  - c. When asked in the N-400, Part 10, Section D, Good Moral Character, question 15 if he has “ever committed a crime or offense for which you were not arrested”, he answered “no”.

- d. When asked in the N-400 question 23 if he has “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”, he answered “no”.
- e. When asked in the N-400 question 24 if he has “ever lied to any U.S. government official to gain entry or admission into the United States”, he answered “no”.
- f. RAZIC completed and signed his application on April 30, 2003.
- g. He ratified his answers at his naturalization interview on January 12, 2004, and made no changes to the application.

VI. Eso RAZIC is subject to denaturalization because he illegally procured his status as a Lawful Permanent Resident so he was ineligible for naturalization.

- a. RAZIC was ineligible when he became a Lawful Permanent Resident because he misrepresented a material fact on his refugee application.
- b. This misrepresentation continued through to his naturalization application.
- c. A report from the Republic of Serbia Office of the War Crimes Prosecutor identifies Eso Razic as also being called Esad Razic.
- d. A document certified as coming from the archives of the Army of the Federation of Bosnia and Herzegovina shows a payroll report from the First Battalion Support Platoon which shows he worked as a “soldier” for twenty two days in November of 1992 and was paid for his work.
- e. A document certified as coming from the archives of the Army of the Federation of Bosnia and Herzegovina shows he worked for an unidentified military unit translated as the Independent Commando Company in December 1992 and was paid for his service.

- f. A document from the Croatian Republic of Herzeg-Bosnia Ministry of Defense Security and Information Service dated October 14, 1993 details an event that occurred on October 2, 1993. On October 2, 1993, RAZIC and fellow brigade scouts killed two Hrvatsko Vijece Obrane (HVO), Croation Defense Council members and captured another named, Nedjeljko Pehar. According to the document, RAZIC was likely involved in the killing of Martin Markovic and Ivica Bunoza. Additionally, RAZIC used prepared wire to tie the hands of Robert Rebac, commander of the brigade scout platoon.
- g. A document from the Republic of Bosnia and Herzegovina Supreme Command Staff of Armed Forces Security Directorate dated October 9, 1993 indicates RAZIC surrendered with a group of fellow Hrvatsko Vijece Obrane (HVO) members from Capljina. According to the document, on October 2 (1993) the group turned over ten automatic rifles, two bazookas and three pistols. The document also noted the group captured and delivered Pehar Nedeljko, deputy commander of military intelligence.
- h. As RAZIC's Application for Lawful Permanent Residency states he was never in any military organization, he lied on his application which later allowed him to naturalize.
- i. The aforementioned reports from Bosnia conservatively indicate RAZIC was a member of the HVO or other militia in and around Capljina from approximately November of 1992 until October of 1993.

VII. RAZIC's failure to mention his military service combined with the activities and human rights abuses present in this area could have been a bar to admission and definitely would

have gone to the discretion he would have received when considering his refugee admission and admission as a Lawful Permanent Resident.

- a. RAZIC was also ineligible for Lawful Permanent Resident status due to his membership in a paramilitary group he failed to disclose.
- b. He was also ineligible for Lawful Permanent Resident status as he committed a crime involving moral turpitude for which he was not arrested, thus he was inadmissible.
- c. A witness statement from Stefa Misita identifies RAZIC as being present on or around June 8, 1992 near Tasovcici, Capljina County. Her husband, a wounded Serb member of a Serbian paramilitary group named Milan Misita was discovered and Razic, along with other members of his Croatia Defense Forces unit arrived and transported him. However, prior to arriving at a detention center Misita was placed by some trees next to the electrical substation and shot with an entire magazine of bullets. She heard a rumor that after he was killed both of his ears were cut off.
- d. A Republica Srpska document addressed to the Bosnia and Herzegovina Prosecutor's office in Sarajevo dated November 10, 2005 indicates that there is a reasonable suspicion that in the period from the beginning of April 1992 through the end of 1992, Razic is suspected of committing the criminal act of illegal detention of individuals of Serbian nationality and looting of their property.

- e. The war crimes allegedly committed by RAZIC are clearly crimes involving moral turpitude that would have barred him from admission as a refugee making him ineligible for citizenship.
- f. The war crimes would also have barred him from Lawful Permanent Resident status making him ineligible for United States citizenship.

VIII. Eso RAZIC is subject to denaturalization because he willfully misrepresented a material fact.

- a. RAZIC has been identified as a member of the military in Bosnia and as a member of a paramilitary group HVO during his time in Capljina.
- b. In spite of the notice on the application for Lawful Permanent Residency (under penalty of perjury), RAZIC states he was never a member of the military anywhere in the world.
- c. This is a willful misrepresentation which would have solicited further questions from the adjudicator and could, based on his activities been a bar to admissibility.
- d. RAZIC willfully failed to detail his activities in the Bosnian Army and the HVO.
- e. Clearly, the crimes he is alleged to have committed including being involved in the murder of a Serbian paramilitary member soldier are material misrepresentations of a material fact.

IX. Eso RAZIC is subject to denaturalization because he concealed a material fact by willful misrepresentation.

- a. RAZIC's failure to list his military memberships during a civil war filled with gross human rights abuses is concealment of a material fact throughout his immigration process.

b. RAZIC's failure to indicate his activities in the groups concealed a material fact.

c. In the alternative, his failure to list the crime he committed could have led to a discretionary denial of his status.

X. Based on the above-described facts, I believe good cause exists to institute proceedings pursuant to Immigration and Nationality Act Section 340(a), (Title 8, United States Code Section 1451) to revoke Eso RAZIC's citizenship, and cancel his Certificate of Naturalization.


XI. RAZIC' last known address is:

  
Asbury, IA 52002

DECLARATION IN LIEU OF JURAT  
(28 U.S.C. § 1746)

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on 12/5/17 at ARLINGTON, VA.

  
Daniel Tigges  
Special Agent  
Homeland Security Investigations  
Department of Homeland Security  
Immigration and Customs Enforcement