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 15 **UNITED STATES DISTRICT COURT**
 16 **CENTRAL DISTRICT OF CALIFORNIA**
 17 **WESTERN DIVISION**

18)	
19)	
20)	CASE NO. 2:16-cv-08416-BRO-MRW
21)	CONSENT JUDGMENT FOR
22)	DENIAL OF NATURALIZATION
23)	
24)	
25)	Hon. Beverly Reid O'Connell
26)	
27)	

19 Pauline Antoine El Deeb,
 20 Plaintiff,
 21 v.
 22
 23 Susan Curda, Director of Los
 24 Angeles District Office, U.S.
 25 Citizenship and Immigration
 Services,
 26
 27 Defendant.

1 Plaintiff Pauline Antoine El Deeb (“Plaintiff”) and Defendant Susan Curda,
2 Director, Los Angeles District Office, United States Citizenship and Immigration
3 Services (“USCIS”) (together, the “Parties”) accept as true the allegations
4 contained in USCIS’s April 20, 2016, decision (“USCIS’s Decision”) denying El
5 Deeb’s Form N-400, Application for Naturalization. The parties accordingly have
6 entered into a Settlement Agreement (“Agreement”) that resolves this matter. *See*
7 Ex. A – Settlement Agreement. Based on this Agreement, and because there is no
8 genuine issue as to any material fact, the Parties:
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- 12 (i) consent to an Order (“Order”) that denies El Deeb’s application for
13 naturalization under 8 U.S.C. § 1427(a)(1) and (a)(3), and 8 U.S.C.
14 § 1429 [Immigration and Nationality Act (“INA”) sections 316(a)(1)
15 and (a) (3) and 318], based on lack of lawful admission and lack of
16 good moral character;
17
 - 18 (ii) consent to the issuance of a Notice to Appear for Ms. El Deeb under
19 8 U.S.C. § 1182(a)(6)(c)(i) [INA section 212(a)(6)(c)(i)], for fraud
20 and willful misrepresentation, thereby initiating proceedings to
21 remove Ms. El Deeb from the United States.
22
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25 Upon entry of this consent judgment, USCIS will execute a Notice to
26 Appear to be filed by the Department of Homeland Security (“DHS”) with the
27 Executive Office for Immigration Review, by which El Deeb stipulates to the
28

1 charges presented against her in the Notice to Appear: 8 U.S.C. § 1227(a)(1)(A)
2 [INA § 237(a)(1)(A)] and 8 U.S.C. § 1182(a)(6)(C)(i) [INA 212(a)(6)(C)(i)]; *i.e.*,
3 that Ms. El Deeb was inadmissible when she obtained her conditional Lawful
4 Permanent Resident status and at the time the conditions were removed because
5 she sought to procure, and/or had procured, a visa or other immigration benefit by
6 fraud or by willfully misrepresenting material facts.
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9 El Deeb retains the right to an immigration hearing before an immigration
10 judge, and retains any right she might otherwise have to apply for asylum,
11 withholding of removal, protection under the Convention Against Torture, and/or
12 any other form of relief from removal, which the immigration judge may grant or
13 deny in accordance with the applicable provisions of the Immigration and
14 Nationality Act. El Deeb agrees to provide notice to the DHS of any change of
15 address within five (5) business days and understands that she may be required to
16 report to the DHS periodically, or may be visited by DHS periodically, during any
17 period in which she is not detained.
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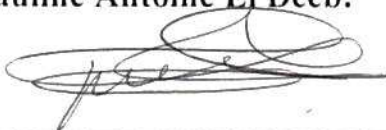
22 El Deeb is represented by legal counsel in this case who has explained her
23 rights and responsibilities to her as contained in this consent judgment. El Deeb
24 agrees to the denial of her United States citizenship freely, knowingly, voluntarily,
25 without duress or compulsion of any kind from USCIS or any other individual or
26 entity, and with full knowledge of the consequences.
27
28

1 The Parties waive all rights to seek judicial review or otherwise contest the
2 validity of the Order, and El Deeb waives any right that may arise under the Equal
3 Access to Justice Act, 28 U.S.C. § 2412. Each Party will bear its own costs and
4 fees incurred in this action.
5

6 The Parties agree that the Court shall retain jurisdiction of this matter for
7 purposes of construction, modification, and enforcement of the Order.
8

9 Dated: ^{August} ~~July~~ 3, 2017

10
11 **FOR Pauline Antoine El Deeb:**

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14 PAULINE ANTOINE EL DEEB
Plaintiff

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26 **SO ORDERED:**

27 August 22, 2017

28 
HONORABLE BEVERLY REID O'CONNELL
UNITED STATES DISTRICT JUDGE

