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FALSE CLAIMS TO U.S. CITIZENSHIP: CONSEQUENCES AND POSSIBLE DEFENSES[1]

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(I) INTRODUCTION

This Practice Advisory provides an overview of the false claim to U.S. citizenship inadmissibility and deportability grounds, and analyzes the consequences of a finding that an individual has made a false claim to U.S. citizenship. It also sets forth potential arguments to overcome this ground.

A false claim to U.S. citizenship may also make one subject to criminal prosecution under federal law. *See, e.g.* 18 U.S.C. § 911; 8 U.S.C. §§ 1541-46. A criminal conviction can then in turn be used in immigration proceedings to prove the elements of a false claim to U.S. citizenship removability ground. It may also constitute a crime involving moral turpitude. *See e.g. Matter of Pinzon*, 26 I&N Dec. 189 (BIA 2013). Criminal defense lawyers should advise their clients of the possible immigration consequences of criminal convictions. *Padilla v. Kentucky*, 559 U.S. 356 (2010).

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(II) RELEVANT STATUTORY SECTIONS

Making a false claim to U.S. citizenship is both a ground of inadmissibility and deportability under § 212(a)(6)(C)(ii) and § 237(a)(3)(D) of Immigration and Nationality Act ("INA"). The statutory provisions are nearly identical.

> *Any alien who falsely represents, or has falsely represented, himself or herself to be a citizen of the United States for any purpose or benefit under this Act (including section 274A)*[3] *or any other Federal or State law is inadmissible [deportable].*

TIP: Practitioners should carefully interview their clients in such a way as to elicit information regarding possible false claims to U.S. citizenship. Though one can imagine countless scenarios, the following are common situations that may lead to a charge of inadmissibility or deportability for having made a false claim to U.S. citizenship:

- Oral statements, including testimony;
- Employment related: checking "U.S. citizen" on Form I-9,[4] Employment Eligibility Verification,[5] or using a social security number or other identification belonging to a U.S. citizen for purposes of obtaining employment;
- Application for a driver's license;
- Mortgage or loan applications;
- College application and student loans;
- Voter registration and voting;[6]
- Application for a U.S. passport;
- Immigration inspection and immigration applications;
- Application for government benefits or licenses.

[3] Section 274A of the INA refers to the unlawful employment of noncitizens.

[4] Prior versions of Form I-9 allowed the individual to check off "national or citizen" of the United States. Several circuits held that in such instances, no categorical false claim to U.S. citizenship had been made because it was unclear whether the individual was claiming to be a citizen or a U.S. national. In such cases, whether the charge was upheld depended on where the burden of proof rested. *See, e.g. Crocock v. Holder*, 670 F.3d 400, 403 (2d Cir. 2012) (respondent did not meet his burden of proving admissibility because he could not show he claimed to be a national and not a citizen), *Theodros v. Gonzales*, 490 F.3d 396, 401 n.7 (5th Cir. 2007) (government met its burden of proof using testimony from defendant); *Kirong v. Mukasey*, 529 F.3d 800, 802-03 (8th Cir. 2008) (government failed to sustain its burden of deportability although petitioner could not establish admissibility); *McLeod v. U.S. Attorney General*, 536 Fed. Appx. 919 (11th Cir. 2013) (same).

[5] In *Matter of Betts* the BIA held that Form I-9 is admissible to support charges of removability and to determine eligibility for relief. 26 I&N Dec. 437 (BIA 2014). Practitioners should nonetheless consider preserving the argument that Form I-9 cannot be used to establish a charge of removability based on the Supreme Court's decision in *Chamber of Commerce of the United States v. Whiting*, 131 S. Ct. 1968 (2011), in which the Court stated, "The form I-9 itself 'and any information contained in or appended to [it] … may not be used for purposes other than for enforcement of' IRCA and other specified provisions of federal law. [8 U.S.C.] § 1324a(b)(5)." This language clearly interprets the statutory phrase "purposes other than for enforcement of this Act" to mean only the Immigration Reform and Control Act of 1986, Pub. L. No. 99-603, 100 Stat. 3359 ("IRCA"), and not the entire INA. The Eighth Circuit is the only circuit to date to consider and reject this argument. *Downs v. Holder*, 758 F.3d 994 (8th Cir. 2014) (holding that "this chapter" refers to the INA).

[6] Unlawful voting is a separate ground of inadmissibility and deportability. INA §§ 212(a)(10)(D); 237(a)(6).

The language of the statute provides an **exception** for individuals who reasonably believed that they were a U.S. citizen. But this is only if each parent (natural or adoptive) "is or was a citizen (whether by birth or naturalization)" and the individual "permanently resided in the United States prior to attaining the age of 16." INA §§ 212(a)(6)(C)(ii)(II); 237(a)(3)(D)(ii). This narrow exception arises infrequently and will not be discussed further in this advisory.

Unlike fraud and misrepresentation under INA § 212(a)(6)(C)(i), false claims to U.S. citizenship need not be made before a U.S. government official (*compare* AFM 40.6(c)(1)(B)(iv) *with* AFM 40.6(c)(2)(C)(ii)), and are not limited to claims made for immigration benefits (*compare* AFM 40.6(c)(1)(A)(vi) *with* AFM 40.6(c)(2)(B)(iii)).

Even if the facts do not reveal a "false claim to U.S. citizenship," a misrepresentation may nonetheless be deemed to be a ground of inadmissibility as a material misrepresentation under § 212(a)(6)(C)(i). The misrepresentation and false claim to U.S. citizenship grounds of inadmissibility can overlap. However, they have several distinct elements. A waiver for fraud or misrepresentation is available under INA § 212(i) if the individual can show extreme hardship to a U.S. citizen or lawful permanent resident (LPR) spouse or parent.

(III) ARGUMENTS TO DEFEAT A CHARGE OF FALSE CLAIM TO U.S. CITIZENSHIP

a. Waiver of inadmissibility available for claims made prior to Sept. 30, 1996

The separate ground of inadmissibility and deportability based on false claims to U.S. citizenship was added by section 344 of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Division C of Pub. L. No. 104-208, 110 Stat. 3009-546 ("IIRIRA"). It thus only applies to false claims made on or after September 30, 1996. False claims to U.S. citizenship made before September 30, 1996 may still render one inadmissible pursuant to § 212(a)(6)(C)(i) as fraud or misrepresentation if made to a U.S. government official to obtain a benefit under the INA. A waiver of inadmissibility for this ground is available in limited circumstances under INA § 212(i) if the individual can show extreme hardship to a U.S. citizen or LPR spouse or parent.

b. The claim was in good faith or not made "knowingly"

The statute states that the individual must "falsely represent" him or herself to be a U.S. citizen. The Foreign Affairs Manual ("FAM")[7] and the Adjudicator's Field Manual ("AFM"),[8] which provide guidance to the Department of State and U.S. Citizenship and Immigration Services ("USCIS") respectively, state that the false claim to U.S. citizenship must have been "knowingly false" (9 FAM 40.63 N11(b)(1)). This means that the individual making the claim "must have known that he or she was not a U.S. citizen" (AFM 40.6(c)(2)(B)(i)).[9]

[7] The U.S. Department of State Foreign Affairs Manual Volume 9 Visas 40.63 N11(b)(1). ("FAM")
[8] The USCIS Adjudicator's Field Manual Ch. 40.6(c)(2)(B). ("AFM")
[9] This 2013 addition to the FAM was based on an opinion issued by the Department of Homeland Security's Office of the General Counsel ("DHS") in 2012. *See* Letter from Brian de Vallance, Acting Assistant Secretary for Legislative Affairs, U.S. Department of Homeland Security, to Harry Reid, Majority Leader, U.S. Senate (Sept. 12,

Individuals may have an affirmative defense that the claim was not knowingly false if they believed they were U.S. citizens. The AFM further states that such belief must be "reasonable." AFM Ch. 40.6(c)(2)(B).[10] When seeking admission or adjustment of status, the individual has the burden of proving clearly and without doubt that at the time of making the false claim, the individual thought he or she was a U.S. citizen. FAM 40.63 N11(b)(1) and AFM 40.6(c)(2)(B). In the context of deportability, the government bears the burden to prove by clear and convincing evidence that the individual is deportable. *See* 8 C.F.R. § 1240.8(a). In such cases, practitioners should argue that burden includes proving that the individual knew he or she was making a claim of citizenship *and* knew that the claim was false.

While neither an applicable conviction nor civil penalty is necessary to find an individual inadmissible or deportable for falsely claiming U.S. citizenship, they may be sufficient to show that the individual "knowingly" made a false claim to U.S. citizenship. AFM 40.6(c)(2)(C)(iv)-(v); *Barcenas-Barrera*, 394 Fed. Appx. 100 (5th Cir. 2010) (court did not reach issue of whether intent is required but held that a conviction under 18 U.S.C. § 1542 which included an element of intent was sufficient to sustain removability, where the Board of Immigration Appeals ("BIA") had also previously found petitioner's claim to be "willful," *Matter of Barcenas-Barrera*, 25 I&N Dec. 40 (BIA 2009)). Conversely, the absence of a criminal conviction will not mean that the ground of inadmissibility or deportability will not be found to be applicable. *See, e.g.* Raymond Dakura, A087 673 826, 2013 WL 5872085 (BIA September 13, 2013) (individual failed to carry burden of establishing admissibility even though criminal charges related to false claim to U.S. citizenship had been dropped due to lack of evidence).

A Note on False Claims by Minors

In 2013, the FAM explicitly articulated an additional affirmative defense for children under the age of 18 who "lacked the capacity (i.e., the maturity and the judgment) to understand and appreciate the nature and consequences of a false claim to citizenship." FAM 40.63 N11(b)(2) This change was made based on Department of Homeland Security's Office of General Counsel's 2012 opinion[11] and after the decision in *Sandoval v. Holder*, 641 F.3d 982 (8th Cir. 2011), in which the court remanded the case to the BIA for consideration of whether a child's maturity should be a factor in assessing a false claim to citizenship.[12]

2013) (AILA InfoNet Doc. No. 13092060). Before the 2012 DHS opinion, the BIA was inconsistent in unpublished opinions on the issue of whether intent was required. *See e.g.* Alma Delia Contreras, A079 805 353, 2005 WL 952460 (BIA April 14, 2005) (emphatically declaring that a false claim must be made knowingly and providing historical context to support its holding); Ahed Salam Shibi, A076 296 316, 2008 WL 5025279 (BIA October 29, 2008) (intent is not a requirement)

[10] *But see Richmond v. Holder*, 714 F.3d 725, 729 (2d Cir. 2013) (raising the issue of whether belief must be objectively reasonable but not deciding).

[11] *Supra*, n. 7.

[12] Note that even though the AFM has a "knowingly" requirement, the defense for minors was not specifically added. The AFM refers only to the much narrower statutory exception for children who believe themselves to be U.S. citizens.

c. Claim was not made for a "purpose or benefit" under the INA or other Federal or State law

A false claim to U.S. citizenship must have been made for a "purpose or benefit" under the INA or any other federal or state law. §§ 212(a)(6)(C)(ii); 237(a)(3)(D)(ii). The exact scope of "purpose or benefit" has not been defined by any BIA published decision. In fact, some circuit courts have identified ambiguities and have called on the BIA to define the scope of this language. *Richmond v. Holder*, 714 F.3d 725 (2d Cir. 2013) (remanded for clarification); *Hassan v. Holder*, 604 F.3d 915 (6th Cir. 2010) (identified ambiguity but did not reach issue).

- ***What is a "benefit"?***

As mentioned earlier, the scope of "purpose or benefit" under this section is broader than the fraud and misrepresentation ground, which refers to an "immigration benefit" under the INA. § 212(a)(6)(C)(i). However, "the statutory language cannot be read so broadly that it fails to exclude anything." *Richmond*, 714 F.3d at 729.

Some benefits have been clearly identified. For example, the statute specifically refers to § 274A, which relates to alien employment, as a benefit. Therefore, a false claim to U.S. citizenship made for purposes of obtaining employment would very likely fall within the scope of the statute. *Theodros v. Gonzales*, 490 F.3d 396, 402 (5th Cir. 2007). Obtaining entry into the U.S. has also been deemed a benefit under this section. *Jamieson v. Gonzales*, 424 F.3d 765, 768 (8th Cir. 2005). Similarly, obtaining a U.S. passport has been deemed a benefit, as it provides the holder with potential employment and entry into the U.S. *Barcenas-Barrera*, 25 I&N Dec.at 44; *Sowah v.Gonzales*, 196 F. App'x 576, 577 (9th Cir. 2006).

Practitioners should consider arguing, where appropriate, that a claim to U.S. citizenship does not render the individual inadmissible or deportable where the potential benefit is not a likely direct result of the false claim. For example, in *Castro v. Attorney General of the United States*, 671 F.3d 356 (3d Cir. 2012), the Third Circuit held that a false claim to U.S. citizenship made to a police officer in the course of an arrest did not render the individual inadmissible because the potential benefit of avoiding deportation was not sufficiently linked to the claim, especially where the police stipulated that they would not have changed their actions based on the individual's citizenship status. The court further commented that a broader interpretation would essentially read the "purpose or benefit" language out of the statute. *Id*. at 368.

Further, practitioners should consider arguing that avoidance of a negative consequence should not be considered a "benefit." *See, e.g. Richmond*, 714 F.3d at 730 (identifying this issue among others and remanding to the BIA to determine in the first instance what constitutes a "purpose or benefit.") For example, one can argue that while receiving entry into the U.S. is a "benefit," avoiding being placed into deportation proceeding is not a "benefit." *Id.*

- ***Does "purpose or benefit" require the individual's subjective intent, availability of an actual benefit, or both?***

Neither the BIA nor agency guidance have been clear about whether the "purpose or benefit" language requires the individual making the claim to have an intent to obtain a benefit (whether real or imagined), whether an actual benefit could have been gained through the false claim, or whether both must be present. The AFM defines "purpose or benefit" by stating that "[a]n alien is inadmissible pursuant to section 212(a)(6)(C)(ii) of the Act, if he or she falsely claims U.S. citizenship *in connection with* obtaining any benefit under any federal or state law…." AFM 40.6.2 (c)(2)(B)(iii) (emphasis added). This language implies that the claim would have actually rendered the individual eligible for a benefit, and it does not speak directly to the individual's subjective purpose or intent. Due to the lack of clear guidance or agency precedent, the circuit courts remain puzzled. *See, e.g. Hassan*, 604 F.3d at 928-29 (identifying both subjective intent and an actual benefit as possible elements of "purpose or benefit" but concluding that the government had failed to meet its burden of proof to show deportability by not offering any evidence or argument with regard to either); *Richmond*, 714 F.3d at 730 (articulating possible interpretation of "purpose or benefit" as requiring both subjective intent and an actual benefit and stating that in such an instance "aliens would trigger the admissibility bar only if they lied about citizenship with the *reasonable intention* of achieving some purpose or benefit under state or federal law" but remanding to the BIA for clarification of the meaning of the phrase).

Practitioners should argue, whenever applicable and appropriate, that the "purpose or benefit" element of the false claim to U.S. citizenship removability ground is not satisfied unless the individual subjectively intends to obtain a benefit *and* the claim could in fact lead to a benefit.

d. Claim was made by someone else

The statute states clearly that the individual must have represented "himself or herself" as a citizen. Therefore, claims made by a third party on one's behalf should not give rise to a charge of having made a false claim to U.S. citizenship. §§ 212(a)(6)(C)(ii); 237(a)(3)(D).

However, even where the claim was made by a third person, an individual who was aware of and was an active participant in the claim, may be deemed to have made a false claim to U.S. citizenship where all the other elements are present. For example, in an unpublished decision, the BIA concluded that where an individual who does not speak English has her photo taken, observes the creation of a false identification card, is present while a third party fills out an employment verification form using a U.S. birth certificate, and uses the false documents, the individual has made a false claim to U.S. citizenship. Rut Betania Castillo de Figueroa, A095 982 111 (BIA Dec. 11, 2013).

e. Timely Retraction

The doctrine of timely retraction – also referred to as timely recantation – generally holds that a statement will not be held against the person where the person corrects him or herself

voluntarily and in a timely fashion. *Matter of Namio*, 14 I&N Dec. 412 (BIA 1973); *Matter of M-*, 9 I& N Dec. 118 (BIA 1960). Agency guidance and case law have considered what is deemed voluntary and timely and when this defense will be effective. *Id*.; AFM 40.6.2(c)(2)(B)(vii). The standard for timely retraction is the same for fraud and misrepresentation under § 212(a)(6)(C)(i) and false representation of U.S. citizenship under § 212(a)(6)(C)(ii).[13]

Published BIA decisions on the issue of timely retraction have focused on whether it can restore "good moral character" as defined in INA § 101(f) (see text box below on good moral character). *Namio*, 14 I&N Dec. 412; *M-*, 9 I& N Dec.118. Nonetheless, agency guidance and circuit court decisions on timely retraction as a remedy to a false claim to U.S. citizenship have cited these BIA decisions as a basis for evaluating when a timely retraction is effective. AFM 40.6.2(c)(2)(B)(vii); *Valadez-Munoz v. Holder*, 623 F.3d 1304, 1310 (9th Cir. 2010)

The determination of whether a retraction was voluntary and timely is fact-based. Generally, a retraction is deemed "voluntary" if it is made before the falsity is exposed. *Valadez-Munoz v. Holder*, 623 F.3d *cert. denied*, 132 S.Ct. 106 (2011). A retraction is "timely" if it was made prior to the conclusion of the proceeding or interview. *Llanos-Senarrilos*, 177 F.2d 164 (9th Cir. 1949). *See also Namio*, 14 I&N Dec. at 414 (retraction a year after false testimony when disclosure of falsity was imminent was neither voluntary nor timely).

(I) RELIEF FROM REMOVAL AVAILABLE DESPITE A FALSE CLAIM TO U.S. CITIZENSHIP

A false claim of U.S. citizenship has been referred to as the "death penalty of immigration" because there is no waiver of inadmissibility and therefore such a finding makes an individual permanently inadmissible. *Munoz-Avila v. Holder*, 716 F.3d 976 (7th Cir. 2013) quoting *Sandoval v. Holder*, 641 F.3d at 984–85. Despite the lack of a waiver of inadmissibility, there are some forms of relief from removal that may be available where the individual has been found to be deportable or inadmissible on this basis.[14] Some forms of relief are not barred specifically for false claim to U.S. citizenship but require a showing of good moral character ("GMC"), which can be affected by a false claim to U.S. citizenship.

A Note on Good Moral Character ("GMC"):

The statute provides both a categorical bar and a "catch-all" provision for "good moral character" ("GMC"). INA § 101(f). The categorical bar describes individuals who are wholly barred from showing GMC. *Id*. The only time that a false claim to U.S. citizenship will result in a categorical bar to GMC is when that false claim is also a false testimony for purposes of obtaining any benefit under the INA. § 101(f)(6). Only oral statements made under oath are

[13] The AFM and the FAM cite the same cases and use identical or near identical language when discussing timely retraction in the context of both fraud/misrepresentation and false claims to U.S. citizenship. AFM 40.6(c)(1)(B)(vii); AFM 40.6(c)(2)(C)(viii); FAM 40.63 N4.6.

[14] Note that the below information may be different or irrelevant if the individual instead (or also) faces a criminal ground of removal based on a conviction related to a false claim to U.S. citizenship. See box on page 1.

testimony. *Kungys v. United States*, 485 U.S. 759 (1988). *See, e.g. Matter of W-J-W-*, 7 I&N Dec. 706 (BIA 1958), Serra-Pascual, A078 741 725, 2006 WL 901480 (BIA February 24, 2006) (unpublished) (false claim to U.S. citizenship and oral oath in connection with passport application found to be false testimony barring GMC under § 101(f)(6)); *Beltran-Resendez v. INS*, 207 F.3d 284 (5th Cir. 2000) (claim to citizenship on I-9 does not fall under GMC bar in § 101(f)(6) because false testimony must be oral).

The doctrine of timely retraction (discussed more fully above) can be used to overcome the categorical bar to establishing GMC. *M-*, 9 I&N Dec.; *Namio*, 14 I&N Dec. However, even if timely retracted, a false claim to U.S. citizenship may still be used to determine that the individual lacks GMC pursuant to the "catch-all" provision of § 101(f).

The "catch-all" provision states that "[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." *Id.* An adjudicator can consider many factors in determining GMC under the "catch-all" provision, including facts that would not categorically bar a finding of GMC such as a false claim to U.S. citizenship. *Matter of Guadarrama*, 24 I&N Dec. 625 (BIA 2008). A finding of lack of GMC is not required even if the individual made a false claim to U.S. citizenship, but the claim may be a factor. *Id.* The statutory exception provides that an adjudicator is precluded from finding of lack of GMC for individuals who make a false claim to U.S. citizenship if they reasonably believed that they were a U.S. citizen and each parent (natural or adoptive) is or was a citizen and the individual permanently resided in the U.S. before turning 16, mirroring the statutory exception in §§ 212(a)(6)(C)(ii) and 237(a)(3)(D).

The authors are not aware of any cases or agency guidance discussing whether timely retraction is simply an equity in the "catch-all" provision or if it precludes a finding of lack of GMC altogether. Petitioners should argue whenever applicable that timely retraction should preclude a finding of lack of GMC on the basis of the false claim.

a. Forms of Relief that Are Not Barred by a False Claim to U.S. Citizenship

Withholding of removal (§ 241(b)(3)) and protection under the Convention Against Torture ("CAT') (8 C.F.R. § 208.16-18) are forms of relief that are not barred by a false claim to U.S. citizenship and do not require a showing of GMC.

Asylum (§ 208(b)(2)), T and U-Visas (§ 212(d)(13)-(14)), and Cancellation of Removal for Lawful Permanent Residents (§ 240A(a)) are also not barred by a false claim to U.S. citizenship and do not require a showing of GMC. However, unlike withholding and CAT, these forms of relief are discretionary and, in deciding whether to grant such discretionary relief, an adjudicator may consider a past false claim to U.S. citizenship.

b. Forms of Relief that May Be Barred by a False Claim to U.S. Citizenship

- *Violence Against Women Act ("VAWA") Self-Petitions*

Though a VAWA self-petition is not itself barred by a false claim to U.S. citizenship, approved petitioners would be permanently barred from adjustment of status on this basis, and no waiver is available. *See* § 245(a)(2). Additionally, VAWA self-petitioners are required to show GMC. §§ 204(a)(1)(A)(iii)(II)(bb); 204(a)(1)(B)(ii)(II)(bb). However, a false claim to U.S. citizenship cannot bar a finding of GMC if the false claim was connected to being battered or subjected to extreme cruelty and a waiver is otherwise warranted. § 204(a)(1)(C).

- *VAWA Cancellation of Removal*

VAWA cancellation of removal is **not barred** if the applicant is **inadmissible** because of a false claim to U.S. citizenship. However, cancellation of removal **is barred** for a VAWA applicant if she is **deportable** for a false claim to U.S. citizenship. § 240A(b)(2)(A)(iv). Additionally, VAWA Cancellation of Removal requires a showing of GMC for three years prior to the final decision on cancellation application. § 240A(b)(2)(A)(iii). Just like VAWA self-petitions, a false claim to U.S. citizenship cannot bar a finding of GMC if the false claim was connected to the battery or the extreme cruelty and a waiver is otherwise warranted. § 240A(b)(2)(C).

- *Cancellation of Removal for Non-Legal Permanent Residents*

Cancellation of Removal for Non-Legal Permanent Residents is not barred by a false claim to U.S. citizenship. However, it requires a showing of GMC for ten years prior to the final decision on the cancellation application. § 240A(b)(1)(B). Furthermore, this form of relief is not available to individuals who (among other things) have "been convicted of an offense under section 212(a)(2)," which includes crimes involving moral turpitude ("CIMT"). § 240A(b)(1)(C). As mentioned briefly in the box on page 1, some criminal convictions relating to false claims to U.S. citizens may be CIMTs.

- *Voluntary Departure at the Conclusion of Proceedings*

Voluntary departure granted by DHS prior to the removal hearing and voluntary departure granted by the Immigration Judge prior to the completion of proceedings are not barred by a false claim to U.S. citizenship and do not require a showing of GMC. § 240B. By contrast, voluntary departure at the conclusion of proceedings requires a showing of GMC for the five years preceding the request. *Id*.

- *Naturalization*

Naturalization is not directly barred by a false claim to U.S. citizenship, but it does require a showing of GMC. § 316(a). While in some cases an individual who has made a false claim to U.S. citizenship may be allowed to naturalize, an individual could also be referred to removal proceedings. This decision is made on a case by case basis, and much may depend on local practices and the individual's equities (how long ago the claim took place, the circumstances, whether it was an ongoing violation, etc.). Therefore, the individual should be informed of the risk before applying for naturalization.