UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA, CRIMINAL NO. 13-20772

Plaintiff, HONORABLE GERSHWIN A. DRAIN

v.

RASMIEH YOUSEF ODEH,

Defendant.

<u>UNITED STATES NOTICE OF INTENT</u> TO REQUEST JUDICIAL ORDER OF REMOVAL

Pursuant to Section 238(c)(2) of the Immigration and Nationality Act of 1952, as amended ("INA"), 8 U.S.C. § 1228(c)(2)(A), the United States intends to seek a judicial order of removal against defendant Rasmieh Yousef Odeh at sentencing. The United States alleges the following Factual Allegations in support of the Judicial Order of Removal:

- 1. Defendant is a native and citizen of Jordan.
- 2. At the time of sentencing in this case, defendant will be convicted of unlawfully procuring naturalization as a United States citizen, in violation of Title 18, United States Code, Section 1425(a), and her United States citizenship will be revoked and her certificate of naturalization canceled pursuant to Section 340(e) of

the INA, 8 U.S.C. § 1451(e).

3. Defendant is subject to removal from the United States as an alien who was inadmissible at time of admission to the United States pursuant to Section 237(A)(1)(A) of the INA, 8 U.S.C. § 1227(a)(1)(A), as an alien described in Section 212(a)(6)(C)(i) of the INA, 8 U.S.C. § Title 8 §1182(a)(6)(C)(i).

Respectfully submitted,

BARBARA L. MCQUADE United States Attorney

s/Jonathan Tukel

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Dated: March 10, 2015

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2015, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to all ECF filers.

s/Jonathan Tukel

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