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Government Investigations & White-Collar Alert

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## DOJ Escalates Civil Denaturalization Enforcement

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The Civil Division of the Department of Justice (the DOJ) has filed a wave of civil actions seeking to revoke citizenship of naturalized individuals in recent months. Naturalized citizens with criminal histories should take notice.



### What's the impact?

- In March and April 2026, the DOJ pursued denaturalization actions to revoke citizenship in cases involving tax fraud, healthcare fraud, immigration fraud, drug trafficking, gun trafficking, extortion, rape, kidnapping, and sexual exploitation of a minor. The DOJ prioritized denaturalization actions in a June 2025 memo directing attorneys to “prioritize and maximally pursue denaturalization proceedings in all cases permitted by law and supported by the evidence.”
- Naturalized citizens with any criminal history, undisclosed conduct, or potential vulnerabilities in their naturalization applications should consult experienced counsel to assess their exposure.

## Recent denaturalization actions

Since January of this year, the Department has pursued denaturalization in several cases.

In April 2026, the DOJ filed a denaturalization action in the United States District Court for the Southern District of New York against a former physician who had been convicted of sex crimes.

In March 2026, the DOJ filed a denaturalization action in the United States District Court for the District of Maryland against a naturalized citizen convicted of organizing an identity theft and tax fraud conspiracy. The DOJ alleged that the defendant's tax fraud scheme committed in the years before and after his naturalization and his concealment of a prior "sham marriage" precluded him from obtaining naturalization lawfully. Previously, in December 2024, the defendant's 15-year sentence for the identity theft and tax fraud case had been commuted.

Also in March 2026, following a two-day trial, the United States District Court for the Northern District of Florida revoked a naturalized citizen's citizenship. The court found that the defendant had concealed his involvement in drug trafficking prior to his naturalization in September 2009.

## What clients should know

Clients facing potential exposure should understand several key features of civil denaturalization proceedings. The government may pursue denaturalization on two grounds: (i) that citizenship was "illegally procured" because the individual did not meet statutory requirements at the time of naturalization (e.g., lacking good moral character due to criminal conduct), or (ii) that citizenship was procured by "concealment of a material fact or by willful misrepresentation." The DOJ may pursue both theories simultaneously.

**Critically, there is no statute of limitations on civil denaturalization actions**, and the government may bring a case years after naturalization. This means that a naturalized citizen who resolved a criminal matter years ago, whether through a plea agreement, cooperation deal, or completed sentence, may still face denaturalization proceedings based on the same underlying conduct. The recent tax fraud case illustrates the point: the defendant's conduct spanned 2012 to 2015, his sentence was commuted in 2024, and the DOJ filed the denaturalization complaint just months later.

## Who is at risk

The breadth of the DOJ's enforcement priority categories means that a wide range of naturalized citizens may face scrutiny. Clients should be alert if any of the following apply:

- / **Financial fraud against the government.** The DOJ's enforcement priorities expressly target individuals who engaged in financial fraud against the United States, including PPP loan fraud and Medicaid/Medicare fraud.

- / **Fraud against private parties.** DOJ guidance separately targets individuals who engaged in fraud against private individuals, funds, or corporations, a category broad enough to likely encompass securities fraud, wire fraud, bank fraud, and similar offenses.
- / **Tax offenses.** Recent filings signal that naturalized citizens convicted of tax crimes, or whose tax conduct predated naturalization, may be subject to DOJ scrutiny.
- / **Undisclosed criminal history.** Any naturalized citizen who failed to disclose arrests, charges, or convictions on their naturalization application is at risk, including for offenses that may bear on good moral character during the statutory period.
- / **Pre-naturalization criminal conduct.** Even where criminal charges were brought after naturalization, the government may seek to prove the underlying conduct predated the naturalization, as it has done successfully in recent cases.

## Bottom line

Naturalized citizens with any criminal history, pending charges, or potential vulnerabilities in their naturalization applications should consult experienced counsel to assess their exposure. Clients who have already resolved criminal matters, including those whose sentences have been served, commuted, or reduced, should be aware that they remain exposed to denaturalization proceedings given the absence of any statute of limitations. Plea agreements, statements of facts, and proffer sessions can generate admissions that the government may later use in denaturalization proceedings, as recent cases have demonstrated. **Corporate clients employing naturalized citizens should also be aware that denaturalization proceedings against an employee could result in loss of work authorization and removal from the United States.**

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