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10 *Attorneys Representing the United States of America*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 KEVIN JESUS KING,  
 aka "Kevin Jesus Lopez Vargas,"  
 aka "Kevin Lopez-Vargas,"  
 17 aka "Kevin Lopez,"  
 aka "Kevin Vagas,"

18 Defendant.

Case No. 3:26-cr-00008-MMD-CSD

**CRIMINAL INDICTMENT**

**VIOLATION:**  
Naturalization Fraud – 18 U.S.C. § 1425(a)

19  
20 THE GRAND JURY CHARGES THAT:

21 **COUNT ONE**  
22 **Naturalization Fraud**  
**(18 U.S.C. § 1425(a))**

23 1. On January 23, 2018, defendant KEVIN JESUS KING submitted an  
24 Application for Naturalization Form N-400 to U.S. Citizenship and Immigration Services

1 (“USCIS”). Question 22 on KING’s Form N-400 asked: “Have you EVER committed,  
2 assisted in committing, or attempted to commit, a crime or offense for which you were  
3 NOT arrested?” In response to Question 22, KING checked a box indicating “No.”

4 2. Question 31 on KING’s Form N-400 asked: “Have you EVER given any  
5 U.S. Government officials any information that was false, fraudulent, or misleading?” In  
6 response, KING checked a box indicating “No.”

7 3. In submitting his application, KING signed and stated: “I certify, under  
8 penalty of perjury, that I provided or authorized all of the information in my application, I  
9 understand all of the information contained in, and submitted with, my application, and  
10 that all of this information is complete, true, and correct.”

11 4. On June 4, 2018, KING appeared before a USCIS officer and was placed  
12 under oath. KING was again asked whether he had ever committed, assisted in  
13 committing, or attempted to commit, a crime or offense for which he was not arrested. In  
14 response, KING stated under oath that he had not. KING then signed an attestation before  
15 the USCIS officer that “I swear (affirm) and certify under penalty of perjury under the laws  
16 of the United States of America that I know the contents of this Form N-400, Application  
17 for Naturalization, subscribed by me, including the corrections displayed above are  
18 complete, true, and correct.”

19 5. On June 15, 2018, KING appeared before the U.S. District Court in the  
20 District of Nevada in Reno, Nevada for a naturalization ceremony. He was sworn in and  
21 became a United States citizen.

22 6. On or about July 25, 2024, KING pled guilty to committing sexual assault, a  
23 Category A felony violation of NRS 200.366.2B on two occasions, once on or about July  
24 25, 2017, and again on or about March 18, 2018. In both instances, KING used threats of

1 physical harm to force the victims to perform oral sex on him. During the July 2017 sexual  
2 assault, KING also forcibly penetrated the victim's vagina against her will with his finger.  
3 During the March 2018 sexual assault, KING also forcibly penetrated the victim's vagina  
4 against her will with both his finger and his penis.


5 7. Between on or about January 23, 2018, and on or about June 15, 2018,  
6 within the State and Federal District of Nevada,

7 KEVIN JESUS KING  
8 aka "Kevin Jesus Lopez Vargas,"  
9 aka "Kevin Lopez Vargas,"  
10 aka "Kevin Lopez,"  
11 aka "Kevin Vagas,"


12 defendant herein, knowingly procured and attempted to procure for himself, contrary to  
13 law, naturalization as a United States citizen, to which he was not entitled, by making  
14 materially false statements under penalty of perjury in connection with his naturalization  
15 application and interview, all in violation of 18 U.S.C. § 1425(a).

16 **DATED** this 25th day of June, 2026.

17 **A TRUE BILL:**

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19 \_\_\_\_\_  
20 FOREPERSON OF THE GRAND JURY

21 TODD BLANCHE  
22 Acting Attorney General

23   
24 \_\_\_\_\_  
RICHARD ANTHONY LOPEZ  
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