# GARDEN STATE GOTTA



## PUBLIC INTEREST

LEGAL FOUNDATION

#### Introduction

Noncitizens are registering to vote across the United States. Some are voting. There are a variety of reasons this is happening, but until the problem is taken seriously, and the defects in the system are examined, the problem of alien voting will continue. This report reveals information obtained about alien registration and voting from election officials in New Jersey. The report documents a subset of alien registration and voting that, as far as we can tell, no one has ever sought to obtain before this report.

New Jersey has statewide elections in 2017. Unfortunately, there is no time to implement solutions. Worse, both federal and state solutions are needed. Federal statutes impose mandates on states regarding voter registration, but those federal laws have proven inadequate to prevent alien registration. States like New Jersey could utilize more tools to detect alien registrations, but are not. Regardless, the first step to fixing the problem is to gather more facts about alien registration.

### Summary of Findings

The Public Interest Legal Foundation (PILF) conducted county-by-county surveys of voter registration records seeking records of aliens who registered to vote and later self-reported their status or were otherwise detected by the minimal procedures in place in New Jersey. The PILF survey revealed startling faults and findings across the Garden State regarding foreigners successfully registering to vote.

In this limited survey, PILF found:

- 616 admitted and officially recorded noncitizens in 11 counties engaged on some level with the statewide voter registration system. These were only the noncitizens who essentially self-reported.
- Nine percent of the aliens who self-reported their alien status also cast ballots. When a noncitizen puts pen to paper on a voter registration application, they open the door to additional scrutiny and worse—should they choose to later become a naturalized citizen.
- New Jersey's voter registration system admitted their immigration status at the outset yet were processed anyway.
- Seventy-five percent of alien voter registration applicants were offered the opportunity to register during Motor Voter transactions. The lifespan of a noncitizen in New Jersey's voter registration system varies between levels of engagement. On average, it takes at least two years for a noncitizen to register, be discovered, and officially be "deleted" from the system. But despite being "deleted," their immigration and naturalization challenges are still ahead of them.

The range of documents recovered vary between counties—even voters—depending on individual circumstances. Unlike PILF's previous work in Virginia<sup>1</sup>, researchers were not given uniform reports of voters cancelled for reasons related to noncitizenship generated from a single database. Instead, PILF accessed handwritten letters, archived voter registration forms, interagency communications, and official mailings within voters' files that lay out individual fact patterns ranging from the initial application to record deletion. Reviewers could regularly discern motives for why an ineligible voter came forward to correct the record. Most often, noncitizens would reveal themselves in advance of or in reaction to their naturalization application being flagged amid the threat of a denial.

Equally surprising as the figures themselves are the starkly different responsive records reportedly maintained by the counties. Six jurisdictions (Hudson, Morris, Sussex, Union, Passaic, Camden) told PILF they had zero records indicating where noncitizens either engaged with or admitted to participating in the statewide voter registration system. Another four counties (Essex, Middlesex, Mercer, and Salem) still have yet to release any records (or declare to have none) since originally requested in March 2017. Failure to release information subjects these counties to a lawsuit by PILF under public records provisions of Motor Voter.

## Broken System: Motor Voter's Victims

News organizations across the spectrum recently made note of the unfortunate case of Margarita Fitzpatrick, a Peruvian national previously living in Illinois with her American husband. In 2005, she visited her local driver's license office—presenting her foreign passport and Green Card to identify herself. As she tells it, despite first documenting that she did not want to register to vote, the DMV clerk offered again in the same transaction—leaving a confused Fitzpatrick to accept and later vote multiple times without incident. Years later, her actions resurfaced when working through the naturalization process, which set her on a track to eventually receive a one-way ticket back to Peru.

In her many media appearances, Fitzpatrick put blame in a variety of places. She said the DMV clerk "misled" her. She said the system failed her: "Noncitizens should not be asked this question — period." Her family attacked the National Voter Registration Act (Motor Voter), as a tool for "entrapment."<sup>2</sup>

Multiple news organizations reported on their failed attempts to better quantify the number of Margarita Fitzpatricks not garnering sympathetic headlines across the nation by requesting access to Department of Homeland Security data. PILF hit the same wall in 2017.<sup>3</sup>

Are there more Margaritas out there? Did they get "trapped" by Motor Voter? Can your naturalization track be derailed even if you do not successfully register and vote? PILF decided to work toward answering these questions in New Jersey in 2017 after finding Virginia had cancelled more than 5,550 registrants for citizenship defects.<sup>4</sup>

New Jersey, like Virginia, will hold statewide elections in November 2017—the only two to do so. With critical races comes pressure to register more voters quickly and move numbers to the polls. Agencies tasked with Motor Voter obligations know their registration rates will be watched closely and will not wish to invite a federal lawsuit for registration rates some special interest groups deem too low. Canvassers will knock on doors for new voters. Campaign ads will flood the airwaves. In the fog of these contests, noncitizens will face confusing invitations and pressure to participate. Nobody knows whether their ballots will help decide close races in November. What is certain is that their legal troubles will follow them for years.

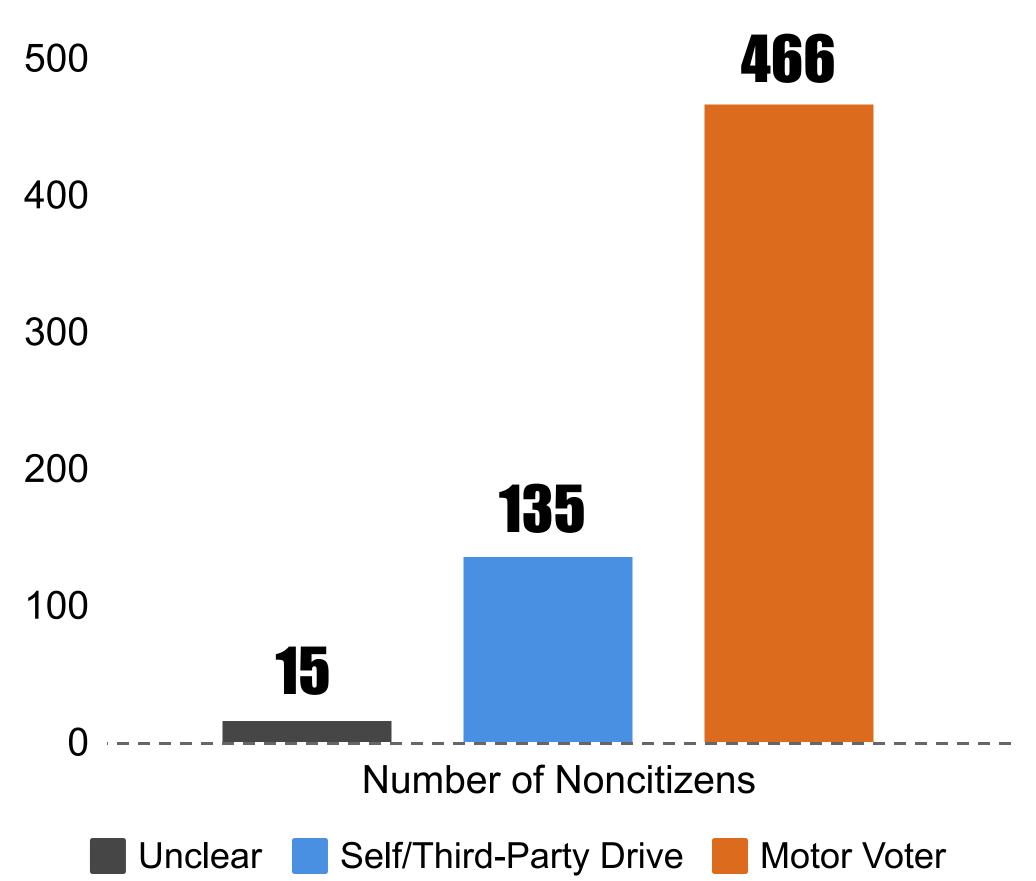
Margarta Fitzpatrick is not alone. PILF found hundreds like her in New Jersey, aliens who have registered to vote in a broken system. In every case, their personal legal jeopardy could have been mitigated with common-sense solutions, and the integrity of our elections would also benefit.

## A Broken System of Patchwork Maintenance

Having now combed through records in New Jersey and Virginia, PILF can declare with great certainty that the two states' approaches for identifying and eventually removing noncitizen voters have few commonalties between them. Whereas Virginia maintains some lines of communication between the motor vehicle agencies and voter registrars to help scrub ineligible voters, New Jersey remains in a passive, reactionary posture waiting for maintenance leads to arrive from third parties when voters themselves are not declaring ineligibility. This has led to aliens getting on the voter rolls, and staying on the rolls.

New Jersey's only defense to alien registration is the hope that aliens who get on the voter rolls will self-report. Without proactive verification mechanisms built into the voter registration application process, cascading negative consequences are sure to follow for eligible and ineligible voters alike.

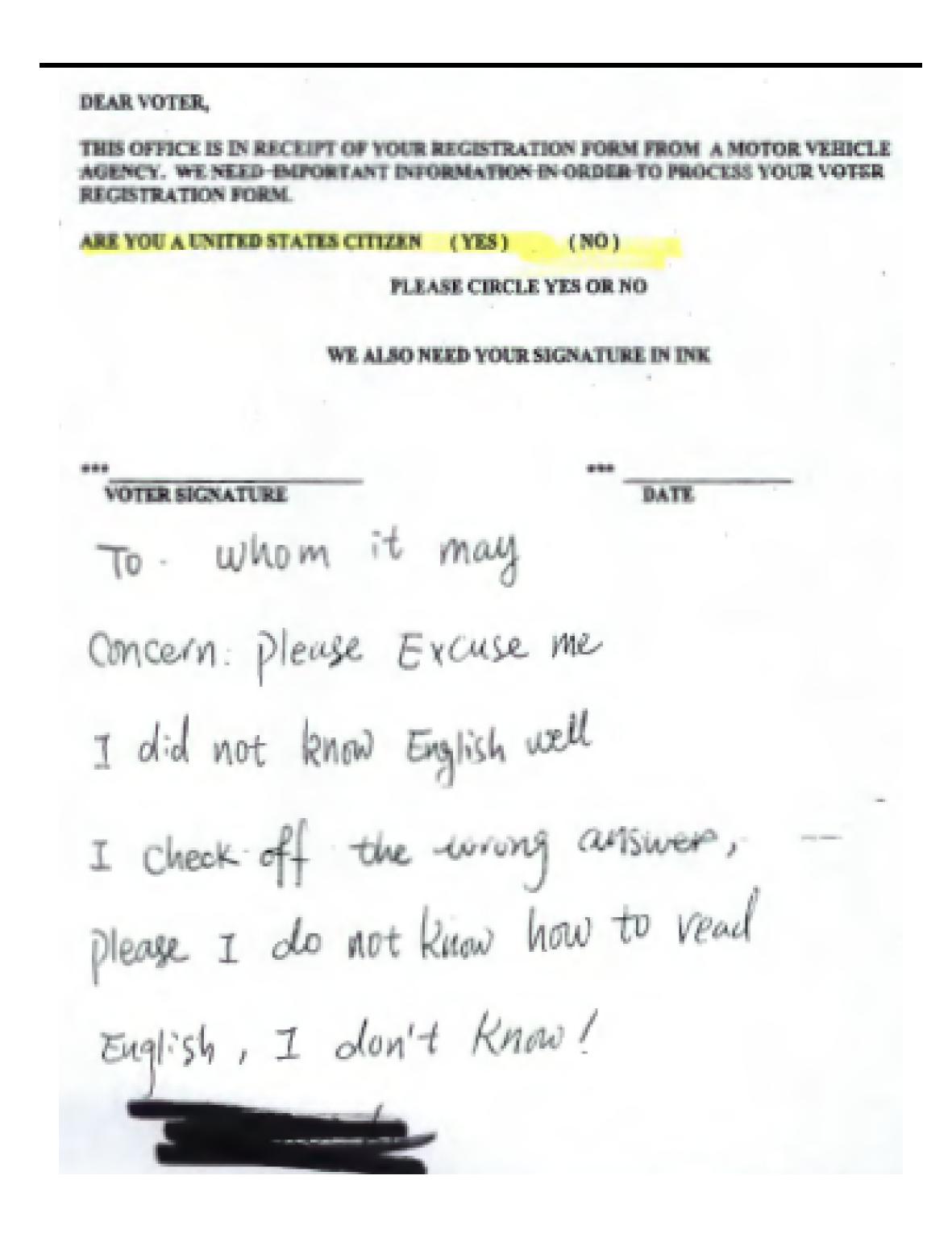
#### How were noncitizens trapped by the system?



### Methodology

PILF consolidated more than a dozen triggers and channels that helped identify noncitizens within the voter registration system into four primary categories. The first are voters who declared their noncitizenship from the outset. In essence, election officials are forwarded voter registration applications, usually from a Motor Voter office, containing either a plain statement of noncitizenship, or a non-response to the citizenship question.

Second, other aliens self-reported their status to election officials in an effort to get off the voter rolls and we obtained these documents in a number of counties in New Jersey. The immigration process has a question on the citizenship application whether the applicant ever registered to vote or actually voted. This question awakens some alien registrants to the fact they have illegally participated in our elections.



Burlington County voter record.

These alien registrants commonly claimed that a mistake was made—either their own or on the part of an official—when the voter application was executed. Language barriers, errant checked boxes, and even pushy DMV employees were repeatedlyused explanations. Outside of Motor Voter transactions, some said they had no memory of submitting an application and would sometimes claim fraud. The available records did not specifically indicate that naturalization applications were pending for this category. However, the apparent urgency of requests and carefully worded letters of those professing poor English comprehension suggest that naturalization is an unwritten motive for seeking removal in most cases. Third, voter registrars were sometimes tipped off by the United States Citizenship and Immigration Services. Rather than a voter coming forward, researchers from the Department of Homeland Security and USCIS contacted county officials seeking information on a potential alien registrant, which can eventually set a path toward deleting them from the statewide database.

Finally, a smaller but clearly defined cohort of registrants is identified as noncitizens thanks to jury clerks sharing their declination data with the appropriate county officials. The most common source of information came from federal district courts throughout the state. We sought and obtained these records from a number of counties.

#### What is 'Motor Voter'?

The problems with the voter rolls in New Jersey and other states can be traced to 1993. Within months of assuming the Presidency, Bill Clinton signed into law the National Voter Registration Act ("NVRA"), a sweeping piece of legislation that proponents claimed would increase the number of registered voters and participation in our elections. One thing is for sure—defects in the legislation also increased the number of ineligible voters on voter rolls.

The NVRA, commonly known as "Motor Voter," requires each state to offer voter registration to any individual that applies for a driver's license. This provision of the law requires the applicant to swear to his or her citizenship under penalty of perjury, but does not explicitly authorize (nor explicitly deny) the state's ability to verify citizenship through formal documentation. Instead, the law provides that the states "may require only the minimum amount of information necessary to . . . enable State election officials to assess the eligibility of the applicant and to administer voter registration and other parts of the election process."

#### Findings

Attempts by various states to require registrants to provide documentary proof of citizenship during registration for federal elections have been thwarted by lawsuits brought by left-leaning groups. Like other states, New Jersey requires applicants to only check a box in order to "prove" their citizenship status. It's the honor system.

The honor system has proven to be inadequate. This honor system not only risks corrupting the voter file, but exposes noncitizens to potential legal difficulties later in life.

The victims of this honor system are both any unwitting alien registrant and also the integrity of our elections. The only beneficiaries of failures in the honor system are the politicians who receive the votes of these aliens and the interests that support them.

Election officials must also "maintain for at least 2 years" and "make available for public inspection ... all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters." Nothing in federal law prevents records from being kept longer than two years. As detailed below, this two year requirement can pose additional difficulty for voters whose files are destroyed well before USCIS requires they be produced to keep a naturalization application from stalling, even declined.

At some point, state voter registration policies and procedures must be based on common sense. New Jersey's Motor Vehicle Commission (MVC) and election officials in New Jersey must improve their policies and procedures to prevent aliens from registering to vote.

When a New Jersey noncitizen engages with state offices conducting voter registration, particularly when seeking a new driver's license, there are helpful cues to ascertain their current immigration status. The MVC requires that such customers follow a "6 Point ID Verification" protocol, demanding documents like foreign passports, alien registration cards, refugee documents, and re-entry permits be shown to help establish identity. A wide array of secondary documents must also be provided—leaving effectively no room for doubt on the immigration status for the person before them.

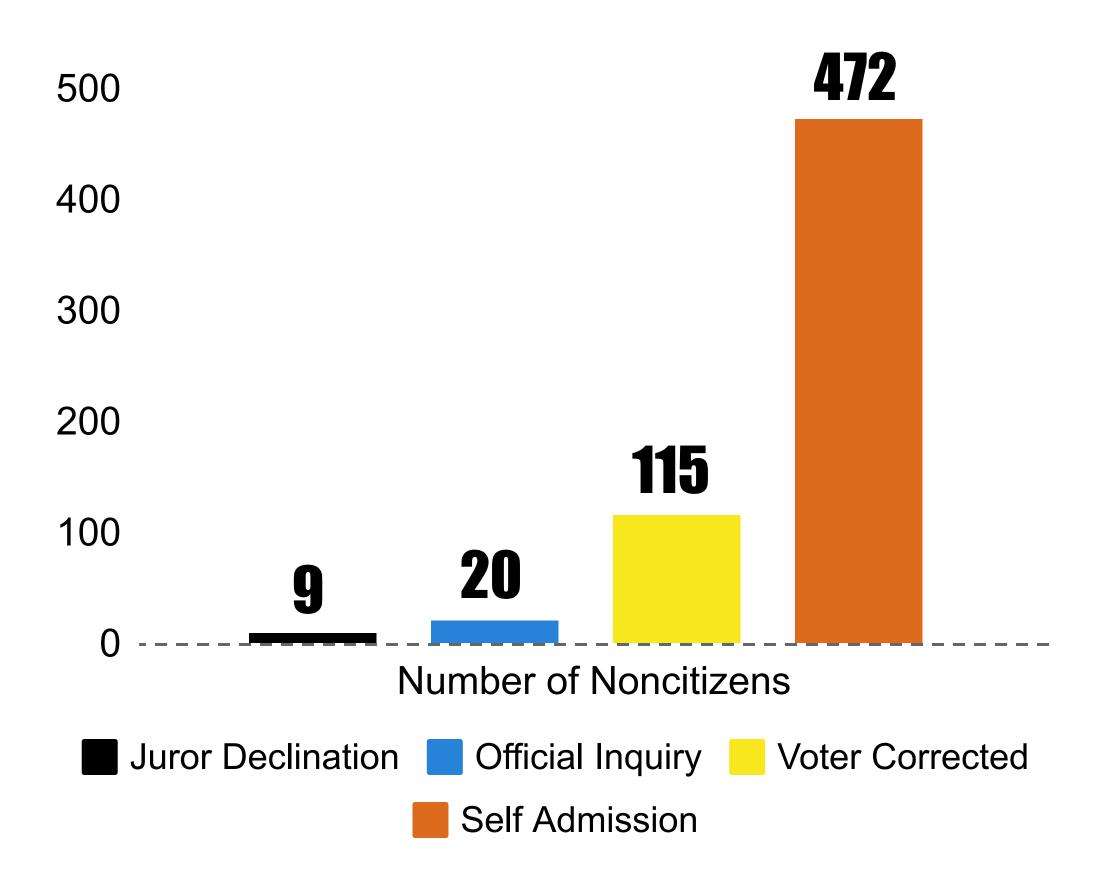
After handling a person's valid foreign passport, asking them if they are a United States citizen interested in registering to vote invites genuine confusion, at best.

### The Motor Voter Trap

Recall Margarita Fitzpatrick, the alien voter who faces deportation for registering and voting. Despite her initial objections, she still completed a registration form and went on to participate in multiple federal elections before immigration authorities seized on her voting record. An immigrant in New Jersey looking for a driver's license need only take some preliminary steps—usually at the prompting of an official—to expose themselves to a similar fate.

Noncitizen voter registration experiences can follow a few different tracks. A common Motor Voter example is when a noncitizen is prompted to register and either indicates noncitizenship on the application or ignores the question altogether. The information is eventually transmitted to the county voter registrar where the person is enrolled, either as one declaring noncitizenship or holding an incomplete registration, pending follow-up mailings to confirm their status. At this point, a unique voter identification number is assigned to the person regardless of the application's outcome. If a voter later answers the question of U.S. citizenship in the negative, their record is marked as such and kept within the system. Should that noncitizen later choose to naturalize, the encounters could be called into question, whether they disclosed them or not.

#### How were noncitizens discovered?



If a noncitizen checks "Yes" to the citizenship question in any setting, they are simply enrolled without any further verification, even if they presented a Green Card to identify themselves at the time of registration. It is incumbent on the ineligible voter or the limited patchwork of maintenance referral systems to correct records after the fact.

When applying for naturalization, the USCIS asks a short series of questions regarding previous claims of citizenship and voter participation.<sup>6</sup> The form asks Yes/No if the applicant "registered to vote in any Federal, state, or local election" and if they ever "voted" in the same. Any answer in the affirmative requires an explanation on separate sheets of paper.

Though PILF is unable to access individual naturalization applications, investigators did study numerous documents where noncitizens claimed to have no previous knowledge of registering or they explained how they felt pressured to do the same. Included in many voter registration files were correspondence between USCIS, noncitizen voters, and local election officials. After a voting investigation by USCIS is triggered, applicants typically saw form letters bearing their file and alien numbers, stating that "examination of your N400 application shows that additional information, documents, or forms are needed," within 30 days after the letter was printed.

"Failure to do so may result in the denial of your application," the letter also stresses that timely and full submission "does not guarantee that this case will be approved." Recipients are required to provide voter records indicating the status of removal and voting history. Applicants are also instructed to "provide a handwritten affidavit indicating how your name became registered for voting eligibility and whether you have voted in an election."

The typical naturalization applicant does not have the required documents on hand where voting is concerned, particularly when they are claiming prior unawareness to their status. Voter records regularly contained communications and handwritten side notes by local registrars indicating when a noncitizen came forward seeking their data. In turn, county officers printed letters showing dates of registration, removal, and whether they cast ballots. Some letters noted that not all USCIS-required files could be reproduced since they were generated well beyond retention statutes under Motor Voter.<sup>7</sup>

#### Case Studies

Following are a few of the real life examples that the Public Interest Legal Foundation uncovered in this Garden State Gotcha investigation. For additional examples, the complete investigation file has been made available.<sup>8</sup>

Name: Kiran B. Shah<sup>9</sup>

County: Bergen

Registration Year: 2012

Deletion Year: 2013
Method: Motor Voter
Citizenship Checkbox
Choice: Unspecified

Shah registered in 2012 and later updated his residential address via Motor Voter. After registering, he began receiving election mail, particularly a sample ballot in 2013. A Bergen County letter reports that he tried to address his ineligible voter registration status by visiting the polling place to which he was assigned. There, poll workers reportedly told him that since he was receiving such mail, he was indeed eligible to vote—and ended up voting. Shah later made contact with the superintendent of elections and was advised "he voted illegally" and should expect to address the episode again if he applies for U.S. citizenship.

Name: Oscar Trujillo<sup>10</sup>

County: Atlantic

Registration Year: 2000

Deletion Year: 2012 Method: Self/Third Party

Citizenship Checkbox

Choice: No

Oscar Trujillo filled a voter registration form in February 2000 and remained on the rolls without incident until December 2012 when he opted to naturalize. Records indicate that he successfully changed his residential address in 2005. Due to record retention caps, the county registrar could not reproduce his voter registration form. A letter to USCIS from Atlantic County reported that he did not ever believe he was registered, despite the fact that his name and signature were kept on file. The County adds that "from time to time persons have signed voter registration application forms out on the street, not aware of what they are signing." Trujillo later managed to successfully naturalize in 2016.

Name: Carlos Gamarra<sup>11</sup>

County: Atlantic

Registration Year: 2008

Deletion Year: 2012

Method: Self/Third Party

Citizenship Checkbox

Choice: No

In September 2008, Carlos Gamarra completed a voter registration application that was later mailed to his local voter registrar's office for processing. Despite answering "No" to the question about U.S. citizenship, he was registered anyway and remained on the rolls until September 2012, at which point Gamarra was pursuing naturalization. After receiving a letter from USCIS demanding more information about his voting record, the Atlantic County Commissioner of Registration's office reported, "he did not realize that he had registered to vote" and "was never aware that he was a registered voter." The letter and supplemental records indicated to PILF that he never attempted to vote in the interim.

Name: Ashfaq Hussain<sup>12</sup>

County: Atlantic

Registration Year: 2004

Deletion Year: 2011

Method: Self/Third Party

Citizenship Checkbox

Choice: Yes

Mr. Hussain submitted a voter registration form in 2004 and was deleted in 2011. He later began the naturalization process around 2011. Paperwork indicates that he was rejected for citizenship that same year. A county letter dated in 2016 to USCIS reports that Hussain "did not recall" completing a registration application and never attempted to cast a ballot. It is unclear according to available records if his second attempt was successful. Atlantic County does not have a record of voter reinstatement following any naturalization.

New Jersey Voter Registration Application

Are you a U.S. Citizen? The Yes The (If No, DO NOT) complete this form)
¿Es ciudadano estadounidense? The Si The No (Si no Jo es, NO complete este formulario)

Will you be 18 years of age by the next election? 

Yes 
No (If No, DO NOT complete Letter) 
Tendra 18 años de edad para la próxima elección? 
No (Si no lo es, NO complete este

Mailing Address

CARLOS A GAMARRA
223 PLEASANT AVE
PLEASANTVILLE NJ 08232-2419

\*Dc

affil OY

anv

Ashfaq Hussain 12 South Spray Ave # # 2 Atlantic City NJ 08401 Refer to this file: NBC\*0008571 Alien Number: A 093 048 435 Date: April 5, 2011

#### DECISION

On February 18, 2011, you appeared for an examination of your application for naturalization, which was filed in accordance with Section 316(A) of the Immigration and Nationality Act.

Pursuant to the investigation and examination of your application it is determined that you are ineligible for naturalization for the following reason(s):

#### See Attachment(s)

If you desire to request a review hearing on this decision pursuant to Section 336(a) of the Act, you must file a request for a hearing within 30 Days of the date of this notice. If no request for hearing is filed within the time allowed, this decision is final. A request for hearing may be made to the District Director, with the Immigration and Naturalization office which made the decision, on Form N-336, Request for Hearing on a Decision in Naturalization Proceedings under Section 336 of the Act, together with a fee of \$650. A brief or other written statement in support of your request may be submitted with the Request for Hearing.

Sincerely,

Market 12

Nieves Cardinale

Field Office Director

Caralana 107

Name: Cezarramo Guisande 13

County: Atlantic

Registration Year: 2014

Deletion Year: 2014
Method: Motor Voter
Citizenship Checkbox

Choice: Yes

Cezarramo Guisande presents one of the most disturbing cases reviewed in this effort. Accompanied by his mother, he visited a local driver's license office and was offered the opportunity to become a registered voter, despite the fact he presented his Green Card to identify himself. An Atlantic County letter to USCIS reports that his mother discouraged him from completing the form, saying he was ineligible. The letter continues: "However, the Division of Motor Vehicles employee told you that you could register to vote with a Green Card and that is the only reason you signed the voter registration form..." Guisande later tried to vote in the 2014 midterms but was stopped when his pollbook record contained incorrect address information—leading him to complete a provisional ballot. Without the pressure of others, he documented that he was not a citizen and was removed from the active registry shortly thereafter.

	Men Men	Jersey	Edward P. McGettigan, Atlantic County Clerk			
Harry Control	Prov	isional E	allot Afi	irmation	Statement	11
	1. Reason for Provisional Ballot: (Check one)    Moved within the county after registering, without notifying election office   The North Man					
	Registration	in the courtly after re information missing w required ID			1527445 AC W2 D2*	38
TACH	Poll book in	dicates-you are a Ma eturn such ballet	il-in Ballot voter, bu	t did not apply for,	AC WZ DZ	
	2. I am a US citizen	Yes No	3. I am 18 or olde	Yes No		
	4. Current Name					
	Last GUISA	108	Flist Cozz	or bremon M	Suffix	
	If your name wa	Last GUISANOS First Cotto M.I. Suffix Suffix If your name was changed after registering to vote, provide your former name				
	Former Name:	*			^	
	Signature of Forr	ner Name:				
	5. Current Home Address: 144 N NOTH County ATANTIC Zip Code _ Sty				19 10050	\
	Municipality _ 1	ANDE CIE	County	WANTIC Z	ip Code	
		ifferent from above:				

Name: Hector R. Guerro-

Bernabel<sup>14</sup>

County: Atlantic

Registration Year: 2014

Deletion Year: 2017
Method: Motor Voter
Citizenship Checkbox
Choice: Unspecified

Mr. Guerro-Bernabel's naturalization application was held up when it was discovered he was a registered voter. The paper trail for this specific file is thin because the county reported to USCIS that no actual voter registration application could be reproduced because there was none. Mr. Guierro-Dernabel became a voter through an online registration prompt, jeopardizing his naturalization track "simply by checking a box" in a different government transaction.

Name: Jheiny Rodriguez-

Gonzales<sup>16</sup>

County: Bergen

Registration Year: 2014

Deletion Year: 2014
Method: Motor Voter
Citizenship Checkbox
Choice: Unspecified

Ms. Rodriguez-Gonzales was applying online to be a student at Bergen County Community College when she says she mistakenly clicked prompts that registered her to vote in June/July 2014. She requested removal in August after she began receiving official election mailings and correspondence from her state assemblywoman. The legal permanent resident clarified her status promptly. It is unclear if she had naturalization paperwork pending at the time.

Name: Yuan Vergera<sup>15</sup>

County: Bergen

Registration Year: 2012

Deletion Year: 2012 Method: Motor Voter Citizenship Checkbox

Choice: Disputed

Yuan Vergera claimed in a letter to Bergen County that while he was renewing his driver's license as a noncitizen, an MVC employee "erroneously filled out a voter registration form with my information without my consent" after telling the clerk verbally that he was not interested in voting. Ms. Vergara asked that the application be disregarded and the record cancelled. It is unclear if he had naturalization paperwork pending at the time.

Name: Anna Jasinska<sup>17</sup>

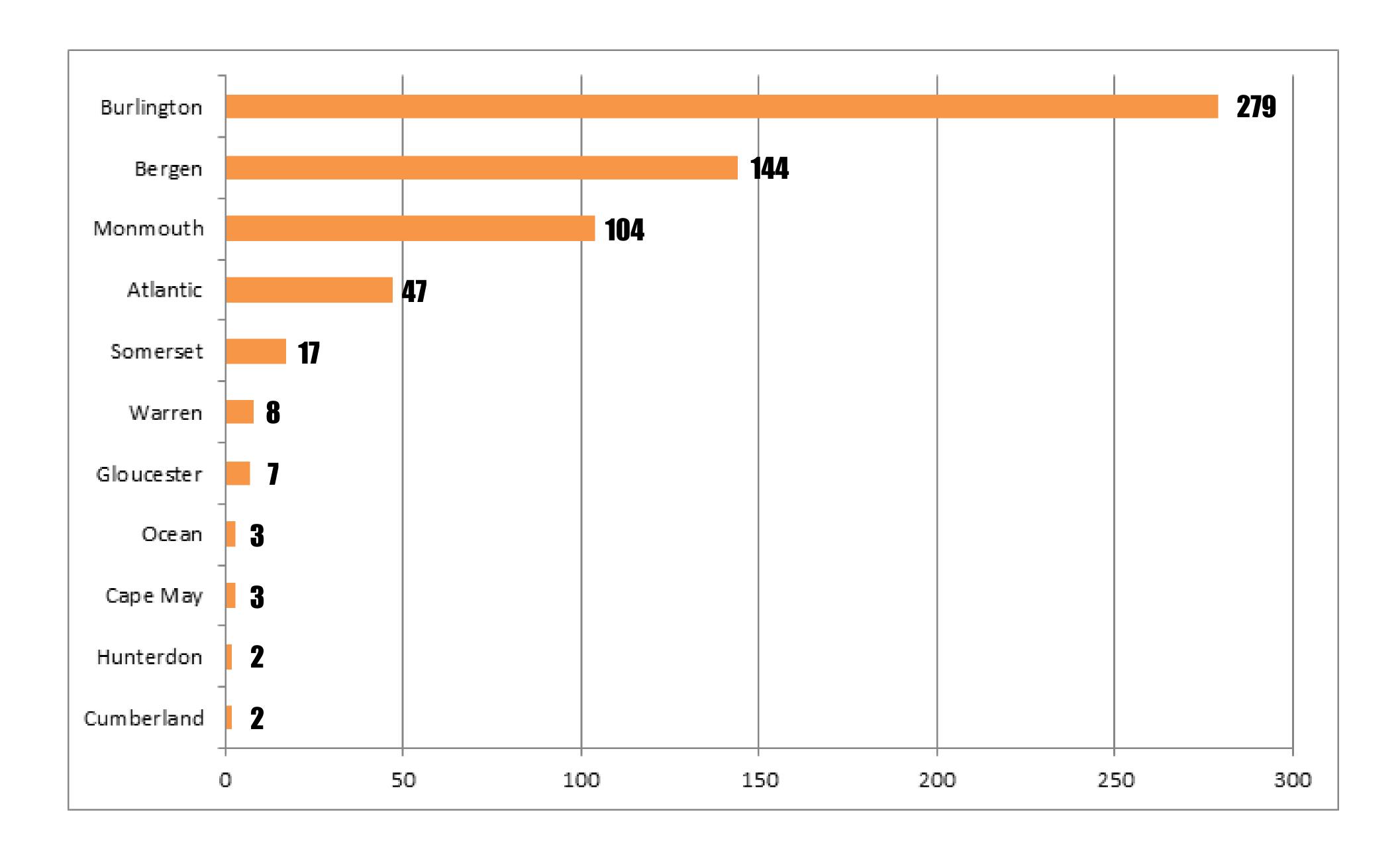
County: Bergin

Registration Year: 2016

Deletion Year: 2016
Method: Motor Voter
Citizenship Checkbox
Choice: Unspecified

Ms. Jasinska promptly reported that a "mistake" was made when she was registered to vote while at a driver's license office. Her letter claimed she is not a fluent English speaker and even presented her Green Card prior to registration. It is unclear if she had naturalization paperwork pending at the time.

### County Numbers



#### Data Limitations

The Public Interest Legal Foundation originally cast the widest nets possible when seeking records from counties, asking they search for "all registrants who were identified as potentially not satisfying the citizenship requirements for registration from any information source ... and actions taken regarding the registrant's registration."

Six jurisdictions (Hudson, Morris, Sussex, Union, Passaic, Camden) claimed they had zero records indicating where noncitizens either engaged with or admitted to participating in the statewide voter registration system.

Another four counties (Essex, Middlesex, Mercer, and Salem) still have yet to release any records. The vast gulf in response between counties like Bergen and Hudson, especially where jurisdictions claim to have absolutely zero cases to share seems dubious, at best.

### Sanctuary Counties

Some New Jersey voting jurisdictions have joined the "sanctuary" trend for illegal aliens. The Garden State currently contains three counties which refuse to cooperate with immigration officials unless various conditions are met—depending on the severity alleged criminal's unlawful actions.

Union, Middlesex, and Ocean Counties each declared such statuses in July/August 2014. With respect to aliens caught in the Motor Voter system and casting ballots, the sanctuary status could inform the stark differences in available data as opposed to nearby non-sanctuary jurisdictions. Union County, near New York City, claims to have zero records indicating ineligible noncitizens were found anywhere in the voter registration system. Ocean County could only identify three (3) similar cases. Middlesex, however, has yet to fully respond to PILF's inquiries.

#### How can we fix this?

There are several reforms and procedural changes that New Jersey should consider going forward.

- Institute a model for detecting more noncitizens caught in the voter registration system to address records before they vote or opt to naturalize. Virginia's model of establishing clear lines of communication between state agencies serving noncitizens and registrars to help scrub rolls—not fill them—can serve as a first step.
- The State of New Jersey should review procedures step-by-step within its Motor Voter system to identify efficiencies and keep ineligible voters out in the first place.
- Local clerks should review record retention procedures and discern better ways to help document cases where voters appear to be caught in a voter registration system despite their wishes in order to better help explain their activities before USCIS.
- The registration process must be changed. The check box honor system most states are using is a complete failure and is facilitating voter fraud. All states should require voter applicants to provide documentary proof of citizenship at the outset. Alternatively, states should utilize federal databases like SAVE to help identify noncitizens more quickly. States should use all available data, including jury recusal information, to help maintain accurate and current voter rolls.

- The database, known as E-Verify, that is being used by U.S. employers to check the citizenship status of prospective employees should be made available to election officials and administrators to better identify registered voters and pending applicants who are not actually citizens.
- The U.S. Department of Homeland Security should open new information-sharing channels between agencies to include Customs and Border Protection (CBP), Immigration and Customs Enforcement (ICE), Citizenship and Immigration Services (USCIS) and Homeland Security Investigations (HSI) with state and local election officials to more easily identify non-citizens coming into contact with the federal immigration system.
- Law enforcement at both the federal and state level should exercise their authority to prosecute cases of voter fraud.

#### Conclusion

The time has come to treat our voter registration system as we would any other government service, by verifying and validating the eligibility of those seeking to take advantage. Introducing citizenship verification serves two clear purposes: it reduces the risk of ballot dilution by those who would vote illegally; and protects immigrants who will mistakenly interact with the voter registration system, which only generates a paper trail that will haunt them later.

Some of the case examples given above may seem outlandish. Some excuses for registering and voting might even prove false. But the same checkbox honor system that let them in, is the same one that allows lets them walk free with a story of their choosing—until immigration officers begin calling.

Let's stop setting up our nation's newcomers to fail. Citizenship verification in voter registration protects us all.

## PUBLIC INTEREST

#### LEGAL FOUNDATION -

The Public Interest Legal Foundation relies on small contributions to conduct research and develop findings like those in this report. PILF is the only organization performing this level of work with respect to voter registration system integrity. Time, travel, and technology help deliver new insights in our election systems to better educate regular citizens and policymakers alike. We also bring lawsuits to pry this information from government officials when necessary. None of this is possible without your support. Please help us expand our efforts by visiting www.publicinterestlegal.org/donate to offer your fully tax-deductible gift today.

September 2017

- <sup>1</sup> PILF: Alien Invasion II: The Sequel to the Discovery and Cover-up of Non-citizen Registration and Voting in Virginia (May 29, 2017), <a href="https://publicinterestlegal.org/blog/alien-invasion-ii-sequel-discovery-cover-non-citizen-registration-voting-virginia/">https://publicinterestlegal.org/blog/alien-invasion-ii-sequel-discovery-cover-non-citizen-registration-voting-virginia/</a>
- <sup>2</sup> NBC News; Grandmother Deported for Voter Fraud Leaves U.S. in Tears (August 5, 2017), <a href="https://www.nbcnews.com/politics/immigration/grandmother-deported-voter-fraud-leaves-u-s-tears-n789766">https://www.nbcnews.com/politics/immigration/grandmother-deported-voter-fraud-leaves-u-s-tears-n789766</a>
- <sup>3</sup> Breitbart News; Immigration Officials Fail to Track Illegal Voting Rates, Say Reports (June 6, 2017), <a href="http://www.breitbart.com/texas/2017/06/06/immigration-officials-fail-track-illegal-voting-rates-say-reports/">http://www.breitbart.com/texas/2017/06/06/immigration-officials-fail-track-illegal-voting-rates-say-reports/</a>
- <sup>4</sup> PILF; Alien Invasion II: The Sequel to the Discovery and Cover-up of Non-citizen Registration and Voting in Virginia (May 29, 2017), <a href="https://publicinterestlegal.org/blog/alien-invasion-ii-sequel-discovery-cover-non-citizen-registration-voting-virginia/">https://publicinterestlegal.org/blog/alien-invasion-ii-sequel-discovery-cover-non-citizen-registration-voting-virginia/</a>
- <sup>5</sup> State of New Jersey Motor Vehicle Commission; 6 Point ID Verification (Accessed September 5, 2017), <a href="http://www.state.nj.us/mvc/Licenses/6PointID.htm">http://www.state.nj.us/mvc/Licenses/6PointID.htm</a>
- <sup>6</sup> USCIS Form N-400, Part 12 Questions 1-3

- <sup>8</sup> Records uncovered from the various counties may be reviewed here: <a href="https://publicinterestlegal.org/garden-state-gotcha/">https://publicinterestlegal.org/garden-state-gotcha/</a>
- <sup>9</sup> Kiran B. Shah voter file exhibit: <a href="https://publicinterestlegal.org/files/Kiran-Shah.pdf">https://publicinterestlegal.org/files/Kiran-Shah.pdf</a>
- <sup>10</sup> Oscar Trujillo voter file exhibit: <a href="https://publicinterestlegal.org/files/Oscar-Trujillo.pdf">https://publicinterestlegal.org/files/Oscar-Trujillo.pdf</a>
- <sup>11</sup> Carlos Gamarra voter file exhibit: <a href="https://publicinterestlegal.org/files/Carlos-Gamarra.pdf">https://publicinterestlegal.org/files/Carlos-Gamarra.pdf</a>

<sup>&</sup>lt;sup>7</sup> 52 U.S.C. 20701

<sup>12</sup> Ashfaq Hussain voter file exhibit: <u>https://publicinterestlegal.org/files/Ashfaq-Hussain.pdf</u>

<sup>13</sup> Cezarramo Guisande voter file exhibit: https://publicinterestlegal.org/files/Cezarramo-Guisande.pdf

<sup>14</sup> Hector R. Guerro-Bernabel voter file exhibit: https://publicinterestlegal.org/files/Hector-Guerro.pdf

- <sup>15</sup> Yuan Vergera voter file exhibit: <a href="https://publicinterestlegal.org/files/Yuan-Vergera.pdf">https://publicinterestlegal.org/files/Yuan-Vergera.pdf</a>
- <sup>16</sup> Jheiny Rodriguez-Gonzales voter file exhibit: https://publicinterestlegal.org/files/Jheiny-Rodriguez-Gonzales.pdf
- <sup>17</sup> Anna Jasinska voter file exhibit: <a href="https://publicinterestlegal.org/files/Anna-Jasinska.pdf">https://publicinterestlegal.org/files/Anna-Jasinska.pdf</a>