

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Andrew DePatto, being sworn, state as follows:

INTRODUCTION

1. I am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI), in Boston, Massachusetts. I have been employed by the United States government as a Special Agent since May 19, 2024. I attended and completed the Criminal Investigator Training Program, which is a twelve-week basic program for all Federal criminal investigators held at the Federal Law Enforcement Training Center. I also attended and completed Homeland Security Investigations Special Agent Training, which is an additional 13 weeks of training. I successfully completed blocks of instruction given on subjects including basic investigative techniques, federal controlled substance laws, money laundering techniques, electronic and physical surveillance techniques, and constitutional law.

2. Prior to becoming a Special Agent with Homeland Security Investigations, I served as the Election Coordinator for the Town of Saugus. As the Election Coordinator for the Town of Saugus my duties included but were not limited to the following: processing voter registration forms; processing absentee/early voting ballot applications; mailing out ballots to registered voters; and assisting the Town Clerk and Assistant Town Clerk with organizing, supervising, and executing all Local, State and Federal Elections. I am generally familiar with the procedures and records associated with voter registration and voting in Massachusetts.

3. My duties as a Special Agent include investigating both criminal and administrative violations of federal laws. During criminal investigations, I have participated in the execution of

search and arrest warrants and have seized evidence as evidence, fruits, and/or instrumentalities of violations of federal law.

4. I submit this affidavit in support of a criminal complaint charging Gladys Adaeze OKAFOR (YOB: 1970) with violating 18 U.S.C. § 611 (unlawful voting by aliens) (the TARGET OFFENSE). As set forth below, there is probable cause to believe that OKAFOR committed the TARGET OFFENSE.

5. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is probable cause for the requested criminal complaint and does not set forth all my knowledge about this matter.

INVESTIGATIVE BACKGROUND

6. I am aware that, under federal law, the right to vote in federal elections is reserved exclusively to citizens of the United States. Under federal law, non-citizens are prohibited from voting in federal elections (18 U.S.C. § 611).

7. As part of continuing efforts to investigate criminal violations of federal law, Homeland Security Investigations has examined voter rolls for certain Massachusetts communities to identify non-citizen registration to vote and non-citizen voting in federal elections. Among those communities is the City of Lynn.

8. According to records that I have reviewed from the City of Lynn, City Clerk's Office, as of February 2024, there were approximately 64,185 registered voters in the City of Lynn. Investigative efforts have focused on the subset of these voters who are non-citizens.

9. Homeland Security Investigations has also identified, and continues to investigate, non-citizens who have registered to vote and/or voted in other Massachusetts communities.

SUMMARY OF PROBABLE CAUSE

10. According to federal immigration records that I have reviewed, OKAFOR is a citizen of Nigeria who was born in Aba, Nigeria. OKAFOR became a United States lawful permanent resident (LPR) on December 1, 2022.¹ She is not a U.S. citizen, and she has not applied for U.S. citizenship. OKAFOR's residential address is in Lynn, Massachusetts.

11. OKAFOR's federal immigration records that I have reviewed further reflect that her date of birth is xx-xx-1970 and her social security number (SSN) is xxx-xx-6653. On recent immigration-related forms, OKAFOR provided (xxx) xxx-8393 as a phone number and a home address in Lynn, MA.²

OKAFOR Submits 2022 Voter Registration Form

12. I have reviewed records from the City of Lynn Election Office that include two voter registration forms submitted by OKAFOR. The first voter registration form is a mail-in voter registration dated July 18, 2022, which was mailed to the City of Lynn and received by the City of Lynn's Election Office on August 4, 2022 (the "2022 Voter Registration Form"). This date is confirmed by the Election Office's date and time stamp they put on the mail-in voter registration form.

¹ There appears to be a typo on OKAFOR's green card itself, which states "Resident Since 12/01/21." However, the stamp reflecting the approval of OKAFOR's application for lawful permanent resident status is dated Dec. 01, 2022. A standard green card is typically valid for 10 years, and the expiration date on OKAFOR's card is 12/01/32, consistent with an issuance date of Dec. 01, 2022, the date of the approval stamp on her LPR application.

² OKAFOR's date of birth, SSN, phone number, and Lynn address are known to the government and are redacted herein for privacy reasons. Each time this Complaint references one of those identifiers, it is referring to the same number or address, unless otherwise noted in this Complaint.

13. On the form, OKAFOR lists her name, her Lynn address and P.O. box, telephone number, and the last four digits of her SSN. The form also contains OKAFOR's signature, as depicted below:

1	Check one: Are you a Citizen of the United States of America? ☐ Yes ☐ No NOTE: If you checked "no," do not complete this form.			
2	Full name:	last name	first name	middle name or initial
	OKAFOR	OKAFOR	Gladys	ADOREE
3	Former name:	last name	first name	middle name or initial
	[REDACTED]	01905	[REDACTED]	Neptune Street Lynn MA
4	Address where you live now (street number / street name / rural route number & box number / apartment number / city or town / zip code):			
	[REDACTED] . 01905			
5	Address where you receive all your mail (if different from #4):			
	[REDACTED] 1970			
6	Date of birth: month day year	7 Identification #: license # or last 4 digits of SSN	8 Telephone (optional):	☐ Check if unlisted
	[REDACTED]	[REDACTED]	[REDACTED]	8393
9	Party enrollment or designation (check one): ☐ Democratic ☐ Republican			
	☒ No Party (unenrolled) ☐ Political Designation (not a political party):			
10	Address at which you were last registered to vote (street number / street name / rural route number & box number / apartment number / city or town / zip code):			
11	If the applicant is unable to sign this form, give the name, address and telephone number (optional) of the person helping the applicant:			
	name	address	telephone number (optional)	
12	I hereby swear (affirm) that I am the person named above, that the above information is true, that I AM A CITIZEN OF THE UNITED STATES, that I am at least 16 years old and I understand that I must be 18 years old to be eligible to vote, that I am not a person under a guardianship which prohibits my registering to vote, that I am not temporarily or permanently disqualified by law from voting because of corrupt practices in respect to elections, that I am not currently incarcerated for a felony conviction, and that I consider this residence to be my home. Signed under the penalty of perjury.			
13	Today's date: month day year	14 Signed: Sign your name here.	Agency Designation: BBA	
	7/18/22	[Signature]		

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OKAFOR Submits Second Voter Registration Form

14. According to voter registration records maintained by the City of Lynn that I have reviewed, on or about October 18, 2023,³ OKAFOR submitted a Massachusetts Official Voter Registration Form (the "2023 Voter Registration Form"). The form was completed in-person and was received by the City of Lynn's Election Office.

³ OKAFOR appears to have written the date incorrectly as October 19, 2023, rather than October 18, 2023, but city records reflect that the form was received on October 18, 2023.

15. On the form, OKAFOR listed her name, her Lynn address and P.O. box, her date of birth, the last four digits of her SSN, and her phone number, as depicted below:

Massachusetts Official Voter Registration Form • William Francis Galvin, Secretary of the Commonwealth

1 Check one: Are you a Citizen of the United States of America? ☒ Yes ☐ No NOTE: If you checked "no," do not complete this form

2 Full name: OLATOR last name ADAMEZE first name GLADYS middle name or initial (circle one if appropriate) Jr. Sr. II III IV

3 Former name: OKATOR, ADAMEZE GLADYS middle name or initial (circle one if appropriate) Jr. Sr. II III IV

4 Address where you live now (street number / street name / rural route number & box number / apartment number / city or town / zip code): Neptune Street Lynn MA

5 Address where you receive all your mail (if different from #4): 01905 Lynn MA

6 Date of birth: month day year 7 Identification #: license # or last 4 digits of SSN 8 Telephone (optional): ☐ Check if unlisted 8393

9 Party enrollment or designation (check one): ☐ Democratic ☐ Republican ☐ Political Designation ():

10 Address at which you were last registered to vote (street number / street name / rural route number & box number / apartment number / city or town / zip code):

11 If the applicant is unable to sign this form, give the name, address and telephone number (optional) of the person helping the applicant: name address telephone number (optional)

12 I hereby swear (affirm) that I am the person named above, that the above information is true, that **I AM A CITIZEN OF THE UNITED STATES**, that I am at least 16 years old and I understand that I must be 18 years old to be eligible to vote, that I am not a person under a guardianship which prohibits my registering to vote, that I am not temporarily or permanently disqualified by law from voting because of corrupt practices in respect to elections, that I am not currently incarcerated for a felony conviction, and that I consider this residence to be my home. Signed under the penalty of perjury.

13 Today's date: month day year 10-19-23 14 Signed: Sign your name here. [Signature]

Agency Designation: []

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16. On the 2023 Voter Registration Form, in response to the question, "Are you a Citizen of the United States of America?" OKAFOR checked "Yes."

17. Towards the bottom of the Voter Registration Form, there is a box that reads (emphasis in original):

I hereby swear (affirm) that I am the person named above, that the above information is true, that **I AM A CITIZEN OF THE UNITED STATES**, that I am not a person under a guardianship which prohibits my registering to vote, that I am not temporarily or permanently disqualified by law from voting because of corrupt practices in respect to elections, that I am not currently incarcerated for a felony conviction, and that I consider this residence to be my home. Signed under the penalty of perjury.

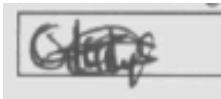
18. OKAFOR signed the form directly under that box, falsely claiming under penalty of perjury to be a United States citizen.

19. I believe that OKAFOR is the person who submitted the 2022 and 2023 Voter Registration Forms based on the information contained therein and the signatures on the cards.

20. The personal information OKAFOR provided on 2022 and 2023 Voter Registration Forms matches the personal information OKAFOR has provided to DHS U.S. Citizenship and Immigration Services (USCIS) in connection with applications for immigration benefits. For example, as explained further below, OKAFOR attested on her I-130 immigration document, signed on January 6, 2023, that she has resided at her Lynn address, [redacted] Neptune Street, Lynn, MA 01905, since 2011.

21. In addition, I confirmed with the United States Postal Inspection Service that the P.O. box listed on OKAFOR's immigration documents and voter registration forms is registered to OKAFOR and has been since May 10, 2016. The verified address for the P.O. box also is her Neptune Street, Lynn address.

22. I also believe that OKAFOR submitted the 2022 and 2023 Voter Registration Forms based on the signatures on the two cards, which are similar to OKAFOR's attested signature on documents submitted to USCIS in connection with her application for immigration benefits, as depicted below:

I-130 <i>Jan. 2023</i>	Voter Reg. Form <i>July 2022</i>	Voter Reg. Form <i>Oct. 2023</i>
		

23. OKAFOR's polling station is 80 Neptune Boulevard, which is the Lynn Vocational Technical Fieldhouse. The location is approximately 0.4 miles from OKAFOR's Lynn address.

OKAFOR Voted in Federal Elections

24. I have reviewed election records maintained by the City of Lynn that show that on November 8, 2022, OKAFOR⁴ voted in the federal midterm elections. Although Lynn's records describe the November 8, 2022, election as a "STATE ELECTION," it was a date on which both state and federal midterm elections were held, and both federal and state candidates appeared on the ballot on that day, including candidates for the U.S. House of Representatives. Lynn election records also show that OKAFOR voted in the Presidential Primary on March 5, 2024.

25. At the time OKAFOR voted, OKAFOR knew she was not a United States citizen. On or about January 6, 2023, approximately two months after voting in the November 2022 federal midterm election and approximately nine months before she submitted the 2023 Voter Registration Form, OKAFOR submitted to DHS a "Petition for Alien Relative" I-130 form. On the form, OKAFOR provided her Alien Registration Number, her name, her Lynn address and P.O. box, her phone number, her social security number, and her date of birth.

26. In response to a question regarding whether she was a U.S. citizen or a Lawful Permanent Resident, OKAFOR checked the box "Lawful Permanent Resident." OKAFOR also checked the box confirming she could read and understand English, and she signed and dated the application.

OKAFOR Interview

27. On September 10, 2026, I conducted an audio-recorded interview with OKAFOR. During that interview, OKAFOR confirmed that she had completed and submitted the 2022 and

⁴ According to City of Lynn records, the name on Okafor's voting record was changed on April 16, 2024, from "Gladys Adaeze Okafor" to "Adaeze Gladys Okator," and the second version appears on Lynn's record of Okafor's voting history displayed above. The two names relate to the same record, which, as laid out above, is Okafor's record.

2023 Voter Registration Forms, that she voted in the federal midterm elections, and that she voted in the 2024 presidential primary election.

CONCLUSION

28. Therefore, there is probable cause to believe that on or about November 8, 2022, OKAFOR, an alien and a non-citizen of the United States, voted in the November 8, 2022, federal midterm elections, an election held in part for the purpose of electing a candidate to be a Member of the House of Representatives, all in violation of 18 U.S.C. § 611.

Sworn to under the pains and penalties of perjury,

Andrew DePatto/by Jennifer C. Boal

Special Agent Andrew DePatto
Homeland Security Investigations

SWORN before me telephonically pursuant to Fed. R. Crim. P. 4.1(d)(3) on September , 2026.



HONORABLE JENNIFER C. BOAL
UNITED STATES MAGISTRATE JUDGE

