

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark, III  
:   
v. : Mag. No. 26-12058  
:   
JACENTH BEADLE EXUM : **CRIMINAL COMPLAINT**

I, Craig Ulicni, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.

s/Craig Ulicni

Craig Ulicni  
Special Agent  
Homeland Security Investigations

\*Agent Ulicni attested to this Complaint  
by telephone pursuant to FRCP  
4.1(b)(2)(A).

Sworn to and subscribed  
this 1st day of April, 2026

NEWARK, NEW JERSEY  
County and State

HONORABLE JAMES B. CLARK, III  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT 1**

**(False Statements in Relation to Naturalization)**

On or about April 8, 2022, in Essex County, in the District of New Jersey and elsewhere, defendant

**JACENTH BEADLE EXUM**

did knowingly make a false statement under oath, in any case, proceeding, or matter relating to, or under, or by virtue of any law of the United States relating to naturalization, citizenship, or registry of aliens, namely during an interview with an official of the United States Citizenship and Immigration Services in connection with the defendant's Application for Naturalization (Form N-400).

In violation of Title 18, United States Code, Section 1015(a).

**COUNT 2**

**(False Statements in Relation to Naturalization)**

On or about April 8, 2022, in Essex County, in the District of New Jersey and elsewhere, defendant

**JACENTH BEADLE EXUM**

knowingly procured and attempted to procure, contrary to law, the naturalization of a person, namely, herself, by way of false statements, in that she knowingly made materially false statements during an interview pertaining to an Application for Naturalization (Form N-400) signed under penalty of perjury on or about April 8, 2022, wherein defendant falsely represented that she had never voted in any Federal, state or local election in the United States.

In violation of Title 18, United States Code, Section 1425(a).

**ATTACHMENT B**

I, Craig Ulicni, a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), having personally participated in an investigation of the conduct of defendant JACENTH BEADLE EXUM ("BEADLE EXUM"), and having spoken with other law enforcement officers and individuals, have knowledge of the following facts. Because this Complaint is submitted for the limited purpose of establishing probable cause, I have not included all facts known to me concerning this investigation. The contents of documents and the actions, statements, and conversations of individuals referenced below are provided in substance and in part, unless otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:
  - a. A United States citizen was a native of the United States; a person naturalized in the United States; or a person who derived U.S. citizenship (from one or both parents); and who owed allegiance to the United States and was entitled to its full rights, privileges, and protection.
  - b. An alien was any person not a citizen or national of the United States. This included immigrants (e.g. lawful permanent residents) and non-immigrants (e.g. individuals who were admitted to the United States for a temporary duration, such as a student, a visitor or a temporary worker).
  - c. A lawful permanent resident ("LPR") was an alien who had been conferred permanent resident status in the United States (colloquially known as a "Green Card" holder). An Alien Registration Receipt Card (also known as a "Green Card") was issued to lawful permanent residents as evidence of their status. Upon meeting the statutory prerequisites for naturalization, an LPR could apply to become a naturalized United States citizen.
  - d. In order to register to vote in the State of New Jersey, an applicant was required to certify and attest that they met certain eligibility requirements, including the requirement that he/she was a United States citizen.
  - e. Upon successfully registering to vote in New Jersey, an applicant was authorized to vote in New Jersey State

and local elections, as well as in federal elections.

- f. Defendant JACENTH BEADLE EXUM ("BEADLE EXUM") was a Lawful Permanent Resident living in Bergen County, New Jersey having entered the United States via a B2 visa in approximately July of 2000 after emigrating from her country of birth, Jamaica. BEADLE EXUM failed to depart the United States upon the expiration of that visa in December of 2000.
2. On or about April 12, 2018, BEADLE EXUM registered to vote in New Jersey. In doing so, BEADLE EXUM certified and attested that she was a United States citizen.
3. Based on the information that BEADLE EXUM provided in her application, including her false statement that she was a United States citizen, BEADLE EXUM's application to register to vote was accepted, and she was successfully registered to vote in the State of New Jersey.
4. After she was successfully registered to vote, BEADLE EXUM voted in the general election held on November 3, 2020 via a mail-in ballot that she signed before casting. The 2020 general election included the election for the offices of President and Vice President of the United States.
5. On or about May 12, 2021, BEADLE EXUM submitted an online Application for Naturalization ("N-400") to the U.S. Citizenship and Immigration Services ("USCIS"). An N-400 is a United States government form that is submitted by LPRs to apply to become U.S. citizens through the naturalization process. The N-400 consists of a detailed questionnaire that requires the applicant to provide personal information, including but not limited to, biographical information, marital history, criminal records, and information concerning whether the applicant has ever registered to vote and/or voted in any federal, state, or local election. The questions on the N-400 are designed to allow USCIS to determine whether applicants meet requirements like good moral character, English proficiency, and knowledge of U.S. history/government, before they are approved for United States citizenship. If it is determined that an applicant has voted in a federal election his/her application for citizenship will be denied.
6. As part of that application, the N-400 requires applicants to swear/affirm and certify under penalty of perjury under the laws of the United States that the information they report in the N-400 is complete, true, and correct.

7. After the N-400 is submitted by the applicant, he/she is scheduled for an interview with an official ("Immigration Services Officer") from USCIS. At the time that an applicant is interviewed by an Immigration Services Officer, the Applicant is placed under oath. Thereafter, the Immigration Services Officer goes over with the applicant the answers that the applicant provided in the N-400 that the applicant filled out and submitted to USCIS. At the end of the interview, the Immigration Services Officer determines whether to: (i) approve the applicant's request to become a citizen; (ii) deny the request for citizenship; or (iii) request that the applicant provide additional information and come in for a subsequent interview. If the Immigration Services Officer approves an applicant's Form N-400, the applicant is scheduled to take the Oath of Allegiance at a naturalization ceremony. The naturalization ceremony is the culmination of the naturalization process.
8. In the N-400 application that BEADLE EXUM submitted on about May 12, 2021, BEADLE EXUM checked neither the "No" box nor the "Yes" box in response to the question "[h]ave you EVER voted in any Federal, state, or local election in the United States?"
9. On or about April 8, 2022, BEADLE EXUM was interviewed by an Immigration Services Officer regarding her application for naturalization and the answers which she had provided on the N-400 form that she had previously submitted to USCIS. At the start of the interview BEADLE EXUM was placed under oath. When she was thereafter questioned, she responded "no" to the question "[h]ave you EVER voted in any Federal, state, or local election in the United States?" despite having voted in the 2020 election via mail-in ballot.
10. On or about August 18, 2022, BEADLE EXUM became a naturalized citizen, a status which would not have been granted had she answered truthfully on or about April 8, 2022 concerning whether she had ever voted in a federal election.