

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

|                          |   |                                 |
|--------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA | : | Hon. Jessica S. Allen, U.S.M.J. |
|                          | : |                                 |
| v.                       | : | Mag. No. 26-8191                |
|                          | : |                                 |
| SANATA COULIBALY         | : | <b>CRIMINAL COMPLAINT</b>       |

I, Timothy Cho, 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 Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.

/s/ Timothy Cho (MKO)

Timothy Cho  
Special Agent  
Federal Bureau of Investigation

Special Agent Cho attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on September 16, 2026.

/s/ Hon. Jessica S. Allen, U.S.M.J. (MKO)

Hon. Jessica S. Allen  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT 1**

**(Voting by an Alien in a Federal Election)**

On or about October 29, 2024, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**SANATA COULIBALY,**

an alien, knowing that she was not a United States citizen, voted in an election held solely or in part for the purpose of electing a candidate for the office of the President, Vice President, Presidential elector, Member of the Senate or Member of the House of Representatives.

In violation of Title 18, United States Code, Section 611.

## **COUNT 2**

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

In or about October 2024, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**SANATA COULIBALY,**

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 in an Application for Naturalization (Form N-400) signed under penalty of perjury on or about October 4, 2024, 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, Timothy Cho, a Special Agent with the Federal Bureau of Investigation (“FBI”), having personally participated in an investigation of the conduct of defendant SANATA COULIBALY (“COULIBALY”), 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. COULIBALY was an LPR living in Hudson County, New Jersey having entered the United States via a B-1 nonimmigration visa in approximately 1993 after emigrating from her country of birth, Senegal.

2. On or about October 18, 2016, COULIBALY registered to vote in New Jersey by submitting her voter registration application in paper format to the Office of the Hudson County Superintendent of Elections. In doing so, COULIBALY certified and attested that she was a United States citizen.

3. Based on the information that COULIBALY provided in her application, including her false statement that she was a United States citizen, COULIBALY'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, COULIBALY voted in-person in Hudson County, New Jersey in the mid-term election held on November 6, 2018. The November 2018 mid-term election included the election of members of the United States Senate and House of Representatives.

5. Thereafter, COULIBALY voted by mail-in-ballot in the primary election held in Hudson County, New Jersey on July 7, 2020. The July 2020 primary election included the election for the offices of President and Vice President of the United States.

6. Then, COULIBALY voted by mail-in-ballot in the general election held in Hudson County, New Jersey on November 3, 2020. The November 2020 general election included the election for the offices of President and Vice President of the United States.

7. On October 29, 2024, COULIBALY voted in-person via a provisional ballot in the 2024 general election. On that provisional ballot, COULIBALY certified and attested that she was a United States citizen. The 2024 general election included the election for the offices of President and Vice President of the United States.

8. At the time that she cast her ballot on or about October 29, 2024, COULIBALY was not a United States citizen and was therefore not authorized to vote in the 2024 general election.

9. On or about October 4, 2024, COULIBALY submitted an 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.

10. 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.

11. 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.

12. In the N-400 application that COULIBALY submitted on or about October 4, 2024, COULIBALY checked the “No” box in response to the question “[h]ave you EVER registered to vote or voted in any Federal, state, or local election in the United States?”

13. On or about January 29, 2025, COULIBALY was interviewed by an Immigration Services Officer regarding the answers which she had provided on the N-400 form that she submitted to USCIS on or about October 4, 2024. At the start of the interview, COULIBALY was placed under oath. When she was thereafter questioned, COULIBALY admitted that she had voted in two past presidential elections.