UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Leda D. Wettre, U.S.M.J.
	:	
v.	:	Mag. No. 26-13211
	:	
ANDREA MORZETTA	:	**CRIMINAL COMPLAINT**

I, Kristine T. Fata, 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/Kristine T. Fata
Kristine T. Fata
Special Agent
Department of Homeland Security
Homeland Security Investigations

Special Agent Fata attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on October 29, 2026.

Sworn to and subscribed 8:09 a.m.
this 29th day of October, 2026

NEWARK, NEW JERSEY
County and State

HONORABLE LEDA D. WETTRE
UNITED STATES MAGISTRATE JUDGE

S/LEDA DUNN WETTRE
Signature of Judicial Officer

ATTACHMENT A

COUNT 1
(Voting by an Alien in a Federal Election)

On or about November 5, 2024, in Passaic County, in the District of New Jersey and elsewhere, the defendant

ANDREA MORZETTA,

an alien, knowing that he 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
(Unlawfully Attempting to Procure Naturalization)

On or about January 30, 2025, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

ANDREA MORZETTA,

knowingly attempted to procure, contrary to law, the naturalization of a person, namely, himself, by way of false statements, in that he knowingly made materially false statements in an Application for Naturalization (Form N-400) signed under penalty of perjury on or about January 30, 2025, wherein defendant falsely represented that he 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, Kristine T. Fata, a Special Agent with the Department of Homeland Security, Homeland Security Investigations, having personally participated in an investigation of the conduct of defendant ANDREA MORZETTA ("MORZETTA"), 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 at the time that he/she registered to vote.

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. MORZETTA was a Lawful Permanent Resident living in Passaic County, New Jersey, having entered the United States as a permanent resident under a P21 classification as the spouse of an alien resident in or around February of 1976 after emigrating from Italy.

2. On or about August 24, 2002, MORZETTA registered to vote in New Jersey by completing a paper voter registration form at the New Jersey Motor Vehicle Commission. In doing so, MORZETTA certified and attested that he was a United States citizen.

3. Based on the information that MORZETTA provided in his application, including his false statement that he was a United States citizen, MORZETTA's application to register to vote was accepted, and he was successfully registered to vote in the State of New Jersey.

4. After he was successfully registered to vote, MORZETTA voted in-person in the November 2014 midterm election and the November 2016 general election. Thereafter, MORZETTA voted via mail-in ballot in the November 2020 election, and then voted in-person in the November 2024 general election. Each of those elections were 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.

5. On or about January 30, 2025, MORZETTA 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.

6. As part of that application, the N-400 further requires applicants to 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. MORZETTA signed the certification on or about April 7, 2024

7. In the N-400 application that MORZETTA submitted, MORZETTA 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?"

8. When subsequently interviewed by USCIS on or about April 1, 2025, MORZETTA admitted that he had voted in prior federal elections. He thereafter received a Request for Evidence (RFE) from USCIS for any New Jersey voter registration, application, voting history, written statement and proof of removal from voter rolls. In a statement dated December 15, 2025 and signed by defendant MORZETTA, he admitted to voting in person on at least one occasion but added that "I did not vote many times."