

**AFFIDAVIT IN SUPPORT OF CHALLENGE TO THE VOTER REGISTRATION OF
THE RUSSIAN ALIEN: ALINA SHIPILINA**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, Roy Den Hollander, residing at 545 East 14th Street, New York, N.Y., a self employed consultant, being duly sworn, deposes and says that based upon personal knowledge:

1. Alina Shipilina, residing at 28-15 34th Street, Apartment 4H, Astoria, N.Y., 11103, Board of Elections registration serial number 305023386 is **not** a United States citizen. See attached Exhibit 1, copy of Ms. Shipilina's alien registration card.
2. Alina Shipilina violated New York State Election Law 5-102(1) and 5-210(6) by falsely swearing or affirming that she was a citizen of the United States when she registered to vote on February 22, 2001. See attached Exhibit 2, certified copy of Ms. Shipilina's New York Voter Registration.
3. Affiant married Ms. Shipilina in Krasnodar, Russia, in March 2000, see attached Exhibit 3, Marriage Certificate and translation, and brought her to America on July 10, 2000, when upon entry Ms. Shipilina obtained conditional permanent residency status from the United States Immigration and Naturalization Service. Conditional permanent residency status normally lasts for two years, see attached Exhibit 1 expiration date of July 10, 2002.
4. When Ms. Shipilina registered to vote in February 2001, she was still a conditional permanent resident and **not** a United States citizen.
5. In fact, Ms. Shipilina is still **not** a United States citizen. Affiant and Ms. Shipilina divorced in December 2001, see attached Exhibit 4, Divorce Judgment, which caused her

conditional permanent residency status to terminate under the Aliens and Nationality law
8 U.S.C. 1186a(b)(1)(A)(ii).

/S/

Roy Den Hollander

I do solemnly swear or affirm that the foregoing statement made by me on August 7, 2002, is a truthful disclosure of the reasons for my belief that the registered voter therein named is not qualified to continue to be registered in the election district in which she is now registered.”

/S/

Roy Den Hollander

Witness



111

SHIPILINA, ALINA

11/10/75F

28-15 34TH ST 4H
ASTORIA NY 11103

QUEE

MV-44 (8/00)

NEW YORK STATE VOTER REGISTRATION

(Complete only if you want to register to vote or change your address with the Board of Elections.)

If you register to vote, your completed voter registration application will be sent directly to the Board of Elections. If you decline to register, remain confidential. You will be notified by your County Board of Elections when your voter registration application has been processed.

Are you a U.S. citizen? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If you answered NO, do not complete this form.	Check box(es) that apply: <input checked="" type="checkbox"/> new registration and enrollment <input type="checkbox"/> address change <input type="checkbox"/> party enrollment change <input type="checkbox"/> name change	Home Telephone Number (718) 27
Last year voted	Your Address was (give house number, street, and city) 28-15 34TH ST	county/state Quee
Under the name (if different from your name now)		

Choose a Party - Check one box only

- REPUBLICAN PARTY
- DEMOCRATIC PARTY
- INDEPENDENCE PARTY
- CONSERVATIVE PARTY
- LIBERAL PARTY
- RIGHT TO LIFE PARTY
- GREEN PARTY
- WORKING FAMILIES PARTY
- I DO NOT WISH TO ENROLL IN A PARTY

Please note:
In order to vote
in a primary
election, you
must be enrolled
in a party.

AFFIDAVIT: I swear or affirm that

- I am a citizen of the United States.
- I will have lived in the county or in the city of New York for at least 30 days before the election.
- This is my signature or mark on the line below.
- The above information is true. I understand that if it is not true I can be convicted and fined up to \$5,000 and/or jailed for up to four years.

Signature or mark

X.

Date 02/22/

MAY 19 11 19 75

NOT NECESSARY IF MAILED

THIS IS A CERTIFIED COMPUTER
PRINTOUT OF VOTERS RECORD

BOARD OF ELECTIONS
42-16 WEST STREET
LONG ISLAND CITY, N.Y. 11101



NO VOTING HISTORY RECORDS FOUND FOR VOTER: 305023386

08/02/02 11:15 ELECTION ADMINISTRATION SYSTEM QUEENS EAXPV010
VOTER REGISTRATION INQUIRY

SERIAL NO: 305023386 STATUS: A AS OF 03/02/2001
FULL NAME: SHIPILINA, ALINA ED/AD: 039/36 NH:
STREET: 28-15 34 STREET 4H ENROLLMENT: R REPUBLICAN
CITY/ZIP: L.I. CITY 11103 REGISTRATION DATE: 03/02/2001
DOB: 11/10/1975 FUTURE ENROLLMENT:
SEX: F EYE COLOR: ENROLLMENT ACT DATE: 00/00/0000
US CITIZEN: Y HEIGHT: . VOTER TYPE: R REGULAR
C/O NAME: DATE LAST VOTED: 00/00/0000
VTR POLL SITE: Q0139 EXPECT SIG: N
MAILING ADDRESS POLL SITE INFORMATION

LINE 1: SITE NUM/NAME: Q0139 PS 17
LINE 2: NUM/STREET: 28-37 29 STREET 30 AVE ENT
LINE 3: CITY/ZIP: L.I. CITY 11102
LINE 4: HANDICAPPED: A STATUS: A ACTIVE SITE
DISTRICT INFORMATION ABSENTEE INFORMATION: _ (Y/N) OLD EDAD
CD: 14 SD: 12 CO: 22 CC: 01 LD: SCH DIST: 30 036/36

PF1 = MENU PF2 = DUP-ID PF3 = PROMPT PF4 = PREV
PF5 = RESTORE PF9 = HISTORY PF10 = ACTIVITY PF12 = SHOW-SIG

THIS IS A CERTIFIED COMPUTER PRINTOUT
OF THE VOTERS RECORD


ROSANNA KOSTAMOULLAS
CHIEF CLERK
MANHATTAN BOROUGH OFFICE

BOARD OF ELECTIONS

840

MINUTES OF THE MEETING OF THE
COMMISSIONERS OF ELECTIONS
HELD ON TUESDAY, MARCH 25, 2003
AT 1:30 P.M.

42 BROADWAY, 6TH FLOOR EVS CONFERENCE ROOM
NEW YORK, NY 10004

P R E S E N T: Nancy Mottola-Schacher, President
 Mark B. Herman, Secretary

Commissioners Cilmi, Graham, Kellner, O'Connor, Weiner

John Ravitz, Executive Director
George Gonzalez, Deputy Executive Director
Pamela Perkins, Administrative Manager
Naomi Bernstein, Director of Communications
John O'Grady, Chief Voting Machine Technician
Beth Fossella, Coordinator, Voter Registration
Virginia Busti, Coordinator of Election Day Operations
Joseph LaRocca, Coordinator, Candidate Records Unit
Pablo Martinez, Computer Programmer
Elliott Borack, ACCO
Steven B. Denkberg, Counsel to Commissioners
Charles Webb, III, Counsel to the Commissioners

Guests

Dave Palmer, NYPIRG
Marjorie Shea
Alan Flacks
Joan McDougal, Women's City Club
Roy Den Hollander, Esq.

President Mottola-Schacher called the meeting to order at 1:35 P.M.

BOARD OF ELECTIONS

employees and draft appropriate revisions to the Board's policies and procedures manual. President Mottola-Schacher seconded the motion, which was adopted by a vote of 6 in favor and 1 abstention-Commissioner Herman.

The Step III, Grievance for Equal Pay, item was tabled until April 8th 2003.

Mr. Richman requested that the Commissioners make a determination regarding Alina Shipilina, who filed a registration form with the Board, and falsely claimed to be a United States citizen. Mr. Hollander stated that Ms. Shipilina a Russian immigrant, filed the false registration in violation of the New York State Election Law and Federal Law, with the intent to obtain a non-driver ID to acquire identification to obtain a United States passport, to prevent INS from deporting her. Mr. Hollander requested that the Commissioners refer Ms. Shipilina to the District Attorney for prosecution. Commissioner Weiner moved to refer the case to the United States District in the Eastern District of New York, and to the Queens County District Attorney for prosecution. Commissioner Graham seconded the motion, which was adopted unanimously.

Regarding the status of the 2003 Community School Board Elections, Mr. Richman reported that as of March 24th 2003, the city has not received a

Speed to BBleeds Meet 3/25 1:30 pm

Would like to add to the IIR in front of you

- although RF alien who grew up in Chechnya
- ① Shyplina speaks, writes & reads Eng sufficiently & understood the voter reg doct she sign claiming US citizenship
 - ② I believe she went to motor vehicle to obtain a) MV identity card non driver & b) voter registration that she could use as additional doct to show she is a US^{citizen} in order to obtain additional US id I as a passport

~~③ When she arrived here her only id was RF passport & Alien registration card~~

④ I believe she is taking this route of ~~claiming US citizenship~~ ^{as a contingency for possibility of} ~~immigration~~ ^{immigration} ~~deciding to~~ ^{immigrant visa applicat} deport her for material misrepresentation her

~~⑤ It will be easier to move about & get out of the US w/ fraudulently obtained US identification papers~~

~~⑥ As a further indicator of her claiming US citizen as not an innocent mistake, in her hometown Grozny she is known to associate w/ RF & Chechen organized crime figures~~

With US identification doct it will be easier for her to continue to live and work in America

NANCY MOTTOLA-
SCHACHER
PRESIDENT

MARK B. HERMAN
SECRETARY

WEYMAN A. CAREY
MICHAEL J. CILMI
NERO GRAHAM, JR.
DOUGLAS A. KELLNER
TERRENCE C. O'CONNOR
FREDERIC M. UMANE
VINCENT J. VELELLA
STEPHEN H. WEINER
COMMISSIONERS



BOARD OF ELECTIONS

IN
THE CITY OF NEW YORK
EXECUTIVE OFFICE, 32 BROADWAY
NEW YORK, NY 10004-1609
(212) 487-5300
FAX (212) 487-5349
www.vote.nyc.ny.us

JOHN RAVITZ
EXECUTIVE DIRECTOR

GEORGE GONZALEZ
DEPUTY EXECUTIVE DIRECTOR

PAMELA GREEN PERKINS
ADMINISTRATIVE MANAGER

STEVEN H. RICHMAN
GENERAL COUNSEL
TEL. (212) 487-5338
FAX: (212) 487-5342
E-MAIL:
srichman@boe.nyc.ny.us

VIA EXPRESS MAIL

March 27, 2003

Honorable Richard A. Brown
District Attorney
County of Queens
125-01 Queens Blvd.
Kew Gardens, NY 11415

Dear District Attorney Brown:

I am writing to you pursuant to a resolution duly adopted by the Commissioners of the Board of Elections in the City of New York at their public meeting held on Tuesday, March 25, 2003.

By letter dated March 13, 2003, Roy Den Hollander, an attorney admitted to the practice of law in the State of New York requested that the Commissioners of Elections refer the matter of Alina Shipilina's illegal registration as a voter, since she was not a United States Citizen. Mr. Hollander also appeared at the Commissioners' March 25th meeting and requested the Commissioners refer this matter to the appropriate prosecutors.

By way of background, Mr. Hollander, who claims to have been married to Ms. Shipilina and subsequently divorced. Mr. Hollander filed an affidavit with the Board in August of last year, pursuant to the provisions of the New York State Election Law, challenging the voter registration of Ms. Shipilina. Under the Election Law, the Board's Queens office conducted a review of

this matter and in December 2002, cancelled Ms. Shipilina's voter registration, listing as the reason, she is not a United States Citizen.

I am enclosing herewith all the materials submitted by Mr. Hollander that was presented to the Commissioners at the March 25, 2003 meeting.

Following said presentations, the Commissioners directed that this matter be referred to both the District Attorney of Queens County and the United States Attorney for the Eastern District of New York for their appropriate investigation, review and action. That resolution results in this formal letter of referral.

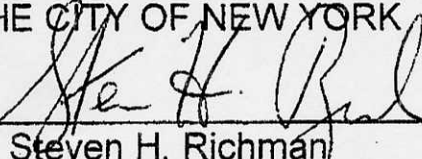
As always, the Board of Elections in the City of New York stands ready to cooperate and assist your office as you conduct your investigation and review. If you have any questions or require any information, please contact me at my office (address and telephone number printed above).

On behalf of the Commissioners of Elections in the City of New York, I want to thank you in advance for your cooperation and assistance in this matter.

Very truly yours,

THE BOARD OF ELECTIONS
IN THE CITY OF NEW YORK

By:


Steven H. Richman
General Counsel

Enclosures

Copies (without enclosures):

The Commissioners of Elections in the City of New York
John Ravitz, Executive Director
George Gonzalez, Deputy Executive Director
Pamela Perkins, Administrative Manager
Naomi Bernstein, Director of Communications
Steven Denkberg, Counsel to the Commissioners
Charles Webb, Counsel to the Commissioners
Barbara Conacchio, Chief Clerk, Queens Office
Katherine A. James, Deputy Chief Clerk, Queens Office

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ADMINISTRATIVE MANAGER

STEVEN H. RICHMAN
GENERAL COUNSEL
TEL. (212) 487-5338
FAX: (212) 487-5342
E-MAIL:
srichman@boe.nyc.ny.us

VIA EXPRESS MAIL

March 27, 2003

Honorable Roslynn R. Mauskopf
United States Attorney for the
Eastern District of New York
One Pierrepont Plaza
147 Pierrepont Street
Brooklyn, NY 11201

Dear United States Attorney Mauskopf:

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By letter dated March 13, 2003, Roy Den Hollander, an attorney admitted to the practice of law in the State of New York requested that the Commissioners of Elections refer the matter of **Alina Shipilina's** illegal registration as a voter, since she was not a United States Citizen. Mr. Hollander also appeared at the Commissioners' March 25th meeting and requested the Commissioners refer this matter to the appropriate prosecutors.

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IN THE CITY OF NEW YORK

By: 

Steven H. Richman
General Counsel

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