APPROVED FOR PUBLIC RELEASE BY COUNSEL TO THE PRESIDENT WARRINGTON on 10 July 2026

From: [redacted](CRM)[redacted]
Sent: Tuesday, January 4, 2022 11:51 AM
To: [redacted]DE) (FBI)
Cc: [redacted](D
Subject: [EXTERNAL EMAIL] - Re [redacted]

[redacted]

Happy to discuss. Are you available this afternoon between 1:30-3:00 pm, ET? Otherwise, I can talk later this week.

[redacted]

On Jan 3, 2022, at 11:46 AM, [redacted]> wrote:

[redacted]
I've been unable to reach you by phone, so I thought it might be best to reach out to you via email. I am one of the agents assigned to the [redacted]nvestigation out of FBI Detroit. We are preparing to close the investigation. Before we do so, I was hoping to discuss with you the limited scope that PIN approved into the investigation of the fraudulent voter registration applications. After reviewing "Federal Prosecution of Election Offenses" (December 2017), put out by the DOJ's Public Integrity Section, it appears as though this type of fraud would result in a full field investigation. Specifically –

- Under the heading, "Conduct that Constitutes Federal Election Fraud"
    - "Submitting fictitious names to election officers for inclusion on voter registration rolls, thereby qualifying the ostensible voters to vote in federal elections (52 U.S.C. §§ 1037(c), 20511(2))". (pg. 24)
    - "Providing false information concerning a person's name, address, or period of residence in a voting district to establish that person's eligibility to register or to vote in a federal election (52 U.S.C. §§ 1037(c), 20511(2)). (pg. 25)
    - "Causing the production of voter registrations that qualify alleged voters to vote for federal candidates, or the production of ballots in federal elections, that the actor knows are materially defective under applicable state law (52 U.S.C. § 20511(2)). (pg. 25)
- Under the heading, "False Information in, and Payments for, Registering and Voting: 52 U.S.C. § 10307(c)"
    - "Section 10307(c) is particularly useful for two reasons: (1) it eliminates the unresolved issue of the scope of the constitutional right to vote in matters not involving racial discrimination, and (2) it eliminates the need to prove that a given pattern of corrupt conduct had an actual impact on a federal election. It is sufficient under Section 10307(c) that a pattern of corrupt conduct took place during a mixed election; in that situation it is presumed that the fraud will expose the federal race to potential harm. Slone 411 F.3d at 647 (collecting cases)." (pg. 39 – 40)
- Under the heading, "False information to an election official"

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- "The "false information" provision of Section 10307(c) prohibits any person from furnishing certain false data to an election official to establish eligibility to register or to vote in a federal election. The statute applies to three types of information: name, address, and period of residence in the voting district." (pg. 40)
- "Some, but not all, states permit a practice commonly known as "bounty-hunting," that is, paying people to collect voter registrations on a per-registration basis. Where it is allowed, it is not unusual to find that this method of remuneration provides a motive for the unscrupulous to forge voter registrations and to enhance the piecework payments they can receive. While this situation usually does not result in fraudulent votes actually being cast, it does cause voter registration offices to become overloaded with the task of processing large numbers of bogus registrations immediately prior to an election, when the resources of those offices should be directed at preparing ballots and staffing polling sites. It also risks overloading voter rolls with "deadwood" names , which in turn undermines public confidence in the election process. Thus, even when no fraudulent votes result from bounty-hunting, the fraudulent registrations that arise from this conduct are not victimless offenses. Federal prosecutors should be cognizant of these circumstances and, when evidence of fraudulent registrations inspired by bounty-hunting is discovered, should consider prosecuting the individuals submitting the false registrations, as well as, in appropriate circumstances, the organizations that employ and pay them, under Section 10307(c)." (pg. 42 - 43)

Although, it doesn't appear [redacted] as paying on a per-registration basis, it is reasonable for the canvassers to believe they would not keep the job if they weren't somewhat productive, and regardless of what they believed, they still submitted fraudulent voter registration applications. I understand that proving this was done "willfully" would still be difficult, but I wanted to raise my concerns before closing the case and was hoping to better understand the reasoning behind not approving a full investigation.
Thanks,
[redacted]

S [redacted]
FBI Detroit

[redacted]