

**Coalition of New Hampshire Taxpayers**

8 North Main St.

Concord, NH 03301

To:

Department of Justice

U.S. Attorney's Office

District of New Hampshire

Concord, NH

**Voter Fraud Complaint**

As per: 52 U.S.C. §§ 10307, 20511 - Providing false information concerning a voter's name, address, or period of residence in order to register to vote, or to vote in a federal election.

I hereby submit names of four people who are currently or have recently been on New Hampshire voter checklists but are by all public documents available to citizens and our taxpayer group, not now or ever were qualified voters in elections for Federal Office in this state.

**1. Ryan Tood Clayton, DOB: 9/8/1981 NH voter number #300346982**

Ryan T. Clayton was arrested Oct. 24, 2017 in Washington, DC. giving DC Police an address of Sterling, Virginia.

From Police press release:

Good afternoon,

Today, at approximately 1:38 p.m., the United States Capitol Police arrested an individual for protesting inside the U.S. Capitol.

An adult male, identified as Ryan T. CLAYTON, 36, of Sterling, Virginia, was preliminarily charged with §10-503.16, Unlawful conduct.

The incident continues to be under investigation.

He has been a regular voter at 200 Bodwell Rd. in Manchester, NH since 2014 and is still on the updated Manchester voter list at that same address.

Below is a copy of his current standing in the Manchester voter database:

**300346982 CLAYTON RYAN**

200 BODWELL RD

MANCHESTER NH 03109

DEM 11-07-2017

MANCHESTER MUNICIPAL GENERAL

Regular 08

Ryan Tood Clayton has a long list of former associated addresses beside the recent address given at his arrest on Oct. 24, 2017 just before voting in NH for the fourth time since 2014.

## 2. Adam Thomas Huberty, DOB: 6/17/1979

Huberty resides at: 164 Lemonton Way, Radnor, PA 19087 where he is a practicing attorney:

State	Status	Acquired	Updated
NY	Currently registered	2007	05/17/2018

Adam Thomas Huberty is registered to vote in New Hampshire and is listed on the Manchester database:

**#300370263 HUBERTY ADAM THOMAS**

25 WALKER ST #1W

MANCHESTER NH 03102

DEM 11-07-2017

MANCHESTER MUNICIPAL GENERAL

Absentee 10

After voting in NH in 2016 he voted absentee in the 2017 Manchester mayoral race.

Huberty is a long time registered voter in Pennsylvania as well and is currently registered as “active.”

Huberty is a professional campaign worker who has worked in many states and who filed an FEC report from 117 Manchester St. Concord, NH 03301- after claiming 25 Walker St. as his domicile.

**3. Hugo E. Palma, DOB: 10/31/1988 and Donna S. Waterman, 25, Po Box 479 Charlotte, VT 05445**

**Palma and Waterman** both voted absentee in 2016 from 345 Cilley Rd. in Manchester, NH. That address, at the time, was a commercial property rented for use by the Sanders for President Campaign. It was not by the terms of the lease, a residential property anyone could use as a domicile.

**Hugo Palma** was staying at a private residence in Warner, NH and driving a car with Colorado plates while working on the Sanders campaign. He was a registered voter in Colorado Springs at the time.

He is currently on the Manchester, NH voter database since voting in NH in 2016:

**300380227 PALMA HUGO E JR**

345 CILLEY RD

MANCHESTER NH 03103

DEM 09

Palma was never a qualified voter in NH as he never had a NH domicile.

**Donna S. Waterman** also used 345 Cilley Rd. as her original illegal domicile. She has since changed her address to:

**# 300380287 WATERMAN DONNA STEINGARD**

1048 HAYWARD ST

MANCHESTER NH 03103

She is still listed as a qualified voter on the Manchester voter database and has removed herself from the Vermont Statewide database where she was a registered voter at the time.

NH Statute regarding qualifications to vote:

**654:17 Absentee Registration Affidavit. –**

I. The absentee registration affidavit shall be prepared by the secretary of state and shall be in substantially the following form:

Affidavit (Absence from town)

I, \_\_\_\_\_ do hereby swear or affirm, under the penalties for voting fraud set forth below, the following:

1) That my legal domicile is in the town of \_\_\_\_\_, New Hampshire, I will be of the age of 18 years or over on election day and am entitled to vote in the election to be held in said town on \_\_\_\_\_, \_\_\_\_\_ (date), except for the fact that my name does not appear on the checklist to be used in said town at such election;

2) That I do not intend to be present within said town at such time prior to said election as shall enable me personally to appear before the supervisors of the checklist of said town in their regular sessions for the correction of the checklist for said election;

3) That I am temporarily residing in \_\_\_\_\_ (city and state or city, province, and country);

4) That I hereby enclose one of the following as proof of identity and domicile:

(a) A copy of a current and valid New Hampshire driver's license or an armed services identification or other photo identification issued by the United States government that shows my name and address; or

(b) A copy of a current and valid photo identification and a copy of a current utility bill, bank statement, government check, paycheck, other government document that shows my name and address, or a letter from the administrator of a nursing home or similar facility affirming that I am a resident of that facility that was

provided to me at my request pursuant to the administrator's duty to provide such a letter upon my request;

5) That I acknowledge that if I do not provide a copy of proof of identity and domicile as required by section 4) above, this application may not be approved; and

6) That I hereby make application for the addition of my name to the checklist of said town to be used at said election.

Signature of Applicant \_\_\_\_\_ Date \_\_\_\_\_

**In accordance with RSA 659:34, the penalty for knowingly or purposefully providing false information when registering to vote or voting is a class A misdemeanor with a maximum sentence of imprisonment not to exceed one year and a fine not to exceed \$2,000. Fraudulently registering to vote or voting is subject to a civil penalty not to exceed \$5,000.**

The above statements are true to the best of my abilities. I can supply more documentation for each individual case.

Signed \_\_\_\_\_

Phone **603-831-2031**

Email: **ednaile@comcast.net**

This date \_\_\_\_\_