BEFORE THE COMMONWEALTH'S ATTORNEY FOR FAIRFAX COUNTY

In re

Peter Graham Olson,

COMPLAINT

Respondent.

Complainant Matt Angle, Director, Lone Star Project, hereby submits this Complaint pursuant to section 24.2-1019 of the Code of Virginia and, in support, avers as follows:

FACTS PERTAINING TO PETER OLSON'S VIOLATION OF SECTIONS 24.2-1004 AND 24.2-1016. OF THE VIRGINIA CODE

- 1. Respondent Peter G. Olson ("Olson") is currently a candidate for the United States House of Representatives in the Twenty-Second Congressional District in Texas. He currently resides at 4018 Weatherfield Court, Sugarland, TX 77479, and is registered to vote at that address. Attachment A.
- 2. On February 23, 1995, Olson purchased a home at 7804 Ashley Glen Road, Annandale, VA 22003.
- 3. On September 6, 1996, Olson registered to vote in Newtown, Connecticut. He listed his voting residence as 31 Poverty Hollow, Newtown, CT 06470, the home of his parents,

Richard and Mary Olson. Olson requested that absentee ballots be sent to 7804 Ashley Glen Road, Annandale, VA 22003, and listed the reason for voting absentee as "Member of armed forces." Attachment B.

- 4. On November 5, 1996 and November 4, 1997, Olson voted in the general elections in Newtown, CT. Attachment C.
- 5. On February 3, 1998, Olson purchased a home at 8203 Strong Spring Court, Annandale, VA 22003. On a Confirmation of Voting Residence Return Form, signed February 27, 2005, Olson indicated that he moved from Newtown, CT to Annandale, VA on February 27, 1998. Attachment D.
- 6. On September 3, 1998, Olson registered to vote in Fairfax County, VA. Attachment E.
- 7. On November 3, 1998, November 2, 1999, November 7, 2000, November 6, 2001, and November 5, 2002, Olson voted in the general election in Fairfax County, VA. Olson voted in the Republican presidential primary in Fairfax County, VA on February 29, 2000, and in the Republican primary in Fairfax County, VA on June 10, 2003. Attachment E.
- 8. Olson voted in a special election in Newtown, CT on August 12, 2003. Attachment C & Attachment F.
- 9. On November 4, 2003, and November 2, 2004, Olson voted in the general election in Fairfax County, VA.

 Attachment E.

- 10. On February 27, 2005. Olson signed and returned a Confirmation of Voting Residence Return Form to the Newtown Town Clerk, indicating that he had moved out of Newtown on February 27, 1998. He gave his new address as 8203 Strong Spring Court, Annandale, VA 22003. Attachment D.
- 11. On June 14, 2005, November 8, 2005, and November 7, 2006, Olson voted in Fairfax County, VA. Attachment G.
- 12. On August 14, 2007, Olson purchased a home at 4018 Weatherfield Ct., Sugarland, TX 77479. On August 17, 2007, he registered to vote in Fort Bend County, TX, and listed his last location of voter registration as Annandale, VA.

Attachment A.

APPLICABLE LAW

- 13. Under Virginia law, any person who intentionally "registers to vote at more than one residence address at the same time, whether such registrations are in Virginia or in Virginia and any other state or territory of the United States . . . is guilty of a Class 6 felony." Va. Code. Ann. § 24.2-1004(C).
- 14. Under Virginia law, "[a]ny willfully false material statement or entry made by any person in any statement, form, or report required by [Title 24.2] shall constitute the crime of election fraud and be punishable as a Class 5 felony. *Id*. § 24.2-1016.

- 15. Under the Constitution of Virginia, "each voter shall be a resident of the Commonwealth and of the precinct where he votes. Residence, for all purposes of qualification to vote, requires both domicile and a place of abode." Va. Const. art. II, § 1.
- 16. Under Connecticut law, in order to register to vote, a person must be a "bona fide resident of the town to which the citizen applies for admission as an elector." Conn. Gen. Stat. § 9-12(a).
- 17. Under Virginia law, there is no statute of limitations for felonies. See Va. Code. Ann. § 19.2-8.

COUNT ONE

- 17. Complainant realleges and incorporates by reference paragraphs 1 through 17, above.
- 18. As set forth above, Olson, while registered to vote in Fairfax County, VA, voted in a special election in Newtown, CT on August 12, 2003.
- 19. Such activity evinces an intent to be registered to vote at more than one residence at the same time.
- 20. Such activity violates section 24.2-1004(C) of the Virginia Code.
- 21. Section 24.2-1019 of the code states that "[a]ny complaint or allegation concerning unlawful conduct under [Title 24.2] shall be filed with the attorney for the

Commonwealth of the county or city in which the alleged violation occurred."

COUNT TWO

- 22. Complainant realleges and incorporates by reference paragraphs 1 through 17, above.
- 23. As set forth above, Olson represented that he was a resident of Fairfax County, VA, when he registered to vote in Fairfax County, VA on September 3, 1998.
- 24. By voting in a special election in Newtown, CT on August 12, 2003, Olson indicated that he regarded himself as a resident of Newtown, CT.
- 25. Olson's representation on his voter registration form that he was a resident of Fairfax County, VA was knowingly false.
- 26. Such activity violates section 24.2-1016 of the Virginia Code.
- 27. Section 24.2-1019 of the Virginia code states that "[a]ny complaint or allegation concerning unlawful conduct under [Title 24.2] shall be filed with the attorney for the Commonwealth of the county or city in which the alleged violation occurred. In the case of a complaint or allegation concerning the filing of a false statement in a voter registration application, the violation shall be deemed to

violation occurred. In the case of a complaint or allegation concerning the filing of a false statement in a voter registration application, the violation shall be deemed to have occurred in the county or city where the applicant sought to be registered."

PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully requests that the Commonwealth's Attorney for Fairfax County

- A. Conduct an immediate investigation and review of this matter and initiate criminal charges against Peter G. Olson for violating sections 24.2-1004(C) and 24.2-1016 of the Virginia Code.
- B. Take such other and further action as the Commonwealth's Attorney deems just and reasonable, or as the law may require.

Respectfully submitted,

Matt Angle

Director, Lone Star Project 6 E Street, SE Washington, DC 20003

STATE OF USC	
County of	
SUBSCRIBED AND SWORN	to before me this 🆊 day of
2008.	Wilne Sim
My Commission Expires:	Notary Public
Wilma Simms Notary Public, District of Columbia My Commission Expires 7/31/2012	

P.02

Attachment A

Dominion I				
Prescribed by the Scorelary of State VOTER RE	CICOD ADVAN			
VR64-2.05E.p65 (SOLICITIED D	GISTRATION APPLICATION			
Land Court (SOLICITUD D	DE INSCRIPCION DE VOTANTE)		For Official Use On	ile.
Last Name (Apellido usual)	First Name			イグルの
ÖLSÖN	(Nombre)		Middle Name (If any)	EDR
	(Nombre) PETER		(SELIEGO Nombre (si bay))	Former Name
Residence Address: Street Add			GRAHAM """	(Nombre Anterior)
(Dirección residencial (Damicilia): Call	partment Number , City, State and Zin, If conv. de	- 12	<u></u>	
Care y numero y	partment Number, City, State and Zip. If none, de número de spartamento. Ciudad, Estado y Código Postal. Si fal URT, SUGAR LAND TX 774700000	SCHDe	where you live. (Do not include P.O. B	ox or Rural De
4018 WEATHERFIELD CO.	HDT CHOICE	m et CK	describa dónde vive.) (No incluya el apartado po	istal ni la mta omiti
Mailing Address: Street Address and Anna	ment Number or P.O. Box, City, State and ZIP: Listing and State and State of the st		DEND	
residence address. (Dirección para Corresponden	unent Number or P.O. Box, City, State and ZIP: 1	f mail.	Common h	
no se puede entregar correspondencia a su dirección re	tment Number or P.O. Box, City, State and ZIP: Beis: Calley admero y admero de apartamento, a Apartado Posta stidencial.)	I. Civda	d. Estado y Cadina P. Gender	(Optional)
D. C. Albert	. Alli 1 7 2007		CED 4 2 1717 1 9-9 (Optativo)
Date of Birth: month, day, year	If you check 'no' in the		_SEP TO ZUU (176/Maio	(Hombre) Female(Mujer)
(Fecha de nacimiento): (mes. día, año) 12-09-1962	If you check 'no' in the response below, do not complete this form. (En caso de dado una res ANNA ADAL E VA			(Hombre) Female(Mujer)
		1	//\	
Check appropriate how I AM A Trans	llene el resto del formulario.)	TV	(Delivertex)	
Check appropriate box: IAM A UNITED S (Marque et cuadro apropriado: ¿Es usted ciudadano/a c	TATES CITIZEN	٦.,°	Driver's License No. or Personal L.D. Public Safety) (Nimero de cultural	No. (Issued by TY Dent
Z Primara (magaano/a (de los Estados Unidos?) Yes No	Ider	Public Safety) (Número de su licencia tejana ntidad expedida por el Departamento de Semuido	de manejar o de su Cédula da
I understand that giving false information t	L (SI) L (No)	ntidad expedida por el Departamento de Segurida	d Pública de Tejas)
crime under state and federal law Conviction	o procure a voter registration is perjury, and a	1		• •
		Are	you interested in serving as an election in de trabajador (a) electoral?)	*
actio nearo puede conflevar encarcelamiento por 180 di	tiendo que el hocho de dar datos falsos con el afán de obtener el clito a tenor de las leyes federales y estalates. Una condena por fas, una muita hasta de dos mil détares o ambos sanciones.)	201.6		
I affirm that I (Afirmo)	dos trai dotates o ambas sanciones.)	Cha	Yes (si) No	(No)
2 2m a resident of the		Cne	ck one (Marque una de las respuestas)	1
 am a resident of this county; (que soy reside have not been finally convicted to a president 	nie de este condado)		New Control A	Replacement
		Esta e	s una solicitud (Nueva) (Modificada)	(Sustitutiva)
Ueen pardoned, and committee	, - P - Court per indication of them.	_	\sim //	
		. `	7// // 1/	08 15 2007
reclusión carcelaria, libertad condicional, supervisión heneficiario/a de un indulto;y)	n/a por un delto mayor ("felonía") o, si se me ha la condena correspondiente, incluso cualquier período de		react OII	
				Date (fecha)
ninguna decision definition d	tent by final judgment of a court of law. [que	Signat of 4 co	ture of Applicant or Agent and Relationship to blicant if Signed by Witness and Date (Firms d	Applicant on Prince and
ninguna decisión delimitiva de un tribunal me ha decl	arado mentalmente incapacitodo/a.)	(ADDOOR)	rado/ at viel assess	croe la solicitante o cu August.
		Solicita	rado/ a) y el parentesco entre los dos o el Nombra ame si la firma es la de un(a) testigo. Indique la fi	en Letra de Molde del/de la
			oo untu) restigo, indique la fi	acha.)

Type or legibly print all information; sign; complete oa	 eth; self address sma	all post card to your current	1 Standard Attachment	В
iddress; fold so that large post card is on outside; seal; co ard and mail.	omplete "to" and up	per left corner ón large post	(R_	
Privacy Act Sta		and the second s	SPECIFIC INS CON	
	request for absentee ballo	s as an application for registration ot.	1. APPLICANT INFORMA	
norther use. All persons covered by the officialist and		owever, failure to provide the keep the pertinent state or other	person requesting regist provide passport, State D	
	sdiction from processing m voting absentee	this request and may prevent you	number. If none, indica certificate, etc.) and n	
	1 11 11 1		1. identification.	
Election Official name and complete address		U.S. Postage Paid	information as known fc VOTED. This is not necess	
	111 11 1	39 USC 3406	3. VOTING RESIDENCE	
			ACTUALLY LINED Your I determination of votin	
		PAR AVION	physical location while your may not use a PO	
		 _	**ROUTE NUMBER. Exampl home of record; perma	
OFFICIAL ABSENTEE BALLOTING N	MATERIAL - FIRS	T-CLASS MAIL	locality or state where you it may have been. It wou	
NO POSTAGE NECESSARY IN THE	U.S. MAILS - DMM	137.3	and telephone number of section in the event local	
Applicant name and co	omplete address		concerning the application	
•			4. MAIL ABSENTEE BAI mailing address where yo	
TO: <u>PETER GRAHAM</u>	OUSON	_	ballot. Be sure to include ZIP Code. If you will ha	
7804 ASHLEY G	ISU ROAD		registration forms or ball- list the new address.	
- FORECT OF	CCPC TOTAL		S. REMARKS. Provi	
_ANNANDALE, V	+ 22003-1	222	feel will assist state office Consult the APPROPRIAT	
Γ	10:504 M	9/14 101	information which may be are requesting your sta	
	lec'd. for Record	_9/4 19%	indicate here the reason special write-in ballot, i.e	
	Town Clerk		mail service, submarine du	
!	Syrthe lu	the dinor	Specific Instructio reverse.	
FEDERAL POST CARD REC	ISTRATION A	AND ABSENTEE BAL	LOT REQUEST	
	OUNTY OF	CITY OR TOV	VNSHIP OF NEWT	
I. APPLICANT INFORMATION (See Instruction 1.)		6. REASON FOR ABSEN		
. Typed or Printed Name (Last, First, Middle) OLSON, PETER GRAHAM	b. Sex c. Race	a. Member of armed forces, u		
I. Social Security No. e. Other Identification No. (Passport, ID Card)	, , , , , , , , , , , , , , , , , , ,	b. Spouse or dependent of 6a		
PASSPORT #J201383	ſ	c. U.S. citizen temporarily resi d. U.S. citizen overseas by vi		
h. Place of Birth (City, State, Country) (Mo(Day)Yr)		e. Other U.S. citizen residing of		
12/09/62 TACOMA, WA, USA		f. Special.		
	Date of Naturalization (Day/Yr)	7. I REQUEST ABSENTE		
2: I LAST VOTED		ELECTIONS (X as applicable X a. Primary X b. General	e. See Instruction 7.) C. Special X d. All ele	
	istration No (If known)	LIST PARTY AFFILIATION IF 7.a. OR		
984 HARRIS TX UNK	NOWN	8. AFFIRMATION BY A	PPLICANT	
B. VOTING RESIDENCE a. Last Date of Residency	· ·	I swear or affirm, un	der penalty of per	
(Legal or last residence in the U.S.) (D8/D1/84) (Number and Street (Do not use box or rural route)		a. 1 am a United States Citizen, eligible	<u></u>	
31 POVERTY HOLLOW		 b. I have not been convicted of a felor mentally incompetent, or if so, my v 		
City, Town, or Village d. County or Parish e. S		 I am not requesting a ballot from or division thereof in the coming elect 		
Newtown C		d. The information on this form is true	and complete	
4. MAIL ABSENTEE BALLOT TO: (Complete mailing want ballot mailed)	address where you	e. SIGNATURY OF APPLICANT	loom	
7804 ASHLEY GUEN ROAD		9. OATH. SUBSCRIBED	AND SWORN TO	
ANNIANDA = 1/4 22.003-155	~	(If path is required by state, enter	following information for the	

d. SIGNATURE OF OFFICIAL

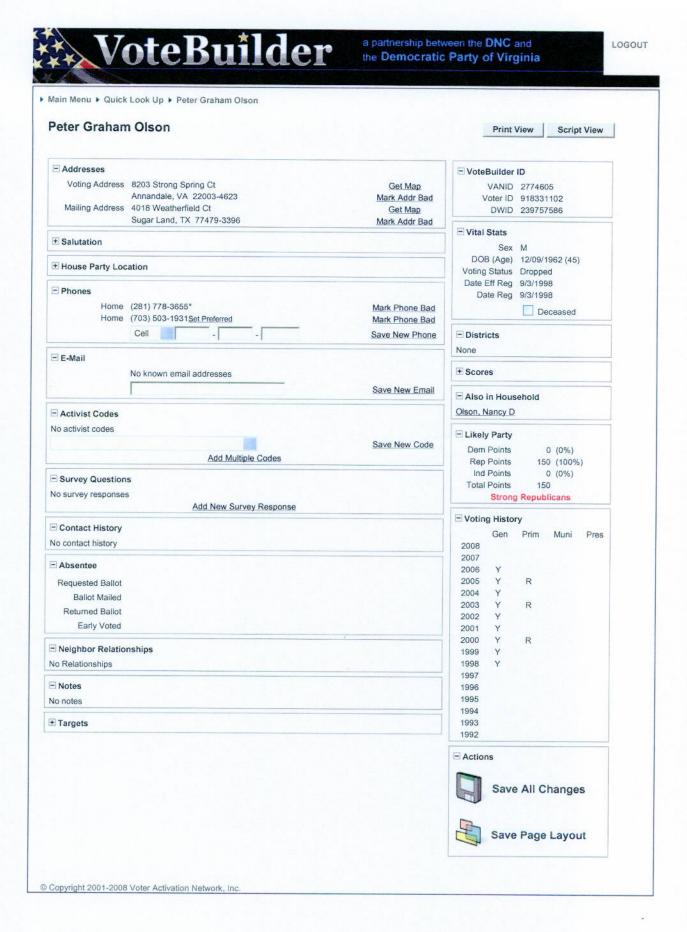
5. REMARKS (703) 573-%33 b. TITLE

Connecticut Voter Registration System Inquiry - View Voter Registration KARIN / Newtown **Previous Name** Previous Address Previous Party Voter Information Residence Address **Enrollment Information Current Party Prefix Name:** Address: 31 Poverty Hollow Road Republican Voter's Name: Peter G Unit: Olson <u>Privilege Date</u> Date of Birth: 12/09/1962 City: Newtown Voter ID: 000545174 **Zip:** 06470 -State: CT 1875 Miscellaneous **Audit History** Gender: Male **Status Information** Telephone: Reg. Effective Date: 09/06/1996 Special Status: Military **Election History Current Status:** Off Perm Absentee Ballot: No Last Active **Canvass History Date:** 03/03/2005 Off Reason: CVR Returned by Voter Mailing Address Street No. Town Street Name /P.O. Box Unit State Zip Code Armed Forces Newtown 06470 CT Country: Senatorial: 028 Assembly: 106 **Districts:** Congressional: 005 District/Ward Precinct Polling Place STATE: 003 Head O Meadow School 01 Cafetorium LOCAL: SPECIAL: 006 00 Middle School Gym A Inquiries Back

Connecticut Voter Registration System							
Inquiry - Voter Election	nquiry - Voter Election History KAR						
	Voter Name Peter G Olson						
Previous Election	Previous Election History						
Election Date	Election Type	How Voted					
08/12/2003	Special	In Person					
11/04/1997	1/1997 General In Person						
11/05/1996	1/05/1996 General In Person						
Back							

Confirmation of Voting Residence RETURN FORM PART B	TO: Registrar of Voters 45 Main Street 06470		District 097	LAST DATE to March 18, 2005	return this form:	
	repriate boxes and en	ter info	rmation re	quested.		
1. [] I still live at the	address shown on this for	rm.	5.	[] I am temporarily but I intend to retu	absent from the town,	
2. [] I have moved to	a different address within	n this tov	<u>vn</u> .	(Reason for your	absence)	
3. 💢 I have moved on	ut of town.		*	/		
4. [] Send me a Mail-	In Card to register in my	new tow	n.	2,7		
NEW ADDRESS IS(N	Vo., street, town, state)	DATE	MOVED	8		
8203 STRONG S ANNANDALE, V		2/2	7/98	Birth Date 12	19/62	
Name and Address on last list of Registered Voters Name and Address On last list of Registered Voters Registered Voters Roude		5	Don't RISK your Right to VOTE! Fill out and Return this to Registrars!!! SIGNATURE OF VOTER DATE SIGNED 2/27/25			





Memo From: *TOWN CLERK*TO:

Attached is a copy of
the voter roll sheet for
8/12/03. Unfortunately,
we no longer have
those from 1996+1997.
Stortute requires that
we keep only 5 years.
Please let us know
if there is anything
else we can do.
Thank you.

Printed: 08/06/2003 For: 08/12/2003 Town of Newtown - Official Voter List - Active Voters in Special District 006

Seq#	Party	St #	Last Name, First Name, MI	Sec	q #	Party	St#	Last Name, First Name, MI
	M RIDGE I	ROAD CONT.		PO	VERT	Y HOLLO	W ROAD CONT	г.
10587	D	5	ROSTAFIN MICHAEL J	9166106		-9 -		SCHWARTZ LISA-B
10588	R	6	CASSIDY KEVIN K	106		D	3 7	SCHWARTZ SCOTT M
10589	R	6	CASSIDY PAMELA A		533	U	4 1	CAMPBELL PAMELA M
10590	R	7 A	HENNESSY JUSTIN D	9200 100	534	U	4 I	CAMPBELL SULLIVAN J
10591	U	7 A	HENNESSY KAREN E W	00-100	22.5	<u>R</u>		BRYMER BARDARA I
10592	R	7 A	HENNESSY MICHAEL E	9124100		R	43	MEADOWS ROY G
10593	R	8	REILLY MARGARET H		537	R R	45	SCHNEIDER HELEN A
10594	R	8	REILLY PATRICK T	106			4 5 4 7	SCHNEIDER WALTER F
10595	R	9	LEITNER JOHN J	106 106		R D	47	EVERTEZ ANTONIO EVERTEZ CECELIA V
10596	R	9	LEITNER LUELLA C MOORE JEFFREY D	106		D	49	D'AMICO MICHAEL F
10597	Ü	10		106		D	49	D'AMICO RAINA D
10598	D	10	MOORE WENDY P	106		Ŭ	50	MENDEZ SANTOS
70611 0599	R U	12	AGUGLIARO JOSEPH	106		Ď	59	REZNIKOFF ALEXANDER J
10600 10601	Ü	12	AGUGLIARO JOSEI II AGUGLIARO KAREN M	106		Ď	59	REZNIKOFF CAROL D
		ROAD Total Voters		106		Ď	61	GARSON ANDREW E
FUSSU	M KIDGE I	NOAD TOTAL VOICES	· • ·	106		D	61	GARSON PATRICIA J
POSTI	ANE			106		Ř	7.3	MICHEL JAMIE D
10602			▲ JACOBS WILLIAM J	106	549	U	73	MICHEL KAREN
	LANE Total	Voters: I		106		Ū	73	MICHEL ROGER D
*	MIND TOTAL	, o.c., ,		9234 100	551 -	R -	-77 -	
POVER	RTY HOLLO	OW ROAD		106	552	R	77	NOSAL AILEEN C
10603	D	I 4	CAPOSELLA KATHERINE A	106	553	R	77	NOSAL AMY M
1250 10604-	- ij	-16 -	ANDRAS AMY B	9331 100	554 -	-R -	77	———— NOSAL-ROBERT D
113 110605	<u> </u>	16-	———— ANDRAS ANN M	100	555	U	78	DARRIN WILLIAM A JR
187/10606	_R	-16	ANDRAS DAVID M	106	556	R	79	GUSTAFSON ANDREA N
41 9 1 0 6 0 7 -	- R -		ANDRAS JANICE A	, 106	557	R	79	GUSTAFSON MELISSA R
18608	 -	16	ANDRAS WILLIAM D	9226 100		R	79 -	———GUSTAFSON PENNY-R
110609	U	18	VANBUSKIRK PETER C	106		R	79	GUSTAFSON RICHARD A
10610	D	18	VANBUSKIRK TRACY S	9290 100		R		———— WEBER JOHN J
10611	U	20	BARRETT KEVIN A	9291 100	561	-U	-87	——— WEBER NANCY J
10612	D	20	BARRETT MARYANN E	9305 100	562 -	- R		
10613	D	2 2	SETZ JAMES R	4244	000	R	-88 -	
10614	R	26	MASSER KAREN H	, 100		D R	89	FIGUEROA-HEATH RAQUEL J
\\\^2\dagger\10615	R -		MASSER RICHARD H	106			89 89	HEATH JOHN S HEATH MEGHANN G
10616	ប្	27	BERKO STEVEN M	106 106		D U	90	* MAURATH DARYL Z
10617	R	27	FEDER JOHN K JR FEDER SABRINA A	106		Ü	90	MAURATH DARTE Z ✓MAURATH THOMAS M
10618	R	2 7	KORTH JOHN M	106		R	93	LETSO ROGER A
10619	U	28	KORTH JOHN M KORTH WENDY	106		R	93	LETSO SUZANNE J
10620	U	28		106	-	Ù	102	SODERHOLM JILL E
167 10621	- U		SHANLEY ESTHER T	106		Ŭ	103	WHITLOCK DAVID E
10622	R D	31	OLSON LINDA M	106		Ŭ	103	WHITLOCK MICHELLE A
10623 1371 0624		- 31	OLSON PETER C	4)80106	574	Ŭ	105	——————————————————————————————————————
10625	R R	31	OLSON RICHARD E	(1.42 10(575	-Ŭ	105	POZEK-RUDOLPII-J
19 10626	R -	$\frac{31}{33}$	- GECKLE KATHERINE L	98106	576	<u> </u>	106	O'NEILL CARMEL T
-10627		33	GECKLE ROBERT A SRIP	106	677	Ď	115	GILCHRIST JOHN H
120027	- R	34	GEHRETT ELLYN B	-10€	578	Ď	119	PEELING JOHN K-PAD-
129 10629	_ R	34	GEHRETT J. PAUL	690) 100	579	D —	-119	
1210630	- 0	35	PRESTERA RONALD K	106	580	U	121	VICARS-HARRIS EVELINE

INFORMATION RETRIEVAL AT FAIRFAX COUNTY BOARD OF ELECTIONS

Records of the Fairfax County Board of Elections, Fairfax, VA disclosed that both Peter & Nancy Olson voted in the November 2005 & November 2006 General Election. Peter Olson voted in the June 14, 2005 Republican Primary. There is no further information available.