

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

Plaintiff,

v.

STEVE SIMON, in his official capacity  
as Secretary of State for the State of  
Minnesota, and the STATE OF  
MINNESOTA,

Defendants.

Case No. 25-cv-3761-KMM-EMB

**PLAINTIFF UNITED STATES' NOTICE OF ADDITIONAL BASIS**

The United States of America submits this Notice of Additional Basis pursuant to the Civil Rights Act of 1960, 52 U.S.C. § 20701, *et. seq.* On April 17, 2026, the Civil Rights Division of the U.S. Department of Justice sent a letter to Defendants titled, "Additional Basis to Obtain Minnesota's Voter Registration List Under the Civil Rights Act of 1960," attached to this filing as Exhibit 1. *See* Ex. 1.

This additional basis is a recent public report that alleged that noncitizen Mukeshkumar Somabhai Chaudhari submitted a ballot in the 2024 federal election and may not have been eligible to vote due to his citizenship status.<sup>1</sup> Further, according to this

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<sup>1</sup> Kate Wermus, *Noncitizens registered to vote, cast ballot in Minnesota's 2024 election: Charges*, Fox9 KMSP (April 14, 2026, 1:58 p.m. CDT), <https://www.fox9.com/news/noncitizen-registered-vote-cast-ballot-minnesotas-2024-election-charges>. (Last accessed April 17, 2026, 3:00 p.m. EST.)

reporting, “Records reviewed by authorities showed Chaudhari registered to vote on March 12, 2023, and was added to the voter rolls on March 27, 2023. Charges allege he signed a voting ballot and submitted it at a polling place in Spring Valley on Nov. 5, 2024.” *See Ex. 1.*

The Civil Rights Division noted in the letter that because Defendants have “failed to remove an ineligible individual such as Chaudhari from Minnesota’s voter rolls, the Division must verify that no such other individual is registered to vote, in violation of federal law.”

DATED: April 17, 2026

Respectfully submitted,

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Civil Rights Division

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*/s/ Brittany E. Bennett*

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 17, 2026 a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

*/s/ Brittany E. Bennett*

BRITTANY E. BENNETT  
Trial Attorney, Voting Section  
Civil Rights Division  
U.S. Department of Justice

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