

October 3, 2025

Via Regular and Certified Mail

C.O.P.S., LLC
524 8th Avenue
Galloway, NJ 08205

Re: Atlantic City “Election Integrity” Investigation

Dear Sir/Madam:

Please be advised that this firm represents the Atlantic County Democratic Committee (“ACDC”). I write concerning the above-referenced matter.

Over the past few weeks, numerous Democratic voters in Atlantic City have been contacted by an “investigator” alleging that he is conducting an “election integrity” or “voter fraud” investigation. All the individuals contacted are of South Asian descent. The “investigator” identifies himself as “Andrew,” states that he is an “investigator,” and displays a badge. However, when questioned further about his identity, he displays an identification card that shows his name is William Dickerson and that he is associated with your agency. A copy of a photograph depicting this individual and his identification card is enclosed.

The ACDC has no tolerance for voter fraud. Indeed, we have successfully obtained court orders enjoining fraudulent conduct in past elections.

However, we have significant concerns about this “investigation.” First, it is unclear who this investigator is and why he is telling people that his name is something different than what is reflected on the identification he displays. Applicable law requires private investigators to carry and display appropriate identification.

Second, we understand that the investigator is persisting in contacting individuals at their places of employment, by phone, and at their residences even after they have advised they do not want to speak to him. We believe such harassing contact, if occurring, is improper and prohibited by law.

Third, as mentioned above, we understand that all the individuals contacted belong to the Democratic Party and are of South Asian descent. To the extent that voters are being targeted for

“investigation” based on their race, ethnicity, or national origin, we believe such conduct is contrary to the New Jersey’s anti-discrimination and civil rights laws.

As you may know, New Jersey has strong laws prohibiting the intimidation of voters. See e.g. N.J.S.A. 19:34-28 and 29. Please be advised that we are closely monitoring this situation. If we determine that those statutes, or any other applicable provision of law, are being violated, we will take immediate legal action to address the same to protect the rights of voters to independently exercise their franchise. In such an action we would seek, and expect to receive, an injunction against any identified misconduct together with all other relief available at law and equity, which may include attorney’s fees and costs.

If you believe we are mistaken as to any of the facts as we set forth above and wish to clarify, please do not hesitate to contact me to discuss the same. Otherwise, we trust that your agency will act within the confines of applicable law going forward.

Thank you for your attention to this matter.

Very truly yours,

HANKIN PALLADINO
WEINTROB BELL & LABOV
Counsellors at Law
A Professional Corporation

By: /s/ Colin G. Bell
Colin G. Bell, Esq.

CGB/jb
enc.

