



"DARKNESS-CANNOT-DRIVE-OUT-DARKNESS,-ONLY-LIGHT-CAN-DO- THAT."¶

--DR.-MARTIN-LUTHER-KING-JR.¶

FINAL REPORT

To: Sean Matteson

From: New Light Investigations LLC

Assigned Investigator: Jacqueline Manning

Date: February 14, 2024

Subject of Investigation: Patricia Clark, Registrar of Vital Statistics

Department: New Haven Health, Vital Statistics, 165 Church St, #154, New Haven, CT 06510

Allegations: Reporting approximately seventy-three marriage licenses for non-citizen immigrants to federal immigration authorities

SCOPE OF INVESTIGATION

New Light Investigations was assigned to conduct a factual investigation into the following:

- a. Allegations regarding the conduct and operations by the Registrar of Vital Statistics (the Registrar) in the sharing of information and potential denial of services for members of the public who may be either undocumented residents of the city or state or non-US citizens, who have legal status (assigned an "A" number/Green Card).
- b. Allegations that the Registrar of Vital Statistics may have denied public services to residents of the City or the State without justification.
- c. Determine whether there have been any other instances whereby marriage, birth, death, or other confidential information was disclosed to any non-City entities, including but not limited to the State or Federal Governments and their agencies, other local municipalities, or any other third parties.
- d. Allegations that the Registrar of Vital Statistics may have reported individuals seeking services from the City as potentially undocumented, non-US citizens to State or Federal immigration or to any other third party without justification.

BACKGROUND

On October 24, 2023, New Haven Health Department (NHV Health) Deputy Director Brooke Logan met with Registrar of Vital Statics Patricia Clark for a one-on-one supervisor meeting. During the meeting, Clark requested to change the hours for marriage license applications from walk-in applications to appointment only. Clark reportedly told Logan that she was concerned about the amount of time it takes for her staff to issue licenses to individuals who are applying for “green card marriages.” Clark reportedly told Logan that the change would deter people looking for “green card marriages” from coming to Vital Statistics without the appropriate paperwork. **[Exhibit 1 & 2]**

On October 30, 2023, Logan raised Clark’s request to NHV Public Health Director Maritza Bond, who denied the request, stating the change could create barriers for citizens. Logan reported the denial of the request to Clark on October 31, 2023. Clark responded via email that the office had “five green card marriages” the previous day and they “grinded the office to a halt.” **[Exhibit 3]** Bond directed Logan to ask Clark what impact walk-in appointments have on operations. Bond also contacted Human Resources (HR) to fast-track NHV Health Department’s Diversity, Equity, and Inclusion training initiative because she was concerned that Clark, as the supervisor of a public facing office, was identifying applications as “green card marriages”. **[Exhibit 1]**

On November 13, 2023, Logan met with Clark for a one-on-one supervisory meeting. Clark reported that it was taking more resources to copy and scan documentation to send to immigration. **[Exhibit 4]**

On November 21, 2023, Clark emailed Logan advising she had started counting the marriages being sent to immigration near the end of August. Clark reported from August 23, 2023, through November 20, 2023, there were 215 marriage licenses issued by the office. Clark disclosed that she flagged 73 applications as being questionable and reported the applicants to immigration. **[Exhibit 5]**

Following this report from Clark, Bond met with HR and the City’s Labor Relations Director, Wendella Ault-Batthey. Logan was asked to inquire with Clark as to what statutory authority she was using to report applicants to immigration. Clark responded that she was not using statutory authority, rather she was acting on a directive from the State of Connecticut Department of Public Health (DPH). **[Exhibit 5]** Clark forwarded an email chain to Logan, which contained correspondence between East Haven’s Assistant Town Clerk Renee Arenas and Town Clerk Lisa Balter, and DPH Health Program Associate, Office of Vital Records, Katie Sehi. **[Exhibit 6]** The email exchange revealed Balter had contacted Sehi because people were coming to East Haven to apply for marriage licenses, reporting that New Haven was requiring applicants to produce birth certificates. In the email correspondence, Balter and Arenas had expressed that they had concerns about some of the applicants who were seeking to be married in East Haven. Balter asked Sehi if her office could also require birth certificates for applicants, and she copied and pasted the language Clark had posted on the New Haven Vital Statistics webpage:

*“The Registrar has the authority to request any additional documents for identification if provided documents are unclear or questionable. Therefore, **birth certificates for those coming from out of state or country are required**, and social security cards are recommended.” **[Exhibit 6]***

Sehi forwarded the email thread to Clark and reminded her that there is no requirement for birth certificates to obtain marriage licenses, only photo identification. She also provided Clark with contact

information for United State Citizenship and Immigration Services [USCIS] Officer Ellis O'Briant in Hartford and advised that she should report any suspicious marriage applications to him.
[Exhibit 6]

On November 30, 2023, Bond met with City Officials to discuss her recommendation to place Clark on administrative leave and investigate her reports to immigration. On December 1, 2023, Clark was officially placed on administrative leave pending an investigation into her conduct as Registrar of New Haven Vital Statics. **[Exhibit 1]**

INVESTIGATIVE OVERVIEW:

This investigation included interviewing Clark, witnesses, including the three assistant registrars who worked in the Vital Statistics office with Clark, Clark's supervisors, the State of Connecticut Registrar, and the DPH Health Program Coordinator. Our office also conducted an in-depth search of Clark's computer and City of New Haven email correspondence. This included reviewing emails and documents that Clark sent to Officer O'Briant. Our office also comprehensively reviewed all additional documents provided by NHV Health. This included but was not limited to data and statistics compiled by the department during the internal investigation of the reports that Clark made to USCIS. NHV HEALTH's internal investigation included the inspection of physical folders that Clark created for the reported applicants, her emails, and evidence related to additional alleged conduct that was discovered during the internal investigation.

People Interviewed:

1. Maritza Bond, NHV Public Health Director, Employee Number: 41959
2. Brooke Logan, NHV Health Deputy Director, Employee Number: 30901
3. Lizaida Andujar, Assistant Registrar of Vital Statistics, Employee Number: 44358
4. Margaret Frias-Negron, Assistant Registrar of Vital Statistics, Employee number: 44337
5. Olivia Davis, Assistant Registrar of Vital Statistics, Employee Number: 11599
6. Lorraine Mitchell, Program Coordinator Community Resilience, Employee Number: 44431
7. Patricia Clark, Registrar of Vital Statistics, Employee Number: 24473
8. Katie Sehi, State of Connecticut Department of Public Health, Health Program Associate, Office of Vital Records
9. Yvette Gauthier, State of Connecticut Department of Public Health, Registrar Office of Vital Records.

INVESTIGATIVE INTERVIEWS

Name: Maritza Bond

Title: NHV Public Health Director

Employee Number: 41959

Date: December 11, 2023

Time: 12:00 pm

Location: 200 Orange Street, New Haven, CT

Interviewer: Jacqueline Manning

NHV Public Health Director (herein Director) Maritza Bond was interviewed regarding this matter.

Bond stated Patricia Clark was hired as the Registrar for New Haven Office of Vital Statistics in 2021. Bond said that during the COVID-19 pandemic, she was the Acting Registrar of Vital Statistics, in addition to her duties as Director, because the position was vacant for approximately a year. Clark was an analyst for the City of New Haven HR Department, and she tested for the Registrar position through the Civil Service Commission.

Bond said that NHV HEALTH Deputy Director Brooke Logan was Clark's immediate supervisor, and that Logan has regularly scheduled one-on-one meetings with Clark. The meetings are held to identify issues that may need to be reported to her as the director and to identify other needs or issues in the department. Bond issued a reminder of the importance of following the chain of command to NHV Health employees and supervisors [August 2, 2023], in reporting any issues. This included a written directive and the NHV Health organizational chart **[Exhibit 7]**.

Bond became aware that Clark had asked Logan to change the application process for marriage licenses to "by appointment only" on October 24, 2023. Historically, the New Haven Vital Statistics Office issues marriage licenses to walk-in applicants. Logan advised Bond that Clark had reported that office operations were strained from marriage applicants coming in without proper paperwork. Bond was aware that three full-time assistant registrars were working in the office. She said that the department was fully staffed and there was no need for this change. She was concerned that making applications "by appointment only" could create barriers for certain members of the public. She denied Clark's request. Bond also instructed Logan to get more information from Clark about the impact that walk-in applicants had on the office. Clark responded to Logan in an email dated October 31, 2023, that she did not agree with Bond's decision and that she had five "green card" marriages on that day. **[Exhibit 5]**

Bond was concerned that Clark was referring to certain applicants as "green card marriages." She wondered why Clark assumed that applicants were getting married to obtain green cards.

Following Clark's referral to applicants as "green card marriages," she reached out to HR Director Marcela Garcia to obtain resources for Diversity, Equity, and Inclusion training (DEI). She intended to incorporate these trainings as part of the national accreditation process for all the departments under the Health Department's umbrella, but the concerning remarks by Clark escalated the initiative. Bond was concerned that Clark, who oversaw a public office for the Health Department, would use this kind of language.

On November 21, 2023, Clark emailed Logan advising that she had been counting the number of marriage applicants that she reported to immigration. Clark reported to Logan that of the 215 marriage license applicants, she had reported 73 couples to immigration. **[Exhibit 5]**

On November 28, 2023, Bond and Logan met with Wendella Ault-Batthey, Director of Labor Relations to discuss the situation with Clark. Bond said nowhere in the job description for the City of New Haven that the Registrar is tasked with reporting applicants to immigration. **[Exhibit 8]** Bond was concerned and did not understand what metrics Clark was using to identify suspect marriages to report to immigration. Prior to the October meeting with Logan, Clark had not mentioned any issues pertaining to Vital Statistics' involvement with immigration. Bond said she wondered how many other applicants Clark had reported to immigration, and if there was such a serious issue or problem, why it was not reported up the chain of command sooner. Bond said Clark only disclosed it when asked to support her request for an operational change.

On November 28, 2023, Logan asked Clark to cite the state statute that required her to report people to immigration as the Registrar. Clark said there was no state statute but rather she received a directive from DPH to report suspected marriage fraud to immigration. **[Exhibit 5]** Clark responded to Logan's request by forwarding the email from Shei at the DPH Vital Records office. **[Exhibit 6]** The email chain included correspondence from East Haven town clerks, who contacted the State because they were receiving applicants who reported being turned away from New Haven. East Haven Town Clerk Lisa Balter was asking Sehi if their town could require birth certificates for marriage applicants, as Clark was requiring in New Haven.

Bond said that in December 2022, she tasked Clark with cleaning up the Vital Statistics' web page and instructed her to cite state statutes for any requirements and include the hyperlink to the State's Vital Statistics web page. Bond stated that Clark acted unilaterally and published a requirement that was not in alignment with the State's processes and procedures by requiring birth certificates for out-of-state and non-US residents.

Bond said that she met with numerous city officials on November 30, 2023, to request that Clark be placed on administrative leave. Clark was placed on administrative leave on December 1, 2023. Bond explained the administrative leave to Clark and told her she had concerns about the email Clark had forwarded to Logan regarding her reports to immigration.

Following Clark's administrative leave, Bond informed the assistant registrars that Clark was placed on leave. She told them that she and Logan were there to support them and help cover the office rotations. Bond said Assistant Registrars Olivia Davis and Lizaida Andujar reported that Clark had been mistreating them and forcing them to get additional documentation when it was not required by the State and against their training by the State DPH. Additionally, Bond learned from the assistant registrars that when applicants had a difficult time with Clark and asked to speak with a supervisor, she told them that there was no one above her. The assistant registrars also reported that Clark had been making applicants come in together at the same time, even though that is not a requirement of the State.

Additionally, Bond learned that Clark had been charging search fees for records. She said Clark had changed the vital statistics form to add search fees and no refunds. Bond said this is not within the statutory approved fee structure. She learned Clark amended the forms without seeking the approval of Logan or Bond. Bond also discovered that Clark was scanning copies of people's identifications, birth certificates, social security cards, and personal documents such as bank records through the Xerox machine, and she had been maintaining physical folders of all the applicants she reported to immigration. Bond said Clark was supposed to ask for identification, not make copies of people's documents and maintain physical records. Clark was sharing these records with immigration. Lastly, Bond learned that Clark had changed the hours for marriage licenses and Elm City ID

applicants from 9:00 am - 3:30 pm. Historically, the hours for applications have been 9:00 am to 5:00 pm.

Bond said that during her time as Acting Registrar in the middle of COVID, she did not identify any potential marriage fraud. She processed many applications during the pandemic, including one at the hospital because the individual could not make it to City Hall with their partner. She said that Clark took the DPH training, and she knew that she could not require applicants to be present at the same time.

Bond reported that NHV Health was compiling all of the data from Clark's email reports to immigration and physical folders into a web-based sharing dashboard for our office to review. Bond learned that 80 percent of the applicants that Clark reported to immigration were from India.

Name: Brooke Logan
Title: Deputy Director, NHV Health
Employee Number: 30901
Date: December 11, 2023
Time: 1:10 pm
Location: 200 Orange Street, New Haven, CT
Interviewer: Jacqueline Manning

NHV Health Deputy Director Brooke Logan was interviewed regarding this matter. She declined to have a Union 3144 Representative attend her interview.

Logan stated that she had a one-on-one supervisory schedule with Clark twice a month. She stated that sometimes they were not able to meet and that, specifically over the summer of 2023, they had not been able to meet. Logan stated that the meeting with Clark on October 24, 2023, was the first one they had in several months. Logan wanted to know what was going on in the department and if there were any needs or issues. Clark told her that they had a lot of people coming in without the appropriate documents and that she was questioning the reasons for the marriages. She requested to make the marriage license applications by appointment. Logan spoke to Bond about Clark's request and Bond denied it, stating that it could create a barrier for applicants. **[Exhibit 3]**

Logan advised Clark of Bond's decision, and Clark pushed back on it. Logan said that Clark was not happy with the denial. She responded via email that she had 5 "green card marriages" that day, and it stopped operations. **[Exhibit 3]** After receiving Clark's response, Logan shared it with Bond, and Bond reached out to Labor Relations and Human Resources.

On November 21, 2023, Logan asked Clark for more information about how many marriage license applicants have been reported to immigration. Clark reported that she had been keeping track of questionable marriages since the end of August 2023 and said that she had reported 73 out of 215 applicants to immigration. **[Exhibit 5]**

After receiving this information from Clark, Logan and Bond had a meeting with Labor Relations Director Wendella Ault-Batthey on November 28, 2023, to discuss this issue. Ault-Batthey advised Bond and Logan to ask Clark what statutory authority she was operating under to report applicants to immigration. Clark replied to Logan by forwarding her the email from Sehi. **[Exhibit 6]**

Clark was placed on administrative leave on December 1, 2023, pending an investigation into her reports to immigration.

ADDITIONAL ALLEGATIONS

During the course of the internal investigation by NHV Health, parallel to this independent investigation, Bond and Logan discovered other issues with Clark's conduct as Registrar. Logan sent our office an investigation memo of the issues discovered. **[Exhibit 9]**

1. Elm City Resident Card

- Clark changed the Elm City ID requirements for minors by adding that the parents needed to provide proof of school enrollment, in addition to the child's birth certificate. She also added language to the Elm City ID that resident documents with only one name will only be accepted for married couples if the original marriage certificate was present. **[Exhibit 10]**
- Clark changed the hours during which residents could obtain Elm City ID cards from 9:00 am – 4:00 pm to 9:00 am - 3:30 pm without approval from the Health Director or Deputy Health Director **[Exhibit 11 & 12]**.

2. Marriage Applications

- Clark changed the hours that applicants could apply for marriage licenses from 9:00 am – 5:00 pm to 9:00 am -3:30 pm without approval from the Health Director or Deputy Health Director. **[Exhibit 13]**
- Clark did not comply with Bond's instructions to remove the phone numbers of Justices of the Peace from the Vital Statistics to avoid the appearance of promotion. **[Exhibit 13]**
- Clark was requiring both applicants to be present at the same time for the marriage license against the State DPH training and Town Clerk manual governing Vital Statistics.

3. Vital Statistics Forms

- Clark changed the Vital Statics forms to add language that charged unauthorized search fees and without approval from her superiors and the New Haven Board of Alders. **[Exhibit 14]**
- Clark was not using the approved state forms for vital records requests, did not cite the necessary statutory language, and added documentation requirements and forms of acceptable identification that were not in alignment with the State's statutes and regulations. **[Exhibit 15]**
- Clark added a sentence to the "Acceptable Forms of ID" section on the marriage license worksheet: "Please bring your Social Security Card for verification purposes." **[Exhibit 16]**

INVESTIGATIVE INTERVIEWS CONTINUED

Name: Lizaida Andujar

Title: Assistant Registrar

Employee Number: 44358

Date(s): 12/12/2023

Time: 1:00 pm

Location: Human Resources Conference Room, 200 Orange St, New Haven, CT, 06513

Interviewer(s): Jacqueline Manning & Johannie Cruz

Lizaida Andujar was interviewed on December 12, 2023, in the presence of Frank Alvarado, the Union President. Andujar has been an Assistant Registrar since April 2022. In the interview, we reviewed the allegations against Patricia Clark, and she stated the following information.

Around February 2023, Andujar and the other Assistant Registrars noticed an influx of marriage license requests. They noticed the average request went from two or three requests to five or six marriage requests daily. In addition to the influx of requests, the requests particularly involved older Indian men, approximately in their thirties, residing in New York, New Jersey, Texas, and Utah. The women the Indian men were marrying were New Haven residents who were much younger, approximately nineteen or twenty years old, and of African American and Hispanic backgrounds. Andujar said that the change in pattern made her and her colleagues naturally curious. They also wondered why these marriage requests were coming into New Haven, as opposed to other towns that would have been closer to the out-of-state applicants.

Andujar said these applicants sometimes came in groups of five or six, accompanied by the same translator who would walk the applicants through the process. Due to the increase in requests, Andujar, and the other Assistant Registrars, would refer to these applicants as "I Cases." Andujar further explained that depending on the region of India the applicants were from, some of the applicants did not have a mother's last maiden name because it is not customary for an Indian woman to take a last name until she marries; and then she takes her spouse's last name. This left some of the marriage license applications incomplete, and Clark would give the applicants a hard time and not issue the license even after the applicants had provided proof of residency and other required documents. Furthermore, due to Clark's giving the applicants a hard time, Andujar and the other assistant registrars believed that the Indian applicants began to make up last names for their mothers so that the marriage license requests would get submitted. In addition to requesting additional forms, Andujar said things kept escalating with Clark, and she would yell at the applicants because she did not believe them. She would tell them that she needed to see original documentation and proof that the mother was not listed with a last name.

Andujar said that all these changes in the marriage request patterns made her and the other assistant registrars uncomfortable; therefore, they voiced their concerns to Clark. Andujar said that it was brought up to Clark in a casual conversation and that she never asked Clark to tell her superiors, do anything about it, or forward the information to the state. Andujar said that Clark took it upon herself to email the state and told the staff that she was reporting to the state after the fact. Andujar said that she knew of this because after Clark was made aware of their concerns, Clark forwarded an email thread to her explaining that the policies for issuing marriage licenses were going to change within the office. Initially, the new process consisted of asking for identification and making copies of birth certificates, which then escalated to asking for proof of residency. Clark would then take the copies into her office at the end of the day.

Andujar said that as part of the marriage application process, proof of address is not a requirement by the state, nor is it in the state statute; it was a requirement made by Clark. However, if at any point the address did not match one of the applicant's pieces of information, Clark would tell the staff not to issue the marriage license until the applicant brought proof of address. Andujar also explained that if anyone in the office failed to make copies of the documents, Clark would yell at them because they were not complying with her directives. Furthermore, if the application wasn't completed exactly how Clark wanted it, then Clark would not accept it even though the parties had met the state requirements. She said Clark would refer to the applicants as "idiots" in front of the staff. Andujar went on to explain that Clark turned away a lot of applicants, even after they had provided all the proof Clark had requested. At times, the applicants would bring in a copy of a birth certificate, and Clark would not accept it. She would tell the applicants directly that the birth certificate looked fake and continued to request an original copy.

Apart from Clark implementing the new requirements, Andujar recalled a couple of instances where Clark gave applicants applying for a marriage license a difficult time because both applicants were not present at the time of the marriage license application submission. The State does not require this. Both applicants can go to the office separately to sign their portion of the license. **[Exhibit 17, Page 53]** Andujar recalled an instance where a woman walked into the office wanting to submit a marriage application. Her fiancé was terminally ill, and his last dying wish was for them to get married before he passed away. The woman tried to explain to Clark that her fiancé was hospitalized at Yale New Haven Hospital and could not come into the office to complete the marriage application. Clark would still not issue the marriage license, even though Clark, along with the assistant registrars, can issue marriage licenses under special circumstances and complete the application in the hospital. According to Andujar, Clark did approve a couple who faced a similar situation, but before her approving it, Clark went as far as requesting confirmation and approval from the medical staff, along with a priest from the hospital, so she could go to the hospital to issue the marriage license. Andujar also expressed that it was a sad situation to see and proceeded to explain another similar situation where the applicant only had days to live, but unfortunately, the applicant passed away before the couple got married. Andujar said anyone in the office would have been more than willing to go to the hospital and fulfill that applicant's last dying wish before he passed away, but Clark denied it. Andujar said she knew the applicant had passed away because Vital Statistics also processes death certificates, and Andujar saw the man's name when the death came in through the system for processing.

Regarding the Elm City ID, Andujar said Clark created unnecessary barriers for New Haven residents trying to obtain an Elm City ID card, particularly people in the Hispanic Community. Clark would require two pieces of mail as proof of residency, and at times, she would give married couples a difficult time because they did not have a bill under their names, even after they provided a copy of their marriage certificate. Andujar further explained that Clark also created barriers for newly released inmates from prison when trying to obtain the Elm City ID. Upon an inmate getting released from prison, they are entitled to receive a free Elm City ID for a year. All they are required to bring is their state-issued release form, which includes proper documentation of their identity; however, Clark would not accept the form. Clark would require the former inmates to obtain a signed waiver from Lorena Mitchell at the Community Resilience Office. At times, Mitchell would not be in the office, so her assistant would sign the waiver; Clark would then reject the waiver, prolonging the process for the former inmate.

In addition to Clark giving former inmates a difficult time, she also rejected residents who were attempting to renew their Elm City ID by using their old one. Prior to Clark being in her position, residents were able to easily renew their IDs by providing their previous ones. Clark implemented new requirements and made it difficult for residents to renew their IDs, and residents began to complain to the staff. According to Andujar, even residents who were homeless had a difficult time obtaining the

ID because they did not have a primary ID, and Clark would deny them. Andujar expressed that the Elm City ID was put in place to help people in the community get on their feet and obtain assistance from the city, but Clark made it nearly impossible for them by creating unnecessary obstacles.

Andujar explained that Clark was very controlling, rude, and condescending towards her, the staff, and the customers. At times, Clark would tell her staff that her father and brother were judges. She felt this was an intimidation tactic so they would not stand up to her. Andujar said she felt degraded by Clark and was afraid to speak to anyone about how Clark treated her and the other staff members. Clark would also yell at them when they made a mistake, and at times, in front of the customers who were waiting in the lobby. Andujar further explained that when she first started in her role, she did not take a lunch break for the first three months. She said the office was very busy, and Clark did not encourage lunch breaks. When Andujar questioned Clark about the lunch break, Clark told her she had thirty minutes of lunch, and Andujar learned that she was allowed an hour.

Andujar further explained that it was very hostile working with Clark. The staff never knew what mood Clark would be in when they walked into the office daily, and they had to prepare themselves mentally by texting each other prior to arriving in the office. Andujar referenced an incident that occurred on September 25, 2023, between her and Clark. Andujar explained the Friday prior she had texted Clark regarding a comment Clark had previously made about the staff being on their phones while working. Clark responded and told her things were taken out of context, but they would talk about it on Monday, which was the 25th. On the 25th Andujar arrived at the office early as she normally did, and she was in the office with Clark before any other staff members arrived. Andujar said that she attempted to speak with Clark about the text message, but Clark did not allow her to speak. She said Clark proceeded to remove her glasses from her face and said, "Do not choose violence with me. I am not a woman that you do not want to mess with." Andujar said that she was in shock that Clark had responded in that manner to her.

Aside from Clark being difficult to work with, Andujar explained that Clark showed favoritism to certain funeral directors who came into the office two to three times a week. The directors came into the office to obtain cremation permits, burial permits, and death certificates. At times, they would go straight to Clark's office and work with her directly, particularly the director from Celentano's Funeral Home. Andujar further said that once the Director would go into Clark's office, Clark would then turn around and go into the vault to issue and certify whatever document the funeral Director needed. However, she would never see Clark cashing them out for their request, leaving her to believe that Clark was not charging them.

FOLLOW-UP INVESTIGATIVE INTERVIEW

Name: Lizaida Andujar

Title: Assistant Registrar

Employee Number: 44358

Date(s): 02/07/2024

Time: 2:30 pm

Location: Zoom

Interviewer(s): Jacqueline Manning & Johannie Cruz

A follow-up interview was conducted with Ms. Andujar via Zoom in the presence of Frank Alvarado

Andujar was specifically asked about the search fees that the Vital Statistics office was charging. Andujar stated that the Vital Statics office was charging research fees for any requests for records

that predated 1940. Andujar said that those records are not in the electronic database. They are in the vault and have to be searched for by hand. Andujar stated that if the record was found, the office would charge \$20.00 for the record. If the record was not found, the office would charge \$20.00 and provide a letter of no record found. When asked if the letter was certified, Andujar said no. Andujar said all people who requested records that were not found would automatically be provided with a letter. Andujar said that the staff would code the search fee under whichever record was searched for, be it a birth certificate, death certificate, marriage license, etc. Andujar said that the search fees were already in place when she started her position in February 2023.

Andujar stated that a lawyer complained to the State that New Haven was charging search fees. She said that Clark told her that the State said she could not charge a search fee, but she was still going to charge because it was up to the Registrar's discretion. Andujar said Clark always said when referencing procedures, "It's up to the Registrar's discretion."

Name: Margaret Frias-Negron

Title: Assistant Registrar

Employee Number: 44337

Date(s): 12/12/2023

Time(s): 2:15 pm

Location: Human Resources Conference Room, 200 Orange St, New Haven, CT, 06513

Interviewer(s): Jacqueline Manning & Johannie Cruz

Margaret Frias-Negron was interviewed in the presence of Frank Alvarado, the Union President. Frias is one of the Assistant Registrars in the office, and she processes marriage license applications. She enjoys processing applications because she believes in love and likes to help people get married. Frias explained that as part of the marriage licensing process, the state provides guidelines on how to process the applications and determine what documents are required. Based on the training Frias received from the State of Connecticut, an applicant can provide state-issued identification to apply for a marriage license. However, if an applicant does not have a state identification, they also have the option of using two other forms of identification combined, such as a birth certificate with social security or a birth certificate along with proof of address. According to Frias, using a combination of two documents was not acceptable to Clark's standards, and she would often deny the request, regardless of the state requirements. In some instances, if someone was born outside of the U.S., particularly anyone who was Spanish, Clark requested that the applicant bring a birth certificate in addition to their identification. According to Frias, Clark would create unnecessary barriers by requesting information that was not needed, and she would respond that she was the Registrar and could request additional information as needed. Frias also said that due to Clark's requesting additional unnecessary documents, someone complained to the State about Clark's actions, and the State told Clark that it was not acceptable for her to ask applicants for additional documentation. Nevertheless, Clark continued to defy state requirements. Furthermore, Clark took it upon herself to update the City of New Haven Vital Records' website to include a birth certificate as a required document.

Around August of 2023, Frias noticed an increase in older Indian males from New York coming into the office, with younger African American or Hispanic females who were approximately in their early twenties requesting marriage licenses. At times, the Indian marriage applicants would come into the office requesting marriage licenses in a group; therefore, the staff referred to those marriages as "I

Marriages” due to the applicant being either of Indian ethnicity or possibly an immigrant. Clark started to request additional documents apart from the identification, such as address verification. In addition, Clark requested that the staff make copies of all the forms that the applicants provided and leave the copies in a basket. According to Frias, at the end of the day, Clark would take the copies, upload them, and then report them to an investigator. Frias knew Clark was reporting her finding to an investigator but never met the investigator herself.

Frias said that Clark would consistently create barriers for any applicant looking for assistance. This included any applicant seeking an Elm City ID. The Elm City ID was created to assist any resident of New Haven with obtaining a secondary form of identification to help them apply for assistance. These applicants included former inmates, homeless individuals, Hispanics, Immigrants, and young African Americans trying to apply for employment. Clark would require the applicants to provide both a primary identification and proof of address. This would make things difficult, particularly with former inmates who were incarcerated for a long time and needed to reestablish themselves. A former inmate would attempt to get the ID using a personalized document issued by the State of Connecticut Department of Corrections. The form includes the former inmate's name, inmate number, photo, and date of birth. According to Frias, that form was not sufficient proof for Clark. Clark would require the former inmate to speak with Carlos Sosa-Lombardo from the Community Services Agency and obtain a waiver from them in order for Clark to issue the Elm City ID. Frias said they are supposed to be there to help people and not to give them a hard time. However, it seemed as if the more barriers Clark could create for the applicants, the better it was for her.

Frias described Clark’s demeanor as being mad all the time, very quick-tempered, intimidating, and controlling. At times, Clark would yell at her staff, especially if they forgot to make copies of any of the “I Marriage” applications. Frias said she was scared to approach Clark. Frias referenced a time when she accidentally mailed a letter using the wrong letterhead. When Clark found out, Clark threw a copy of the letter onto her desk, yelled at her, and said that it was unacceptable and incorrect in front of everyone in the office. Frias said that it was embarrassing and unfair to have been treated that way. She also said that due to her strong Spanish accent, she felt that Clark treated her poorly and would get frustrated with her because, at times, she would mispronounce words. This was particularly difficult for Frias because, as a Latina woman, not only was she subjected to the mistreatment of Clark, but she also saw first-hand Clark’s dislike of the Spanish community. Frias said that, at times, they would receive marriage licenses that were completed incorrectly because the officiants would not properly follow the instructions on the application. These marriage licenses would need to be amended, and Clark’s response was, “That’s an idiot. I’m pretty sure it’s a Hispanic officiant,” when, at times, it was not a Hispanic officiant, Frias explained. Furthermore, Clark was rude to the customers and showed little patience at the window, particularly with the Spanish-speaking customers. According to Frias, Clark did not like to interact with any other culture. At times, the customer would ask Clark for a supervisor, and Clark would rudely respond to them and say, “I am all you get.”

Frais said that everything needed to be done the way Clark demanded it, even if it meant going against what the State DPH required. Frias also said that Clark had a way of intimidating the staff and using her family to hold power over them by making comments that her father and brother were judges. Frias said that she did not try to say anything because, according to Clark, she was always right.

Frias also said that it was clear that Clark had her favorites. She took care of any customers she knew personally, particularly two gentlemen from two different funeral homes. One of the individuals was the director from Celentano Funeral Home, and the other was a young man from Washington Memorial Funeral Home. At times, the gentlemen would come in through the side door. Clark would immediately get up to speak with them and gladly print out their forms without any issues.

FOLLOW-UP INVESTIGATIVE INTERVIEW

Name: Margaret Frias-Negron

Title: Assistant Registrar

Employee Number: 44337

Date(s): 02/07/2024

Time(s): 2:30 pm

Location: Human Resources Conference Room, 200 Orange St, New Haven, CT, 06513

Interviewer(s): Jacqueline Manning & Johannie Cruz

A follow-up interview was conducted with Frias via Zoom in the presence of Frank Alvarado.

Frias concurred with Andujar that the \$20.00 search fees were already in place when she started her position in 2023. Frias confirmed that search fees were for records that predated 1940, and that customers were given letters if no record was found.

Frias also recalled that a lawyer complained to the State that New Haven was charging search fees. She recalled Clark stating that she could charge search fees because it was up to the Registrar's discretion.

Name: Olivia Davis

Title: Assistant Registrar

Employee Number: 11599

Date: 12/12/2023

Time: 3:30 pm

Location: Human Resources Conference Room, 200 Orange St, New Haven, CT, 06513

Interviewer(s): Jacqueline Manning & Johannie Cruz

Olivia Davis was interviewed in the presence of Frank Alvarado, the Union President. Davis was hired as a Registrar Assistant and has been assisting with the processing of death, marriage, and birth certificates since February 2022. Davis was the first of the three Assistant Registrars to get hired, and when she was hired, it was just her and Clark in the office processing various types of application submissions. Due to Covid and a lack of staff, there was a backlog in the processing of mailed-in requests that was approximately a year long. Davis said that due to this, she did not take a lunch break the first couple of months after her employment, at times leaving her to snack at her desk throughout the day. Davis stated that she did not begin taking a lunch break until after the other Assistant Registrars were hired. They researched labor laws in Connecticut and realized they were entitled to a lunch break. According to Davis, once they brought this information back to Clark, Clark wanted them to take a thirty-minute lunch break that included the use of bathroom breaks. However, they told Clark they were entitled to an hour, and according to Davis, Clark gave them an attitude.

Davis went on to further explain that during her initial employment time frame, there were a lot of transitions within the Union and other departments within the City of New Haven. In addition to the transitions, there was a new electronic system being implemented, and the department was transitioning from paper filing to electronic submissions. Davis also explained that during that transition, she received her training from the New London Town Clerk, who took the time to walk her through the steps of using the new electronic system. Davis, in turn, trained Clark.

Davis explained that as part of her role, she processes death certificates for fetal death requests that come into the office. Davis also explained that due to the amount and nature of the death requests, Clark processed the majority of them. Celentano Memorial Funeral Home, Washington Memorial, and North Haven Memorial are three frequent funeral homes that come into the office regularly. Davis believed that Clark had a personal relationship or knew one of the young men from one of the funeral homes on a personal level. According to Davis, the young man would only go directly to Clark's office, and she would process the death certificates. Davis further explained that Clark was judgmental and judged funeral homes and how much money the family had based on the information she captured from the death certificates.

In addition to the death certificates, Davis has also assisted with the processing of birth and marriage requests. Davis explained that they have a lot of marriage application requests coming through the office, and depending on what is going on nationally, they can see a change in the demographic of the applicants who are requesting to get married. Davis said that in the summer of 2023, Clark started having the staff make copies of birth certificates of the older Indian men who were marrying younger women. Davis stated she believed this started because Clark could not accept that in other cultures, a mother did not have a maiden last name. Davis referred to these marriage requests as "life on the table" requests due to all of the documents Clark required the applicants to provide. According to Davis, the process went from Clark having an issue with birth certificates to requesting bank statements for verification of address. If the addresses did not match, then Clark wanted a bank statement in order to prove there was a discrepancy in the address the applicants were providing. Furthermore, Clark wanted the staff to make copies of every piece of documentation that the applicants provided. This also included bank account numbers, visas, and even passports. If she or any of the staff members forgot to make copies of any of the documents, Clark would get upset and yell at them.

Davis further explained that Clark treated people from other ethnicities as a low priority. Clark, at times, would make errors on the Elm City IDs she processed and make customers return to fix them. In addition, Clark would also create additional obstacles for the applicants by issuing Elm City IDs that would expire the same day, printing out marriage certificates with low ink, where the writing was illegible, or at times, printing the marriage certificate crooked. Davis further explained that, at times, she would step in to help applicants who were struggling due to language barriers complete the marriage license application correctly. She did this because she did not want the applicants to come back later on and get the marriage license amended due to something that could have been avoided.

Regarding the Elm City ID, Davis said that Clark was not a fan of the people obtaining the ID. The card is issued to help provide a secondary ID for people who are seeking additional assistance within the City. This includes former inmates and the homeless. Davis further said that if former inmates came in with their state-issued release documents, Clark would disregard the document and make them go to the Community Service Administration office to obtain an unnecessary signed waiver for them to get the ID. In addition, Davis said from what she witnessed, the homeless were not allowed to get an ID.

Davis said that Clark does not know how to communicate effectively with people. Davis further explained that Clark has tried to belittle her and the other staff members. Davis said that she has seen her co-workers cry due to Clark's yelling or belittling them. Davis also recalled an instance where she accidentally sent out an email incorrectly, and Clark yelled at her in the middle of the office with customers in the lobby. Davis further said that Clark recently yelled at her for something as simple as decorating the office for the Christmas holiday. In addition to Clark's mistreatment, Davis said that Clark is constantly reminding them of who her family members are. Davis feels like Clark uses that as a constant reminder that she is socially above them.

Interview

Name: Lorraine Mitchell

Title: Program Coordinator Community Resilience

Employee Number: 44431

Date: 1/9/2024

Time: 2:00 pm

Location: Mayor's Conference Room 2, 165 Church St, New Haven, CT, 06513

Interviewers: Jacqueline Manning, Samantha Marsh

Lorraine Mitchell was interviewed in the presence of Union 3144 representative Kristen Bayer. Mitchell explained that she works for the city's Community Mental Health Initiatives and the Department of Community Resilience and that she started roughly in June of 2022. Mitchell said that she had taken over from her supervisor, Carlos Sosa-Lombardo, and that one of her duties was to oversee a waiver program intended to increase access to Elm City ID cards for formerly incarcerated individuals. Mitchell stated that a formerly incarcerated individual had to provide proof of incarceration and one item proving New Haven residency, and then she would provide a waiver that could be taken to Vital Statistics to obtain an Elm City ID. According to Mitchell, this provided easier access for these individuals, as the standard requirements to obtain an Elm City ID include a ten-dollar fee, an identity document, and two items establishing New Haven residency.

Mitchell stated that since starting her position, there has been some miscommunication between her and the Office of Vital Statistics regarding their intersecting programs. Mitchell stated that in the beginning, the Registrar and Assistant Registrars would send individuals over to her office to obtain a waiver at any point, not knowing that an appointment made with Mitchell greatly facilitated the process. Mitchell also stated that there was some confusion with waivers that needed to be reissued.

However, Mitchell stated that the Registrar, Clark, was always responsive via email and phone and that these issues were resolved through communication. For example, Mitchell implemented a procedure where she sent an email to the Registrar to advise her of waivers that were reissues that would be going to her office and that this solved that issue.

According to Mitchell, she was not aware of any of the barriers being created by the Registrar to obtaining an Elm City ID.

Interview

Name: Patricia Clark

Title: Registrar Vital Statistics Employee Number: 24473 Date(s): 1/9/2024

Time(s): 2:30 pm

Location: Mayor's Conference Room 2, 165 Church St, New Haven, CT, 06513

Interviewers: Jacqueline Manning, Samantha Marsh

Patricia Clark was interviewed in the presence of Union 3144 representative Kristen Bayer. Clark is the Registrar for New Haven's Office of Vital Statistics. Clark stated that she assumed this position in May of 2021, but that she had priorly worked for the City in the Human Resources Department since approximately 2007.

Clark stated that New Haven is unique in that, unlike most towns, the Office of Vital Statistics is separate from the Town Clerk. She stated that in smaller towns and cities without major hospitals, her function is part of the job description for the Town Clerk. It is only because of the volume of work that there is a separate office dedicated exclusively to Vital Statistics in New Haven. Clark reported that she did not receive any specific formal training from the State of Connecticut upon assuming her role, as a town clerk would undergo. However, she was trained by the State through on-the-job training accomplished on site. She was also provided with a handbook detailing policies and procedures from the State DPH involving Vital Statistics.

Clark stated that it was her understanding that she had been given the role of Registrar to "clean up" the Office of Vital Statistics. She stated there was no immediate training. She said Bond said, "Here are the books" and that Bond sat with her for about 1-2 hours. She explained that there had been issues with efficiency, many consumer complaints about the office, and that she intended to institute reform to improve service. Clark said that the three staff members who were working in the office when she took over had left within a few months, so she was all by herself at that time.

Clark stated that within a year, she had all new staff and she implemented updated technology and other reforms. Clark stated that Logan is her supervisor, and Bond is the supervisor above Logan, but that her understanding was that she was expected to do what needed to be done to improve the office. She had an understanding that there was not going to be significant oversight and that she was expected to function independently. She referred to the Office of Vital Statistics as the Health Department's outlier office in City Hall. She explained that she was supposed to have biweekly meetings with Logan, but that this schedule was not adhered to regularly and that she had at times gone months without a meeting with Logan.

Clark stated that she had concerns about some of the marriage applicants from the very beginning of her position at the Office of Vital Statistics. She had observed that there was a trend of what she determined to be "suspicious" marriages coming through the office. She stated that they would come in with a "handler." When asked what she meant by the term "handler," Clark said, "someone who arranged the marriage." She stated that indicators that the marriages were suspicious were that the couple appeared not to know each other, and at times, appeared not to know each other's names. She stated that they would have difficulty filling out the required paperwork.

The assigned investigators asked Clark numerous times to elaborate on specific behaviors that she observed that would indicate the couples did not know each other. Clark could not elaborate or articulate her observations. She repeatedly stated that they had a “handler” and that it was obvious by their mannerisms that they did not know one another. She said, “it is obvious,” and “you can just tell when two people don’t each other.”

Clark stated that she attempted to report her suspicions to Logan but never felt that there was any response. In February of 2023, Clark was instructed by a representative from the State, Katie Sehi, that she should report these suspicious marriages to an Immigration Official, Ellis O’Briant. Clark repeatedly characterized this as being “told to” report the marriages and that she considered this a direction rather than an option.

Clark said that she started requiring birth certificates for out-of-state and -US applicants because the applicants could not fill out the forms correctly. She said that in order to have the application process completed properly and accurately, she required birth certificates. Clark stated it was within her right as Registrar to request any additional documentation she required to process a marriage license. Clark stated that applicants did not seem to know their parent’s names, each other’s names, or each other. She said both had to be present to sign the application and the birth certificates to ensure the information was accurate. She stated that sometimes Hispanic applicants’ parents had two last names. She said women from India don’t have last names period because “the women don’t count.”

The assigned investigators asked Clark what caused the significant uptick in her reporting these marriages to Immigration in approximately August of 2023. Clark stated that this was because there was a “sudden influx” of these suspicious marriages. She stated that the “handlers” were coming in with four couples at once. She stated that she believed that the “handler” and these couples were coming to New Haven because surrounding towns required appointments for marriage licenses, and New Haven did not. Clark stated that she requested that New Haven adopt this policy, but this was denied by Logan.

Clark also noted that in that time period, she was alerted by a Justice of the Peace (JP), Shelly Armatino, that another JP, Bianca Bowles, was allegedly being paid to arrange these “marriages.” Clark denied that she automatically flagged marriages involving Bowles. Clark also denied that the suspicious marriage trends involved any specific nationality or ethnic group.

Clark denied that language barriers or cultural differences contributed to the characteristics of the identification of “suspicious” marriages. Clark stated that she only sent information on marriages that she found suspicious to O’Briant because she was “told to do so” by the State.

The assigned investigators also questioned Clark regarding the changes to forms and the Office of Vital Statistics website, including charging search fees for records. Clark stated that she had the idea to charge for search fees from researching the procedures and policies of other town clerks in Connecticut. She stated that the fee was for the embossing. She said that the office would have to provide a certified record of the search result, and so it was an official record. She was unaware there was an issue with charging for a search fee for a record, as the consumer was always being provided with a certified record, either the requested record or a certified letter indicating that a search was performed, but that the record was not found. She stated that she was unaware that this conflicted with any state law or policy. Clark indicated that she did not seek approval of this fee from Logan, citing her understanding that she had the authority to run her department as she saw fit as part of being hired as the Registrar.

Name: Katie Sehi

Title: State of Connecticut DPH, Health Program Associate, Office of Vital Records

Date: 1/31/2024

Time: 2:00 pm

Location: Department of Public Health, 410 Capitol Avenue, Hartford, CT

Interviewer: Jacqueline Manning

Note: Prior interviews with Katie Sehi and Yvette Gauthier, DPH Deputy Legal Director Ryan Burns clarified that the State Office of Vital Records does not act in a supervisory or enforcement capacity over local municipal vital records offices or clerks/registrars.

Katie Sehi, Health Program Associate, State of CT Office of Vital Statics was interviewed. DPH Deputy Legal Director Ryan Burns was present during the interview.

Katie Sehi stated that her role as a program coordinator is to provide guidance to local clerks and registrars regarding the State statutes and regulations that govern vital records in Connecticut, only in relation to their responsibilities. She said that when issues are brought to her attention that she is uncertain about, she will seek an answer from DPH legal department and report the answer back to the inquiring clerk/registrar.

Sehi said that she has a very good rapport with many town clerks and speaks with them frequently. She said clerks will often ask her questions that fall outside of the scope of vital records. For example, they may ask questions about land records or probate. Sehi said that she tries to be helpful, and when she is asked questions about matters unrelated to vital records, she will try to guide the clerk to the right resource who can better help with the question.

Sehi said that she did not recall if she had a conversation with Arenas or Balter about the concerns they reported via email in November of 2022 and February 2023 regarding marriage applicants coming to East Haven. **[Exhibit 6]** Sehi said this kind of question is an example of when a clerk will inquire about an issue that falls outside the scope of her guidance. Sehi said she had the information that she passed on to Arenas and Clark regarding the immigration officer from a training that was conducted at DPH Vital Records prior to Covid by Hans Mauer from Passport Servies, who is now retired. Mauer was a federal contact for DPH Vital Records, and he conducted training for the staff, prior to COVID-19, on what to look for to spot fraudulent identifications, photo IDs, and birth certificates. Sehi said she just passed the information to Clark via email; she did not have a conversation with Clark.

Interview

Name: Yvette Gauthier

Title: State of Connecticut Department of Public Health, Registrar Office of Vital Records

Date: 1/31/2024

Time: 2:30 pm

Location: Department of Public Health, 410 Capitol Avenue, Hartford, CT

Interviewer: Jacqueline Manning

Yvette Gauthier, State of Connecticut, Registrar of Office of Vital Records was interviewed regarding this matter. DPH Deputy Legal Director Ryan Burns was present during the interview.

Gauthier stated that her responsibility to town clerks and municipal registrars is to provide guidance and send communication regarding legislative updates that impact vital records. She stated that she is also available to answer questions pertaining to vital records.

Gauthier stated that the State Office of Vital Records also provides training to municipal clerks and registrars regarding the State's laws and regulations governing Vital Statistics. Gauthier said that there is no requirement for clerks or registrars to take the training. Each clerk/registrar is supposed to know how to do their job, and the State provides training and guidance to help them if they request, but the State does not mandate training. Gauthier said the Town Clerk's Association promotes the State's training within their own organization.

When asked what prompted the State's training of the staff in the New Haven Registrar's office on June 27, 2023, Gauthier said she recommended the training for the New Haven Office of Vital Statistics. When asked what prompted her recommendation, she stated that she was getting a lot of calls from New Haven customers, the assistant registrars, and Clark, and she wanted to ensure the office had a foundation, resources to refer to, and an understanding what roles were local and what were state. She said, for example, citizens can seek to have amendments to vital records at the local level, but replacement of a record is an amendment that takes place at the state level. She stated that there were new registrars at the office, and she led the training at the New Haven Office of Vital Statistics. **[June 27, 2023, Exhibit 18]**

Gauthier was specifically asked about the email she sent Clark on September 12, 2023. **[Exhibit 37]** Gauthier had contacted Clark and advised her that she could not charge fees for amendment letters and that she could not charge search or research fees. The only fees allowed were for a certified record or if there was no record found and if the person specifically requested a certified letter stating as such.

Gauthier stated that she received a call from a New Haven customer who did not understand the amendment process. She told Clark that she should not have charged the customer for the amendment and she should refund the customer if she had. Gauthier stated that the State used to charge for amendments, but specific legislation was passed stating that the State cannot charge for amendments. Gauthier explained that the State cannot charge for amendments, or charge search or research fees. She stated that municipalities have to follow the State's laws and regulations governing vital records. Thus, if the State cannot charge these kinds of fees, then towns cannot charge.

When asked if she was aware if there were any regulations or laws prohibiting the copying and sharing of vital records or personal documents with other agencies, Gauthier stated she was not aware of any specific law or regulation.

Gauthier stated that she was not the State Registrar at the time that Passport Services came to the State DPH and conducted the training on detecting fraudulent identifications and documents.

EVIDENCE REVIEW/TIMELINE

Date	Item Type	Details
November 18, 2022 through February 9, 2023	Email Correspondence ➤ Exhibit 6	East Haven Assistant Town Clerks expresses concerns about suspicious marriages. Sehi advises her to make copies of identifications and marriage licenses, write a brief description of the encounter, and forward the information to Ellis O'Briant, an immigration official with USCIS. East Haven Town Clerk then contacts Sehi when her office is receiving clients from New Haven, stating that New Haven requires birth certificates. Sehi forwards the correspondence to Clark and explains that birth certificates are not required, and a license cannot be denied to someone who produces an ID. Clark replies that she was under the impression that she could request further documents and that she was unaware she had the option to send marriage information to immigration.
March 13, 2023	Correspondence ➤ Exhibit 19	Clark sends Officer O'Briant's contact information to the assistant registrars, requesting a write-up be sent to him on an individual who was seeking an amendment to a marriage record.

March 15, 2023	Draft Letter Clark's Computer ➤ Exhibit 20	Clark composes a letter on her computer to O'Briant outlining the nature of some of the "suspicious" marriages her office is receiving. This includes that most of the male applicants are from India.
March 24, 2023	Email between Clark and Glen Oliwa, IT ➤ Exhibit 21	Clark requests that IT replace the birth, death, and marriage applications on the City website, indicating that the new forms include a "search fee."
March 31, 2023	Meeting Minutes ➤ Exhibit 22	Supervisory meeting between Logan and Clark, no mention of immigration issue or updated forms.
May 26, 2023	Email to Glen Oliwa, IT ➤ Exhibit 23	Clark asked Oliwa to change Elm City ID hours to 9:00 am - 3:30 pm
May 31, 2023	Meeting Minutes ➤ Exhibit 24	Supervisory meeting between Logan and Clark. Logan notes in minutes that she can be contacted by text, phone, or email in between regularly scheduled meetings if Clark has any issues. No Mention of Elm City ID hour change.
June 15, 2023	Meeting Minutes ➤ Exhibit 25	Supervisory meeting between Logan and Clark. There is no mention of suspected marriage fraud or reports immigration.

June 16, 2023	<p>Email between Clark and O'Briant</p> <p>➤ Exhibit 26</p>	<p>Clark reports a possible fraudulent marriage application. Clark provides details of the encounter, including that the male tried to apply twice on the same day with two different women. Clark reports to O'Briant that she is receiving applicants like this on a weekly basis.</p>
June 27, 2023	<p>DPH Training</p> <p>➤ Exhibit 18</p>	<p>Gauthier provides training for Clark and the Assistant Registrars for their roles in Vital Statistics. The training states that registrars cannot issue uncertified death certificates, with an example involving the State Police, and that applicants do not have to present in the office at the same time or even on the same date.</p>
June 28, 2023	<p>Meeting Minutes</p> <p>➤ Exhibit 27</p>	<p>Last supervisory meeting between Logan and Clark until October 24, 2023. There is no mention of suspected marriage fraud or reports immigration.</p>
August 2, 2023	<p>Chain of Command Memo, NHV Health Leadership Meeting</p> <p>➤ Exhibit 7 & 57</p>	<p>Bond holds a leadership meeting with heads of NHV Health offices. Clark attends. Bond issues a chain of command memo and organizational chart for reporting issues to NHV Health employees and supervisors.</p>

July 3, 2023	Email Correspondence ➤ Exhibit 28	Gauthier and Clark correspond after Clark reports a “disruptive” woman who has come to her office claiming that her husband committed marriage fraud. Gauthier advises Clark that this is a legal matter not in purview of Clark’s nor of Gauthier’s office.
July 5, 2023	Email Correspondence ➤ Exhibit 29	Clark reports the issue from the correspondence with Gauthier on 7/3/23 to O’Briant and attaches a copy of the marriage license in question.
July 18, 2023	Email Correspondence ➤ Exhibit 30	Clark reports possible fraudulent marriage to O’Briant, stating that the applicants had passports and identification but could not prove where they lived and had the same Justice of the Peace.
July 18, 2023	Timeline ➤ Exhibit 1	Bond is approached by a citizen, who stated that he was unable to update his marriage certificate. Bond further alleged that Clark was requiring translated copies of Spanish documents when that was not necessary and demanding that a client communicate in English when it was not their primary language.

July 25, 2023, through Aug 3, 2023	Email Correspondence ➤ Exhibit 31	Clark reports a possible attempt to obtain a fraudulent license and that the license was never issued. She advises O'Briant that a man tried two days with two different women and could not prove his residency. She reports that she is concerned that the individuals may have gone to East Haven or another town to finish the application process.
August 25 through Aug 29, 2023	Email Correspondence ➤ Exhibit 32 & 33	Clark and Justice of the Peace (JP) Shelley Armatino discuss another JP Bianca Bowles. Clark loops in O'Briant and tells him that Armatino reported to her Bowles offered her a "deal" finding women for arranged marriages. Clark reported that Bowles was onto the fact that she was "copying IDs" on all the applications bearing Bowles name and therefore Bowles was fraudulently listing Armatino on applications to avoid this. Clark reported the three married couples to O'Briant.
September 7, 2023	Email Correspondence ➤ Exhibit 34	Clark reported two applications to O'Briant. She stated that the applicants could not prove residency at the location listed on their application. She advises O'Briant that she instructed her staff not to issue in that case again.

September 12, 2023	Email Correspondence ➤ Exhibit 35	Clark reported to Gauthier an issue with a marriage being contested by the father of the groom due to a question of competency. Gauthier clearly states, “We do not policemarriage” and “an issue of legitimacy is a court matter after the fact.”
September 13, 2023	Email Correspondence ➤ Exhibit 36	Clark reported to O’Briant that her staff issued numerous questionable marriages while she was out of the office. She sent O’Briant 11 marriage license applications. Clark did not articulate what was “questionable.”
September 15, 2023	Email Correspondence ➤ Exhibit 37	Gauthier contacted Clark and told her explicitly that she could not charge fees for amendment letters and that she could not charge a fee for a record search. The only fee that could be charged is for a certified record or if there is no record found, if the client specifically requests a certified letter stating as such.
September 21, 2023	Correspondence ➤ Exhibit 38	Bond orders that Clark issue death certificate to NHPD, Clark cites State policy as reason for her initial refusal.
September 27, 2023	Email Correspondence ➤ Exhibit 39	Clark reported a marriage applicant to O’Briant. She wrote, “Just one today! But they were extremely difficult to deal with!” There is no other description of the encounter.

October 4, 2023, through October 11, 2023	Email Correspondence ➤ Exhibit 40	Clark reported several “questionable” marriages to O’Briant. She stated her staff had issued while she had missed work due to a car accident.
October 17, 2023	Email Correspondence ➤ Exhibit 41	Clark reported one marriage, saying there would have been more but they didn’t bring IDs.
October 24, 2023	Meeting Minutes ➤ Exhibit 2	Clark’s first meeting with Logan since June 28, 2023. Logan notes a ??discussion with Clark regarding making applications for marriage licenses by appointment only.
October 30, 2023	Email Correspondence ➤ Exhibit 42	Clark reported five marriages to O’Briant, noting that they came in a large group with JP Bowles.
October 31, 2023	Timeline, Email Correspondence ➤ Exhibits 1 & 3	Logan reports that Clark’s request for appointments for marriage applications is denied. Clark states she had five “green card” marriages the previous day that disrupted operations.
November 1, 2023	Email Correspondence ➤ Exhibit 43	Gauthier responds to a July 20, 2023, email from Clark requesting clarification about non-English documents supporting amendments to records. Gauthier advises that certified translations are necessary to properly preserve and maintain the records.

November 3, 2023	Email Correspondence ➤ Exhibit 44	Clark reported three more marriages with personal information to O'Briant but notes that only one followed all the way through with obtaining the license. Clark wrote that the JP refused to perform the marriage because the applicants did not seem to know each other.
November 13, 2023	Meeting Minutes ➤ Exhibit 4	Logan and Clark meet. Logan notes, "Marriage licenses will still be available by walk-in only. Clark reported there continues to be extra help needed to scan and email paperwork to immigration when there is a question of 'green-card' marriages."
November 14, 2023	Email Correspondence ➤ Exhibit 45	Clark reports two applications to O'Briant. She writes, "Two more from yesterday! Happy hunting!"
November 20, 2023	Email Correspondence ➤ Exhibit 46	Clark reported that she had eleven applications that day and reported four of them to O'Briant.

November 21, 2023 through November 28, 2023	Email Correspondence ➤ Exhibit 5	Clark and Logan exchange email correspondence. Logan questions the reporting of “suspicious marriages” to immigration and requests further details and support from state law. Clark provides a summary of what she considers suspicious, including having a “helper” present who had helped “find the girl.” Clark indicated that there is no statutory basis but referenced the directions she received from Sehi in February 2023
November 22, 2023	Email Correspondences ➤ Exhibit 47	Clark reported more marriages to O’Briant
November 27, 2023	Email Correspondence ➤ Exhibit 48	Clark reported additional marriages to O’Briant and signed off the email with “Enjoy!”
November 29, 2023	Email Correspondence ➤ Exhibit 49	Clark reported, “only one today woohoo” to O’Briant
December 1, 2023	Letter ➤ Exhibit 1	Clark placed on administrative leave
December 7, 2023	Correspondence ➤ Exhibit 19	Andujar forwards Bond the March 13, 2023, email from Clark to the registrars regarding reporting to O’Briant. Andujar states that she was uncomfortable with the request from the beginning and did not follow up with Clark.

December 8, 2023	Correspondence ➤ Exhibit 50	Logan requested from the City's website manager that language regarding requiring birth certificates be taken down from the Vital Statics webpage.
December 18, 2023	Letter ➤ Exhibit 9	Logan documents discrepancies existing in NHV Health Vital Forms vs. State forms as of that date. Logan notes other unauthorized changes made by Clark.

Investigative Note: A follow-up interview was conducted with Clark following the evidence review to afford Clark the opportunity to elaborate and clarify some of the previous interview statements and respond to the additional evidence identified.

FOLLOW UP INTERVIEW

Name: Patricia Clark

Title: Registrar Vital Statistics Employee Number: 24473 Date(s): 2/8/2024

Time(s): 9:00 am

Location: Zoom

Interviewers: Jacqueline Manning

A follow-up interview was conducted with Clark on February 8, 2024, through video conference. Union 3144 Representative Kristen Bayer was present on the video conference.

Clark was asked what she understood Sehi and Gauthier's role to be with respect to her duties as Registrar. Clark said she understood that she could contact them if she had any questions or concerns. She added that they also provided training and instruction. She said that Sehi was her main point of contact for her to obtain the best and quickest answer. When Sehi was not in, Clark would contact Gauthier.

Regarding the Elm City ID and Marriage License hours change in the Vital Statistics office, Clark said that the hours for one of the applications were always until 3:30 pm and the other was 4:00 pm. She could not recall which one was historically 3:30 pm. Clark said Logan did approve the change for the other applications to be until 3:30 pm. Clark stated that most of the JP's know that applicants should get to the office by 3:30 pm because it takes time for them to get the license processed, get married, and then get it recorded. Clark said that this also leaves some wiggle room for applicants coming in a little later than 3:30 pm. Clark said the Vital Statistics office is very busy, and it takes time to issue

and close out the licenses. Clark said she changed the hours for one of the applications, with Logan's approval, to help the functionality of the office, which is what she was hired to do.

Clark was asked about the email she sent to Liz Andujar with the information for immigration reporting, O'Briant's contact information, and a request to write up a draft letter. **[Exhibits 19 & 20]** Clark said she sent the email to all the all the assistant registrars, not just Andujar. She said she forwarded the assistant registrars the information because she thought everyone in the office should have it given the situation. She stated that particular day, there was an issue with the documents being used for an amendment to a marriage record, as the email stated, and Andujar was the one dealing with that person.

Clark was asked about whether or not she authored the letter on her computer and if so, why it was referring to her in the third person. She was directly asked if she authored the letter for Andujar to send to O'Briant. Clark replied that she probably worked on drafting the letter with one of the staff members. When asked if the letter was ever sent to O'Briant, Clark responded, "You tell me. Did it look like it was sent?"

Clark was also asked about the emails she sent to Officer O'Briant on September 13, 2023, October 4 and 11, 2023, and November 20, 2023. **[Exhibits 36, 40 & 46]** Clark was reminded that she previously told the assigned investigators that she observed that the parties did not know each other. She was asked to clarify how she determined that applicants did not know each other if she was not present to observe them. She was asked if she had left specific instructions with her staff to copy documents in her absence. Clark responded that her staff observed the same things that she did every day, that people were coming in groups and were not familiar with each other. She was asked if she had a staff meeting and gave specific instructions to her staff. She stated that the Office of Vital Statics is very busy and staff meetings are not feasible. She said she probably discussed with staff separately in free moments, but they were all observing the same modus operandi and they would copy documents.

Clark said that in one of the emails, the office received 10 or 11 couples on the day she was absent from a car accident. **[Exhibit 36]** Clark said no one believes her. When asked to elaborate on what she means by that, Clark stated no one believes her that so many marriages are occurring that the people do not know each other. She said this is why she was copying their documents and reporting to immigration, which she was told to do by Sehi.

INVESTIGATIVE ANALYSIS

1. Undocumented Residents

In order to determine if Clark reported undocumented residents, the assigned investigator conducted a sample review of the documentation she provided to USCIS Officer O'Briant in emails on 7/18/23, 9/7/23, 10/11/23, 11/3/23, and 11/29/23. Additionally, we reviewed the National Immigration Law Center's publication on State Laws Providing Access to Driver's Licenses or Cards, Regardless of Immigration Status, Last updated September 2021. **[Exhibit 51]**

Numerous States, including Connecticut, New York, New Jersey, Colorado, Utah, Virginia issue driver's licenses and state identifications to undocumented residents and non-U.S. citizens. The NHV Health

"In 2023, of the 998 marriage license applications, 579 (58%) had either one or both spouses born outside of the US. There were 93 applications where either additional documents were requested and/or an email was sent to Immigration. This was 9.3% of applications for 2023. There were 89 applications where at least one spouse was born outside of the US and 4 applications where both spouses were born outside of the US." **[Exhibit 52]**

internal investigation of Clark's emails and physical files found:

According to the demographic statistics of the internal review of Clark's emails, 80 percent of the applicants that were reported to immigration Officer Ellis O'Briant were from India. Additionally, there was a significant spike in Clark's reporting of applicants to immigration beginning in August of 2023. **[Exhibit 53]**

SAMPLED EMAILS

July 18, 2023, Subject: Marriage Fraud Issue [Exhibit 30]

Clark reported two males from India who had identification cards from the State of Colorado to Officer O'Briant. She provided copies of their Colorado State identifications, both of which were marked "Not Valid for Federal Identification, Voting or Federal Public Benefits Purposes." Colorado is a state that will issue provisional identifications to undocumented people or residents who are temporarily lawfully in the United States and residing in Colorado. **[Exhibit 51]**

Clark noted in her email to O'Briant, "Both men initially applied for the marriage license by putting an address for themselves and Spouse # 2 that neither lived at. They could not provide anything as proof of address. So, they both changed to use the address on their driver's license instead."

Both couples were married by Justice of the Peace Bianca Bowles.

September 7, 2023, Subject: Marriages 9-6-23 [Exhibit 34]

Clark reported two marriages that occurred the previous day. Both male applicants were from India.

- One of the men provided a United States Employment Authorization photo identification which indicated at the bottom, "Not valid for US Reentry," and which was active and valid. It seems this male had a legal status to work in the United States. Clark provided a copy of this photo identification to O'Briant.

- The other male had a U.S. issued Social Security Card for work only, a Passport from India, and an expired work visa as his photo identification. It appears that this male's visa was expired, and he may not have had legal status at the time of the application.

Clark sent photocopies of all the documents to O'Briant. Clark noted in her email to O'Briant that neither person could provide proof of the address that they listed. She informed her staff to not issue in that case ever again.

Justice of the Peace Shelly Armatino married both couples.

October 11, 2023, Subject: Marriage Questions [Exhibit 40]

It is noted that Clark was not present in the office when these marriages applicants presented. Clark reported four couples to Officer O'Briant. All the males were from India.

- One male provided an Indian passport, which Clark copied and sent to O'Briant.
- One male had a NY State Commercial Driver's License, which indicated, "Not for Federal Purposes." Clark copied the driver's license and sent it to O'Briant.
- One male had a NY State Driver's License, which indicated, "Not for Federal Purposes." Clark copied the driver's license and sent it to O'Briant.
- One male provided an Indian passport, which Clark copied and forwarded to O'Briant.

All these applicants were most likely undocumented. Two only presented passports for identification and the other two had non-federal driver's licenses from NY, which is a state that issues driver licenses to undocumented residents.

November 3, 2023, Subject: Three for today – kind of [Exhibit 44]

Clark reported three couples to O'Briant. It is noted that two of the marriages were not completed. According to Clark, the officiant, Jason Longo, refused to perform the marriages because the couples did not seem to know each other. All of the males were from India.

- One male had a NY State identification card, which indicated "Not for Federal Purposes" and a Social Security card that indicated, "Valid for work with Department of Homeland Security (DHS) Authorization." Clark copied both documents and sent them to O'Briant. It is unclear if this male had a current legal status. This couple did not complete the marriage.
- One male presented a N.Y. State Learner Permit, which indicated "Not for Federal Purposes," as photo identification. Clark photocopied the identification and forwarded it to O'Briant. This marriage was also not completed by Longo. This applicant's basic NY state driver's permit suggests that he could be undocumented.
- One male presented with a Virginia State Driver's License, which had a star indicating it was for use for federal identification. He also presented a passport from India. This marriage was completed by Officiant Henry Mullins. Clark forwarded copies of both documents to

O'Briant.

November 29, 20213, Subject: Only 1! [Exhibit 49]

Clark reported a male from India, who presented with a passport, expired Visa, and bank statements.

Clark copied all of the documents and forwarded photocopies of all to O'Briant.

Clark's email to O'Briant stated, "Only 1 yesterday and none today! Whoo Hoo!" She signed off, "Happy days!"

The evidence supports that most of the male applicants Clark reported to Immigration Officer Ellis O'Briant were most likely undocumented residents, mainly from India. The metrics used to reach this conclusion are the facts that the men used U.S. issued work authorizations, an expired visa, passports, social security cards for work purposes only, and driver's licenses and identifications from states that provide State issued photos identifications to undocumented residents as their primary photo id. All, except one, of the state-issued identifications Clark sent to O'Briant were not sufficient to be used for federal purposes. Several of the photo identifications were also expired, and many applicants only provided passports for photo identification.

2. Sharing of Confidential Information

The review of all of the documents that Clark collected, copied, and emailed to O'Briant during the internal investigation by the NHV Health found:

"Flagged Status" category includes Not flagged, Requested additional documents, Application was emailed to Immigration, or Requested additional documents AND the application was emailed to Immigration.

Additional documents include copies of passports, licenses, and birth certificates and were only included with some applications. Accompanying document copies found with the ones above included social security cards, lease agreements, bank statements, and background checks. These were noted in the Comments field. **[Exhibit 52]**

Our review of the sample emails determined that Clark shared copies of the male applicants' photo identifications, including government issued visas and work authorizations, and Social Security cards, and a copy of one man's bank statement with Officer Ellis O'Briant with USCIS. Clark also shared copies of the photo identifications of all the female applicants, two birth certificates of female applicants, and numerous Social Security cards. Almost all of the female applicants in the sampled emails appeared to be U.S. Citizens, and most were Connecticut residents.

Clark also copied and shared the City of New Haven marriage license applications and the certified marriage certificates for the couples who were married.

The sample review our agency conducted of Clark's email reports to O'Briant was consistent with the NHV Health internal investigation findings. Specifically, our investigation found that Clark was requiring applicants to produce confidential personal documents in order to issue the marriage license, and she was copying these confidential personal documents and sending them to Officer O'Briant. The documents belonged to undocumented, out of state residents, as well as U.S. citizens, most of whom lived in Connecticut. Additionally, Clark copied and shared New Haven vital records with O'Briant.

No evidence was identified that Clark shared personal or confidential information with any other State or government agencies or third parties.

3. Justification

Clark's position in this matter is that she did nothing wrong and that she was justified in reporting the marriage license applicants to USCIS. She states that she was instructed to do so by State DPH Program Coordinator Katie Sehi on February 3, 2023. **[Exhibit 6]**

Sehi wrote to Clark:

If you are suspicious of the reason behind the marriage, you should report it, but you cannot deny the parties the license. Here is the specific information about contacting our local immigration officer as sent to me by Hans from Passport Services. Officer O'Briant is located in Hartford. **[Exhibit 6]**

Sehi shared the information from Passport Services:

You may recommend the following contact at CIS Fraud Deterrence and National Security to the Town Clerks when they encounter suspect marriage overtures and other irregularities that would relate to immigration benefits:

Immigration Officer Ellis O'Briant 860/728-2323 ellis.j.obriant@uscis.dhs.gov

When referring the cases, it is important to prepare a PDF of the license worksheet, the typed marriage certificate (if the process gets that far), photocopies of each party's identification (front and back) and description of the encounter. When a foreign passport is presented, it is important to capture the US visa in addition to the biographic page. **[Exhibit 6]**

Clark

responded to Sehi's email:

We have had too many couples to count requesting marriage licenses that can't fill out the section for their parents' names. Which is why we asked for birth certificates for those coming from out of state or country. Up until this point I was not made aware that we can contact immigration for the numerous marriages that the staff is quite uncomfortable issuing. I was under the impression that the registrar reserved the right to ask for more identification documents when necessary. We deemed it necessary to do so. But we can follow the immigration steps outlined below as well. **[Exhibit 6]**

Clark also states that she was within her rights as Registrar to require additional documentation as the registrar, such as birth certificates. There is nothing in the Town Clerk's Manual or State Registrar Training on Vital Statistics that authorizes Clark to request additional documentation. **[Exhibits 17 & 18]** The only applicable state law identified that authorizes the Registrars to request additional documentation is **Connecticut General Statutes Sec. 19a-41-13**. Application for marriage license. **[Exhibit 54]** The statute states that if the registrar has reason to doubt the authenticity of a document presented by the applicant, the registrar may request any additional document listed in subdivisions, which includes but is not limited to birth certificates and Social Security cards.

Notably, the registrar can only request additional documents under **Connecticut General Statutes Sec. 19a-41-13** if he/she has reason to doubt the authenticity of a document presented by the applicant.

The statute does not give the registrar the authority to collect documents if he/she doubts the authenticity of the union/marriage.

REGISTRAR'S ACTIONS

- Clark did not take the birth certificate requirement off of New Haven Vital Statistics page after being corrected by Sehi that she only needed a valid photo identification. **[Exhibit 50]**
- Clark continued to collect and copy birth certificates of applicants when available and forwarded copies of the documents to Officer O'Briant.
- Clark changed the New Haven Marriage license application to include that applicants produce Social Security cards for verification purposes under forms of acceptable ID. **[Exhibit 16]**
- Clark collected and copied Social Security cards for applicants and forwarded the documents to Officer O'Briant.
- Clark continued to require additional documentation from applicants to prove their residency and, at times, cohabitation. Clark copied the documents she collected and forwarded these documents to immigration.
- Sehi expressly told Clark that she only needed a photo identification to issue a marriage license and that she could ask for additional documents, such as SS card or birth certificate, if the applicant did not have a photo identification. Clark collected all these additional documents, after appropriate photo identification had already been provided. **[Exhibit 6]**
- The information Sehi gave to Clark from Passport Services stated to make a copy of the identification, marriage license worksheet, and marriage application. Clark required that additional documentation be produced to verify identity, Social Security numbers and residency, and she forwarded all these additional documents to O'Briant.
- The information Sehi gave to Clark from Passport Services stated to include a brief description of the encounter:
 - o Clark included a brief description of the encounter in some of the reports such as in **Exhibits 26, 31, 32, 33, 42 & 44.**
 - o Clark described the encounter in **Exhibits 30 & 34** that the applicants could not prove where they lived.
 - o In **Exhibits 36, 40 & 46**, Clark was not present in the office and reported that her staff issued "questionable" marriage licenses in her absence. Clark did not personally encounter these couples.
 - o In **Exhibit 39**, Clark reported, "Just one today! But they were extremely hard to deal with!"
 - o In **Exhibit 41**, Clark reported, "Here is one from today. There would have been more, but they didn't bring valid IDs with them!"
 - o In **Exhibit 45**, Clark reported, "Two more from yesterday! Happy Hunting!"
 - o In **Exhibit 55**, Clark reports, "Three for today! Let's hope we do better tomorrow before the holiday!"
 - o In **Exhibit 47**, Clark reports, subject: 4 pre-Thanksgiving marriages and writes, "I knew it was too much to think today would be quiet! Happy Thanksgiving!"
 - o In **Exhibit 48**, Clark reports, "We had 3 for today. Enjoy!"
 - o In **Exhibit 49**, Clark reports, "Only 1 yesterday and none today! Whoo Hoo! Happy days!"

- o In **Exhibit 27**, Clark reports a marriage fraud complaint by a citizen to Gauthier. Gauthier responds to Clark that fraud is not a matter for her office or the State's office to handle; it is a matter for the legal system. Clark forwarded the New Haven Marriage License to O'Briant, after Gauthier advised her that it was not a matter for her office to address. **[Exhibit 29]**
- In **Exhibit 35**, Clark reported to Gauthier an issue with a marriage being contested by the father of the groom due to a question of competency. Gauthier clearly states, "We do not police marriage," and "an issue of legitimacy is a court matter after the fact." This email was sent to Clark on September 12, 2023. The very next day, September 13, 2023, Clark reported 11 couples to immigration who her staff issued "questionable" marriage licenses to. Clark continued to aggressively report applicants following this email from Gauthier.
- Clark did not report the issue, nor her actions to the Health Director or the Deputy Health director until she was requesting an operational change for marriage applications to appointment only.
- Clark did not report the issue, nor her actions to the Health Director or the Deputy Health director, until she requested an operational change for marriage applications to appointment only.
- Clark did not have a conversation with Sehi or Gauthier about this issue or ask any for any additional guidance from the state on this issue.
- During her interview Clark stated that she had never spoken to Immigration Officer Ellis O'Briant.
- Clark based her justification on one email from Sehi. Clark did not follow these perceived instructions when she did not provide descriptions of many of the interactions and collected and copied personal documents that Sehi told her she could ask for only if the applicant did not have photo identification.

There were specific patterns identified in Clark's reporting noted during the investigative analysis. Specifically, the majority of males were from the same country, India, and they were coming from out of state to marry female residents of Connecticut, with whom there was, at times, a notable age difference and other suspect indicators, such as a perceived unfamiliarity. Additionally, the applicants were coming in groups, at times, with someone helping them fill out the marriage applications and serving as a translator. Clark reported that the couples did not seem to know each other and, at times, did not know each other's names. Two officiants seemed to be associated with the marriages, Bianca Bowles and Shelly Armatino. According to an email Clark sent to O'Briant, Armatino reported that she had been approached by the person who arranges the marriages, who asked her if she would like the same deal and arrangement as Bowles, who assists him in finding the women for the marriages. **[Exhibit 33]**

During interviews with New Haven's Assistant Registrars, they expressed that this was a deviation from the norm of marriage applicants. The assistant registrars observed the same anomalous details with the influx of marriage applicants. East Haven Town Clerk Lisa Balter also reported that her staff was feeling uncomfortable issuing some of the marriage licenses to applicants coming to East Haven. **[Exhibit 6]**

The evidence supports that many of the applicants coming to New Haven seeking marriage licenses were raising red flags, indicating a larger operation involving individuals and officiants, who were possibly connecting the couples for immigration purposes. According to statements, the likely reason that applicants were coming to Connecticut was that there is no waiting period, and couples can be married on the same day that they apply for the license. Notwithstanding Clark's suspicions that there was some kind of fraudulent operation coming to the Office of Vital Statistics, her actions

as New Haven Registrar are the matter at hand and are in question. Having justifiable concerns does not automatically justify the actions taken to address those concerns.

In her capacity as Registrar, Clark essentially implemented a “marriage fraud” screening process in the Office of Vital Statistics. She implemented operational procedures to collect and obtain evidence for immigration that she had no authority to require or request from applicants in her capacity as Registrar. She instructed her staff to copy these personal documents to aid her in her immigration reports. Essentially, Clark was acting as a self-appointed agent for the USCIS. Moreover, she was essentially creating a state of quid pro quo by issuing New Haven marriage licenses to compel the production of additional documentation from the applicants that she suspected may be getting married to obtain immigration benefits. As she became more comfortable reporting to Officer O’Briant, Clark was signing off her emails with comments such as, “Enjoy!” “Happy Hunting!” and hopes for more applicants to send him before the Thanksgiving holiday. Clark stepped far outside the scope of her authority to assist federal authorities in suspected immigration fraud.

Clark did not bring her concerns to Logan’s or Bond’s attention at any point in time to ask for guidance and/or support to address these concerns. During her interview with our office, Clark stated that she tried to tell Logan about the issue, but Logan did not want to hear about it. Clark’s response is not credible. The fact that Logan asked questions about the problem and asked Clark why she would need to report to immigration if she checked identifications, demonstrates that she did not know about the issue until November 13, 2023. Logan asked for more details when the issue was brought to her attention. **[Exhibit 4 & 5]** Clark’s response to Logan, “We are tasked with alerting Immigration when the marriages look fishy, so to speak,” indicates this was the first time she was reporting that the office is “tasked” to report to immigration.

While there were several months that Clark and Logan did not have one-on-one meetings during July, August, and September, Logan noted in her meeting minutes with Clark on May 31, 2023, that she could be reached by phone, email, or text if Clark had any issues. **[Exhibits 24 and 56]** Moreover, Logan met with Clark on June 15, 2023, and June 28, 2023. **[Exhibits 25 & 27]** There are no mentions of reports to immigration or suspected marriage fraud in the meeting minutes. However, on June 16, 2023, the day after Clark met with Logan, Clark sent an email to O’Briant reporting that her office was receiving applicants who were possibly committing marriage fraud on a weekly basis. **[Exhibit 26]** It is also notable that Bond held a leadership meeting on August 2, 2023, at 11:00 am, which Clark attended. Bond sent a chain of command memo for reporting issues to Clark and other NHV Health employees ahead of the meeting. **[Exhibit 7 & 57]**

Clark saw an increase in marriage license applicants with the suspected modus operandi during the summer months. However, it was not reasonable or justifiable that she did not bring this concern to her supervisors. Instead, she set up processes to police the situation herself. She compelled applicants to produce documents proving their residency, investigated whether or not the address was a legitimate residency, compelled additional identifying documents such as social security cards and birth certificates, and copied all the documents to send to Immigration. She did not have the authority to report the applicants to another government agency. She also released New Haven Vital Records to another government agency without discussing it with her supervisor.

This investigation finds that neither the email correspondence from Sehi, nor **Connecticut General Statutes Sec. 19a-41-13** constitute reasonable justification for Clark’s actions as the Registrar of New Haven Vital Statics. **[Exhibits 6 & 54]**

4. Denial of Services

Exhibit 6 contains a report from East Haven Town Clerk Lisa Balter that East Haven was receiving applicants from New Haven because New Haven was requiring birth certificates. Our office attempted to interview Balter in January 2024. Balter required that East Haven Town Attorney Michael Luzzi approve interviews for herself and Arenas. The assigned investigator left three voicemails for Attorney Luzzi, requesting interviews with Balter and Arenas. Luzzi did not return our phone calls.

This report arose because Clark posted on the City of New Haven Vital Statistics webpage that applicants from out of the state or country were required to bring a birth certificate when applying for a marriage license. **[Exhibit 6]** Some applicants were turned away from New Haven because they could not produce birth certificates. This requirement also created barriers for any applicants who visited the City's website and did not have a copy of their birth certificate.

The Assistant Registrars of the New Haven Vital Statics all stated that Clark denied customers services. They stated that Clark would deny services for any number of reasons, including that she perceived documents were fake, the couple was lying, or that they could not prove where they lived.

Andujar stated that on one occasion, Clark denied a marriage license to a man who was dying because he could not present at City Hall at the same time as the bride. According to Andujar, the man died. Clark's insistence that couples present at the same time in the office, against the State's training and procedures, created barriers for couples who could not present at the same time.

In an email to O'Briant **[Exhibit 34]**, Clark told O'Briant that the applicants she was reporting could not prove where they lived, and she told her staff not to issue in that case ever again.

The evidence supports that Clark denied City services to numerous individuals at various times in her capacity as Registrar and created barriers for individuals to apply. The evident barriers were Clark's requirements for birth certificates on the Vital Statistics webpage and the Social Security card requirement on the marriage license application. The barriers that were unseen by the applicants were the spontaneous tests Clark put them or their documents under. There is no way to quantify or identify the individuals who were denied services or who could not overcome the barriers that Clark erected.

5. Additional Findings

- Clark changed the hours for the Elm City Resident Card to 3:30 pm without Logan's approval or knowledge. **[Exhibits 10, 11 & 12]** Logan stated that she did not approve of this change and would not have done so without Bond's approval because it was an operational change. Logan's meeting minutes during that time frame include discussions about the Elm City Resident Card but do not mention a change of the hours. **[Exhibits 22 & 24]**
- Clark charged unauthorized search and research fees. **[Exhibit 21]** During Clark's interview, she stated that the charge was for a certified letter if no record was found. She stated that the charge was for the embossing. However, Gauthier advised Clark that she could only charge for a certified letter of no record found if the requester specifically asked for one. **[Exhibit 37]** According to Andujar and Frias, the State advised Clark that she could not charge for search or research fees, but Clark stated that this was at her discretion. Andujar and Frias stated that the

research fees were charged for all records that predated 1940, and if no record was found, a letter would automatically be furnished, and that letter was not certified.

- While Clark was acting as the Registrar, she added that social security cards needed to be presented to verify identification on the marriage license form against State requirements and Sehi's instructions on February 3, 2023. **[Exhibits 6 & 16]**
- Clark forced applicants to present in the office at the same time, against the State training and Town Clerk Manual guidelines. **[Exhibits 17 & 18]**

INVESTIGATIVE SUMMARY

The impetus for this investigation was the revelation that the New Haven Vital Statics Registrar Patricia Clark had reported a significant number of marriage applicants to U.S. Citizenship Immigration Services [USCIS] beginning in June 2023. NHV Public Health Director Maritza Bond was concerned that Clark took these actions unilaterally without consulting her supervisor, Deputy Director Brooke Logan, or Bond, and that Clark was referring to these applicants as "green card marriages."

The NHV Health internal investigation determined that Clark reported 93 marriage applicants to a USCIS immigration officer in 2023 before she was placed on administrative leave on December 1, 2023. **[Exhibit 52]** It is evident from the data that there was a significant increase in applications reported to immigration beginning in September of 2023, which is not explained by a corresponding increase in applications. That is, the actual percentage of applications reported jumped from between 0 and 4% to 18% and then to over 34% by November 2023. **[Exhibit 52 and 53]** In her interview, Clark attributed this to the fact that instead of coming in separately, she was now seeing large groups of couples come in at the same time and exhibit "suspicious" behavior. This was also noted in the interviews our office conducted with the Assistant Registrars.

That there was an issue with an increase in marriage applications wherein the applicants exhibited suspicious behavior and came in groups is not contested. However, the fact that Clark reported these individuals to Immigration Officer Ellis O'Briant without consulting or bringing any aspect of this problem to her supervisor's attention until late October of 2023 is entirely problematic.

This investigation found that Clark did not disclose that she was reporting applicants to immigration to Logan until November 13, 2023, after her request for an operational change to make marriage applications by appointment only was denied by Bond on October 31, 2023. **[Exhibits 2, 3, 4 & 5]** Clark had numerous opportunities to engage Logan and Bond regarding her concerns and reports to immigration, but she did not. Logan met with Clark on March 8, 2023, March 31, 2023, May 31, 2023, June 15, 2023, and June 28, 2023. **[Exhibit 56]** Logan also noted in her meeting minutes from May 31, 2023, "Discussed that any matters which need attention in between regularly scheduled check-ins can be brought to attention via text, phone, or email with Brooke." **[Exhibit 24]** It was noteworthy that Logan met with Clark for a supervisory meeting on June 15, 2023, and there is no mention in the minutes of any issues related to suspected marriage fraud or immigration. **[Exhibit 25]** However, the very next day, June 16, 2023, Clark sent an email to O'Briant reporting that she was receiving suspicious applicants on a weekly basis, and she asked him how she should proceed with reporting. **[Exhibit 26]** Furthermore, Clark met with Logan again on June 28, 2023, after she had notified O'Briant that suspected marriage fraud was occurring on a weekly basis, and there is no mention of this issue in Logan's meeting minutes. **[Exhibit 27]** Clark also attended a NHV Health

Leadership meeting on August 2, 2023, and was sent a chain of command memo for reporting issues on August 2, 2023, ahead of the leadership meeting she attended. **[Exhibit 7 & 57]**

This investigation found it significant that Clark disregarded the State's guidance on several matters after being corrected by the State Registrar, Yvette Gauthier, and DPH Health Program Associate Katie Sehi. This included but was not limited to Clark continuing to charge unauthorized search and research fees after Gauthier told her that she could not. **[Exhibit 37]**

Most notably, Clark only received the information for the immigration officer from Sehi because she was requiring that out-of-state and -country applicants present birth certificates. **[Exhibit 6]** Clark was expressly instructed by Sehi that she needed to provide services to those who provided proper photograph IDs, that is IDs that were government-issued, and that she could ask for birth certificate and Social Security cards, if the applicant did not have a photo identification. Our investigation conducted a sample review of emails Clark sent to O'Briant. In all of the emails we reviewed, all applicants had produced government-issued photo identifications, which is all that is required under the State's laws and regulations, and which Sehi made clear to Clark in her email on February 9, 2023. **[Exhibit 6]** Yet, Clark persisted to compel applicants to produce sensitive personal documents in order to obtain a marriage license. She then made copies of the personal documents and confidential New Haven Vital Records and shared them with USCIS, a federal agency that processes immigration applications. Most of the male applicants Clark reported were determined to be likely undocumented and from India. Most of the female applicants were U.S. citizens and mainly presented Connecticut identifications.

[Exhibits 52 & 53]

Additionally, after Clark was informed by Sehi that her requirement for birth certificate was not in alignment with the State requirements, Clark failed to remove the requirement from the website. **[Exhibit 50]** Clark made social security cards a requirement on New Haven's marriage license application under acceptable forms of ID. **[Exhibit 16]**

During her interview with our office, Clark continued to state that it was her right to ask for additional documentation as the Registrar. Many of Clark's responses during her interview were not credible and/or lacked specific details. During her first interview, Clark stated that there was no particular ethnic group or nationality that was associated with the applications she was flagging. However, **[Exhibit 20]**, a draft letter to immigration that was found on her computer, demonstrated that she had identified the male applicants were "almost always [from] India." When Clark was asked if she was flagging applications that had a specific justice of the peace listed, Bianca Bowles, she denied that she was flagging all of Bowles' applications. However, in an email to O'Briant **[Exhibit 33]**, Clark told him, "Bianca is aware that when we see her name listed, we're copying the IDs." Clark's statements that she attempted to tell Logan about the issue, but Logan did not want to hear it and that Logan approved the hours change for residents to obtain Elm City identifications from 9:00 am - 3:30 pm, were found not to be credible.

Clark was not forthcoming with many details during her interviews, even when asked questions in several different ways. Several times, Clark responded to the investigator's questions by asking a question rather than giving an answer. During her first interview, when she was asked to elaborate on what she was observing between couples that indicated that they did not know each other, Clark asked investigators what they would observe when people did not know each other. Eventually, she stated that it was "obvious" when two people did not know each other. During her second interview, when she was asked if she sent the draft letter to Officer O'Briant, she responded, "You tell me. Does it look like it was sent?" **[Exhibit 20]**

INVESTIGATIVE CONCLUSION

USICS has an intensive examination process that potential beneficiaries need to pass to receive benefits. Couples are interviewed together and separately and asked a series of scrutinizing questions about their relationship, household matters, and other personal and intimate questions. The applicants do not know the questions in advance of the interviews. Couples are not only required to provide proof of residency but are also required to provide proof of cohabitation and commingling. USCIS officials have extensive protocols in place to vet out marriages that are not genuine. A bride and groom who do not speak the same language and cannot communicate with each other without a translator would raise an immediate red flag to trigger an investigation by the USCIS.

Clark was told by Gauthier on two occasions that their offices do not “police marriage” and that the legitimacy of a marriage was a legal matter not under the purview of the registrar. **[Exhibits 28 & 35]** In fact, shortly after Gauthier advised Clark that questions of legitimacy were a court matter and not a matter for her office or Clark’s office, Clark forwarded the New Haven marriage license of the couple in question to Officer O’Briant. **[Exhibit 29]**

Despite USCIS being a federal agency designated to investigate immigration fraud and Gauthier advising Clark on two occasions that Vital Statistics does not police marriage or handle matters of marriage legitimacy, Clark was policing marriage applications and aggressively reporting suspected fraud to immigration. Moreover, Clark’s action created a state of quid pro quo at the New Haven Vital Statistics Office. She misused her authority to issue marriage licenses as a means to compel additional evidence to be provided to Officer O’Briant.

This investigation found that Clark was operating under the impression that she had full autonomy and authority to implement any policies or procedures she deemed necessary to run her office efficiently, even when those practices were out of alignment with State regulations and laws and/or were not approved by her supervisors. A comprehensive review of all of the evidence in this matter, as well as the statements made by New Haven Assistant Registrars, find that while Clark’s concerns about the applicants were reasonable, the actions she took to address those concerns were not reasonable or justified.

END REPORT