FILED IN O. OURT

ON 8-26-2025 BG

Peter A
US Dist
Eastern

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION

NO.7:25-CR-63-D-RN

UNITED STATES OF AMERICA	)	INDICTMENT
v.	) )	
DENIS JOSEPH BOUCHARD	)	

The Grand Jury charges that:

# **COUNT ONE**

On or about November 5, 2022, in the Eastern District of North Carolina, the Defendant, DENIS JOSEPH BOUCHARD, an alien in the United States, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote in a Federal, State, and local election, in violation of Title 18, United States Code, Section 1015(f).

# **COUNT TWO**

On or about November 5, 2022, in the Eastern District of North Carolina, the Defendant, DENIS JOSEPH BOUCHARD, did knowingly and willfully deprive, defraud, and attempt to deprive and defraud the residents of the State of North Carolina of a fair and impartially conducted election process by casting a ballot that

he knew to be materially false and fraudulent under the laws of the State in which the election was held, that is BOUCHARD cast a ballot which was obtained by falsely certifying that he was eligible to vote when, in fact and as the defendant knew, he was not eligible to vote because he was not a citizen of the United States, in violation of Title 52, United States Code, Section 20511(2)(B).

### COUNT THREE

On or about February 13, 2024, in the Eastern District of North Carolina, the Defendant, DENIS JOSEPH BOUCHARD, an alien in the United States, did knowingly make a false statement and claim that he was a citizen of the United States in order to register to vote in a Federal, State, and local election, in violation of Title 18, United States Code, Section 1015(f).

### COUNT FOUR

On or about October 30, 2024, in the Eastern District of North Carolina, the Defendant, DENIS JOSEPH BOUCHARD, did knowingly and willfully deprive, defraud, and attempt to deprive and defraud the residents of the State of North Carolina of a fair and impartially conducted election process by casting a ballot that he knew to be materially false and fraudulent under the laws of the State in which the election was held, that is BOUCHARD cast a ballot which was obtained by falsely certifying that he was eligible to vote when, in fact and as the defendant

knew, he was not eligible to vote because he was not a citizen of the United States, in violation of Title 52, United States Code, Section 20511(2)(B).

### REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

Foreperson

Date: 26 AUG 25

W. ELLIS BOYLE

United States Attorney

BY: KAREN K. HAUGHTON Assistant United States Attorney