

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.
AULENA CLEMENT, : 18 U.S.C. §§ 152(3) & 2
a/k/a "Aulenia Clement," : 42 U.S.C. § 408(a)(7)(B)
a/k/a "Aulena Morris" :

I N F O R M A T I O N

The defendant, having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

Count One

1. In or about July and August, 2004, defendant AULENA CLEMENT opened a total of three credit card accounts with Bank of America and American Express Company. In response to the questions calling for her social security number, defendant CLEMENT provided the number xxx-xx-2456, when she knew that number had not been assigned to her by the Commissioner of Social Security.

2. After her applications were submitted and approved, defendant AULENA CLEMENT used the fraudulently aquired credit cards to obtain approximately \$27,300 worth of goods and services.

3. In or about July and August 2004, at Newark, in the District of New Jersey and elsewhere, defendant

AULENA CLEMENT,
a/k/a "Aulenia Clement,"
a/k/a "Aulena Morris,"

for the purpose of obtaining something of value from Bank of America and American Express Company, did knowingly and with intent to deceive falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to her, when in fact such number was not the social security account number assigned to her by the Commissioner of Social Security.

In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.

Count Two

1. Paragraphs 1 and 2 of Count One of this Information are realleged and incorporated as though set forth in full herein.

2. On or about January 24, 2006, defendant AULENA CLEMENT signed and caused to be filed a petition with the United States Bankruptcy Court for the District of New Jersey, under Chapter 13 of the United States Bankruptcy Code. The petition was assigned case no. 06-10519, and was, at all times relevant to this Information, a "case under title 11" of the United States Code within the meaning of 18 U.S.C. § 152(3).

3. The bankruptcy petition that defendant AULENA CLEMENT signed and caused to be filed contained a written declaration that the information contained in the petition was true and correct and that it was made under penalty of perjury.

4. Among other things, defendant AULENA CLEMENT was required to set forth on the bankruptcy petition her true social security number so that a determination could be made concerning whether she qualified for a discharge of her financial obligations.

5. The bankruptcy petition that defendant AULENA CLEMENT filed was not true and correct as to every material matter because the social security number, which ended in 2456,

that she listed on the petition had not been assigned to her by the Commissioner of the Social Security Administration.

6. By filing the bankruptcy petition, defendant AULENA CLEMENT sought to discharge debt that she incurred using someone else's social security number.

7. On or about January 24, 2006, at Newark, in the District of New Jersey and elsewhere, defendant

AULENA CLEMENT,
a/k/a "Aulenia Clement,"
a/k/a "Aulena Morris,"

did knowingly and fraudulently make a material false declaration, certificate, verification and statement under penalty of perjury in relation to a case under title 11 of the United States Code, as set forth in paragraph 2.

In violation of Title 18, United States Code, Section 152(3) and Section 2.

RALPH J. MARRA, JR.
Acting United States Attorney