

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-
 :
 v. : 18 U.S.C. § 371
 :
 SULIAMAN KAMARA : I N F O R M A T I O N
 :

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

DEFENDANT AND HIS CO-CONSPIRATOR

1. At all times relevant to this Information, defendant SULIAMAN KAMARA owned a property located at 85 West End Avenue, in Newark, New Jersey (the "85 West End Property"). On or about June 2007, defendant SULIAMAN KAMARA and co-conspirator S.L. were married and remained married through at least in or about December 2011.

2. From in or about September 2006 to in or about February 2009 and from in or about April 2010 to in or about December 2011, defendant SULIAMAN KAMARA resided at the 85 West End Property with S.L. From in or about February 2009 to in or about March 2010, defendant SULIAMAN KAMARA resided at a property located on Lincoln Avenue in Newark, New Jersey (the "Lincoln Avenue Residence") with S.L.

3. From in or about September 2006 to in or about December 2011, S.L. received low-income rental assistance from the Newark Housing Authority ("NHA"), located in Newark, New Jersey, through

a federally-funded low-income housing benefits program (the "Section 8 Program").

THE SECTION 8 HOUSING PROGRAM

4. At all times relevant to this Information:

a. The U.S. Department of Housing and Urban Development ("HUD") was an agency of the United States. HUD, among other things, provided federal grant money to NHA pursuant to the Section 8 Program. The Section 8 Program was a federal public housing assistance program administered by HUD that provided rent subsidies to qualified low-income individuals and households.

b. Under the Section 8 Program, a tenant's rent was based upon the tenant's anticipated family gross annual income less deductions, such as dependents, disabilities and medical claims. Annual household income was the anticipated income from all sources received from the family head and spouse, and any additional members of the family 18 years of age or older.

b. Individuals receiving Section 8 rental assistance through NHA were required to submit applications and certifications that, among other things, truthfully informed NHA of all the members of the household and the annual household income.

THE CONSPIRACY TO DEFRAUD

5. From at least as early as in or about September 2006 to in or about December 2011 in Essex County, in the District of New Jersey and elsewhere, defendant

SULIAMAN KAMARA

did knowingly and intentionally conspire and agree with S.L. to embezzle, steal, purloin, and convert to his own use and the use of another, money and things of value of a department and agency of the United States, that is, the United States Department of Housing and Urban Development, contrary to Title 18, United States Code, Section 641.

OBJECT OF THE CONSPIRACY

8. It was the object of the conspiracy for defendant SULIAMAN KAMARA and S.L. to submit fraudulent information, applications, supporting documents, and certifications to HUD in order to obtain federally-funded low-income housing benefits to which they were not entitled.

OVERT ACTS

9. In furtherance of the conspiracy and to effect its unlawful object, defendant SULIAMAN KAMARA and S.L. committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

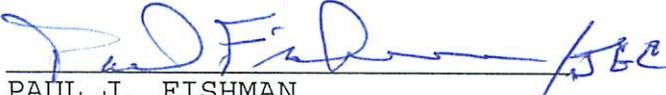
a. Defendant SULIAMAN KAMARA and S.L. each submitted to NHA signed and notarized statements, dated March 11, 2010, stating that defendant SULIAMAN KAMARA and S.L. had no relationship when, in fact, defendant SULIAMAN KAMARA and S.L. were married.

b. On or about May 10, 2010, defendant SULIAMAN KAMARA signed and submitted to NHA a Housing Assistance Payment Contract for the 85 West End Property that failed to disclose

that defendant SULIAMAN KAMARA was living at the 85 West End Property.

c. On or about December 4, 2010, S.L. signed a fraudulent NHA Housing Choice Voucher Program Eligibility Questionnaire, based upon a fraudulent HUD Family Report, wherein S.L. failed to disclose that S.L. was married to defendant SULIAMAN KAMARA and that defendant SULIAMAN KAMARA was living with S.L. at the 85 West End Property and earning household income.

In violation of Title 18, United States Code, Section 371.


PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR
18 U.S.C. § 371

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