

2012R00457/SFM/SUE

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-84 (WHW)  
 :  
 v. : 18 U.S.C. § 911  
 : 18 U.S.C. § 1542  
 ANGELA DE JESUS-CONCEPCION : 18 U.S.C. § 1028A(a)(1)  
 : 18 U.S.C. § 2

**SUPERSEDING INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at  
Newark, charges:

**COUNT ONE**  
(FALSE REPRESENTATION OF  
UNITED STATES CITIZENSHIP)

**BACKGROUND**

1. At all times relevant to this Indictment:
  - a. Defendant ANGELA DE JESUS-CONCEPCION  
("CONCEPCION") was a native and citizen of the Dominican Republic and had no  
legal immigration status in the United States.
  - b. The victim ("Victim One") was a United States citizen.
  - c. Defendant CONCEPCION knew that Victim One was a  
real person.

DEFENDANT FRAUDULENTLY OBTAINS A U.S. PASSPORT

2. On or about December 27, 2007, defendant CONCEPCION secured a United States passport bearing passport number \*\*\*\*\*947, issued in the name of Victim One, but bearing defendant CONCEPCION's photograph (the "Fraudulently-Obtained U.S. Passport") by filing a Form DS-64 Statement Regarding a Lost or Stolen Passport with the United States Department of State, in which Statement defendant CONCEPCION falsely claimed that she was Victim One and that she had lost her passport, in substance and in part, "around 2003" (the "Statement of Lost/Stolen Passport").

3. On or about December 27, 2007, defendant CONCEPCION also filed a Form DS-11 Application for a U.S. Passport with the United States Department of State by using Victim One's identifying information but defendant CONCEPCION's own photograph and address (the "Passport Application").

4. Defendant CONCEPCION caused the Fraudulently-Obtained U.S. Passport to be issued to her based on her false representations in the Statement of Lost/Stolen Passport and the Passport Application that she was Victim One.

DEFENDANT'S USE OF THE FRAUDULENTLY-OBTAINED U.S. PASSPORT

5. On or about March 17, 2012, defendant CONCEPCION arrived at Newark Liberty International Airport ("Newark Airport") on United Airlines Flight UA 1472 from the Dominican Republic and used the Fraudulently-Obtained U.S. Passport to falsely impersonate a United States citizen, namely Victim One, in an attempt to gain lawful entry into the United

States.

6. Upon her arrival at Newark Airport on or about March 17, 2012, defendant CONCEPCION was detained by Customs and Border Protection (“CBP”) officers because the passport under which defendant CONCEPCION was traveling, i.e., the Fraudulently-Obtained U.S. Passport, did not match the photograph of the true bearer of the identity indicated on that Passport, namely that of Victim One.

7. In addition to the Fraudulently-Obtained U.S. Passport, defendant CONCEPCION had in her possession a New Jersey Auto Driver License bearing her photograph but in the name of Victim One, and a debit card that was in the name of “Angela DeJesus.”

8. The following day, on or about March 18, 2012, law enforcement authorities conducted a fingerprint analysis that revealed that defendant CONCEPCION was a native and citizen of the Dominican Republic who was previously ordered deported by an immigration judge on or about February 11, 1997.

9. The fingerprint analysis also revealed that defendant CONCEPCION was the same person who, on or about April 20, 2004, filed a Form I-485 Application to Register Permanent Alien or Adjust Status, which Application was denied on or about June 17, 2005 with a statement that, if defendant CONCEPCION subsequently failed to depart from the United States, proceedings would be instituted to enforce her departure.

10. On or about March 17, 2012, in the District of New Jersey,

and elsewhere, the defendant,

ANGELA DE JESUS-CONCEPCION,

a citizen of the Dominican Republic and therefore an alien in the United States,  
did falsely and willfully represent herself to be a citizen of the United States.

In violation of Title 18, United States Code, Section 911 and  
Section 2.

**COUNT TWO**  
(USE OF PASSPORT SECURED BY  
FALSE STATEMENT)

1. Paragraphs 1 through 9 of Count One of this Indictment are realleged and incorporated herein.

2. On or about March 17, 2012, in the District of New Jersey, and elsewhere, the defendant,

ANGELA DE JESUS-CONCEPCION,

did knowingly and willfully use and attempt to use Passport No. \*\*\*\*\*947, issued under the authority of the United States, the issuance of which was secured by reason of a false statement.

In violation of Title 18, United States Code, Section 1542 and Section 2.

**COUNT THREE**  
(AGGRAVATED IDENTITY THEFT)

1. Paragraphs 1 through 9 of Count One of this Indictment are realleged and incorporated herein.

2. On or about March 17, 2012, in the District of New Jersey, and elsewhere, the defendant,

ANGELA DE JESUS-CONCEPCION,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely a United States Passport bearing Victim One's name, during and in relation to a felony violation of false representation of United States citizenship, in violation of Title 18, United States Code, Section 911, as charged in Count One of this Indictment, and a felony violation of a provision contained in chapter 75, United States Code, that is, use of a United States passport secured by false statement, in violation of Title 18, United States Code, Section 1542, as charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

A TRUE BILL

\_\_\_\_\_

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 14-

13-CR-84(WHW)

---

---

**United States District Court  
District of New Jersey**

---

---

**UNITED STATES OF AMERICA**

**v.**

**ANGELA DE JESUS-CONCEPCION**

---

---

**INDICTMENT FOR**

18 U.S.C. § 911  
18 U.S.C. § 1542  
18 U.S.C. § 1028A  
18 U.S.C. § 2

---

---

**A True Bill.**

---

---

**PAUL J. FISHMAN**  
*UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

---

---

SARA F. MERIN  
SHIRLEY U. EMEHELU  
*ASSISTANT U.S. ATTORNEYS*  
*(973) 645-2738*

---

---

**USA-48AD 8**  
**(Ed. 1/97)**