

AFFIDAVIT OF SPECIAL AGENT JAMES COOPER

I, James Cooper, having been duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the U.S. Department of State, Diplomatic Security Service (“DSS”) and have been so employed since June 2010. I have successfully completed a training program in conducting criminal investigations at the Federal Law Enforcement Training Center in Glynco, Georgia. In 2010, I graduated from the University of North Carolina in Charlotte with a bachelor’s degree. My current duties as a DSS Special Agent include conducting investigations involving the fraudulent acquisition, production, and misuse of U.S. immigration documents, U.S. passports, and identity documents. Due to my training, experience, and conversations with other law enforcement officers, I am familiar with the methods, routines, and practices of document counterfeiters, vendors, and persons who fraudulently obtain or assume false identities.

2. I am also a member of the U.S. Department of Homeland Security Investigations’ Document and Benefit Fraud Task Force (“DBFTF”), a specialized field investigative group comprised of personnel from various state, local, and federal agencies with expertise in detecting, deterring, and disrupting organizations and individuals involved in various types of document, identity, and benefit fraud schemes.

3. I submit this affidavit in support of an application for a criminal complaint charging Elizabeth CLEMENTE (born 1982) with the knowing use of a forged or fraudulent U.S. Passport Card, in violation of 18 U.S.C. § 1543, and aggravated identity theft, in violation of 18 U.S.C. § 1028A (collectively the “SUBJECT OFFENSES”). As detailed below, there is probable cause to believe that CLEMENTE committed the SUBJECT OFFENSES on or about November 7, 2023

in Shrewsbury, Massachusetts.

4. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit includes only those facts that I believe are necessary to establish probable cause for the issuance of the requested complaint and does not include all the information uncovered during the investigation.

PROBABLE CAUSE

5. On November 7, 2023, at approximately 4:30 p.m., Shrewsbury Police responded to Central One Federal Credit Union (the “Credit Union”) located at 714 Main Street in Shrewsbury. Credit Union employees reported to Shrewsbury Police that a female, later identified as Elizabeth CLEMENTE, had attempted to withdraw money from the Credit Union by impersonating a Credit Union account holder, “Person #1.”

6. Responding officers made initial contact with CLEMENTE immediately after she exited the Credit Union. CLEMENTE first identified herself to police as “Heather.” When asked for her last name and date of birth, CLEMENTE then told the officer that her name actually was “Person #1” but that she could not remember her date of birth or address. When further questioned, CLEMENTE handed the officer U.S. Passport Card #C362710233. The passport card bore Person #1’s name and actual date of birth but contained CLEMENTE’s photograph.¹ CLEMENTE also provided the officer a U.S. Bank credit card ending in -3324 with Person #1’s name on it.

¹ Notably, under the “Place of Birth” section of the passport card, the state was misspelled as “Massachucetts.”

7. One officer remained with CLEMENTE while another entered the Credit Union and spoke with the branch manager. According to the branch manager, CLEMENTE approached the teller station at the Credit Union, identified herself as Person #1, and requested Person #1's monthly statements and account balances. CLEMENTE provided a U.S. Bank credit card and U.S. passport card, both bearing Person #1's name, as identification.

8. The Credit Union maintains a photograph of their customers on their system. The branch manager explained to police that when she (the branch manager) accessed the photo of Person #1, she observed that the photo did not match CLEMENTE. The manager stated that she surreptitiously called the police and that CLEMENTE quickly exited the Credit Union when she saw the police in the parking lot.

9. While still on scene, CLEMENTE subsequently gave police several conflicting stories about who she was and why she was at the Credit Union. At one point, CLEMENTE identified herself as "Person #2," a New Jersey resident born in 1972. However, when Shrewsbury Police ran that information, it came back to an actual person whose photograph did not match CLEMENTE. When officers informed CLEMENTE of that, she repeatedly insisted that her name was Person #2.

10. Officers arrested CLEMENTE and transported her to the Shrewsbury Police station. After being advised of her *Miranda* rights, CLEMENTE provided admitted that her actual name is Elizabeth CLEMENTE (born 1982). CLEMENTE also admitted that Person #2 is actually her sister.

CONCLUSION


11. WHEREFORE, based on the foregoing facts, I respectfully request that the Court issue the requested criminal complaint charging CLEMENTE with the SUBJECT OFFENSES.

I declare that the foregoing is true and correct.


James Cooper
Special Agent, DSS 

Time and Date: 10:04 a.m. Jan 3, 2024

Notice is hereby provided that, pursuant to Federal Rule of Criminal Procedure 4.1, the affiant was sworn by telephone on the date and time indicated above and on the criminal complaint issued by the Court.


HONORABLE DAVID H. KENNEDY
United States Magistrate Judge 