

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT
H-08-1

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
	:	<u>Violations:</u>
v.	:	18 U.S.C. § 641
	:	[Theft of Government Property]
CHRISTINE TATE	:	18 U.S.C. § 1001
	:	[False Statement]

INDICTMENT

The Grand Jury charges:

1. The United States Department of Homeland Security, Federal Emergency Management Agency (FEMA), is an agency of the United States of America.
2. FEMA provides various types of assistance to the victims of disasters, including, but not limited to, expedited assistance payments provided through FEMA's emergency assistance programs.
3. Hurricane Katrina struck southeastern Louisiana and other areas of the Gulf Coast on or about August 29, 2005.

COUNT ONE

(Theft of Government Property – 18 U.S.C. § 641)

1. Paragraphs One through Three of this Indictment are hereby re-alleged and incorporated as though fully set forth herein.
4. From in or about September 2005 through February 2006, in the District of Connecticut and elsewhere, the defendant, CHRISTINE TATE, did willfully and knowingly steal, purloin, and convert to her own use, a thing of value of an agency of the United States, namely, expedited assistance payments consisting of United States Government funds provided through

FEMA's emergency assistance programs, in an amount totaling \$3,472, with the intent to deprive the United States of the use and benefit of said funds.

All in violation of Title 18, United States Code, Section 641.

COUNT TWO

(False Statement – 18 U.S.C. § 1001)

_____1. Paragraphs One through Three of this Indictment are hereby re-alleged and incorporated as though fully set forth herein.

4. In or about August and September 2005, in the District of Connecticut and elsewhere, the defendant, CHRISTINE TATE, in a matter within the jurisdiction of FEMA, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations when she applied to FEMA for expedited assistance payments and represented that she was a victim of Hurricane Katrina. Specifically, the defendant falsely stated that she was eligible for such assistance when, in truth and fact, the defendant well knew she was ineligible for FEMA expedited assistance payments.

All in violation of Title 18, United States Code, Section 1001.

COUNT THREE

(False Statement – 18 U.S.C. § 1001)

_____1. Paragraphs One through Three of this Indictment are hereby re-alleged and incorporated as though fully set forth herein.

4. In or about October 2005 through February 2006, in the District of Connecticut and elsewhere, the defendant, CHRISTINE TATE, in a matter within the jurisdiction of FEMA, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations when she applied to FEMA for expedited assistance payments and represented that

she was a victim of Hurricane Katrina. Specifically, the defendant falsely stated that she was eligible for such assistance when, in truth and fact, the defendant well knew she was ineligible for FEMA expedited assistance payments.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:

GRAND JURY FOREPERSON

NORA R. DANNEHY
ACTING UNITED STATES ATTORNEY

MICHAEL J. GUSTAFSON
SUPERVISORY ASSISTANT U.S. ATTORNEY

WILLIAM A. COLLIER
ASSISTANT U.S. ATTORNEY