

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO. _____
v.	: DATE FILED: _____
ERICA N. BROWN	: VIOLATION: 18 U.S.C. § 666 (a)(1)(A) (theft from program receiving federal funds – 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this indictment:

1. SELF, Inc. was a non-profit organization in Philadelphia whose mission is to help the homeless through the provision of shelter and drug and alcohol recovery services.
2. SELF, Inc. constituted an “organization” which received annual benefits in excess of \$10,000 in the each of the fiscal years ending in June 2009 and June 2010, under a federal program involving a grant, contract, subsidy, loan, guarantee, and other form of federal assistance.
3. Between approximately 2005 and November 2010, defendant ERICA N. BROWN was the Chief Operating Officer at SELF, Inc. and as such was its agent.
4. Defendant ERICA N. BROWN had an American Express credit card issued by SELF, Inc. for her business use.

5. Between approximately April 2005 and November 2010, defendant ERICA N. BROWN used SELF Inc.'s corporate American Express credit card to pay for her personal expenses. For example, defendant BROWN charged personal travel and lodging expenses in places such as the Caribbean, Orlando, and Cape May; personal dining expenses, from groceries and purchases at Wawa's to meals at the Four Seasons; personal automobile repairs and insurance payments; vehicle rentals, including a Hummer rental for travel to Braddock's Tavern in New Jersey on Valentine's Day (where she also charged the dining expenses to SELF's American Express card); children's toys; clothing, including five pair of Ugg boots; a gym membership with the services of a personal trainer; and pet medical services, among many other expenses. In total, defendant BROWN charged approximately \$198,628 of personal expenses to her corporate American Express card between approximately April 2005 and November 2010. At various times prior to the end of her employment in November 2010, defendant BROWN wrote checks to SELF, Inc. to reimburse her personal expenses. These checks totaled approximately \$4,867.

6. In the fiscal year ending June 30, 2011 SELF, Inc. received approximately \$1,178,128 of federal funds from the United States Department of Health and Human Services and the United States Department of Housing and Urban Development, in the form of "pass through" funding from the city of Philadelphia and the Commonwealth of Pennsylvania.

7. In the fiscal year ending June 30, 2010, SELF, Inc. received \$1,084,169 of such funds.

8. Between approximately August 1, 2009 and November 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ERICA N. BROWN,

being an agent and employee of SELF, Inc., an organization which received benefits of over \$10,000 in any one-year period under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance or other form of federal assistance, embezzled, stole and obtained by fraud property valued at \$5,000 or more, that is, funds totaling approximately \$46,161, which funds were owned by and under the care, custody and control of SELF, Inc.

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

ZANE DAVID MEMEGER
United States Attorney