

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
v. : **DATE FILED:** \_\_\_\_\_  
**CANDICE HILL** : **VIOLATIONS:**  
: **18 U.S.C. § 1001 (false statement to**  
: **federal government - 4 counts)**  
: **18 U.S.C. § 641 (conversion of**  
: **government funds - 1 count)**

**INDICTMENT**

**COUNTS ONE THROUGH FOUR**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

**The Housing Choice Voucher Program**

1. The United States Department of Housing and Urban Development (“HUD”) was a federal agency which, among other things, operated programs to help lower-income families obtain and pay for safe, sanitary and decent housing. Among such programs was HUD’s Housing Choice Voucher Program (“HCV Program”).
2. Local public housing authorities administered the HCV Program in accordance with federal rules and regulations, using federal funds disbursed by HUD. The Housing Authority of Montgomery County, Pennsylvania (“the Housing Authority”) was a local public housing authority which administered HUD funds through the HCV Program.
3. Families participating in the HCV Program selected and leased housing from private owners of rental housing. That housing had to meet the quality standards

established by the HCV Program. The HCV Program then used federal HUD funds to subsidize the families' rental payments.

4. To determine an individual's eligibility to receive HUD funds under the HCV Program, and the amount of any such subsidy, the Housing Authority required each applicant to complete an Application for Tenant Eligibility and Recertification ("the Application"). That Application required the accurate and complete disclosure of all of the applicant's employment, income, and assets. This form also required the applicant, as the head of the household, to disclose the identity of all persons living with the applicant, and the employment, income, and assets of every such household member. The head of household was required to sign the Application, certifying that the information provided was accurate and complete.

5. The Housing Authority reviewed the Application with the applicant in an in-person interview, and verified the stated sources of income. The Housing Authority then determined if the applicant was eligible for the HCV Program, and the appropriate amount of the federal housing subsidy for that applicant, based on the disclosures in the Application as to the applicant's household income, assets, and composition.

6. Each year, the applicant was required to obtain recertification by submitting a new and complete Application to the Housing Authority. The Housing Authority again reviewed the renewal Application with the applicant in an in-person interview, and verified the stated sources of income. The Housing Authority then determined if the applicant remained eligible for the HCV Program, and the appropriate amount of the federal housing subsidy for the year for that applicant, based on the same factors.

7. Because of the limited amount of HUD funds, the Housing Authority of Montgomery County maintained a waiting list of families desiring to participate in the HCV Program. As of the time of this indictment, a family seeking HCV Program assistance must wait up to four years to participate in the Program in Montgomery County.

The Defendant's Participation In The Program

8. From approximately January 2000, through approximately February 2006, defendant CANDICE HILL participated in the HCV Program administered by the Housing Authority.

9. Defendant CANDICE HILL submitted her Applications for the HCV Program on November 12, 1999, November 7, 2000, December 11, 2001, December 3, 2002, March 2, 2004, and March 1, 2005. Defendant HILL signed each Application, certifying to the accuracy of its contents, and reviewed each Application in person with an HCV Program official.

10. Based on these Applications, the Housing Authority approved rental subsidies for defendant CANDICE HILL in the total amount of \$31,700 for the period from approximately January 2000, to approximately February 2006.

11. Defendant CANDICE HILL knew that these Applications were false and fraudulent because they omitted information and income from her employment with Medical Data Management, Inc., CardioNet, Inc., and Willis Benefits of Pennsylvania, Inc.

12. On or about the following dates, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendant

**CANDICE HILL,**

in a matter within the jurisdiction of the Department of Housing and Urban Development, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant failed to fully and accurately disclose all of her household income, each false statement constituting a separate count, as set forth below:

Count	Date of Statement	False and Fraudulent Statement
1	December 11, 2001	failed to disclose complete and accurate income
2	December 3, 2002	failed to disclose complete and accurate income
3	March 2, 2004	failed to disclose complete and accurate income
4	March 1, 2005	failed to disclose complete and accurate income

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

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations of paragraphs 1 through 11 of Count One are incorporated here.

2. From in or about October 2000, through in or about September 2005, in Norristown, Montgomery County, in the Eastern District of Pennsylvania, defendant

**CANDICE HILL**

embezzled, stole, purloined, and knowingly converted to her own use a thing of value of the United States in an amount over \$1,000, that is, \$23,020 in rental subsidy payments made by the Montgomery County Housing Authority under HUD's Housing Choice Voucher Program on defendant HILL's behalf, and made based on defendant HILL's false and fraudulent statements to the Housing Authority.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
UNITED STATES ATTORNEY