

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 15-
v.	:	DATE FILED:
SCHWANA DEBNAM	:	VIOLATION:
	:	18 U.S. C. § 641 (conversion of
	:	government funds – 1 count)
	:	Notice of forfeiture

INFORMATION

COUNT ONE

(Conversion of Government Funds)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Federal Emergency Management Agency (“FEMA”), an agency of the United States, was responsible for coordinating the federal government’s role in preparing for, preventing, mitigating the effects of, responding to, and recovering from all domestic disasters, whether natural or man-made, including acts of terror. As part of these responsibilities, FEMA administered certain government financial assistance programs, including rental and housing assistance for victims of domestic disasters pursuant to Title 42, United States Code, Sections 5170 and 5191.

2. In August 2011, Hurricane Irene made landfall along the East Coast, and

resulted in flooding and damage in areas including the Eastern District of Pennsylvania. As a result, FEMA began providing financial and other assistance to affected individuals who applied for assistance as a result of Hurricane Irene.

3. On or about September 15, 2011, defendant SCHWANA DEBNAM filed an Application for Disaster Assistance with FEMA. Thereafter, on or about September 20, 2011, defendant DEBNAM contacted FEMA and falsely stated that due to Hurricane Irene, she would be forced to move from her home on North Judson Street in Philadelphia to a home on South 52nd Street in Philadelphia.

4. In support of her claim for rental assistance from FEMA, defendant SCHWANA DEBNAM submitted false receipts purporting to show her paying rent for the South 52nd Street address.

5. In support of her claim for rental assistance from FEMA, defendant SCHWANA DEBNAM also submitted false receipts purporting to show her paying utilities for the South 52nd Street address.

6. On the basis of the documents submitted, FEMA approved defendant SCHWANA DEBNAM's application for rental assistance. On or about September 21, 2011, FEMA sent defendant SCHWANA DEBNAM her first rental assistance payment. Defendant DEBNAM continued to receive payments from FEMA until on or about November 14, 2013.

7. Despite her assertions that she had been forced to relocate, defendant SCHWANA DEBNAM did not move from the North Judson Street address she lived in prior to Hurricane Irene.

8. As a result of her false statements to FEMA, defendant SCHWANA DEBNAM improperly received and used approximately \$26,756.45 in FEMA benefits that she was not entitled to receive.

9. Beginning on or about September 20, 2011, and continuing through on or about November 14, 2013, in the Eastern District of Pennsylvania and elsewhere, the defendant

SCHWANA DEBNAM

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$26,756.45 in FEMA assistance benefits to which the defendant knew she was not entitled.

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

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 641, set forth in this information, defendant

SCHWANA DEBNAM

shall forfeit to the United States of America:

- (a) any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$26,756.45.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 981(a)(1)(C).


ZANE DAVID MEMEGER
United States Attorney