IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,) No. 11-00022-01-CR-W-DGK
Plaintiff,)) COUNTS ONE and TWO
) 18 U.S.C. § 641
V.) (Theft of Government Money)
)
ZAIMAH K. MUHAMMAD,) NMT Ten Years Imprisonment
[DOB: 03/29/1979],) NMT \$250,000 Fine
) NMT Three Years Supervised Release
Defendant.) Class C Felony
)
) \$100 Mandatory Special Assessment Each
) Count
)
) Restitution May Be Ordered

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

(Theft of Government Money - FEMA Benefits)

From on or about December 2005 through on or about July 2007, at Kansas City, Jackson County, and elsewhere within the Western District of Missouri, as part of a single continuing scheme involving the Federal Emergency Management Agency (FEMA) program designed to provide emergency housing assistance to Hurricane Katrina victims, and with the intent to deprive the owner of the use and benefit of the money so taken, the defendant, Zaimah K. Muhammad, willfully and knowingly did steal, convert, and purloin goods, property, and money of the United States having a value in excess of One Thousand Dollars (\$1,000.00), that is, the defendant submitted false certifications to FEMA and thereby obtained Hurricane Katrina

emergency housing benefits that defendant was not entitled to receive, with the value of the improperly obtained benefits being in the approximate amount of \$17,977.70.

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

COUNT TWO

(Theft of Government Money - HUD Benefits)

Between on or about December 2005 through on or about July 2007, at Kansas City and elsewhere within the Western District of Missouri, as part of a single continuing scheme involving the Section 8 Housing program, and with the intent to deprive the owner of the use and benefit of the money so taken, the defendant Zaimah K. Muhammad, willfully and knowingly did steal, convert, and purloin goods, property, and money of the United States having a value in excess of One Thousand Dollars (\$1,000.00), that is, defendant submitted false certifications to the United States Department of Housing and Urban Development (HUD) and the Housing Authority of Kansas City (HAKC) and thereby obtained low-income housing benefits that defendant was not entitled to receive, with the value of the improperly obtained benefits being in the approximate amount of \$10,243.00.

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

<u>1/31/2011</u> DATE /s/Gene Porter Phillip Eugene Porter Criminal Division Chief