

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 14-_____</b>
<b>v.</b>	:	
<b>VANESSA CLAY,</b>	:	<b>DATE FILED:</b>
<b>a/k/a "Vanessa Hatcher,"</b>	:	
	:	<b>VIOLATION:</b>
		<b>18 U.S.C. § 641 (conversion of government funds - 1 count)</b>
		<b>Notice of Forfeiture</b>

**INFORMATION**

**COUNT ONE**

**(Conversion of Government Funds)**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. The United States Department of Housing and Urban Development ("HUD"), an agency of the United States, administered certain government benefit programs, including Housing Assistance Payments ("HAP") and Utility Assistance Payments ("UAP"). In the City of Philadelphia, HUD payments were administered by the Philadelphia Housing Authority ("PHA").
2. Through HAP, HUD paid rental subsidies so that eligible families could afford decent, safe, and sanitary housing. HAP provided a portion of an approved recipient's rent directly to the recipient's landlord. Through UAP, HUD paid monetary subsidies so that qualified individuals received monetary assistance to pay for their basic utilities. HUD benefits

were available based on several factors, including the monthly income of a household, and the amount of rent for a HUD-approved home.

3. The Social Security Administration ("SSA"), an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income ("SSI") program, pursuant to Title 42, United States Code, Sections 1381-1383f.

4. The SSI program, which was funded through general tax revenues of the United States, provided monthly cash benefits to individuals who were age sixty-five or over, or who were "disabled" and who demonstrated financial need, as determined by his or her "income" and "resources," as those terms were defined for purposes of the Social Security Act. Individuals receiving SSI benefits were required to disclose to SSA any event affecting their right to receive or continue receiving disability benefits, including the receipt of income.

5. In or about September 1969, upon application to the Social Security Administration, defendant VANESSA CLAY, a/k/a "Vanessa Hatcher," was issued a Social Security Number ("SSN"), xxx-xx-0818, by the Commissioner of Social Security. This card was obtained using the name "Vanessa Clay."

6. In or about June 1970, defendant VANESSA CLAY, a/k/a "Vanessa Hatcher," fraudulently obtained a second Social Security Number from the Commissioner of Social Security, by failing to disclose that she had previously been issued a SSN. Defendant CLAY was issued SSN xxx-xx-8704 under the alias "Vanessa Hatcher".

7. In or about March 1998, defendant VANESSA CLAY, a/k/a "Vanessa Hatcher," applied for SSI from the SSA under the SSN xxx-xx-0818, corresponding to the "Vanessa Clay" name. When defendant CLAY applied for SSI benefits, she failed to disclose that she had a second SSN, xxx-xx-8704, under the alias "Vanessa Hatcher." Defendant CLAY

was approved for SSI benefits in or about April 1999, and received these benefits through in or about November 2010.

8. At various points throughout the time frame of April 1999 through November 2010 in which she received SSI benefits, defendant VANESSA CLAY, a/k/a “Vanessa Hatcher,” obtained employment using the “Vanessa Hatcher” alias, and use of the corresponding SSN, xxx-xx-8704. Defendant CLAY did not report this income to SSA under her true name and SSN, xxx-xx-0818. Additionally, in or about August 2007, defendant CLAY was married, and she did not report her marriage or her husband’s income to the SSA.

9. As a result of defendant VANESSA CLAY, a/k/a “Vanessa Hatcher’s” failure to report and fraudulent concealment of income received under SSN xxx-xx-8704, defendant CLAY received SSI benefits of approximately \$34,193.09 between in or about April 1999 and in or about November 2010 that she was not entitled to receive.

10. In or about September 1997, defendant VANESSA CLAY, a/k/a “Vanessa Hatcher,” applied for HAP and UAP benefits from HUD and the PHA under her true name and the corresponding SSN, xxx-xx-0818. In applying for these benefits, defendant CLAY falsely claimed that she was renting her home from “Vanessa Hatcher,” defendant CLAY’s alias. Defendant CLAY concealed from HUD and the PHA that she in fact owned the home on Catherine Street that she claimed to rent from her alias.

11. Between in or about September 1997 through in or about December 2009, defendant VANESSA CLAY, a/k/a “Vanessa Hatcher,” concealed her ownership of the home on Catherine Street from HUD and the PHA, and continued to apply for continued benefits for the home throughout this time frame. The failure to report and fraudulent concealment by defendant CLAY of the fact that she owned the Catherine Street home that she claimed to rent from her

alias led HUD and the PHA to provide HAP and UAP benefits that defendant CLAY was not entitled to receive.

12. As a result of defendant VANESSA CLAY, a/k/a “Vanessa Hatcher’s” failure to report and fraudulent concealment of her ownership of the Catherine Street home she claimed to rent, defendant CLAY received HAP benefits of approximately \$79,528, and UAP benefits of approximately \$3,750, for a total of \$83,278 of HUD benefits, none of which she was entitled to receive.

13. Beginning in or about September 1997 and continuing through in or about November 2010, in the Eastern District of Pennsylvania and elsewhere, the defendant

**VANESSA CLAY,  
a/k/a “Vanessa Hatcher,”**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$34,193.09 in SSA benefits, and \$83,278 in HUD benefits, for a total of approximately \$117,471.09 in government benefit payments 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, Sections 641, set forth in this information, defendant

**VANESSA CLAY,  
a/k/a “Vanessa Hatcher,”**

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 \$117,471.09.

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