

**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>REVONIA JONES</b>	:	<b>DATE FILED:</b>
	:	
	:	<b>VIOLATIONS:</b>
		<b>18 U.S.C. § 641 (conversion of government funds – 1 count)</b>
		<b>18 U.S.C. § 1001 (false statements – 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 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. The United States Department of Housing and Urban Development (“HUD”), an agency of the United States, administered certain government benefit programs, including the Housing Choice Voucher Program, commonly referred to as the “Section 8” program. As part of the Housing Choice Voucher Program, HUD provided a portion of a qualified applicant’s rent directly to the applicant’s landlord in order to provide safe and affordable housing for low-income families.

3. From at least March 2009 through at least November 2012, defendant REVONIA JONES resided at an apartment complex in Morrisville identified herein as “R.S.A.” Defendant JONES received Housing Choice Voucher Program assistance from HUD for her rental of an apartment at R.S.A. As part of her receipt of HUD benefits, defendant JONES was notified in writing that she was not allowed to receive any other Federal, State, or local housing assistance while receiving Housing Choice Voucher payments.

4. In September 2011, Tropical Storm Lee caused 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 Tropical Storm Lee.

5. On or about September 30, 2011, defendant REVONIA JONES filed an Application for Disaster Assistance with FEMA for damage to her residence as a result of Tropical Storm Lee. Defendant JONES sustained damage to her rented apartment which caused her to be relocated to another apartment within the R.S.A. complex.

6. On November 4, 2011, and May 22, 2012, defendant REVONIA JONES completed and submitted to FEMA forms entitled “Declaration of Continuing Need for Temporary Housing Assistance.” On these forms, she falsely stated that she was not receiving housing assistance from another federal agency, including HUD.

7. In connection with her application and receipt of FEMA disaster assistance money, defendant REVONIA JONES submitted false rent receipts, in which she asserted she paid significantly more money to R.S.A. than what she was required to pay due to her receipt of HUD benefits. If defendant JONES had truthfully reported her receipt of HUD benefits, she would not have qualified for FEMA disaster assistance money regarding her rental of an apartment with R.S.A.

8. As a result of her false statements to FEMA, defendant REVONIA JONES improperly received and used approximately \$11,843 in FEMA benefits that she was not entitled to receive.

9. Beginning on or about October 6, 2011 and continuing through on or about June 11, 2012, in the Eastern District of Pennsylvania and elsewhere, the defendant

**REVONIA JONES**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$11,843 in FEMA assistance benefits to which the defendant knew she was not entitled.

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

**COUNT TWO**

**(False Statements)**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged here.
2. The HUD form entitled "Personal Declaration" is a form used by HUD to periodically verify the household occupants and all sources of income for families receiving HUD Housing Choice Voucher Program benefits, in order to determine continuing eligibility for HUD recipients. Defendant REVONIA JONES completed a Personal Declaration form on or about April 16, 2012. At the time this form was completed, defendant JONES was receiving income from FEMA in the form of disaster assistance benefit payments to assist with her rent.
3. On or about April 16, 2012, in the Eastern District of Pennsylvania, defendant

**REVONIA JONES**

in a matter within the jurisdiction of HUD, an agency of the executive branch of the United States, knowingly and willfully falsified, concealed, and covered up material facts by trick, scheme, and device, and made materially false, fictitious, and fraudulent statements and representations, that is, defendant JONES failed to list her receipt of FEMA disaster assistance benefit money on HUD's Personal Declaration form, and falsely stated that she had no other receipt of money than what she had listed on the Personal Declaration form.

In violation of Title 18, United States Code, Section 1001.

**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

**REVONIA JONES**

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 \$11,843.

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