

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-  
v. :  
RYAN STEVENS : 18 U.S.C. § 1040 and § 2

**INFORMATION**

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information, defendant RYAN STEVENS was a resident of Camden, New Jersey.
2. At all times relevant to this Information, the Federal Emergency Management Agency (“FEMA”) was a constituent agency of the United States Department of Homeland Security and a member of the executive branch of the United States Government.

**Disasters and Fraud on FEMA Generally**

3. When a natural disaster or federal emergency occurred in the United States, federal agencies, such as FEMA, provided relief and assistance to effected individuals and entities. FEMA provided financial assistance by, among other things, helping effected individuals repair their property.
4. Due to FEMA's vast size and the typically large number of victims resulting from a disaster, FEMA frequently has been targeted in disaster fraud schemes by individuals or groups seeking FEMA monetary assistance for benefits to which they were not entitled. These individuals accomplished their schemes by submitting fraudulent applications to FEMA for

among other things, repairs and rental assistance.

The Damage

5. In August 2011, the various counties of southern New Jersey, including Camden County, suffered severe storms which caused significant damage due to wind, rain, and flooding, hereinafter (“the storms.”)

6. On or about August 31, 2011, a Presidential Disaster Declaration for the State of New Jersey, Atlantic (DR-4021 - Hurricane Irene), was made pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistant Act, 42 U.S.C. § 5121-5206. This enabled eligible individuals to seek financial assistance from FEMA when displaced by the storms.

7. On or about September 13, 2011, defendant RYAN STEVENS filed an application with FEMA seeking federal rental assistance and assistance for personal property damage under FEMA’s Individual Assistance Program, claiming that his house in Camden was damaged as a result of the severe storms and unfit for occupancy.

8. On September 14, 2011, a FEMA inspector confirmed defendant RYAN STEVENS’ occupancy and the damage to his rental unit. The FEMA inspector declared defendant STEVENS’s house uninhabitable. Thereafter, FEMA awarded defendant RYAN STEVENS rental assistance in the amount of \$1,200 per month and \$409 for personal property damage.

The Charge

9. From in or about October 2011 to July 2012, in Camden, in the District of New Jersey, and elsewhere, in a matter involving benefits authorized, transported, transmitted, transferred, disbursed, and paid in connection with a major disaster declaration under the Robert

T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5170, the defendant

RYAN STEVENS,

knowingly made materially false, fictitious, and fraudulent statements and representations to FEMA, verbally and in writing, in a matter involving benefits authorized, transported, transmitted, transferred, disbursed, and/or paid in connection with a major disaster declaration.

The Scheme

10. In applying to FEMA for rental assistance, defendant RYAN STEVENS was required to list his pre-disaster income. At the time of the severe storms, STEVENS was unemployed and listed his monthly income from Social Security benefits he received on behalf of his daughter. STEVENS listed his pre-disaster monthly rental expense as \$700.

11. To support his continued rental assistance, defendant RYAN STEVENS was required to complete FEMA forms, Declaration of Continuing Need for Temporary Rental Assistance. STEVENS caused the forms, dated October 24, 2011, January 23, April 16 and July 15, 2012, respectively, to be sent via facsimile to FEMA in Hyattsville, Maryland. Each form contained a declaration that it was submitted under penalty of perjury. At various times between October 2011 and July 2012, to support his continued rental assistance, STEVENS faxed false and fraudulent lease agreements and rental receipts which were never executed by the landlord. Moreover, STEVENS never paid his landlord any rent.

12. Between October 2011 and April 2012, FEMA paid defendant RYAN STEVENS \$15,487 for rental assistance through the issuance of one U.S. Treasury Checks mailed to STEVENS' address in New Jersey and eight electronic fund transfers into a bank account provided by STEVENS.

13. The total amount of benefits that defendant RYAN STEVENS collected to which he was not entitled was approximately \$15,487.

All in violation of Title 18, United States Code, Section 1040(a)(2) and Title 18, United States Code, Section 2.



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PAUL J. FISHMAN  
United States Attorney

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**INFORMATION FOR**

**18 U.S.C. § 1040  
18 U.S.C. § 2**

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**PAUL J. FISHMAN**  
*U.S. ATTORNEY NEWARK, NEW JERSEY*

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**JASON M. RICHARDSON**  
*Assistant U.S. Attorney  
Camden, New Jersey  
(856) 757-5026*

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