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CLERK, U. S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

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1 MCGREGOR W. SCOTT
United States Attorney
2 SHELLEY D. WEGER
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
Facsimile: (916) 554-2900
5

6 Attorneys for Plaintiff
United States of America
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 PATRICK PRIGMORE,

15 Defendant.
16

CASE NO. **2019 - CR - 226 - JAM**

18 U.S.C. § 1040(a)(2) – Fraud in Connection with a
Major Disaster or Emergency Benefits

17 INDICTMENT

18 The Grand Jury charges:

19 PATRICK PRIGMORE,

20 defendant herein, as follows:

21 I. INTRODUCTION

22 At all times relevant to this indictment:

23 1. The Federal Emergency Management Agency, also known as FEMA, was an agency of
24 the United States government within the Department of Homeland Security (DHS). FEMA's
25 responsibilities included, among other things, providing disaster assistance to individuals in an area
26 declared a major disaster by the President of the United States of America. The President could declare
27 a major disaster for any natural event that the President determined had caused damage of such severity
28 that it was beyond the combined capabilities of the state and local governments to respond.

1 2. On or about November 12, 2018, the President of the United States of America declared a
2 major disaster existed in California due to damage resulting from wildfires that began on November 8,
3 2018. FEMA designates major disasters by name and number. A major disaster declaration number is
4 preceded by the letters "DR." The name of the disaster typically relates to the type and/or location of
5 the disaster. FEMA designated the above identified disaster as: California Wildfires (DR-4407).

6 3. As a result of this presidential declaration, residents of Butte County who were affected
7 by what has become known as the Camp fire became eligible to apply for disaster assistance from
8 FEMA.

9 4. FEMA offered various types of disaster assistance to residents in the areas affected by the
10 California wildfires, including through the Individuals and Households Program. The Individuals and
11 Households Program provided financial assistance and direct services to eligible persons in the form of
12 Housing Assistance and Other Needs Assistance. Housing Assistance and some forms of Other Needs
13 Assistance, were available only to an otherwise qualified applicant whose pre-disaster primary residence
14 incurred disaster-related damage.

15 **II. FRAUD IN CONNECTION WITH A MAJOR DISASTER**

16 5. Defendant herein, on or about December 3, 2018, in the State and Eastern District of
17 California, did knowingly make a materially false, fictitious, and fraudulent statement and
18 representation, in a matter involving a benefit authorized, transported, transmitted, transferred,
19 disbursed, and paid, in connection with a major disaster declared under the section 401 of the Robert T.
20 Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5170), and where the benefit was a
21 record, voucher, payment, money and thing of value of the United States and of a Department or Agency
22 of the United States; and the authorization, transportation, transmission, transfer disbursement, and
23 payment of the benefit was in and affected interstate and foreign commerce; that is: the defendant
24 knowingly made a false, fictitious, and fraudulent claim for FEMA assistance in connection with major
25 disaster DR-4407, wherein defendant claimed 1040 Pearson Road, Paradise, California, was his primary
26 residence at the time of the wildfire (DR-4407), when in fact, it was not the defendant's primary
27 residence and the defendant did not reside at this address. As a result of defendant's claim he received

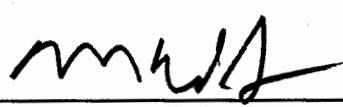
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benefits, including a payment of approximately \$12,837.71, and a FEMA trailer. All in violation of Title 18, United States Code, Section 1040(a)(2).

A TRUE BILL.

/s/ Signature on file w/AUSA

FOREPERSON



McGREGOR W. SCOTT
United States Attorney

United States v. Patrick Prigmore
Penalties for Indictment

COUNT 1:

VIOLATION: 18 U.S.C. § 1040 (a)(2) - Fraud in Connection with a Major Disaster or
Emergency Benefits

PENALTIES: 30 years in prison;
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

PATRICK PRIGMORE

I N D I C T M E N T

VIOLATION(S): 18 U.S.C. § 1040(a)(2) –
Fraud in Connection with a Major Disaster or Emergency Benefits

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 12 day

of DECEMBER, A.D. 20 19

Clerk

Bail, \$ _____

NO BAIL WARRANT PENDING HEARING

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