

FILED IN OPEN COURT

1-24-2020

CLERK, U. S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

UNITED STATES OF AMERICA

v.

CASE NO. 3:19-cr-196-J-20JRK

DEANNAJO WHITE

a/k/a Deanna White

a/k/a Deanna Mart

a/k/a Deanna Martin

a/k/a Deannajo Martin

a/k/a Deannajo Hamant

a/k/a Deanna Hamant

a/k/a Diann Hamant

**UNITED STATES' NOTICE OF MAXIMUM PENALTIES,
ELEMENTS OF OFFENSE, PERSONALIZATION OF ELEMENTS
AND FACTUAL BASIS**

The United States of America, by and through its undersigned

Assistant United States Attorney, states as follows:

A. MAXIMUM PENALTIES

The defendant has expressed a desire to enter a plea of guilty to the offense charged in Count One of the Indictment. Count One charges the defendant with disaster assistance fraud, in violation of Title 18, United States Code, Section 1040. Count One carries a maximum sentence of up to 30 years of imprisonment, a fine of no more than \$250,000, or both a term of imprisonment and a fine, a term of supervised release of up to 5 years, and a

special assessment of \$100, said special assessment to be due on the date of sentencing. A violation of the terms and conditions of supervised release carries a maximum sentence of up to 3 years of imprisonment, as well as the possibility of an additional term of supervised release.

With respect to certain offenses, the Court shall order the defendant to make restitution to any victim of the offense(s), and with respect to other offenses, the Court may order the defendant to make restitution to any victim of the offense(s), or to the community. The United States will be seeking restitution in the amount of \$15,331.74.

B. ELEMENTS OF THE OFFENSE

The elements of an offense in violation of Title 18, United States Code, Section 1040 are:

- First:** The defendant knowingly made a materially false or fraudulent statement or representation;
- Second:** the statement or representation was in connection with a benefit;
- Third:** the benefit was in connection with a major disaster declaration under Title 42 of the United States Code; and
- Fourth:** the benefit was a record, voucher, payment, money, or thing of value of the United States or the Federal Emergency Management Agency.

C. PERSONALIZATION OF ELEMENTS

1. Do you admit that on or about September 27, 2017, in the Middle District of Florida, you knowingly made a materially false and fraudulent statement, that is, you falsely stated in an application for disaster assistance benefits involving the Federal Emergency Management Agency (FEMA) that your primary residence was 9839 NW 37th Court, Branford, FL 32008?

2. Do you admit that the false statement was in connection with your application for disaster assistance benefits involving Hurricane Irma?

3. Do you acknowledge that the disaster assistance benefits were in connection with a major disaster declaration under Title 42 of the United States Code?

4. Do you admit that the benefits were money from FEMA?

D. FACTUAL BASIS

On September 10, 2017, President Donald Trump declared a major disaster under Title 42 of the United States Code for all counties in the State of Florida, backdating the declaration to September 4, 2017, due to Hurricane Irma. Subsequently, Duval, Suwannee, and several other counties in the State of Florida were approved for disaster assistance through the Federal

Emergency Management Agency's (FEMA) Individuals and Households Program (IHP). Through the IHP, FEMA provided disaster assistance benefits to eligible beneficiaries. One component of disaster assistance benefits was Financial Housing Assistance (FHA). FHA provided a benefit, money, to eligible beneficiaries who lacked the means to meet certain needs including housing-related expenses such as rent and lodging. To be eligible for FHA, an applicant, among other things, had to incur losses in a presidentially declared major disaster area, and the applicant's affected home had to be where the applicant usually lived and where the applicant was living at the time of the disaster, that is, their primary residence.

On September 27, 2017, Deannajo White (White) while in Suwannee County, Florida, made an application for disaster assistance benefits to FEMA over the internet. In the application, she claimed her primary residence was 9839 NW 37th Court, Branford, FL 32008 (primary residence) and that she rented the residence as part of a rent-to-own contract. She stated that she lived at her primary residence since 2015 and up to and when Hurricane Irma occurred. White explained that storm damage from Hurricane Irma to her primary residence forced her to move and rent a different residence at 7301 US Hwy 27, Branford, FL 32008 (post-disaster dwelling). In support of her application, White submitted a rental lease for the post-disaster dwelling,

which listed rent of \$800 per month. On or about October 15, 2017, White submitted an amended rental lease claiming that she moved from rental unit "A" to rental unit "B" at the post-disaster dwelling. She claimed that rental unit "A" had black mold, which necessitated her moving to rental unit "B" at the post-disaster dwelling. She claimed that because of the change in rental unit she had been paying \$875 for rent since October 2017. Based on the statements made by White in her application, FEMA awarded her \$15,331.74, which was electronically transferred from a U.S. government account outside of Florida to her checking account at American Express National Bank in Suwannee County, Florida.

Follow up investigation by DHS-OIG determined that the post-disaster dwelling claimed by White as her residence was owned by F.W. During an interview with J.T., the daughter of F.W., she stated in substance and among other things, she managed the post-disaster dwelling owned by her father. The post-disaster dwelling was a single-family home and did not contain any units or separated living quarters. White and her husband moved into the post-disaster dwelling in July 2017 and lived there until approximately July 2018. J.T. started the eviction process against them, but both were arrested prior to the completion of the eviction process. She explained that the post-disaster dwelling sustained no damage from Hurricane Irma. When shown the

documents submitted by White to FEMA in support of her application J.T. stated all of the documents were fraudulent or forged.

On August 13, 2019, DHS-OIG SA Billyer and HSI SA Wells, interviewed White about her disaster assistance application. Prior to any questioning about the investigation SA Billyer advised White of her Constitutional rights. After voluntarily waiving her Constitutional rights in writing, White spoke to the agents. SA Billyer and SA Wells briefly reviewed with White her disaster assistance application dated September 27, 2017. White confirmed all of the information on the disaster assistance application was correct. She explained that Hurricane Irma put a large piece of a tree through the roof of her primary residence, making it uninhabitable. She stated that is why she was forced to move into the post-disaster dwelling with her husband.

White continued to lie during questioning until confronted by the agents with evidence showing that the documents submitted by her to FEMA in support of her application were fraudulent. White eventually admitted that she intentionally provided false information on her application. She admitted that she did not live at the residence claimed as her primary residence on her application when Hurricane Irma hit Florida. She lived at the post-disaster dwelling when Hurricane Irma hit Florida. White stated that multiple

documents that she submitted to FEMA in support of her application, including rent receipts, leases, letters, invoices, and estimates were altered or forged.

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CERTIFICATE OF SERVICE

I hereby certify that on January 24th, 2020, I filed the foregoing with the Clerk of the Court in open court and previously hand delivered a true and correct copy to the following:

Mark Rosenblum, Esq.



KEVIN C. FREIN
Assistant United States Attorney