

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 16-  
 :  
 v. :  
 :  
 ANDREA KNOERZER : 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:

**COUNT 1**  
**[18 U.S.C. § 1040 – Disaster Fraud]**

1. Defendant ANDREA KNOERZER was a resident of Voorhees, Camden County, New Jersey. KNOERZER owned a second home in Ocean City, Cape May County, New Jersey.

2. 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.

**Disaster 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 affected individuals and entities by, among other things, helping affected individuals repair their property and paying for emergency housing.

4. Due to FEMA's vast size and the typically large number of victims resulting from a disaster, FEMA has frequently been targeted in disaster fraud schemes. Often, individuals or groups sought FEMA monetary assistance for benefits to which they were not entitled by

submitting fraudulent applications to FEMA for, among other things, repairs and rental assistance, and transportation assistance.

### The Damage

5. In October 2012, the various counties of New Jersey, including Cape May County, suffered a severe storm, Hurricane Sandy, which caused significant damage due to wind, rain, and flooding, hereinafter (“the Storm”).

### Hurricane Sandy

6. On or about October 30, 2012, President Barak Obama signed a Presidential Disaster Declaration for the State of New Jersey (DR-4086 – Hurricane Sandy) pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5206. This enabled eligible individuals to seek financial assistance from FEMA when displaced by the Storm.

7. On or about November 1, 2012, defendant ANDREA KNOERZER filed an application with FEMA seeking federal rental assistance and assistance for personal property damage under FEMA’s Individual Assistance Program. KNOERZER claimed that her house in Ocean City was her primary residence, that the Storm damaged it, and that it was unfit for occupancy. KNOERZER also claimed that the Storm damaged her 2001 Volvo Cross Country Station wagon rendering it not drivable.

8. On or about November 1, 2012, a FEMA inspector inspected defendant ANDREA KNOERZER’s Ocean City residence and determined that it was uninhabitable and in need of repairs. The inspector determined that the home’s floors, walls, ceiling, windows, and doors were unsafe.

9. On or about November 7, 2012, FEMA awarded defendant ANDREA

KNOERZER rental assistance and home repair assistance. On or about February 14, 2013, FEMA awarded KNOERZER transportation assistance based on her claim that the Storm damaged her vehicle.

The Charge

10. From in or about November 2012 to in or about February 2013, in Cape May County, 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, defendant

ANDREA KNOERZER

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

11. In applying to FEMA for home repair and rental assistance, defendant ANDREA KNOERZER falsely claimed that the property in Ocean City was her primary residence and that the Storm displaced her from that property.

12. In applying to FEMA for transportation assistance, defendant ANDREA KNOERZER falsely claimed that the Storm damaged her 2001 Volvo Cross Country station wagon and that it was not drivable.

13. Between November 2012 and February 2013, FEMA paid defendant ANDREA KNOERZER \$13,373.46 for housing assistance and \$7,500 for transportation assistance based on KNOERZER's false, fictitious, and fraudulent statements and representations.

14. Defendant ANDREA KNOERZER received the FEMA housing assistance and transportation assistance benefits by direct deposits through electronic funds transfers to a credit union account that KNOERZER controlled. KNOERZER then used the money to pay her personal expenses.

15. The total amount of benefits that defendant ANDREA KNOERZER collected to which she was not entitled was approximately \$20,873.46.

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



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER:

---

---

**United States District Court  
District of New Jersey**

---

---

**UNITED STATES OF AMERICA**

v.

**ANDREA KNOERZER**

---

---

**INFORMATION FOR**

**18 U.S.C. §§ 1040 and 2**

---

---

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

---

---

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

---

---