

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-  
v. :  
DWANA WRIGHT : 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 DWANA WRIGHT 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, 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 Assistance 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 27, 2011, defendant DWANA WRIGHT filed an application with FEMA seeking federal rental assistance and assistance for personal property damage under FEMA’s Individual Assistance Program, claiming that her house in Camden was damaged as a result of the severe storms and unfit for occupancy.

8. On September 29, 2011, a FEMA inspector confirmed defendant DWANA WRIGHT’s occupancy and the damage to her rental unit and declared WRIGHT’s house uninhabitable. Thereafter, FEMA awarded WRIGHT rental assistance in the amount of \$900 per month (totaling \$14,465) and \$1,298 for personal property damage.

#### The Charge

9. From in or about September 2011 to August 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

DWANA WRIGHT,

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 DWANA WRIGHT was required to list her pre-disaster income. WRIGHT listed her monthly income of \$1,540 from her employment at a charter school. WRIGHT listed her pre-disaster monthly rental expense as \$900.

11. To support her continued rental assistance, defendant DWANA WRIGHT was required to complete FEMA forms, Declaration of Continuing Need for Temporary Rental Assistance. WRIGHT caused the forms, dated November 10, 2011, January 21, April 23, and July 23, 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 her continued rental assistance, WRIGHT also faxed false and fraudulent lease agreements and rental receipts which were never executed by the landlord. Moreover, WRIGHT never paid her landlord any rent.

12. Between October 2011 and July 2012, FEMA paid defendant DWANA WRIGHT \$15,763 for rental assistance and personal property damage through the issuance of two U.S. Treasury Checks mailed to WRIGHT's address in New Jersey and three electronic fund transfers into a bank account provided by WRIGHT.

13. The total amount of benefits that defendant DWANA WRIGHT collected to which she was not entitled was approximately \$15,763.

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

CASE NUMBER: 13-

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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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