

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

CRIMINAL NO. 14-\_\_

v.

KIA ARTHUR

DATE FILED:

VIOLATION:

18 U.S.C. § 641 (conversion of government  
funds – 1 count)

Notice of Forfeiture

INFORMATION

COUNT ONE (Conversion of

Government Funds)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Federal Emergency Management Agency ("FEMA"), an agency of the United States, was responsible for coordinating the federal government's role in preparing for, preventing, mitigating the effects of, responding to, and recovering from all domestic disasters, whether natural or man-made, including acts of terror. As part of these responsibilities, FEMA administered certain government financial assistance programs, including rental and housing assistance for victims of domestic disasters pursuant to Title 42, United States Code, Sections 5170 and 5191 .

2. In August 20 II, Hurricane Irene made landfall along the East Coast, and resulted in flooding and damage in areas including the Eastern District of Pennsylvania. As a result, FEMA began providing financial and other assistance to affected individuals who applied for assistance as a result of Hurricane Irene.

3. On or about September 25, 2011, defendant KIA ARTHUR filed an Application for Disaster Assistance with FEMA. In her application, she falsely stated that due to Hurricane Irene, she had been forced to move from her home on Emily Street in Philadelphia to a home on Ringgold Street in Philadelphia.

4. In support of her claim for rental assistance from FEMA, defendant KIA ARTHUR also submitted false receipts purporting to show her paying rent for the Ringgold Street address.

5. On the basis of the documents submitted, FEMA subsequently approved defendant KIA ARTHUR's application for rental assistance. On or about October 11, 2011, FEMA sent defendant KIA ARTHUR her first rental assistance check. Defendant ARTHUR continued to receive payments from FEMA until on or about December 3, 2012.

6. Despite her assertions that she had been forced to relocate, defendant KIA ARTHUR did not move from the Emily Street address she lived in prior to Hurricane Irene.

7. As a result of her false statements to FEMA, defendant KIA ARTHUR improperly received and used approximately \$18,413 in FEMA benefits that she was not entitled to receive.

8. Beginning on or about October 11, 2011 and continuing through on or about December 3, 2012, in the Eastern District of Pennsylvania and elsewhere, the defendant

**KIA ARTHUR**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$18,413 in FEMA assistance benefits to which the defendant knew she was not entitled.

In violation of Title 18, United States Code, Section 641.

## NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY CHARGES THAT:

I. As a result of the violation of Title 18, United States Code, Section 641, set forth in this information, defendant

KIA ARTHUR

shall forfeit to the United States of America:

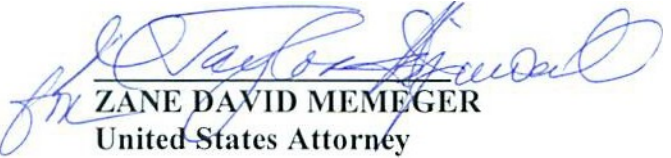
- (a) any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$18,413.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,  
United States Code, Section 981(a)(1)(C).

  
**ZANE DAVID MEMEGER**  
United States Attorney